

**Environmental  
Protection Agency**

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

September 26, 2012

Re: Washington County  
Marietta Industrial Enterprises  
Facility ID # 0684000148  
Title V Inspection  
Certified: 70102780000197044848

Scott Elliott  
Marietta Industrial Enterprises  
17943 State Route 7  
Marietta, OH 45750

**Subject: Response to Title V full compliance inspection conducted September 13, 2012**

Dear Mr. Elliott:

On September 13, 2012, I performed a Title V full compliance inspection of the Marietta Industrial Enterprises (MIE) facility in Marietta. During the September 13, 2012, site visit, MIE representatives Eric Taylor and you escorted me and Ohio EPA representative Sara Anderson throughout the facility. The inspection was conducted to determine the facility's compliance with the applicable state and federal air pollution rules and regulations.

The facility's Title V permit expired July 12, 2007. The agency received a revised renewal application on December 21, 2011, and is pending at the agency.

- The agency received multiple requests from MIE to permanently shut down and withdrawal a number of emission units that are currently included in the Title V permit. The agency has since processed the request and permanently shut down/withdrawn the following emission units:

**F017** (Fine Screening and Briquetting);

**F021** (Portable Screening & Conveying of Cement Clinkers and Screening and Conveying at Xenia Ohio);

**F022** (#4 crushing system, controlled with a baghouse);

**F024** (#1 Loading Station);

**F912** (Smico Screeners);

**F028** (#1 Cored Wire System);

**P903** (Briquetting Plant);

**P907** (Stedman Sizing System);

**P908** (Air Bagger, controlled with enclosures and baghouse);

**P910** (#1 Fume Storage Silo);

**P911** (Ball & Pebble Mill);

**P916** (#3 and #4 Crushing and Screening System);

**P917** (Ferro Alloy Brick Press);

**P923** (2.8 TPH picking operation);

Southeast District Office  
2195 Front Street  
Logan, OH 43138-8637

740 | 385 8501  
740 | 385 6490 (fax)  
[www.epa.ohio.gov](http://www.epa.ohio.gov)

**P924** (Drying and Screening system); and  
**P928** (Pelletizer)

- It was determined during the site visit and through follow-up correspondence with the facility that the following Title V permitted non-insignificant and insignificant emissions units are located at the facility but may have not operated in 2 or more years and have not been withdrawn:

**F005** (Ferrosilican Mill System);  
**F013** (Rodmill Rotex);  
**F030** (CEC Screen-it Portable Screen with Two Conveyors);  
**P929** (Manganese Ore Crusher);  
**P905** (#1 Packaging System); and  
**F019** (Ferro Alloy Bagger)

**Ohio EPA is requesting that the facility submit the current status of the above emissions units including the last date of operation. Please also include a request to withdraw any emissions units that are permitted at the facility but no longer located on the MIE property within 30 days of receiving this letter.**

A number of the above-referenced emissions units appear to have been partially dismantled and/or stripped of vital parts. Prior to the facility operating the above-referenced emissions units, the Ohio EPA, Division of Air Pollution is requiring that the facility submit updated Permit-to-Install (PTI) applications and associated Emission Activity Category (EAC) forms in order to determine if the above-referenced emissions units have been modified as defined per Ohio Administrative Code (OAC) rule 3745-31-01.

- The following emissions units transferred ownership to Mr. Dan Bolender of Well Site Supply effective on May 22, 2012 and are now under Facility ID 0684015013.  
**P901** (#1 Crushing and Screening System)  
**P906** (Bulk Material Handling Tuck Load-Out)

Though MIE and Well Site Supply will be considered one facility for Title V permitting applicability, these emissions units will be owned and operated by Well Site Supply as their own separate facility. The facility will be responsible for requesting a Title V operating permit via Air Services.

- The following emissions units transferred ownership to Mr. Carl Baker of Riverside Bulk Terminals LLC effective on May 30, 2009, and are now known as Marietta Industrial Enterprise (M.I.E.) - Dockside (Facility ID 0684015004):

**F001** (Material Handling Dockside);  
**F003** (Storage Piles Dockside); and  
**F029** (Coal Load out Station).

Though these emissions units no longer belong to MIE, MIE had requested that they remain operating under MIE's current Title V permit as the operator of the emissions units. **If MIE is no longer the operator of the MIE Dockside emissions units please notify our office within 30 days of receiving this letter.**

- The following Title V permitted non-insignificant emissions units are still present at MIE and have not been withdrawn to-date:

**F011** (Dump Station);  
**F014** (Roadway and Parking Areas);  
**F016** (Storage Piles);  
**F020** (Portable Conveying System);  
**P012** (#1 Rotex);  
**P904** (#2 Crushing and Screening System);  
**P905** (#1 Packaging System);  
**P921** (#3 Rod Mill); and  
**P926** (Manganese Ore Milling Operation)

During the September 13, 2012 inspection none of the above sources were operating except for the roadways and the storage piles associate with the facility. Therefore, complete compliance with the applicable state and federal air pollution rules and regulations was not able to be determined. Please note the following comments regarding the inspection below:

**F016** (Storage Piles) - This emission unit includes those storage piles associated with the ferro alloy side of the facility (not dockside). It was noted during previous inspections that many of the storage piles have not been used or moved in some time. Ohio EPA encourages the facility to properly dispose of any storage piles that no longer serve a purpose for the facility. It appears that the facility has removed some storage piles on site; however a significant amount of carbon and other piles are still present on site.

**F020** (Portable Conveying System)

During the site visit Mr. Taylor indicated that this conveyor may be part of the new load out station (P906). Please confirm if this is the case and if this emissions unit needs to be shut down. In addition, it is unclear the last date of operation for this emissions unit and if spray bars or a baghouse are being used to control this source when it is operating. **Please submit the requested information for this emissions unit within 30 days of receiving this letter.**

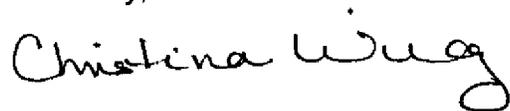
**P012** (#1 Rotex) – This emissions unit was not adequately labeled in order to aid in identification. **Please label this emissions unit within 30 days of receiving this letter.**

**P921** (#3 Rod Mill); and **P905** (#1 Packaging System) – Please provide the last date of operation for these two emissions units. **Please submit the requested information for these emissions unit within 30 days of receiving this letter.**

In conclusion, many of the emissions units at MIE are nonoperational or operate sporadically due to the nature of the business making it difficult for Ohio EPA to determine compliance with applicable air pollution regulations. Ohio EPA's failure to list specific deficiencies or violations in this letter does not preclude MIE from having to comply with all applicable regulations.

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) 380-5223 or email [christina.wieg@epa.state.oh.us](mailto:christina.wieg@epa.state.oh.us).

Sincerely,



Christina Wieg  
Environmental Specialist III  
Division of Air Pollution Control  
Southeast District Office

CW/cs

Enclosure: Title V Inspection Forms

cc: Dean Ponchak, DAPC/SEDO