Ohio Environmental Protection Agency

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

Re: ThorWorks Industries, Inc.
Erie County
0322022003
Stack Test
Notice of Violation

October 13, 2011

CERTIFIED MAIL

Mr. Jim Ulizzi
ThorWorks Industries, Inc.
2520 South Campbell Street
Sandusky, Ohio 44870

Dear Mr. Ulizzi:

The stack test conducted on June 28-30, 2011, on Ohio EPA emissions unit numbers P001 (Sand and Aggregate Dryer with Baghouse Control) and P902 (Product Conveying, Screening, Mixing and Packaging Operations), 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)

Emission Unit	Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate[a]
P001	PM	0.0067 gr/dscf 0.009 lb/ton material produced	0.04 gr/dscf 0.127 lb/ton material produced	65 TPH	72.2 TPH
P001	SO_2	< 0.0016 lb/ton material produced	0.0003 lb/ton material produced	65 TPH	72.2 TPH
P001	NO_x	0.024 lb/ton material produced	0.0461 lb/ton material produced	65 TPH	72.2 TPH
P001	CO	0.229 lb/ton material produced	0.039 lb/ton material produced	65 TPH	72.2 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.

Emission Unit	Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate[b]
P001	VOC	0.0074 lb/ton material produced	0.0051 lb/ton material produced	65 TPH	72.2 TPH
P902	PM	0.00021 gr/dscf	0.04 gr/dscf	24.0 tons/hr aggregate 1.44 tons/hr liquid asphalt	26.6 tons/hr aggregate 1.6 tons/hr liquid asphalt
P902	VOC	6.77 lbs/hr as propane	0.05 lb/hr	24.0 tons/hr aggregate 1.44 tons/hr liquid asphalt	26.6 tons/hr aggregate 1.6 tons/hr liquid asphalt

Emissions unit P001 was burning natural gas during the compliance test. For the testing of P001, a baghouse pressure drop of 5.5 inches of water was recorded, which met the requirement that it be between 0.5 and 7.5 inches of water.

The testing of emissions unit P001 demonstrated a violation of the emission limitations established for carbon monoxide (CO) and volatile organic compounds (VOC) in Permit-to-Install and Operate (PTIO) #P0105915 issued final on April 1, 2010, and of Ohio Revised Code (ORC) 3704.05. In addition, the testing of this emissions unit was not conducted within the time frame required in the PTIO and required in NSPS Subpart I (60 days after achieving the maximum production rate but no later than 180 days after initial startup of the emissions unit). It should also be noted that the testing of sulfur dioxide emissions did not conclusively demonstrate compliance.

The testing of emissions unit P901 demonstrated a violation of the emission limitation established for VOC in PTIO #P0105915 and of ORC 3704.05. In addition, the testing of this emissions unit was not conducted within the time frame required in the PTIO and required in NSPS Subpart I (60 days after achieving the maximum production rate but no later than 180 days after initial startup of the emissions unit).

This office is requesting that the facility submit a written response to this letter which includes, at a minimum, a compliance plan and schedule as well as a permit modification request (complete application). The facility is required to submit this information by no later than November 11, 2011. 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.

[b] 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.

If you have any questions regarding the content of this letter, I can be reached at (419) 373-3118 or mohammad.smidi@epa.state.oh.us.

Sincerely,

Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control (DAPC)

/llr

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