



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 Korleski, Director

September 24, 2009

**Perry County**  
**Oglebay Norton Industrial Sands, Inc.**  
**Facility ID # 0664000087**  
**2009 Compliance Inspection**  
**Notice of Violation**  
**HPV-GC7**

**Certified: 70073020000178847664**

Tom Himes  
Oglebay Norton Industrial Sands, Inc.  
2446 Glass Rock Road  
Glenford, OH 43739

Dear Mr. Himes:

On September 10, 2009, I met with you to conduct a Title V inspection at your Glenford, Ohio facility. The inspection was conducted to determine the facility's compliance with state and federal air pollution rules and regulations. There are currently 16 non-insignificant sources permitted at your facility:

- F005 - Glass sand bulk loadout
- F007 - Steel sand storage silos
- F009 - Sand dryers related process equipment
- F010 - Plant stockpiles
- F011 - Plant haul roads
- F013 - Quarry blasting
- F014 - Quarry haul roads
- P902 - Ball mill 1
- P903 - Ball mill 2
- P904 - Ball mill 3
- P905 - Flotation dryer
- P906 - Finish Dryer
- P907 - Steel sand dryer
- P909 - Flint bagger/palletizer
- P910 - Starkaire fluid bed dryer
- P911 - RSG air classifier

Oglebay Norton Industrial Sands, Inc. was issued a Title V permit on June 13, 2001; that permit expired on June 13, 2006, and Ohio EPA received the renewal application on January 26, 2006. The renewal application is currently in review at this office.

At the time of the inspection, emissions units F005, F010, F011, F013, F014, P909, and P912 were in operation and appeared to be in compliance. Emissions units F007, F009, P902, P903, P904, P905, P906, P907, and P911 were not in operation at the time of the inspection.

### Compliance issues

P910 - Starkaire fluid bed dryer - The scrubber was operating and no visible particulate emissions were noted from the scrubber stack. The duct work leading to the scrubber was in poor repair and there were two visible holes. Particulate emissions were observed escaping from these holes in the duct work.

40 CFR Part 60, Subpart UUU, requires that you have monitoring devices in place that continuously measure and record the pressure loss of the gas stream through the scrubber and the scrubbing liquid flow rate to the scrubber. At the time of my inspection, the required monitoring and recording equipment for pressure drop was not functioning properly and the accuracy of the device was in question. A handheld device measured the pressure drop across the scrubber to be between 1.0 and 1.5 inches of water, though the chart recorder in the control room measured it to be approximately 2.5 inches of water.

This unit has a history of non-compliance. On September 10, 2003, Sarah Harter performed an inspection. She included in her September 30, 2003, inspection/NOV letter that monitoring and record keeping were not in compliance and that control equipment was in poor maintenance. In my September 27, 2007, inspection/warning letter, these same issues were still found to be unresolved. Since that time, effort has been made to bring the unit back into compliance. The scrubber was replaced and according to your December 2, 2008, letter, on January 1, 2008, monitoring and recording devices were installed for both pressure drop and flow volume, but were not operating properly until August 14, 2008. From August 2008 to the day of the inspection, there is a record of deviations in your records and compliance reports showing the pressure drop monitoring and recording devices are often not working properly. The current equipment installed for monitoring and recording pressure drop does not appear to be adequate for this emissions unit to consistently maintain compliance.

General house keeping – The leach plant building housing emissions units P905, P906, and associated control equipment and the building housing P909, P912, and associated control equipment had large deposits of fine sand on the roofs. This presents not only a safety hazard but also a source of fugitive particulate emissions. The interior of the buildings also had drifts of sand and coatings of sand on ductwork and control equipment. This is indicative of past equipment failures and/or leaking ductwork. This sand needs to be cleaned up and the sources of sand found and repaired.

Please provide Ohio EPA, within thirty (30) days of your receipt of this letter, a compliance plan and schedule that outlines the steps that you will take to resolve these violations and ensure compliance with the applicable permit conditions and state and federal air pollution regulations as indicated above.

Acceptance by Ohio EPA of the above requested information does not constitute a waiver of 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 Ohio EPA at a later date.

Tom Himes  
Oglebay Norton Industrial Sands, Inc.  
September 24, 2009  
Page 3

During the inspection, I also reviewed your records, as required by your Title V permit, and all appear in order. I would like to thank you for your assistance with this inspection. A copy of the inspection forms are attached for your records. If you have any questions or need additional information, please contact me by phone at (740) 380-5234 or email at [joseph.laughery@epa.state.oh.us](mailto:joseph.laughery@epa.state.oh.us).

Sincerely,



Joseph H. Laughery  
Environmental Specialist  
Division of Air Pollution Control

JHL/mlm

Enclosure