



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

June 30, 2008

Mr. Lindon Pierce, Regional Environmental Manager
Carmeuse Lime, Inc. – Millersville Operation
1967 West County Rd 42
Bettsville, OH 44815

Subject: Notice of Violation (NOV) and follow-up of May 28, 2008 inspection of Carmeuse Lime, Inc. – Millersville Operation (0372000081) with responses due July 28, 2008.

Dear Mr. Pierce:

This letter shall serve as follow-up to the inspection conducted on May 28, 2008 of the above-referenced facility by this writer. The purpose of this inspection was to determine the compliance status of all air contaminant sources located at the facility.

Based on our discussions, observations during the inspection, and a review of the company's files, my findings are as follows:

1. P901 – Material Loadout: Records of pressure drop readings for the Donaldson baghouse associated with this emissions unit for 4th quarter 2006 could not be located at the time of the inspection. This data was later located and submitted for review on June 4, 2008. All readings recorded during this time period were within the permitted range of 1-6 inches of water.

Multiple pressure drop readings for emissions unit P901 were out of range over several months during 2007 in violation of the terms and conditions of PTI 03-14076 and ORC 3704.05. These deviations were not reported in any quarterly reports for 2007, nor were they identified in the company's 2007 annual compliance certification report. In order to resolve this violation, Carmeuse must submit a compliance plan outlining how they plan to prevent future pressure drop deviations. The plan should detail the steps the company will take to correct these deviations. In addition Carmeuse will also need to resubmit their 2007 annual compliance certification report in order to include these deviations. The compliance plan and updated report should be submitted by **July 28, 2008**.

2. P005 – Rotary Lime Kiln #1 and P006 – Rotary Lime Kiln #2: As identified in the follow-up letter to the June 7, 2006 facility inspection, the company has an operational restriction (term and condition A.II.4) in its Title V permit that requires the fuel burned in these emissions units meet, on an as received basis, the sulfur contents, in lbs/mmBtu, that are no greater than the sulfur contents documented during the most recent stack test.

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The sulfur content in this term and condition should be in the units percent by weight, rather than lbs/mmBtu. This language will be corrected during the renewal process of the company's Title V permit.

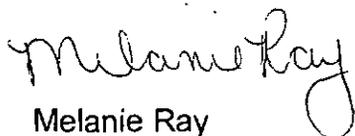
At the time of the previous facility inspection, the company had not collected solid fuel samples during the most recent stack test to establish the sulfur contents of the fuels to use to show compliance with the sulfur dioxide (SO₂) limitation of 25 pounds of SO₂/ton of product. In the company's response to the inspection letter, it was stated that solid fuel samples would be collected, as required, during future official stack test events. This was done on a subsequent stack test, however the exact sulfur contents were not known at the time of the inspection. It was suggested that the sulfur contents were 4.2% for coal and 5.67% for coke and in reviewing records, numerous weekly composites for coke exceeded 5.67%. The company will need to review stack test data since the last inspection and provide a summary of solid fuel sulfur contents during the compliant tests. This information must also be submitted by **July 28, 2008**.

3. P005 – Rotary Lime Kiln #1 (secondary cooler): Carmeuse has had several complaints in the past and has received a notice of violation in regards to emissions from the secondary cooler vent associated with this emissions unit. The company has stated that they have since eliminated this vent. Please provide a summary of what was done and include the date that the vent was eliminated.

All other emissions units appear to be in compliance with the air pollution control emission limitations and regulations of Ohio EPA at this time.

Thank you for the courtesy extended during my visit. If the company has any questions and/or comments concerning this letter, please contact me at the above address or call (419) 373-4111.

Sincerely,



Melanie Ray
Division of Air Pollution Control

/csl

pc: Samir Araj, Ohio EPA, DAPC-NWDO
◀ NWDO Sandusky County File,
Don Waltermeyer, Ohio EPA, DAPC-NWDO
Tom Kalman, DAPC, CO
Lisa Holscher, USEPA, Region 5, Air and Radiation Division