

Sharon Stone Corresp.
Washington Co.



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

March 31, 2008

Re: Washington County
Sharon Stone Co.-Belpre Sand & Gravel
Facility ID # 0684010136
Inspection- Non-HPV Warning Letter
Certified: 70063450000190560990

Roger Osborne
Sharon Stone Co.-Belpre Sand & Gravel
38455 SR 821 S.
Dexter City, OH 45727

Subject: Response to Site Visit Conducted March 20, 2008

Dear Mr. Osborne:

On March 20, 2008, Michael Carper and I performed an inspection of the Sharon Stone Co.-Belpre Sand & Gravel facility in Belpre, Ohio. The inspection was conducted to determine the facility's compliance with state and federal air pollution rules and regulations.

While at the facility, we met with Belpre Sand and Gravel Company representatives Dave Skinner and Jodi Ruth.

The facility's permitted emission unit is the unpaved roadways and parking areas (F001). A Permit To Install (PTI) was issued for the unpaved roadways and parking areas (F001) on February 16, 2000 (PTI 06-06046). A Permit to Operate application was received by your facility on May 2, 2002. The application has not been processed to-date.

Based on my inspection, file review, and reports submitted by Sharon Stone Co.-Belpre Sand & Gravel, the following violations/issues have been discovered:

- **Failure to maintain required records for unpaved roadways and parking area (F001)**

During the inspection, it was determined that the facility was not keeping the below required records.

Belpre Sand & Gravel Co was issued PTI 06-06046 on February 16, 2000 for Emission Unit F001 (unpaved roadways & parking areas). Part II.C. of the Special Terms and Conditions for Specific Emissions Units states the following:

"The permittee shall maintain records of the following information:

- a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;*
- b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;*
- c. The dates the control measures were implemented; and*
- d. On a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.*

The information required in 4.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter."

- **Failure to submit required deviation reports for unpaved roadways and parking areas (F001).**

During the inspection, it was determined that the facility was not submitting the below required deviation reports.

Belpre Sand & Gravel Co was issued PTI 06-06046 on February 16, 2000 for Emission Unit F001 (unpaved roadways & parking areas). Part II.D. of the Special Terms and Conditions for Specific Emissions Units states the following:

"The permittee shall submit deviation reports that identify and of the following occurrences:

- a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and*
- b. Each instance when a control measure, that was to be implemented as a result of an inspection was not implemented.*

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit."

Part I.A.2.b. of the General Terms and Conditions of the permit states the following:

"Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, I.E., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)"

Therefore, the facility is required to submit deviation reports on the following schedule:

- 1st quarter due April 30th (covering January 1 through March 31)
- 2nd quarter due July 31st (covering April 1 through June 30)
- 3rd quarter due October 31st (covering July 1 through September 30)
- 4th quarter due January 31 (covering October 1 through December 31st)

The deviation reports should include any deviations from the emission limitations, operational restriction, and control device operating parameter limitations outlined in the PTI. These limitations can be viewed in the Special Terms and Conditions For Specific Emissions Unit(s) Part II.A. and B of the PTI. If a deviation occurred, please include the required information outlined in Part I.A.2.b. of the General Terms and Conditions above. **Please be aware that your facility is still required to submit a deviation report even if no deviations occurred.** The report would consist of a letter stating that no deviations had occurred for the quarter.

- **Request for additional information concerning generators and gravel processing plant located at the facility.**

During the inspection, it was determined that two generators, one crusher, two screeners, and numerous conveyors are currently located at the facility. In order to determine if there are permitting needs for the facility, I am requesting the following information:

1. A detailed description of the processes that take place at the facility.
2. A time line that outlines the facility's history of operation which includes the installation date of all equipment and process (quarry operation, conveyors, crushers, grinders, screeners, generators, etc).

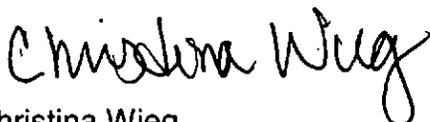
3. A list of all equipment associated with the process of crushing, sorting, and screening gravel. Included in this list should be a process weight rate for each piece of equipment. This process weight rate is based on manufactures rated capacity.
4. The horsepower rating for each generator, annual hours of operation, and purpose for use.

Within 30 days of receipt of this letter, Belpre Sand & Gravel Co. shall submit the requested information. In addition to the requested information, Belpre Sand & Gravel Co. shall develop a plan and schedule to return the facility's unpaved roadways and parking areas (F001) to compliance with all applicable air pollution laws. The plan should include a timeline for completing corrective actions and 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.

The assistance provided during the inspection is greatly appreciated. If you are unable to respond to any part of this 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.

Sincerely,



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

CW/mlm

cc: Jodi Ruth, Belpre Sand & Gravel Co. (with Enclosure)
Dave Skinner, Belpre Sand & Gravel Co. (with Enclosure)

Enclosures: Permit To Install 06-06046:
Example roadway recordkeeping log
Example deviation report