



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: Crawford County
Bucyrus Road Materials, Inc
Premise # 0317010049
Stack Test/Notice of Violation

January 6, 2010

CERTIFIED MAIL

Mr. Regieg Kimerline
Bucyrus Road Materials
1707 Tiffin Road
Bucyrus, Ohio 44820

Dear Mr. Kimerline:

The stack test conducted on July 16, 2008, on Ohio EPA emissions unit No. P901 (150 TPH Batch Mix Asphalt Plant), has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data is accurate:

**Critical Test Data
(In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
PM	0.0125 gr/dscf	0.04 gr/dscf	145 TPH	150 TPH
SO ₂	0.00484 lb/ton asphalt produced	0.10 lb/ton asphalt produced	145 TPH	150 TPH
CO	0.084 lb/ton asphalt produced	0.40 lb/ton asphalt produced	145 TPH	150 TPH
VOC	0.0256 lb/ton asphalt produced (as VOC)	0.15 lb/ton asphalt produced	145 TPH	150 TPH

^a Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.



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1. The stack test report does not include any data regarding the nitrogen oxide (NOx) emissions. It was determined during the testing that the NOx monitor was contaminated by a small amount of dust which resulted in high drift checks and a failed calibration test of that monitor. As a result, the testing continued for all other pollutants and compliance with the NOx emission limitation was to be demonstrated at a later time. To date, testing in order to show compliance with the NOx limit has not been performed.

Additionally, Permit to Install (PTI) #03-17134, issued 06/12/07, required the company to perform emissions testing within 60 days after achieving maximum production but no later than 120 days after initial start up. Failure to conduct emissions testing by the specified timeframe in the permit is a violation of the testing requirements of the permit and Ohio Revised Code (ORC) 3704.05.

The company is required to conduct emissions testing for NOx and carbon monoxide (CO) within 30 days of the initial operation of P901 for the 2010 production season, with the understanding that if no projects of significant production volume occur within that time, the deadline will be extended.

2. The company was required to submit a comprehensive written report on the results of the emissions testing to Northwest District Office (NWDO) within 30 days following completion of testing. Prior to my brief site visit on 11/19/09, NWDO had not received any reports indicating the results of this testing. The company submitted the outstanding report to NWDO on 12/01/09. This delay is a violation of the testing requirements of the permit and ORC 3704.05.
3. The above compliance testing is acceptable for particulate matter (PM), sulfur dioxide (SO₂) and volatile organic compound (VOC) emissions while satisfying the testing requirements in PTI #03-17147 for these pollutants. Please be aware that if in the future a design mix is used that would produce a higher level of emissions, it may be necessary to retest.

Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

At this time, I would like to thank you for the courtesy that was extended during my visit.

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If you should have any questions or comments regarding this letter, please contact me at (419) 373-3110.

Sincerely,



Brian Riedmaier
 Division of Air Pollution Control

//lr

pc: Tom Kalman, DAPC-NWDO
 Lisa Holscher, US EPA, Region 5
 Robert Teer, DAPC-NWDO
 DAPC-NWDO File
 Stack File
 Certified Receipt Number 7007 2560 0000 4485 5232

ec: Wendy Licht, DAPC-NWDO
 Tom Sattler, DAPC-NWDO
 Robert Teer, DAPC-NWDO
 Don Waltermeyer, DAPC-NWDO

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 MR. REGIEG KIMERLINE - BUCKYUS ROAD MATERIALS
 1707 TIFFIN ROAD
 BUCKYUS, OH 44620
 PS Form 3811, August 2006 See Reverse for Instructions

2525 5866 0000 0452 2002

SENDER: COMPLETE THIS SECTION <ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	COMPLETE THIS SECTION ON DELIVERY A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee B. Received by (Printed Name) C. Date of Delivery D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No P.O. BOX 350 JAN 10 2010
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