



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

January 6, ~~2009~~ 2010

**CERTIFIED MAIL**

Ms. Stacey Rader, Area Environmental Manager  
Carmeuse Lime, Inc.-Millersville Operation  
1967 West County Road 42  
Bettsville, Ohio 44815

Subject: Notice of Violation (NOV) [HPV-GC8, MC1] for emissions units P005 and P006 at Carmeuse Lime, Inc.-Millersville Operation (0372000081).

Dear Ms. Rader:

This letter shall serve as another NOV for excess particulate matter (PM) emissions from the two rotary lime kilns, emissions units P005 and P006. It is also for Carmeuse's failure to submit the required written reports of the results for emissions tests conducted on August 20, 2009, and September 29, 2009.

The PM emission violations were discovered during our review of the company's 3<sup>rd</sup> quarter 2009 deviation report, submitted on November 2, 2009, and from a summary of diagnostic tests conducted on the kiln control systems, submitted on September 30, 2009. The diagnostic data were submitted per the Northwest District Office's (NWDO) request for information to verify the company's claim that the use of pet coke has contributed to multiple previous failed stack tests for particulate emissions (Lime MACT violations).

**August 11 & 13, 2009, PM emission violations (Kiln #2):**

In the company's 3<sup>rd</sup> quarter 2009 deviation report and in the diagnostic data summary, it was noted that two diagnostic tests were conducted on kiln #2 and that PM emissions both days were in violation of the Lime Manufacturing MACT, 40 CFR Part 63, Subpart AAAAA. The first test was conducted on August 11, 2009, and was done while using 20% pet coke. The 2<sup>nd</sup> was performed on August 13, 2009, and done while using 100% coal. The company noted that there were "problems" with the cooler during this test but provided no additional information explaining what occurred.

At this time, the company should submit a detailed summary of the problems found with the cooler during the August 13 test, what was done to resolve these problems and when it was done.

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The company's response should also identify if any work was done to the control equipment prior to the August 20, 2009, stack test of kiln #2. This information should be submitted by February 5, 2009.

**February 8, 2008, and March 11-12, 2009, PM emission violations (Kiln #1):**

Carmeuse's September 30, 2009, submittal of a summary of diagnostic tests performed on the lime kilns from October 2006, (prior to the MACT compliance date) to present also showed that PM emissions from Kiln #1 were in violation of the Lime MACT limitation during tests conducted on February 8, 2008, March 11, 2009, and March 12, 2009. The comment was made after the 2/8/08 test that the company began focusing on coke as a possible source of PM noncompliance and would try to determine the max pet coke percentage going forward in order to be compliant with the MACT. The tests on 3/11 and 3/12 were conducted using 30% and 20% pet coke, respectively.

Additional diagnostic tests were conducted on Kiln #1 on March 26-27, 2009, using 25% pet coke. Both tests showed compliance with the MACT PM limitation, however, the results were very close to the limit. Based on these results, the company noted that pet coke use would be decreased to 15% going forward. However, the Ohio EPA witnessed stack test performed on March 31, 2009, on Kiln #1 was done while using 15% pet coke and emissions exceeded the MACT PM limitation (see May 28, 2009 NOV). After receiving the results of this test, the company chose to shut down the kiln and assemble a team to review the data and work on a solution for returning the kiln to compliance.

The May 28, 2009, NOV required Carmeuse to submit a response outlining the team's findings and a plan of corrective action. This information was again requested in a July 23, 2009, letter to the company since no response was received by the initial June 30, 2009 deadline. A response to these letters was finally received on August 14, 2009, stating that the company planned to restart kiln #1 on August 21<sup>st</sup> or 22<sup>nd</sup> after testing of kiln #2 was complete and retesting of kiln #1 would be completed shortly thereafter. The retest was then conducted on September 29, 2009.

Although a response was submitted outlining the testing plans for both kilns, the company again ignored our requests for information on the reasons for the failed test on kiln #1 in March and for its plans to bring the kiln back into compliance prior to retesting. If a team was ever assembled to look at the kiln and the issues resulting in the noncompliant test, please provide all this information as well as any changes that were made to the process and/or control equipment prior to retesting the kiln.

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In addition to the above-mentioned information, Carmeuse should also provide all additional engineering studies, either done internally or externally, pertaining to the use of pet coke and achieving MACT compliance. This information should be provided by February 5, 2009. The company will also need to resubmit its 2008 Title V annual compliance certification report to include the excess PM emissions from the February 8, 2008, test. The excess emissions from all 2009 stack tests will also need to be included in the 2009 annual compliance report.

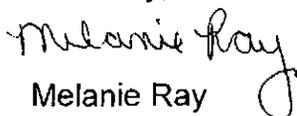
**Failure to submit August 20, 2009, and September 29, 2009, stack test reports:**

As previously noted, Carmeuse conducted a stack test on kiln #2 on August 20, 2009, and a retest of kiln #1 on September 29, 2009. Both tests were witnessed by the Ohio EPA, NWDO. An email was received from Chris Imbrogno on September 14, 2009, stating that preliminary results for kiln #2 showed that the test passed and an official report would be submitted soon. These reports were not submitted until December 15, 2009. These are violations of the company's Title V permit which requires a written report of test results be submitted within 30 days following completion of the test.

If the information requested above is not submitted as requested, DAPC will take immediate action to have Director's Unilateral Orders issued requiring it be done. 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 has already made the decision to pursue such penalties regarding this matter at a later date.

Please feel free to contact me with any comments and/or questions at 419.373.4111 or email [melanie.ray@epa.state.oh.us](mailto:melanie.ray@epa.state.oh.us).

Sincerely,



Melanie Ray  
Division of Air Pollution Control

//lr

pc: Don Waltermeyer, DAPC-NWDO  
Tom Kalman, DAPC-CO  
Lisa Holscher, USEPA-Region V  
DAPC-NWDO-Sandusky County correspondence File  
NWDO Follow-up File  
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