



State of Ohio Environmental Protection Agency

Southeast District Office

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

March 28, 2008

RE: Washington County
Facility ID: 0684000145
Shelly: Price Inland Terminal
Warning Letter

Certified: 70063450000190560907

Mr. Robert Pennock
General Manager
3059 Washington Blvd.
Belpre, Ohio 45714

SUBJECT: Request for Information Regarding Issues Identified during Site Visit

Dear Mr. Pennock:

On March 20, 2008, Christina Wieg and I visited your facility. I would like to thank Mr. Don Wagner for his assistance during my visit. Several compliance issues were identified while I was onsite. Please provide a response to the issues addressed below by **April 30, 2008**.

Generator

While on site, a generator was observed powering conveyor belts at your coal unloading area near the west end of your facility. Mr. Wagner stated that these conveyors are normally powered by electric but that there had been an electrical short out due to excessive precipitation in the area for the past several days. Mr. Wagner also stated that this generator is rarely used at the site and is for emergency use. The installation and operation of an air contaminant source prior to applying for and obtaining the proper permits is a violation of OAC 3745-31-02(A)(1) and 3745-35-02(A).

Please provide the following information about the generator:

- 1) Date it was purchased by Price Inland Terminal.
- 2) Date it was installed.
- 3) Date it was first operated.
- 4) The total number of hours that the generator has operated at Price Inland Terminal.
- 5) The horsepower rating of the generator.
- 6) If the generator has permits issued by the Division of Air Pollution Control, please provide the Permit to Install number and facility identification number.

Visible Emissions from Roadways

Visible emissions were noted at the coal pad on the west side of the facility (near the generator). A Method 22 was conducted on the area of roadway that passes through the coal piles (see attached). During our visit, front end loaders were operating in this area. Tan and black colored dust was observed throughout the observation period. Winds were coming from the southeast at approximately 10-15 mph with gusts exceeding 20 mph. It appears that some of the visible emissions may be caused by coal fines being washed from the piles, redeposited on the concrete pad, and then resuspended by yard traffic and wind. The water truck was observed operating in other areas of the facility but it did not operate at the coal piles while we were in that area.

PTI 06-6018 issued on December 22, 1999 allows 3 minutes of visible emissions in any 60 minute period for roadways. The Method 22 results were 3 minutes and 43 seconds in the 37 minutes observation period. Exceedance of your allowable permit limit is a violation of OAC rule 3745-31-05(A)(3) and 3745-17-08(B)(2).

Complaints about coal dust in neighboring areas have been received recently and in the past. Samples taken from a neighboring home in April 2006 were tested and revealed that black specks appearing on the house's siding contain coal.

As indicated in the facility's PTI, the air contaminants emitted by the emissions unit covered by this permit shall not cause a nuisance, in violation of OAC rule 3745-15-07. If the deposition of coal particulate associated with the facility is deemed a nuisance by Ohio EPA, legal action may be taken.

Please submit a compliance plan and schedule outlining Price Inland Terminal's plans to abate visible emissions of fugitive particulate at the coal storage area.

Acceptance by the Ohio EPA of the above requested compliance plan and schedule 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.

If you have any questions or comments regarding the content of this letter, please feel free to contact me at 740-380-5299 or at michael.carper@epa.state.oh.us.

Sincerely,



Michael Carper
Environmental Specialist II
Division of Air Pollution Control

MC/mlm