



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

January 14, 2010

RE: ASPHALT PLANT (EU No. P901)
STACK TEST RESULTS
KOKOSING MATERIALS, INC
FACILITY ID NO. 02-28-00-2002

Mr. Ralph E. Kynako
Environmental Manager
Kokosing Materials, Inc.
P.O. Box 334
Fredericktown, OH 43019-9159

Dear Mr. Kynako:

This is to inform you that we have reviewed the stack test report that was conducted at 14948 Mayfield Rd. in East Claridon, Ohio on October 21, 2010. A copy of the stack test report was received by this office on November 24, 2009. The testing company, Affiliated Environmental Services, Inc., collected volumes of air emission samples from the baghouse exhaust stack to determine the concentrations of criteria pollutants, specifically for particulates (PE), sulfur dioxide (SO₂), carbon monoxide, (CO), nitrogen oxide (NO_x), and volatile organic compound (VOC). These collected samples are then analyzed for compliance determination.

The following are the stack test results for each criteria pollutant:

- **Particulate emissions:**

Based on the average of three runs, the asphalt plant demonstrated compliance with the allowable mass emission limit of 0.04 gr/dscf. Specifically, the average emissions rate was calculated to be 0.002 gr/dscf.

- **Sulfur Dioxide emissions:**

Based on the average of three runs, the asphalt plant had an emissions rate of 27.8 lbs/hr. The SO₂ allowable is 29.7 lbs/hr. This result, however, is being rejected because the tested emissions rate was very close to the permit allowable emissions limit for the source being tested. The tested emissions rate was approximately 93.71% of the permit allowable emissions limit.

A retest is required for the asphalt plant to demonstrate compliance.

- **Nitrogen Oxide emissions:**

Based on the average of three runs, the asphalt plant did not demonstrate compliance with the mass emission limit of 19.2 lbs/hr for NO_x. Specifically, the average emissions rate was calculated to be 20.7 lbs/hr. This violates your PTI No. P0104603 (issued on 5/15/2009).

MR. RALPH E. KYNAKO
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Kokosing Materials, Inc. is required to make all necessary steps for the plant to successfully demonstrate compliance with the permit allowable emissions limit.

A retest is required for the asphalt plant to demonstrate compliance.

- **Carbon Monoxide emissions:**

Based on the average of three runs, the asphalt plant demonstrated compliance with the allowable mass emission limit of 100.8 lbs/hr. Specifically, the average emissions rate was calculated to be 51.7 lbs/hr.

- **Volatile Organic Compound emissions:**

The stack test report shows a much higher VOC emission concentration on run #2 in comparison to run #1 and run #3. Specifically, the collected hourly emissions for run #1, #2, and #3 were calculated to be 6.1 lbs/hr, 31.9 lbs/hr, and 3.3 lbs/hr, respectively. Based on the average of 13.7 lbs/hr for all three runs, Kokosing Material demonstrated compliance with the mass emissions limit of 20.7 lbs/hr. This office, however, is questioning the validity of run #2. Having an unusually high VOC emission concentration on run #2, in comparison to the other two runs, indicates possible air sample contamination. Contamination of any air samples is construed as an invalid test.

Please provide an explanation as to why such high VOC emission concentration resulted on test run #2. This office will then make a determination whether acceptance of the VOC test result can be warranted or requiring another stack emissions test for VOC is necessary.

Please provide all required information to this office within thirty (30) days of receipt of this notice. In addition, please provide a retest date of the asphalt plant for NOx and SO2 emission compliance determination.

Please contact me at (330) 963-1273, if you have any questions in this regard.

Sincerely,



Ed Perez
Environmental Specialist
Division of Air Pollution Control

EP:bo

ec: Ed Fasko, Ohio EPA, DAPC, NEDO
Tim Fischer, Ohio EPA, DAPC, NEDO