Ohio | Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Wood County
Stoneco, Inc. - Portage Quarry
11580 South Dixie Highway
Portage, OH 43451
Premise #0664960067
Premise #0664000125
Inspection Letter
Notice of Violation

May 6, 2011

Mr. Lee Wehner
Quarry Superintendent
Stoneco, Inc.
1360 Ford Street
Maumee, Ohio 43537

Dear Mr. Wehner:

This letter shall serve as the follow-up to the inspection conducted on April 15, 2011, at the above-referenced facility. The purpose of the inspection was to determine the compliance status of the portable air contaminant sources located at this facility with the rules and regulations of the Division of Air Pollution Control (DAPC). I was accompanied to the site by Ms. Carol Norman, the Wood County contact.

Based on our discussions with you, our observations during the inspection, and a review of the company files at the Northwest District Office (NWDO), the findings are summarized as follows:

1. The facility currently identified as premise number 0664960067 was issued Permit to Install (PTI) number 03-13781 on September 12, 2002, (emissions unit is an 1153 horsepower diesel-fired generator identified as P002). This generator has not operated since 2007. Southeast District Office (SEDO) is currently processing the Permit to Install and Operate (PTIO) for this emissions unit. Any questions you may have regarding the processing of this PTIO can be directed to Ms. Sandra Colegrove at (740) 380-5201 or sandra.colegrove@epa.ohio.gov.

2. The facility currently identified as premise number 0664000125 was issued Permit to Install (PTI) number 06-08328 on November 27, 2007. The fee emission report submitted twice on April 13, 2011 and once on April 25, 2011 contains a few errors that need to be addressed.

It notes that the diesel engine operated for 1790 hours during 2010. That is the operating limit for the engine but the actual operation time was only 500 hours. In addition, the diesel fuel usage was noted as 1,185,000 gallons in the fee emission report. The correct number that was tabulated during the inspection based on the records was only 1,246 gallons. Please look into this discrepancy and correct accordingly.

In the second quarter of 2010, you reported that on 4/23/2010 this generator utilized 25 gallons of high sulfur fuel (>0.5%). On 4/30/2010, an additional 20 gallons of this high sulfur fuel was used.

The PTI's Operational Restrictions states:

1. *The permittee shall only burn low sulfur No. 2 diesel fuel, containing no greater than 0.5% sulfur by weight, in this emissions unit.*

Yet on your cover letter, you stated there were no deviations for the emission unit P901. A utilization of any fuel other than what is permitted is a deviation from the PTI and should be reported as such.

Also, the PTI requires the fuel deviation to be reported in a timely manner:

2. *The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.*

This use of high sulfur fuel was reported to the Southeast District Office (SEDO) on July 31, 2010, which is greater than the 30 days required by the PTI.

In the future, please report deviations in accordance with the PTI.

It was also noticed that the required NSPS test on the plant has not been completed. You may remember a test was performed on the Fold N Go plant on August 20, 2008, but the results were invalid; as the test was not performed in accordance with the PTI, which required a test be conducted when the generator was operating at or near capacity. The test was conducted at far below the capacity of the generator.

Please respond to the violations noted above directly to Ms. Colegrove, SEDO, concerning the deviation report discrepancy as well as the required NSPS test within 30 days of the receipt of this letter.

Please be advised that the submission of information to respond to this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you have any questions and/or concerns regarding this letter, please contact me at (419) 373-3118 or mohammad.smidi@epa.ohio.gov. Thank you for taking the time out of your schedule to accommodate this inspection.

Sincerely,

Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/llr

pc: Beth Mowrey
DAPC-NWDO Facility File
DAPC-SEDO Facility File

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