



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

October 8, 2010

Re: Washington County
Mid Ohio Valley Lime
Facility ID # 0684020015
Warning Letter
Certified: 70101060000178960347

Charles Merrill
Plant Manager
Ohio Valley Lime
PO Box 734
Marietta, OH 45750

Dear Mr. Merrill:

On October 6, 2010, I conducted a site visit to Mid Ohio Valley Lime in Marietta, Ohio. The inspection was conducted in response to a complaint our Agency received. The complaint indicated that the facility was releasing lime emissions into the air.

While at the facility, I met with you to review records and perform a visual inspection of the facility. The facility's permitted emissions units include the following:

- 150 tons/hr lime hydrator (P901);
- roadways and parking areas (F001); and
- lime bagging, transfer, and storage (F002).

Permit-to-install (PTI) 06-2384 was issued May 17, 1989 for F001 and PTI 06-1050 was issued October 6, 1983 for P901. The last permits-to-operate (PTO) for sources P901 and F002 was issued on October 8, 1998 and have since expired. Renewal PTO applications were received on November 21, 2002 and are currently pending processing in our office.

The roadways and parking areas (F001) appear to have been installed prior to the requirement to receive a PTI and are currently under registration status.

The following violation of permit terms and issues were observed during the site visit:

Failure to Maintain Baghouse Pressure Drop Range

The PTO requires the facility to maintain a baghouse pressure drop between 3.0 to 8.0 inches of water column while emissions unit P901 is in operation. Upon review of the P901 records, it appears that the pressure drop has ranged from 2.3 to 2.6 for the entire months of July and August 2010. Therefore, the facility is in violation of PTO term Part II.B.

Failure to Record Daily Baghouse Pressure Drop Readings

It was also observed during the site visit that the baghouse pressure drop was not being recorded every day that the emissions unit was operating. Therefore, the facility is in violation of PTO term Part II.C.2.

Possible Failure to Report Deviations in Semi-Annual Reports

The permit also requires that the facility shall record the baghouse pressure drop on a daily basis and submit semi-annual reports indicating any non-compliance with the allowable range. The facility has submitted the required deviation reports; however, the reports submitted have reported no deviations from the baghouse pressure drop range. Though I only reviewed the records for July and August of 2010, and those dates are included in a semi-annual reporting period for the second semi-annual 2010 report (not yet submitted), I am requesting that the facility review their past deviation reports and baghouse pressure drop record keeping. If the pressure drop was not within the required range of 3.0 to 8.0 inches of water, the facility must resubmit the semi-annual deviation report for the past time periods and include these deviations in them. **Please submit any required revised deviation reports within 30 days of receiving this letter.**

Failure to Receive PTI prior to Installation of Emissions Units

While conducting the site visit, it was also determined that the facility has installed a new silo and is in the process of installing a new bagger. The installation of a new air contaminant source without first receiving a PTI is a violation of Ohio Administrative Code rule 3745-31-02. **Please submit the required PTI application within 30 days of receiving this letter.**

Possible Visible Emissions from Operation of F002

During the site visit, no visible particulate emissions were observed from this emissions unit. However, it should be noted that the bagging operation was in operation during my site visit, and there was a large amount of lime located on the ground by the bagging unit. Plant personnel indicated to me during the site visit that the bagger has a "bad seal" when operating. Please let me remind you that the PTO for F002 requires that the bagging storage unit, load out chute, bagging operation and transferring operation be enclosed and adequately vented to the fabric filter to eliminate visible particulate emissions at the point of capture. Any visible emissions from the bagging operation while operating would be considered a violation of the PTO terms Part II A.1. and 2.a.

From review of our records and viewing the current operation of the plant, it appears that some components of the emissions unit may have been modified. Please review the most recent PTO renewal application and resubmit an updated PTO application (including a current flow diagram) that is reflective of the changes that have occurred. If any of the changes would be deemed a modification, as defined in OAC rule 3745-31-01, a PTI application would also be required. **Please resubmit the revised renewal PTO and any needed PTI applications within 30 days of receiving this letter.**

Charles Merrill
Ohio Valley Lime
October 8, 2010
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Within 30 days of receipt of this letter, Mid Ohio Valley Lime shall submit a plan and schedule to return the facility to compliance. The plan should include a time line for completing any corrective actions and should specify the corrective actions taken.

Acceptance by the Ohio EPA of a schedule for compliance does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

Please be aware that your facility is responsible for complying with the terms and conditions outlined in the permits. Please read over the permits carefully. There are many emission limitations, monitoring, record keeping, and reporting requirements that the facility is responsible to maintain. I encourage the facility to contact Ralph Witte, with Ohio EPA's Small Business Compliance Assistance Program at (740)380-5241. Ohio EPA provides small business compliance assistance to help small businesses understand and comply with environmental regulations. The service is free, non-regulatory, and available to small business with fewer than 100 employees.

If you are unable to respond to any part of the above request, within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions, feel free to contact me at (740) 380-5223 or email christina.wieg@epa.state.oh.us. The assistance provided during the inspection was greatly appreciated.

Sincerely,

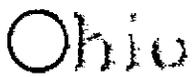


Christina Wieg
Environmental Specialist III
Division of Air Pollution Control
Southeast District Office

CW/mlm

Enclosure

CC: Bruce Weinberg, DAPC/SEDO
Ralph Witte, OCAPP/SEDO



**Environmental
Protection Agency**

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

May 10, 2011

Re: Washington County
Ohio Valley Lime
Facility ID #0684020015
Acceptance of Compliance Plan
Certified #70101060000178962334

Mr. Charles Merrill
Plant Manager
Ohio Valley Lime
PO Box 734
Marietta, OH 45750

Subject: Acceptance of Ohio Valley Lime's submitted compliance plan

Dear Mr. Merrill:

On October 6, 2010, I performed a site visit of Ohio Valley Lime in Marietta, Ohio. Based on my inspection, a number of violations/issues were discovered including failure to operate and maintain the baghouse within the specified pressure drop range, failure to record daily baghouse pressure drop readings, failure to report deviations in semi-annual reports, and failure to receive a permit-to-install and operate (PTIO) prior to installation of emissions unit.

You were informed of these violations in a warning letter from me dated October 8, 2010. In the letter, I requested that you respond within 30 days and provide a plan and schedule to return the facility to compliance.

I received the requested written response from you on October 20 and 25, 2010 which included the following actions:

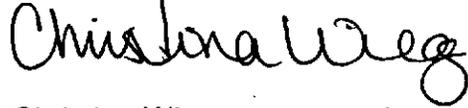
- Purchase and installation of two new baghouse pressure drop gages;
- Instruct plant personnel that the daily observation and required records must be kept for any day that the emissions unit and baghouse are in operation;
- Revise and resubmittal of semi-annual deviation reports; and
- Submittal of PTIO application for new sources that have been installed.

The Ohio EPA accepts Ohio Valley Lime's plan and schedule as submitted. Acceptance by the Ohio EPA of a schedule for compliance does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.6 of the Ohio Revised Code. The determination to pursue or to decline such penalties in this case will be made at a later date.

Mr. Charles Merrill
Ohio Valley Lime
May 10, 2011
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If you have any questions, feel free to contact me at (740) 380-5223 or email christina.wieg@epa.state.oh.us.

Sincerely,

A handwritten signature in black ink that reads "Christina Wieg". The signature is written in a cursive, flowing style.

Christina Wieg
Environmental Specialist III
Division of Air Pollution Control
Southeast District Office

CW/mlm

cc: Ralph Witte, OCCAP/SEDO
Bruce D. Weinberg, DAPC/SEDO