



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

October 17, 2012

Re: Harrison County  
Dust Complaint  
Complaint 30002555  
Notice of Violation – Non HPV

**Certified: 70102780000197062132**

Steven Reese  
Scio Packaging Company  
38510 Crimm Road  
Scio, Ohio 43988

Dear Mr. Reese:

I am writing this letter in response to a complaint received on September 18, 2012, about your facility, Scio Packaging Company, located at 38510 Crimm Road, Harrison County. The complaint alleges that Scio Packaging allowed the emissions of excessive lime dust that traveled as far as Harrison North Elementary School, located at 322 West Main Street, in Scio.

On September 27, 2012, Sandra Colegrove and I investigated this complaint. You were not available at the time of this investigation but your brother, and partial owner of the facility, Chris Reese showed us around the facility.

**Observation:**

During the investigation, Chris Reese stated he was not aware of any dust problems as mentioned in the complaint. When speaking with Matt, an operator at the facility, he stated that approximately two weeks ago the lime silo was overfilled and a large amount of lime dust was released. He believes this is what caused the event. Overfilling of the lime silo qualifies as a malfunction of air pollution control equipment. In Ohio Administrative Code (OAC) rule 3745-15-06(B)(1) it states:

*"In the event that any emission source, air pollution control equipment, or related facility breaks down in such a manner as to cause the emission of air contaminants in violation of any applicable law, the person responsible for such equipment shall immediately notify the Ohio environmental protection agency district office or delegate agency of such failure or breakdown."*

**Violation:**

By not immediately reporting this malfunction to Ohio EPA, Scio Packaging Co. is in violation of OAC rule 3745-15-06(B)(1).

**Requested Action:**

Ohio EPA requests Scio Packaging Co. immediately comply with all applicable OAC rules.

**Observation:**

Upon arrival to the facility, we observed a large amount of debris toward the back of the facility by the truck loading silos. Chris explained this debris was from a fire that destroyed part of the building. He stated that this fire was caused by the burning of pallets by Scio Packaging Company in close proximity to the building. On top of the debris was a burn barrel in which open burning was occurring during our investigation. It appeared that wood debris, from the demolition of the building, and paper was being burnt. As I explained at that time **businesses cannot open burn for waste disposal purposes**, not even paper, cardboard or other wood waste. It is also important to note that any type of waste material that is hauled to a property from another location also cannot be open burned in Ohio.

**Violation:**

Open burning of improper waste materials at this location is in violation of OAC rule 3745-19-03 and is punishable by a maximum fine of up to \$25,000 per day per violation. I am enclosing a pamphlet that explains this rule for you. All open burning in violation of the requirements specified in OAC rule 3745-19-03 must stop immediately. If you continue to open burn improper waste materials at this location or any other location in Ohio, legal action may/will be taken against you.

**Requested Action:**

**Please provide a written response, within 14 days of receipt of this letter**, which includes a commitment from you to stop open burning in violation of OAC rule 3745-19-03, a plan and schedule for cleanup of the burn area and any remaining solid waste materials, and a copy of the landfill receipt as proof of proper disposal. Acceptance by Ohio EPA of this 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 to decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

A copy of this letter is being forwarded to Ohio EPA's Division of Materials and Waste Management (DMWM). The information in this letter will be evaluated by DMWM and further investigation may be initiated if it appears violations within their jurisdiction have occurred.

**Observation:**

During the investigation we observed excessive lime dust in the pan mixer (P903) room. The pan mixer is to be vented to a fabric filter in order to minimize or eliminate excess emissions of particulate matter. It appeared that this filter may not have been working properly. The pan mixer was not in operation during the time of the investigation to verify this.

**Requested Action:**

Ohio EPA requests Scio Packaging Co. check all filters and fans to the filters at the facility and provide evidence of proper operation to the this office within 30 days of receipt of this letter.

**Observation:**

Approximately every 60 seconds, concrete dust pulsed from the loading boot of the truck loading silos (F006) during the investigation.

**Violation:**

The pulsing of the concrete dust is a violation of PTO P0089430, issued February 12, 1998. PTO P0089430 states the following:

*"The permittee shall ensure that the cement blend loading chute shall be adequately enclosed and exhausted to the cartridge filter. The enclosure shall be sufficient so as to eliminate at all times visible emissions of fugitive dust at the point of capture".*

**Requested Action:**

Ohio EPA requests Scio Packaging Co. immediately correct this problem and comply with all terms and conditions of PTO P0089430.

**Observation:**

Chris Reese did not have available the record keeping required for Scio Packaging Co. during the time of the inspection. On October 2, 2012, you, Steven Reese emailed me a copy of the records that are being kept for the facility.

**Violation:**

Per PTO P0089430, issued February 12, 1998, the following records are to be kept:

**Paved and unpaved roads and parking F001:**

- "1. The permittee shall maintain monthly records of the following for the paved roadways and parking areas:*
  - a. The date the paved surfaces were swept.*

- b. *The portions of the paved surfaces that were swept.*
- c. *The name of the equipment operator responsible for the sweeping.*

*2. The permittee shall maintain monthly records of the following for the unpaved roadways and parking areas:*

- a. *The date dust suppressants were applied to the unpaved surfaces.*
- b. *The portions of unpaved surfaces that were treated with dust suppressants.*
- c. *The application rate of water and any chemical additives (gallons of each per square yard).*
- d. *The name of the equipment operator responsible for the application of the dust suppressants."*

**Material handling, transferring and conveying with fabric filter (F004):**

*"1. The permittee shall perform daily checks for any visible particulate emissions from the fabric filter exhaust while this emissions unit is in operation. The presence or absence of any visible emissions from the fabric filter exhaust shall be noted in an operations log. If any visible emissions are observed, corrective action shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log."*

**Pneumatic silo filling and tanker loading with cartridge filter (F005):**

*"1. The permittee shall maintain daily records of the following:*

- a. *Type of product loaded;*
- b. *Time tanker loading started;*
- c. *Time tanker loading stopped; and*
- d. *Quantity of product loaded (tons).*

*2. The permittee shall perform daily checks for any visible particulate emissions from the cartridge filter exhaust while this emissions unit is in operation. The presence or absence of any visible emissions from the cartridge filter exhaust shall be noted in an operations log. If any visible emissions are observed, corrective action shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log."*

**Mixer #1 to storage silos and truck loading with cartridge filter (F006):**

*"1. The permittee shall maintain daily records of the following:*

- a. *Type of product loaded;*
- b. *Time truck loading started;*
- c. *Time truck loading stopped; and*
- d. *Quantity of product loaded (tons).*

*2. The permittee shall perform daily checks for any visible particulate emissions from the cartridge filter exhaust while this emissions unit is in operation. The presence or*

*absence of any visible emissions from the cartridge filter exhaust shall be noted in an operations log. If any visible emissions are observed, corrective action shall be taken to eliminate the visible particulate emissions and these actions shall also be noted in the operations log."*

**Product bagging station with fabric filter (P901):**

*"1. The permittee shall perform daily checks for any visible particulate emissions from the cartridge filter exhaust while this emissions unit is in operation. The presence or absence of any visible emissions from the cartridge filter exhaust shall be noted in an operations log. If any visible emissions are observed, corrective action shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log."*

**Aggregate handling and #2 oil-fired rotary dryer with fabric filter (P902):**

*"1. The permittee shall maintain daily records of the following:*

- a. Hours dryer was operated;*
- b. Quantity of materials dried;*
- c. Quantity of oil used (gallons); and*
- d. An analysis from the oil supplier providing the type of fuel and sulfur content (percent by weight) for each shipment of oil."*

According to PTI 17-1619, issued August 12, 1998, for **Binder blending system 4 silos, pneumatic blender, truck and rail unload and load out, hand add station, all with fabric filter (P905)**, the following records are to be kept:

*"The permittee shall perform daily checks for any visible particulate emissions from the fabric filters exhaust, transfer point, air slides, pneumatic conveying pipes and enclosures while the emission unit is in operation. The presence of or absence of any visible particulate emission from the fabric filters exhaust, transfer point, air slides, pneumatic conveying pipes and enclosures shall be noted in an operations log. If any visible particulate emissions are observed, corrective action shall be taken to eliminate the visible particulate emissions and these actions shall also be noted in the operations log."*

Currently, Scio Packaging Co. keeps a daily inspection log that includes F004, F005, F006, P901 and P904. Daily visible emissions checks however are not being recorded. The only time an inspection is recorded in the operations log is when a problem is noted. An explanation of the corrective actions is also not being noted. No records are maintained for F001. Daily records of the type of the product loaded, the time the tanker/truck loading started, the time the tanker/truck loading stopped, and the quantity of product loaded in tons, for F005 and F006 are also not maintained. All records for P902 are not currently kept. For these reasons, the current records are not sufficient to meet the monitoring and record keeping requirements as required in the permits for Scio Packaging Co.

**Requested Action:**

Ohio EPA requests that Scio Packaging Co. immediately comply with all monitoring and record keeping requirements as stated in the permits.

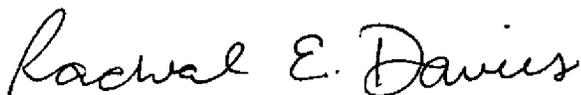
During the investigation, Chris Reese stated that the facility planned on installing equipment for frac-sand operations. Please be aware that this operation may require you to first obtain a permit-to-install-and-operate (PTIO) through Ohio EPA Division of Air Pollution Control. I have enclosed information 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 if you would like assistance in evaluating the need for a permit for the frac-sand equipment and/or preparing and submitting PTIO applications.

**Within 30 days of receipt of this letter, Scio Packaging Co. shall submit a plan and schedule to return the facility to compliance. The plan should include a time line for completing corrective actions and specify the corrective actions taken.**

Acceptance by Ohio EPA of a schedule for compliance does not constitute a waiver of Ohio EPA's authority to seek civil penalties (up to \$25,000 per day per violation) 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 the above request, within the time frame discussed above, please inform us and explain so that we may be of assistance. Should you have any questions, please feel free to contact me at 740-380-5246 or by email at [racheal.sams@epa.state.oh.us](mailto:racheal.sams@epa.state.oh.us).

Sincerely,



Racheal Davies  
Division of Air Pollution Control  
Southeast District Office

RD/cs

Enclosure

cc: Dean Ponchak – DAPC/SEDO  
Ralph Witte – OCAPP/SEDO  
Dale Warner – DMWM/SEDO  
Bruce Weinberg – DAPC/CO  
Michelle Jencius – U.S. EPA-Region V