



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 Korteski, Director

September 27, 2007

**Re: Belmont County  
Mar Zane Plant #29  
0607100109 P901  
COMPLIANCE TEST**

**Certified #70063450000190560334**

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

Dear Mr. Ruggiero:

On July 12, 2007, Chief Environmental Group performed particulate, nitrogen oxides, sulfur dioxide, carbon monoxide and volatile organic compounds emission compliance tests at Mar-Zane Plant #29, State Route 40 West, Morristown on the 200 ton per hour asphalt batch plant (Emissions Unit P901). Ohio EPA received the test report on August 21, 2007. 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, 6C, 7E, 10 and 25. The results of the test showed the source to be in compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions.

Our test review shows the following:

	<u>Particulate</u>	<u>SO<sub>2</sub></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOC</u>
Tested Emission Rate:	0.04 gr/dscf	15.4 lbs/hr	13.8 lbs/hr	13.3 lbs/hr	10.8 lbs/hr
Allowable Emission Rate:	0.04 gr/dscf	17.6 lbs/hr	24.0 lbs/hr	80.0 lbs/hr	28.5 lbs/hr
Source Operating Rate:	142 tons/hr				
Isokinetic Rate:	Run #1 - 93%; Run #2 - 93%; Run #3 - 98%				

Because Emissions Unit P901 was only marginally compliant with the particulate and SO<sub>2</sub> emissions limits at an operating rate of 142 tons/hour (~71% of the maximum permitted operating rate), Mar-Zane may not operate this unit above the tested operating rate unless compliance with the particulate emissions limitation is demonstrated through an Ohio EPA-approved compliance test at the higher rate within 30 days of exceeding the tested rate. Further, as noted in my inspection letter dated July 18, 2007, there is concern that the capture system for the asphalt plant may not be achieving the 99.95% capture rate specified in the permit, and as a result, it is likely these compliance tests did not measure all pollutants being generated in the asphalt batch process. To date, no response to my July 18, 2007 letter has been received, even though a response was requested within 30 days of your receipt of the letter. Again, I am requesting, within fourteen (14) days of your receipt of this letter, an evaluation of the capture rate for the emissions control equipment for P901 and either confirmation that the required capture rate is being achieved, or if not, a compliance plan and schedule outlining the steps the company will take to improve the capture of the system such

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that fugitive particulate emissions from the batch plant are minimized or eliminated as required by Ohio Administrative Code (OAC) rule 3745-17-08(B). Note that additional compliance testing will be required in the event it is determined that 99.95% capture was not being achieved by the control equipment during the July 12, 2007 compliance tests.

All test information will be used by Ohio EPA personnel for permit processing and source compliance review. Please refer any questions concerning the above requirements to me at 740-380-5245 or [kim.reinbold@epa.state.oh.us](mailto:kim.reinbold@epa.state.oh.us).

Thank you for your cooperation in this matter.

Sincerely,



Kimbra Reinbold  
Division of Air Pollution Control  
Southeast District Office

KR/mlm

cc: Dean Ponchak, DAPC-SEDO w/ CETA summary attachment  
Emissions Unit File Copy  
Test Report File Cop

**DIVISION OF AIR POLLUTION CONTROL-SEDO**  
**CETA APPENDIX K DATA**  
**Stack Test Review Summary Form**

**FACILITY INFORMATION**

FACILITY NAME: Mar-Zane Plant 29

COUNTY: ~~Muskingum~~/Belmont

FACILITY ID: 0607100109 P901

SCC: 3 05 002 47

**EMISSION TEST INFORMATION**

POLLUTANT(S) TESTED: particulate, NOX, VOC, CO, SO2

INTENT TO TEST (ITT) NOTIFICATION SUBMITTED: July 3, 2007

SCHEDULED TEST DATE FROM ITT: July 12, 2007

TESTING FIRM: Chief Environmental Group,

DATE TEST CONDUCTED: August 12, 2007

**DAPC-SEDO TEST OVERSIGHT**

NAME OF DAPC-SEDO STAFF WITNESS: Kim Reinbold

WERE ALL RUNS WITNESSED? YES

\*IF NO PROVIDE EXPLANATION:

IS STACK TEST FIELD FORM COMPLETE? YES

WERE AUDIT SAMPLES TAKEN? NO

**EMISSION UNIT INFORMATION**

EMISSION UNIT ID#: P901

EMISSION UNIT DESCRIPTION: 200 tons/hr asphalt plant

**EMISSION UNIT MONITORING AND CONTROL**

LIST EU MONITORING EQUIPMENT: none

LIST EU CONTROL EQUIPMENT: baghouse

**TEST REPORT**

TEST REPORT REVIEWER: Lisa Duvall

DATE TEST REPORT RECEIVED AT SEDO: August 21, 2007

POLLUTANT: particulate TEST METHOD: 1-5  
ALLOWABLE EMISSION RATE (UNITS): 0.04 gr/dscf  
AVERAGE TEST EMISSION RATE (UNITS): 0.04 gr/dscf  
MAXIMUM PERMITTED OPERATING RATE FOR EU: 200 tons/hr  
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 142 tons/hr  
TEST PASSED YES  
DATE TEST RESPONSE LETTER SENT TO FACILITY: September 24, 2007

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POLLUTANT: SO2 TEST METHOD: 6C  
ALLOWABLE EMISSION RATE (UNITS): 17.6 lbs/hr  
AVERAGE TEST EMISSION RATE (UNITS): 15.2 lbs/hr  
MAXIMUM PERMITTED OPERATING RATE FOR EU: 200 tons/hr  
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 142 tons/hr  
TEST PASSED YES  
DATE TEST RESPONSE LETTER SENT TO FACILITY: September 24, 2007

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POLLUTANT: NOX TEST METHOD: 7E  
ALLOWABLE EMISSION RATE (UNITS): 24.0 lbs/hr  
AVERAGE TEST EMISSION RATE (UNITS): 13.8 lbs/hr  
MAXIMUM PERMITTED OPERATING RATE FOR EU: 200 tons/hr  
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 142 tons/hr  
TEST PASSED YES  
DATE TEST RESPONSE LETTER SENT TO FACILITY: September 24, 2007

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POLLUTANT: CO TEST METHOD: 10  
ALLOWABLE EMISSION RATE (UNITS): 80.0 lbs/hr  
AVERAGE TEST EMISSION RATE (UNITS): 13.3 lbs/hr  
MAXIMUM PERMITTED OPERATING RATE FOR EU: 200 tons/hr  
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 142 tons/hr  
TEST PASSED YES  
DATE TEST RESPONSE LETTER SENT TO FACILITY: September 24, 2007

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POLLUTANT: VOC TEST METHOD: 25  
ALLOWABLE EMISSION RATE (UNITS): 28.5 lbs/hr  
AVERAGE TEST EMISSION RATE (UNITS): 10.8 lbs/hr  
MAXIMUM PERMITTED OPERATING RATE FOR EU: 200 tons/hr  
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 142 tons/hr  
TEST PASSED YES  
DATE TEST RESPONSE LETTER SENT TO FACILITY: September 24, 2007

**I HEREBY VERIFY THAT THE INFORMATION CONTAINED WITHIN THE STACK TEST REPORT HAS BEEN REVIEWED AND IT HAS BEEN DETERMINED THAT THE TEST PROCEDURES, ANALYSES, AND CALCULATIONS ARE:**

**AN ACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED TESTING METHODOLOGY**

**AN UNACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED TESTING METHODOLOGY**

August 30, 2007

Lisa Duvall

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Date of Review

Reviewed by