



State of Ohio Environmental Protection Agency

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**Central District Office**

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Columbus, OH 43216-1049

**CERTIFIED MAIL # 91 7108 2133 3932 4449 3992**

August 12, 2010

Chase Nichols  
Mid-Ohio Paving, Inc.  
6095 Columbus Road  
Centerburg, OH 43011

**Re: NOTICE OF VIOLATION - Compliance Test Failed**  
**Facility ID: 0142000407**  
**Name: Mid-Ohio Paving, Inc.**  
**Location: 6095 Columbus Road**  
**Centerburg, OH 43011**  
**County: Knox**

Dear Mr. Nichols:

On June 3, 2010, Custom Stack Analysis, LLC performed an emissions test to demonstrate compliance with permitted emission limitations for particulate, sulfur dioxide, carbon monoxide, nitrogen oxide, volatile organic compound, and opacity emission compliance test at the facility, indicated above, on 150 ton per hour drum mix asphalt concrete plant with storage silo, P901. Ohio EPA received the test report on July 29, 2010. 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 Methods 1-5, 7E, 8, 9, 10, and 25. The results of the test showed the source to be out of compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions.

Our test review shows the following:

I.

Pollutant	Allowable Emission Rate	Tested Emission Rate	Violation (Y/N)
Particulate	0.04 gr.dscf	0.31 gr.dscf	Yes
Particulate	0.028 lbs/ton of asphalt	0.26 lbs/ton of asphalt	Yes
Carbon Monoxide	0.15 lbs/ton of asphalt	0.30 lbs/ton of asphalt	Yes
Nitrogen Oxide	0.055 lbs/ton of asphalt	0.05 lbs/ton of asphalt	No
VOC	0.10 lbs/ton of asphalt	0.35 lbs/ton of asphalt	Yes
Sulfur Dioxide	0.14 lbs/ton of asphalt	0.030 lbs/ton of asphalt	No

II. Source Operating Rate: 120 tons of asphalt per hour

III. Isokinetic Rate: Run #1 - 108.70%; Run #2 -104.86%; Run #3 -107.29%

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



Chase Nichols  
Mid-Ohio Paving, Inc.  
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From the way the carbon monoxide emissions were increasing and nitrogen oxide emissions were decreasing throughout the day of the test, it may be due to the burner not being hot enough, leading to incomplete combustion. The burner tuning results may have been useful to determine this, but they were not included in the stack test report. Variability in the CO and NO2 emissions may indicate issues with the combustion system.

According to an email from Shara Dine, dated July 31, 2010, ruptured plates were found in the baghouse, which account for the high particulate emissions.

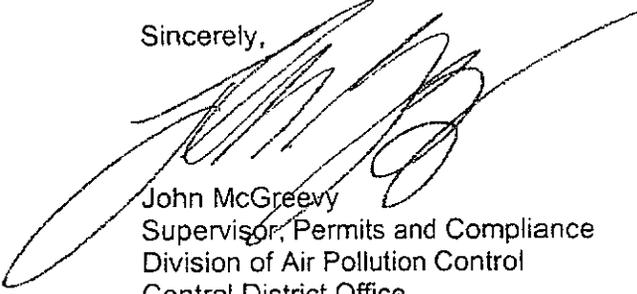
Action Items:

1. Please adjust the burner according to the burner tuning test;
2. Install new plates in the baghouse; and
3. Submit an Intent To Test and retest emissions unit P901 within 45 days of receipt of this letter using methods U.S. EPA Test Methods 1-5, 7E, 9, 10, and 25. Submit this intent to test to the attention of Sara Geary.

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

If you have any questions, please contact Sara Geary of my staff at 614-995-0668 or email [sara.geary@epa.ohio.gov](mailto:sara.geary@epa.ohio.gov).

Sincerely,



John McGreevy  
Supervisor, Permits and Compliance  
Division of Air Pollution Control  
Central District Office

c: Shara Dine, Dine Comply, Inc.

ec: Sara Geary, DAPC, Central District Office, Ohio EPA  
John Paulian, DAPC, Central Office, Ohio EPA