

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

Re: Erie County
0322010283
Willoway Nurseries, Inc.,
Huron Greenhouse
**Inspection/
Notice of Violation
(NOV/non-HPV)**

March 20, 2013

CERTIFIED MAIL

Mr. Tim Cullinan
Willoway Nurseries, Inc., Huron Greenhouse
4534 Center Road
Avon, Ohio 44011

Dear Mr. Cullinan:

This letter shall serve as a follow-up to the inspection conducted on March 12, 2013 of Willoway Nurseries, Inc., Huron Greenhouse by Miranda Garlock of the Division of Air Pollution Control (DAPC). A complaint received on March 8, 2013 regarding the facility's emissions prompted the compliance inspection. The purpose of the inspection was to determine the compliance status of all air contaminant sources located at the facility.

Based on my observations during the inspection and my discussions with you on March 14, 2013 regarding the facility's files, my findings are as follows:

1. The complainant indicated that heavy grey smoke was being emitted from the stack at the greenhouse that burns wood pellets. During the inspection, DAPC observed visible emissions from the stack serving the 20.7 mmBtu wood fired boiler (B001) which appeared white in color. The facility indicated that emissions observed on the day of the inspection were representative of "normal" emissions from B001. DAPC conducted Method 9 readings of visible emissions from the stack for approximately 21 minutes. Method 9 readings identified an opacity of 23.1% over a six-minute average during the start of a new cycle but an opacity of 17.3% over a six-minute average after the start of the new cycle had leveled out. As established in P0086951 issued July 22, 2010, B001 has a visible particulate emission limitation of 20% opacity as a six-minute average, except as provided by rule. According to OAC rule 3745-17-07(A), visible particulate emissions from any stack may exceed 20% opacity, as a six minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed 60% opacity, as a six-minute average, at any time. The highest opacity readings recorded on the day of the inspection was 40%. Therefore, visible emission opacity levels recorded on the day of the inspection are in compliance with DAPC regulations and air pollution control emission limitations established in P0086951.

2. DAPC was unable to review records at the facility on the day of the inspection and you met with me on March 14, 2013 to discuss the facility's record keeping as it relates to the facility's permit requirements. The facility maintains two permits from its three on-site boilers, P0086951 for B001 and 15.97 mmBtu/hr natural gas and No. 2 fuel oil fired boiler (B002) and a Permit-by-Rule (PBR) subject to OAC rule 3745-31-03(A)(4)(j) for 300 HP gas-fired boiler/heater (B003). It is our understanding that B002 and B003 are used as backup boilers and B001 is the primary boiler used to heat the greenhouse. The boilers are used only seasonally, typically between the months of November through April and/or May. Wood chips are used as fuel for B001. B002 and B003 operate approximately 30 minutes for four days a week during the seasonal heating season. The facility has never used No. 2 fuel oil in B002 since its installation.

The following was noted during our discussion:

- a. Monitoring and record keeping requirements for B001 specify in d(1) "the permittee shall perform daily checks when the emission unit is in operation and when the weather conditions allow for any visible particulate emissions from the stack serving the emission unit. The presence or absence of any visible emissions shall be noted in an operational log. If visible emissions are observed, the permittee shall be noting the following in the operations log":
 - i. the color of the emissions;
 - ii. whether the emissions are representative of normal operations;
 - iii. if the emissions are not representative of normal operation, the cause of the abnormal emissions;
 - iv. the total duration of any visible emissions incident; and
 - v. any corrective actions taken to minimize or eliminate the abnormal visible emissions.

The facility is not currently keeping a daily operational log of visible emission checks for B001, which is a violation of the Terms and Conditions of P0086951 and Ohio Revised Code (ORC) §3704.05.

- b. As discussed with you on March 14, 2013, B001 had a few instances of abnormal emissions in December 2012 due to some equipment issues. Maintenance was conducted on the boiler and visible emissions returned to "normal" conditions. Reporting requirements for B001 specified in e)(2) require the permittee to identify all days during which any visible emissions were observed from the stack serving the emission unit and any corrective action taken to eliminate the visible particulate emissions.

The facility failed to identify the abnormal emissions, their cause, and any corrective action which occurred in December 2012 on the annual Permit Evaluation Report (PER) received on February 13, 2013, which is a violation of the Terms and Conditions of P0086951 and ORC §3704.03(l).

- c. Monitoring and record keeping requirements for B002 as specified in d(2)(a) and for B003 as specified in j(iii)(b) requires the facility to maintain monthly records of the total volume of natural gas (mmft3) burned in these emission units.

The facility is not currently keeping a monthly log of natural gas usage for B002 and B003, which is a violation of the Terms and Conditions of P0086951, OAC rule 3745-31-03, and ORC §3704.05.

3. The facility's 2012 PER received on February 13, 2013 indicated there were no deviations or exceedences of PTIO requirements of operational restrictions or emission limitations, monitoring, record keeping, or reporting requirements for B001 or B002. However, as discussed above, the facility was not maintaining proper records as required by the PTIO permit for B001 or B002; therefore, letter "B" under B001 and B002 should have been marked "Yes" instead of "No". Additionally, the facility observed abnormal emissions in December 2012 from B001; therefore, letter "A" under B001 should have been marked "Yes" instead of "No". As required by the PTIO to be submitted with the annual PER, the facility failed to submit accompanying information including all days during which any visible emissions were observed from the stack of B001.

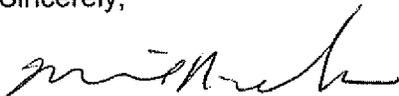
The facility is required to revise the 2012 PER form and resubmit a corrected version.

The facility's written response to this letter is requested by **April 19, 2013**. It should be submitted to Ohio EPA, Northwest District Office and contain a compliance plan to remedy the observed situations and prevent these, or any similar situations, from occurring in the future.

Please be advised 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 pursuant to ORC §3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3069 or electronically at Miranda.Garlock@epa.ohio.gov.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/cg

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