



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Richland County
Imperial Truck Refinishing
Premise # 0370012010
Notice of Violation (non-HPV)

January 18, 2013

CERTIFIED MAIL

Mr. David Hornikel
Imperial Truck Refinishing
910 Park Avenue East
Mansfield, Ohio 44905

Dear Mr. Hornikel:

This letter shall serve as a follow-up to the complaint investigation that was conducted at Imperial Truck Refinishing (ITR) on January 15, 2013, by Alyse Johnson and me from the Division of Air Pollution Control (DAPC). The complaint alleged that ITR had been sandblasting outside without an enclosure. It further alleges that the spent sand is being dumped at 368 8th Avenue, Mansfield, Ohio, and that the sand may be hazardous.

Based on discussions and observations during the investigation, along with a review of the company's files, my findings are as follows:

1. ITR had been sandblasting outside without an enclosure due to the weather conditions that rendered their temporary enclosure ineffective. Although the enclosure was taken down, another enclosure was not put up for the continuation of the sandblasting activities. PTI P0110308, issued on June 6, 2012, requires that the permittee shall employ best available control measures for the sandblasting unit. Best available control measures for this unit have been determined to be the use of a three-sided enclosure with a roof to ensure compliance. The company's failure to meet this requirement has resulted in a violation of P0110308 and Ohio Revised Code 3704.05.
2. In addition, ITR was able to provide Ohio EPA with waste receipts from Noble Road Landfill for the spent sand. The facility will need to store the spent sand in containers, an enclosed building or in the three-sided enclosure to prevent particulates from becoming airborne until such time as it can be taken to an appropriate landfill.

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In addressing the hazardous sand complaint, a sample was taken by the Division of Materials and Waste Management (DMWM) on March 20, 2012, with the results of the sample indicating that the spent sandblasting material is non-hazardous.

ITR stated they will not continue with sandblasting activities until another enclosure is constructed. Ohio EPA requests ITR submit a compliance plan providing a timeline for the installation of another 3-sided enclosure. This compliance plan is required no later than February 1, 2013.

Please note that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case.

Thank you for the courtesy extended during my visit. Should you have any questions regarding this letter, please feel free to directly contact me at 419-373-3121.

Sincerely,



Chad Winebrenner
Environmental Specialist
Division of Air Pollution Control

/llr

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ec: Jennifer Jolliff, DAPC-NWDO
Bruce Weinberg, DAPC-CO
Brian Dickens, US EPA, Region V
Alyse Johnson, DAPC-NWDO
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