



State of Ohio Environmental Protection Agency

Southeast District Office

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

May 14, 2010

RE: Washington County
Mar-Zane Materials, Inc.
Mar-Zane Plant #2
0684020005
Compliance Test Warning Letter

Certified: 70063450000190558911

Mr. Anthony Ruggiero
Mar-Zane Materials, Inc.
P.O. Box 1585
Zanesville, OH 43702-1585

Subject: Response to results of stack tests conducted on September 15 and 16, 2009.

Dear Mr. Ruggiero:

On September 15 and 16, 2009, Chief Environmental Group, LTD (Chief LTD) performed two separate compliance tests at Mar-Zane Inc, Asphalt Plant #2 (Plant #2), 20220 State Route 7, Marietta, OH, on Emission Unit (EU) P901, 190 ton per hour asphalt plant. The test was conducted to meet the requirements of the permit-to-install and operate (PTIO) 06-08394, issued February 23, 2009, and 40 CFR Part 60. Ohio EPA received the test report on October 21, 2009. The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Method(s) 1 – 5, (6) 6C, 7E, 9, 10, and 25. The results of the test showed the source not to be in compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions; please see additional concerns/issues for further explanation.

Test specific conditions are as follows: on September 15, 2009, Chief LTD performed a particulate matter (PE), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) emissions compliance test while burning used oil, 20% recycled asphalt product, 5.23% asphalt concrete and operating at maximum capacity of 190 tons per hour. On September 16, 2009, Chief LTD performed a SO₂, NO_x, CO, visible emissions, and VOC emissions compliance test while burning natural gas, 20% recycled asphalt product, 5.23% asphalt concrete and operating at maximum capacity of 190 tons per hour

Plant #2 permit requirements and test results for EU P901 when burning used oil:

P901 – 190 TPH. Fuel – used oil	Particulate matter	Sulfur dioxide	Nitrogen oxide	Carbon monoxide	Volatile organic compounds
Tested Emission Rate:	0.014 gr/dscf	1.9 lbs/hr	10.0 lbs/hr	16.0 lbs/hr	3.8 lbs/hr
Allowable Emission Rate:	0.04 gr/dscf	7.4 lbs/hr	22.8 lbs/hr	22.9 lbs/hr	14.5 lbs/hr
Source Operating Rate:	190 tons/hr (190 tons/hr Max)				
Isokinetic Rate:	Run #1 – 95.7%	Run #2 – 99.1%	Run #3 – 93.8%		
Test Pressure Drop	2.8 inches of H ₂ O				

Plant 2 permit requirements and test results for EU P901 when burning natural gas:

P901 – 190 TPH. Fuel – used oil	Sulfur dioxide	Nitrogen oxide	Carbon monoxide	Volatile organic compounds	Opacity
Tested Emission Rate:	0.1 lbs/hr	5.2 lbs/hr	11.0 lbs/hr	3.6 lbs/hr	0.69% opacity as a 6 min average
Allowable Emission Rate:	0.9 lbs/hr	12.9 lbs/hr	22.9 lbs/hr	14.5 lbs/hr	20% opacity as a 6 min average
Source Operating Rate:	190 tons/hr (190 tons/hr Max)				
Isokinetic Rate:	Run #1 – 101.7%	Run #2 – 96.4%	Run #3 – 94.9%		
Test Pressure Drop	2.8 inches of H ₂ O				

Additional concerns/issues:

- Per PTIO 06-08394 issued February 23, 2009, Mar-Zane Plant #2 was to conduct emissions testing within 60 days after achieving the maximum production rate for the primary fuel, but no later than 120 days after initial startup of the emissions unit P901. Emissions testing for the secondary fuels was to be conducted within 60 days after the switch to the secondary fuel.

Per information submitted by the facility, Mar-Zane Plant #2 began production on April 13, 2009 and reached maximum production rate on approximately June 9, 2009. The emissions testing for emissions unit P901 was conducted on September 15 and 16, 2009. Based on the information provided, the emissions test should have been conducted by August 8, 2009 in order to comply with Permit Term f)(1)a.i. of PTIO 06-08394.

In an email dated February 8, 2010, you indicated that the plant experienced periods of low production between June and September 2009 due to low market demand for asphalt. Though we understand the facility's inability to have adequate production to carry out required emissions testing on P901, the facility did not comply with the applicable testing requirements of PTIO 06-08394. The Ohio Environmental Protection Agency (OEPA) did not receive a request to extend the period in which the facility could conduct emissions testing for P901. In the future, be aware you are to contact OEPA, Southeast District Office when such situations arise and request an extension to complete the required emissions testing.

- PTIO 06-08394 states that the emissions testing shall be conducted to demonstrate compliance with the allowable mass emissions rates for PE, VOC, CO, NO_x, and SO₂ for the primary fuel. Prior to secondary fuel emission testing, the permittee shall consult the appropriate OEPA District Office or local air agency to determine which pollutants should be tested.

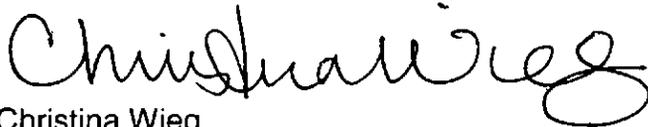
You have indicated to the agency that the primary fuel for Mar-Zane #2 was natural gas and the secondary fuel was used oil. Therefore, the facility was required to test emissions of PE, VOC, CO, NO_x and SO₂ while burning natural gas per the PTIO requirements. The facility submitted results to the agency for VOC, CO, NO_x, SO₂, and Method 9 opacity readings for natural gas.

Through correspondence with you, it was determined that the PE emissions testing was completed while running natural gas, however, you did not submit these results to the agency for review. From the correspondence, it appears you are unaware of whether the filters from the PE test were not processed or were misplaced. You also emphasized that the facility had shown compliance with the applicable PE limitation the day prior while using a "worst case" fuel of used oil, and that in order to fail the PE the next day, the baghouse would have to have bags breaking and visible opacity occurring. The agency acknowledges your arguments; however, by the facility not conducting PE emissions tests for the primary fuel, the facility did not comply with the applicable testing requirements of PTIO 06-08394. At this time, OEPA Southeast District Office will waive the requirement to conduct PE emissions testing on P901 as required by PTIO 06-08394 for natural gas since P901 demonstrated compliance with a "worst case" fuel (used oil) the day prior. However, please be aware that the agency may require the facility to conduct emissions test for PE at a later date such as upon PTIO renewal.

Mr. Anthony Ruggiero
Mar-Zane Materials, Inc.
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If you have any questions or concerns regarding this letter, please feel free to contact me at 740-380-5223.

Sincerely,

A handwritten signature in cursive script that reads "Christina Wieg". The signature is written in black ink and is positioned above the typed name.

Christina Wieg
Environmental Specialist III
Division of Air Pollution Control

CW/mlm

cc: Christina Wieg, DAPC-SEDO (Emissions Unit File Copy)
Marco Deshaies, DAPC-SEDO
Test Report File Copy