



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

Re: Richland County  
Mid-Ohio Collision Center  
Notice of Violation (NOV/non-HPV)

March 7, 2013

CERTIFIED MAIL

Mr. George Gaskins  
Mid-Ohio Collision Center  
2900 West Fourth Street  
Mansfield, OH 44906

Dear Mr. Gaskins:

This letter shall serve as a follow-up to the site visit on February 28, 2013, of Mid-Ohio Collision Center by Ms. Alyse Johnson and myself from the Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO).

Based on discussions and observations during the investigation, our findings are as follows:

- 1) Mid-Ohio Collision Center operates a down-draft paint booth with 7-8 cars on average being painted per week. Entire cars are painted and minor touch-ups are performed with clear coating, primer and topcoat being employed in the booth using HVLP spray guns. On average, 1 pint of base coat and 1 pint of clear coat are used for each car. Solvents are then used as cleanup material.
- 2) Mid-Ohio Collision Center failed to submit an application for a permit before installing and operating the paint booth. This is a violation of OAC rule 3745-31-03(A)(4)(a)(ii) and ORC 3704.05.
- 3) Due to the amount of paint being applied and jobs being performed, Mid-Ohio Collision Center will need to apply for a Permit by Rule (PBR). If the facility cannot meet all qualifying criteria for the issuance of a PBR, Mid-Ohio Collision Center will be required to submit a permit-to-install and operate (PTIO) application, emissions activity category (EAC) form for surface coating operations for the paint booth and emissions calculations. Electronic PTIO and EAC forms are available on Ohio EPA's website at <http://epa.ohio.gov/dapc/fops/eac/eacforms.aspx>.

As discussed during the inspection, Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is also available to assist qualifying small businesses in achieving and maintaining compliance with Ohio's environmental regulatory programs. OCAPP will be able to help you with the permit requirement determination and the permitting process.

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More information pertaining to OCAPP is also available on our website at <http://www.epa.state.oh.us/ocapp/ocapp.html>. Should you choose to contact OCAPP for assistance with issues pertaining to this letter, please contact Ron Nabors, at (419) 373-3147. If you decide to contact OCAPP for assistance, please inform me of that as soon as possible so that a new deadline for information submission can be determined, if needed.

Finally, as a courtesy reminder, the new Federal NESHAP rule HHHHHH, for Paint Stripping and Miscellaneous Surface Coating Operations, became effective March 2011. If you have questions regarding this new requirement, please contact Ron Nabors.

The company's written response to this letter is requested by April 4, 2013. The response should contain all pieces of information identified in item (2). The response should be submitted to Ohio EPA, Northwest District Office, to my attention.

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.

If you have any questions or comments concerning this letter, please feel free to contact me at the above referenced address, by email at [Chad.Winebrenner@epa.state.oh.us](mailto:Chad.Winebrenner@epa.state.oh.us) or call (419) 373-3121.

Sincerely,



Chad Winebrenner  
Environmental Specialist  
Division of Air Pollution Control

/llr

Certified Mail Receipt Number 7009 1410 0001 1834 4133

cc: Alyse Johnson, NWDO-DAPC  
Chad Winebrenner, NWDO-DAPC  
Jennifer Jolliff, NWDO-DAPC  
Bruce Weinberg, DAPC-CO  
Brian Dickens, US EPA, Region V  
George Gaskins