



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

October 15, 2012

RE: Perry County
Hocking Valley Concrete
Facility ID 0664000016
Notice of Violation
Non HPV

Certified: 70102780000197044923

Mr. David Vaughn
Hocking Valley Concrete
35255 Hocking Drive
Logan, OH 43138

Dear Mr. Vaughn:

On October 1, 2012, Racheal Sams, Jessica Kelley and I conducted a site visit at Hocking Valley Concrete located at 1500 Commerce Drive in New Lexington, Perry County, Ohio. Jim Thomas, the plant manager, was present throughout the site visit. The site visit was conducted to determine the facility's compliance with the current Permit-to-Install (PTI) terms and conditions and state and federal air pollution control rules and regulations prior to issuing a renewal permit to install and operate (PTIO).

The emissions units (EUs) located at Hocking Valley Concrete are as follows:

- F001 – Storage silo;
- F002 – Weigh hopper and transit mix truck loading; and
- B002 – 2.2 mmBtu/hr gas-fired boiler.

A PTI (06-2517) was issued for EUs F001, F002 and B002 on November 22, 1989. EU B002 was issued a PTO (P0040147) on December 29, 1989, and placed on registration status and EU F002 was issued a PTO (P0090254) on March 16, 1990, and placed on registration status. EU F001 was issued a PTO (P0090253) on February 12, 1998, which expired on February 12, 2003. On October 24, 2002, a renewal PTIO application was submitted for EU F001. This application is currently under review.

In reviewing the facility records, including the renewal PTO applications submitted on March 13, 1996, and October 24, 2002, I noticed that Hocking Valley Concrete relocated from 120 Mechanic Street in New Lexington to 1500 Commerce Drive in New Lexington. When I reviewed the facility files, I did not find a relocation request or new PTI and PTO applications for the emission units. A review of the files show that Ready-Mix Concrete Products, Inc., located at 120 Mechanic Street in New Lexington was sold to Hocking Valley Concrete on

December 31, 1992. Hocking Valley Concrete assumed operations at this site according to a letter submitted on March 26, 1993, by Ready-Mix Concrete Products, Inc. The renewal PTO application submitted on March 16, 1996, still listed the facility address as 120 Mechanic St., New Lexington. The renewal PTO application received on October 24, 2002, listed the facility address as 1500 Commerce Drive in New Lexington.

Based upon this information, Hocking Valley Concrete moved to the new location between 1996 and 2002. When I spoke with Jim Thomas, he indicated that the equipment is fairly new and has been located at this site for approximately 16 years.

Based on the above, the following violation needs to be addressed:

**(1) Failure to obtain a PTIO prior to installation or modification, and subsequent operation of any new source
Ohio Administrative Code (OAC) rule 3745-31-02(A)(1)(b)**

The Ohio Administrative Code (OAC) rule 3745-31-02(A)(1)(b) states that:

“(A) Permit-to-install or PTIO

(1) Except as provided in rule 3745-31-03 of the Administrative Code, no person shall cause, permit, or allow the: ...

(b) Installation or modification, and subsequent operation of any new source that is not part of a facility, as defined in Chapter 3745-77 of the Administrative Code, and that is not required to obtain a Title V permit under Chapter 3745-77 of the Administrative Code, without first obtaining a PTIO from the director;”

Hocking Valley Concrete installed or modified and subsequently operated a new source without first obtaining a PTIO at its new address of 1500 Commerce Drive, New Lexington, Ohio, constituting a violation of Ohio Administrative Code (OAC) rule 3745-31-02(A)(1)(b).

Within 30 days of your receipt of this letter, please submit to this office a plan and schedule that details the company’s strategy and timeline to submit the requested PTIO applications for the emissions units that are currently operating at this new site.

Comments:

- **New facility ID:** Once you have submitted the required PTIO applications, the current facility ID 0664000016 for Hocking Valley Concrete will be shut down and a new ID for the facility will be assigned.
- **EUs B001 (880,000 Btu/hr gas boiler) and P001 (160,000 lbs/hr ready-mix concrete process):** These two EUs were still listed as operating in the facility profile. Based on the site visit, file review and discussion with Jim Thomas, it appears that these two EUs were from the original plant and that EUs B002, F001 and F002 replaced these units. I designated these EUs as permanently shut down in the current facility profile.

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- **Visible Emissions from EU F002:** While on site, visible fugitive emissions were observed during truck loading. The current control requirements for F002 under PTI 06-2517 states that, "*There shall be no visible emissions of particulate emissions from this source.*" BAT will apply under the new permit, and the General Permit for Truck Mix Ready Mix Concrete Batch Plants (4.1 template) specifies that a control system will operated at all times trucks are being loaded and shall be sufficient to minimize or eliminate visible emissions of fugitive dust.

I have enclosed information for Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP). Ralph Witte is the OCAPP contact for Ohio EPA's Southeast District Office, and his business card is enclosed. Please contact Mr. Witte at (740) 380-5241 if you would like assistance in submitting a PTIO application for B002, F001 and F002, and making a compliance plan and schedule in order to return the facility to compliance.

Acceptance by Ohio EPA of submitted 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.

If you are unable to respond to any part of this request within the time frame discussed above, please contact me so that I may be of assistance. Should you have any questions or concerns, please feel free to contact me by telephone at (740) 380-5259 or via email at miki.mercer@epa.state.oh.us.

Sincerely,



Mykal L. Mercer
Environmental Specialist II
Division of Air Pollution Control
Southeast District Office

MLM/cs

Enclosures

cc: Cory Hann, Hann Manufacturing
Dean Ponchak, Acting Manager, DAPC-SEDO
Sarah K. Harter, Supervisor, DAPC-SEDO
Ralph Witte, OCAPP-SEDO
Bruce D. Weinberg, DAPC/CO
Michele Jencius, U.S. EPA, Region V