



State of Ohio Environmental Protection Agency

Southeast District Office

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

August 18, 2008

RE: Muskingum County

Mr. Tony Ruggiero
Mar-Zane Materials, Inc.
3570 South River Road
Zanesville, Ohio 43701

SUBJECT: Information Request in Response to Site Inspection of S&S Aggregates Finlay Plant 3 (0660950008) and MarZane Screen Plant 12 (0660950028).

Dear Mr. Ruggiero:

On August 11, 2008 and August 15, 2008, Christina Wieg and I visited S&S Aggregates mine site located near the intersection of Enterprise-Iles Road and Chieftain Drive in Enterprise, Ohio. I would like to thank Mr. Nick Jarrett for his assistance at the time of our site visit. The purpose of our inspection was to determine which facilities were on site and if they were in compliance with all applicable state and federal air regulations.

S&S Aggregate Plant #3

Records were reviewed for roadways (F002) and storage piles (F003). PTI 06-07649 issued May 25, 2006 [Part II.C.3.a(F002) and Part II.C.6.a(F003)], requires that the date and reason that any required daily inspection was not performed be recorded. Multiple dates were missing in the records for roadways and storage piles. It was determined that these missing records were days when the facility was not operated. Please begin recording the dates that you did not complete an inspection and the reason why the inspection was not completed, including dates the plant did not operate, in accordance with the permit.

PTI 06-07649 also requires that daily inspections be completed for the plant and all material handling operations listed in Part II.A.2.a of F001. No records were available on-site for the screening plant. Mr. Jarrett did not seem to be aware of any requirements to inspect the plant. Please provide this office with all inspection logs for S&S Aggregate Screen Plant #3 from 2003 to present.

MarZane Plant 12

Records were not available for this facility at the time of our site inspection. Mr. Jarrett indicated that when the plant was relocated to Enterprise, no inspection logs were brought with the facility. He also indicated that the plant was brought on site

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approximately two weeks ago. Please provide the date that the plant was moved to this site, the date that it began operating, and the first date that inspections, as required by the FESOP for P901 and the PTO for F001 and F002 issued on February 20, 2008, were completed. Also, please provide a copy of inspection log forms used by the facility for review by this office. Please provide the above requested information by **September 15, 2008**.

Please be aware that failure to keep the required records is a violation of OAC rule 3745-15-03(A) and applicable permits. This office requests that you audit the recordkeeping requirements of all applicable permits for the portable aggregate processing plants operated by S&S Aggregates and MarZane and submit the results of the audit to this office by **September 30, 2008**.

Roadways

A visual determination of fugitive emissions, in accordance with U.S. EPA Method 22, was conducted on the plant roadways at the time of our site inspection. As I started my Method 22 observation, facility personnel began applying water to the plant roadways. The accumulated time of observed particulate emissions was 1 minute and 4 seconds in a 34 minute observation period. In accordance with the FESOP issued for roadways associated with MarZane Screen Plant 12 and S&S Aggregate Plant 3, roadways are restricted to no visible particulate emissions except for 3 minutes during any 60-minute period per OAC rule 3745-31-05(A)(3). Roadways appear to be in compliance with the applicable rules. Please ensure that the water truck is being operated frequently in order to continue to comply with the visible particulate emission limitation in your permit.

Drag-Out onto Public Roadways

It was noted while exiting the site that there is considerable drag-out onto Chieftain Drive. The PTO and PTI 06-07649 for paved and unpaved roads (F001) associated with Mar-Zane 12 and S&S Aggregate Screen Plant 3, respectively, requires that the permittee promptly remove, in such a manner as to minimize or prevent suspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment. Please have the plant personnel remove deposited material from Chieftain Drive as soon as possible and provide a description of measures that will be taken by MarZane in the future to ensure that deposited material is promptly removed.

Controls

PTI 06-07649 for the S&S Aggregate Plant #3 [Part II.a.1 (F001)] states that this emissions unit shall use best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. In addition, the application submitted by S&S Aggregate on September 24, 2004 stated that this is a washing plant (wet system)

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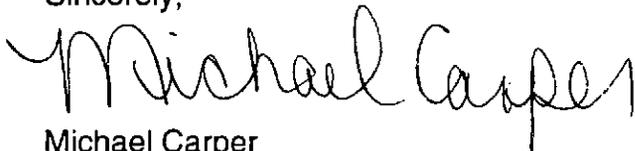
and would have continuous application of the control to the screening operation. Last October, I spoke with Mr. Brian Exline regarding Mar-Zane Plant #3 and #17 and he explained that the amount of dust seemed to be dependent on the type of material from the site being loaded into the screener. In order to minimize dust, water bars should be installed so that, should it become necessary to apply water to the material, they are readily available for use. Spray bars were located in storage on site and Mr. Jarrett stated that it would take between a half day and a day to get the water bars in place.

Please install the water spray bars on S&S Aggregate Plant #3. It is my understanding that S&S Aggregate plant #17 will be returning to the Enterprise location in the near future. Please ensure that all control devices and measures required by the applicable permit are installed so that they are readily available for use should the facility personnel determine through inspections that the application of controls is needed. Please submit to this office the date that the spray bars are attached to S&S Aggregate Plant #3 and the date that S&S Aggregate Plant #17 is relocated to the Enterprise site so that I may inspect it to determine if it is operating in compliance with all applicable federal and state air pollution regulations and laws. Please provide this information by **September 15, 2008**.

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 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.

If you are unable to respond to any part of this request within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions, feel free to contact me at (740) 380-5299.

Sincerely,



Michael Carper
Environmental Specialist II
Division of Air Pollution Control

MC/mlm

Site Visit Report

F002	Roadways	yes (8/11/08 and 8/15/08)	Yes	No
F003	Stockpiles	yes (8/11/08 and 8/15/08)	Yes	No

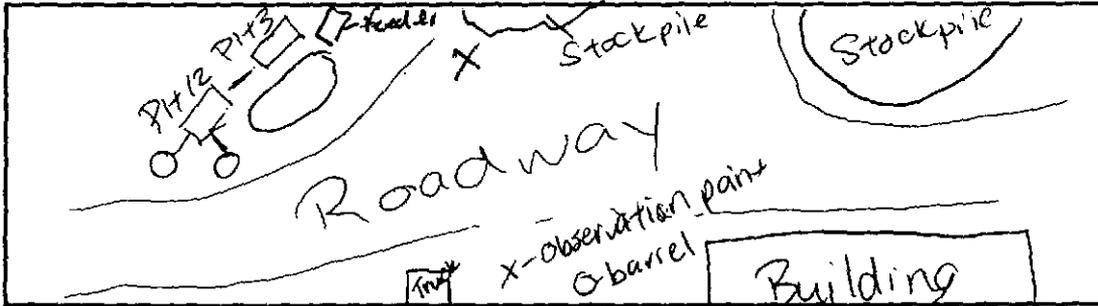
Inspector: Michael Carper
Print Name

Signature

FUGITIVE OR SMOKE EMISSION INSPECTION OUTDOOR LOCATION

Company <u>Sts Agaph 3</u>	Observer <u>Carper</u>
Location <u>Enterprise, OH</u>	Affiliation <u>DEPA</u>
Company Rep. <u>Nick Jarrett</u>	Date <u>8/11/08</u>
Sky Conditions <u>Overcast</u>	Wind Direction _____
Precipitation <u>None</u>	Wind Speed <u>0-8</u>
Industry _____	Process Unit <u>Roads</u>

Sketch process unit: indicate observer position relative to source and sun, indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation Period Duration, min:sec	Accumulated Emission Time, min:sec
Begin Observation	<u>10:45</u>	_____	_____
	_____	_____	_____
break	<u>11:07</u>	<u>22min</u>	<u>0:50min</u>
	_____	_____	_____
start	<u>11:12</u>	_____	_____
	<u>11:24</u>	<u>34min</u>	<u>1:04</u>
	_____	_____	_____
End Observation	_____	_____	_____