



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Re: Seneca County
Carmeuse Lime
Premise #0374000010
Inspection follow-up letter
Notice of Violation

CERTIFIED MAIL

September 30, 2010

Ms. Stacey Rader, Regional Environmental Manager
Carmeuse Lime – Maple Grove Facility
1967 West County Road 42
P. O. Box 708
Bettsville, Ohio 44815

Dear Ms. Rader:

This letter shall serve as follow-up to the inspection conducted on September 15, 2010, of the above-referenced facility by this writer. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there with the rules and regulations of the Division of Air Pollution Control (DAPC).

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

1. Carmeuse Lime – Maple Grove (herein referred to as CLMG) was issued a Permit to Install (PTI) #03-13527 on May 23, 2002, (and modified on October 14, 2003) for the roadways and parking areas. A PTI modification (P0104549) was issued for this emissions unit on July 15, 2009. The permit, based on Best Available Technology (BAT), requires that CLMG not exceed one minute of visible particulate emissions (PE) during a sixty minute observation period on the paved roadways and no more than three minutes of visible PE during a sixty minute observation period on the unpaved roadways.

Visible emission (VE) observations of the paved roadways were conducted after the inspection had concluded. During an observation period of 3 minutes and 10 seconds of the paved roadway, the accumulated emission time was one minute and 18 seconds. Therefore, CLMG is in violation of the BAT requirement as well as the terms and conditions in the PTI and the Title V permit for this emissions unit. In addition, CLMG is in violation of Ohio Revised Code (ORC) section 3704.03.

CLMG failed to apply any water during the day of the inspection. CLMG is therefore in violation of the BAT requirement since particulate matter had been deposited onto the paved roadway stretching beyond facility property without promptly removing that material.

In addition to CLMG being in violation of the rules stated above, such conditions demonstrate roadway emissions are not being properly calculated. CLMG is using a 90% reduction efficiency on an annual basis for the roadway emissions when in fact there are days in which no watering or chemical stabilization/dust suppressants is used as was witnessed during this inspection, even though it is required. This means that the reduction efficiency is not being met and therefore CLMG is in violation of not meeting the emission limitation specified in the PTI and TV permit.

Although watering records were viewed during the inspection, the review was not complete. The watering records viewed were only for June 1, June 14 and September 15, 2010. Since the records were on a computer spreadsheet, it was not possible to fully ascertain whether the recordkeeping requirements in the permit are being met. Therefore, it is necessary that CLMG state which individual(s) inspected the roadways on a daily basis in determining the need for implementing the control measures. This report shall span from September 2008 to September 2010. The report shall include what reason(s) was made to conclude the control measures as not being needed on that given day. In addition, the report shall note whether the roadways, paved and unpaved, were watered for that given day.

2. The material storage piles identified in the facility profile as emission unit F002 is permitted under PTI #03-13527. The permit references coal and coke as having storage piles. During the inspection, both piles were inspected. The coke storage pile was identified as an issue during the inspection. The reason is because the roadway leading to the coke pile, as well as adjacent roadways, was completely covered in coke. A compliance plan will need to be submitted as how to best address this situation. In addition, emission calculations pertaining to this situation will need to be re-evaluated and submitted for review.

The material storage piles were witnessed during the inspection. There was a significant amount of what was termed as "off-spec" material that had been dumped there. This material is not indicated as being part of this emissions unit. Therefore, CLMG is in violation of all terms and conditions related to this emissions unit since emissions from these piles would be significant in nature. There is no BAT being applied as this material was very dry and could become airborne quite easily.

There appeared to be a waste lime storage pile that is quite large. This was witnessed as I was leaving the facility (near the transloader) so this was not mentioned in the post-inspection comments. It would be helpful to explain how this large pile has been permitted or under what emissions unit is it classified.

The lime kiln dust (LKD) mentioned in the permit for this emissions unit requires CLMG to completely saturate this pile. The LKD pile that is filled into trucks and disposed of in the quarry appeared to have sufficient moisture. However, the LKD pile that is close to the pug mill was very dry and was not watered at all. In addition, this pile was not covered at all.

Both of these facts are violations of the term and condition in the PTI as well as the TV permit. This is also a violation of ORC section 3704.03. The emission calculations are based on the fact that complete saturation and partial covering would reduce emissions by 99 percent. Since this is not the case, CLMG is violating the emission limitations for the LKD pile.

3. The Facility Profile in Air Services must be updated to properly reflect the operations at CLMG. During the inspection, there appeared to be emission units listed as operating when in fact these units have been permanently shut down. In addition, there are many emission units that are duplicates and the duplicates (Z sources) would need to be invalidated if that is deemed the case. Please contact Ms. Andrea Odendahl by telephone at (419) 373-3052 or by e-mail at Andrea.Odendahl@epa.ohio.gov to discuss this matter further so that agreement is reached on the status of each emission unit.
4. An updated diagram detailing the roadways and parking areas is necessary. The diagram shall include the route that CLMG is responsible for as well as the number of vehicles miles traveled per year on both the paved and unpaved roadways. The basis for the number of vehicles miles traveled will need to be addressed.
5. There is no record of any VE tests conducted on the process stone handling operations. CLMG is required to submit a process flow diagram that identifies all process stone handling operations and how, if any, visible emission checks have been conducted at each location in the past. Documentation is necessary to demonstrate compliance with the requirement to have conducted VE checks. CLMG is requested to provide this documentation for the period from September 2008 to September 2010. In addition, any VE test(s) conducted on the processed stone handling operations will be necessary.
6. The last compliance test conducted on the two kilns was in December of 2008. Therefore, CLMG is required to respond as to when the next testing date will be.
7. Actual annual lime production numbers are not readily apparent in the reports that have been reviewed. Having reviewed the lime produced on a quarterly basis, there is a question regarding nitrogen oxide (NO_x) and sulfur dioxide (SO₂) emissions from both kilns. Please submit emission calculations as it relates to reporting years 2008 and 2009 for NO_x and SO₂ emissions from both kilns. The basis of the emission factors will need to be referenced in the calculations.
8. The coke analysis was not reviewed during the inspection. It is necessary that CLMG supply the coke analysis that was received December 2009 to March 2010.

The information required above must be submitted by no later than November 5, 2010. Please be advised that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06.

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The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

I can be reached at (419) 373-3118 or mohammad.smidi@epa.ohio.gov if you have any questions regarding this letter.

Sincerely,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/llr

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Tom Kalman, DAPC-CO
DAPC-NWDO Inspection File
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