



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

Re: Erie County
0322010062
Huron Lime, Inc.
**Inspection/
Notice of Violation (NOV/non-HPV)/
Resolution of Violation**

May 29, 2013

CERTIFIED MAIL

Mr. Christopher Kitts, General Manager
Huron Lime, Inc.
100 Meeker Street
Huron, Ohio 44839

Dear Mr. Kitts:

This letter shall serve as a follow-up to the inspection conducted on May 8, 2013 of Huron Lime, Inc. by Miranda Garlock and Tom Cikotte of the Division of Air Pollution Control (DAPC). The purpose of the inspection was to determine the compliance status of all air contaminant sources located at the facility.

Based on our observations during the inspection and our discussions with you and Ms. Tammy Endlish regarding the facility's files, my findings are as follows:

1. Permit to Install (PTI) P0108309, issued August 16, 2011 established a federally enforceable emission limitation for hydrogen chloride (HCl) per rolling, 12-month period for P901, P902, and P903 for purposes of avoiding applicability of Maximum Achievable Control Technology (MACT) regulations. The federally enforceable emission limitation is based on the lbs HCl/ton emission limitation and a lime production restriction for P901, P902, and P903. A review of the first 12 calendar months of operation under the provisions of PTI P0108309, determined compliance with the facility's lime production restrictions and HCl limitations based upon a rolling, 12-month summation of the monthly usage rates for P901, P902, and P903.
2. Upon the review of the facility's records, it was discovered that the facility has failed to keep daily visible emission (VE) operational logs for P904 and P905. This is required and thereby a violation of the monitoring and record keeping requirements in the Title V Permit to Operate (PTO) P0086935 issued October 21, 2008 which was superseded by P0109165 issued December 20, 2011 for P904 and in PTI 03-17107 issued August 1, 2006 for P905, which is a violation of the Terms and Conditions of Title V PTO P0109165, PTI 03-17107, and Ohio Revised Code (ORC) §3704.05.

3. In addition, the facility failed to report these monitoring and record keeping deviations on its TV Annual Compliance Certifications and semiannual deviations reports since the date the permits were issued until the present, which is a violation of the Terms and Conditions of Title V PTO P0109165, PTI 03-17107, and Ohio Revised Code (ORC) §3704.03.

To address these administrative violations, on May 9, 2013, the facility provided examples of daily VE operational logs which will be used for each P904 and P905 that satisfy the monitoring and record keeping requirements listed in Title V PTO P0086935 issued October 21, 2008 which was superseded by P0109165 issued December 20, 2011 for P904 and PTI 03-17107 issued August 1, 2006 for P905. In addition, on May 15, 2013, the facility submitted amended Title V Annual Certifications and semiannual deviation reports for P904 dating back to 2008 when this emission unit was permitted in the TV PTO and for P905 dating back to 2006 when this emission unit was permitted in the PTI. With the submission of the VE operational logs, amended semiannual deviation reports and Annual Compliance Certificates, these administrative violations have been resolved.

It should be noted that under the active permits for P904 and P905, the facility is required to conduct daily VE checks from egress points from both P904 and P905. The Title V PTO renewal permit P0113321, currently in draft form, will continue to require the facility to record daily VE checks from egress points from P905 but will no longer require the facility to perform daily VE checks from egress points associated with P904 (removed in renewal permit because no opacity restriction was established for this unit). In addition, the Title V PTO renewal permit will require the facility to record daily VE checks from the baghouse (BH-2) stack serving P905.

4. The Ohio EPA is in receipt of the Intent to Test for HCl and sulfur dioxide (SO₂) for emission units P901, P902, and P903 on June 4 through June 6, 2013. The facility is reminded that particulate matter (PM) testing for P904 and P905 is due within six months prior to the expiration date of the Title V PTO (October 21, 2013). In addition, In accordance with Engineering Guide #16, the facility is required to test the three kilns (P901, P902, and P903) for particulate emissions annually. It is required that testing this year for particulate emissions be conducted within one year of the previous testing date (November 19-21, 2012).

Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC §3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

All emissions units appear to be in compliance with air pollution control emission limitations and regulations of Ohio EPA at this time.

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Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3069 or electronically at Miranda.Garlock@epa.ohio.gov.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/cg

pc: Certified Mail Receipt Number 70091410000118346960

ec: Miranda Garlock, NWDO, DAPC
Tom Cikotte, NWDO, DAPC
Jennifer Jolliff, NWDO, DAPC
Mark Budge, NWDO, DAPC
Bruce Weinberg, CO, DAPC
Brian Dickens, US EPA, Region V
Molly DeSalle, US EPA, Region V
Christopher Kitts, Huron Lime, Inc.
Nancy Case, Huron Lime, Inc.
Tammy Endlish, Endlish Environmental & Energy, LLC