



**Environmental
Protection Agency**

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

Re: Sandusky County
Carmeuse Lime
Premise #0372000081
Inspection follow-up letter
Notice of Violation
(NOV/non-HPV)

September 28, 2012

Certified Mail

Ms. Stacey Rader, Regional Environmental Manager
Carmeuse Lime – Millersville Operation
1967 West County Road 42
P.O. Box 708
Bettsville, Ohio 44815

Dear Ms. Rader:

This letter shall serve as follow-up to the inspection conducted on September 20, 2012 at the above-referenced facility. The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there with the rules and regulations of the Division of Air Pollution Control (DAPC). Ms. Melanie Ray and myself from Ohio EPA's Northwest District Office (NWDO) conducted a full compliance evaluation of the air contaminant sources operating at the referenced location.

During the inspection, we met Mr. Brent Sandberg who is the Site Operations Manager and Mr. Bob Prystaloski who is the Area Operations Manager as well as yourself. Mr. Sandberg led us on a tour of the facility and we witnessed all of the air contaminant sources. Based on our discussions with you and Mr. Sandberg, our observations during the inspection, a review of the facility records as well as a review of the company's files at NWDO, the findings can be summarized as follows:

1. Carmeuse Lime – Millersville (herein referred to as Carmeuse) operates paved and unpaved roadways identified by DAPC as emissions unit F001. This emissions unit was witnessed during the inspection. The water truck had gone down the previous day and a rental truck was being brought in. During the tour, a water truck owned by MGQ, Inc. watered the paved roadway. In reviewing the records of visible emissions checks, it was identified that the checks are incomplete as it only records visible emissions of roadways and does not separate the two types between paved and unpaved as is required by the permit.

It was asked that July 2012 data be witnessed. In viewing this documentation, there were three separate occurrences in July (1-5, 10-15 and 19-23) where no watering occurred since the water truck was down. After reviewing DAPC records, it was found that Carmeuse failed to notify the agency of these malfunctions for all time periods. During the three malfunction periods, the extent of failure or break down of control measure exceeded seventy two (72) hours which requires Carmeuse to submit a letter to the director within two weeks of the date of the malfunction occurring. Carmeuse failed to notify Ohio EPA of this malfunction as it occurred and failed to submit any information regarding this malfunction to the director. This is a violation of Ohio Administrative Code (OAC) rule 3745-15-06(B) and Ohio Revised Code (ORC) §3704.05. This information must be presented in the deviation report for the third quarter 2012 that is due no later than October 31, 2012. In addition, the previous deviation reports dating back to the second quarter of 2010 to the second quarter 2012 shall be revised to rectify this matter.

2. Carmeuse operates plant stock piles that consist of limestone, solid fuels and waste lime. This emissions unit is identified as F002 and was issued a new Permit to Install (PTI) #P0107876 on June 10, 2011. In this permit, there is an annual maximum load-in rate of solid fuel, large and middle size stone, screenings, aglime, scrap, stone fusite and others. The information was reviewed only for solid fuel which in this case is considered coal. The amount received in 2011 was 68,828 tons of coal whereas the permit limits the solid fuel (and overstock) to 70,000 tons. Although the information for the other piles were not reviewed, it would be possible that the annual amount received for each may be a significant portion of the maximum allowed. That being said, the permit limits the facility to 13.1 tons of particulate emissions (PE). The reported amount for 2011 in the fee emission report was 0.58 ton of PE. Please submit clarification as to how this value was calculated. In addition, please specify whether a permit modification is necessary to better establish the maximum load-in (or received rates) of each product.
3. It was identified during the inspection that the emissions unit F003 (Primary Crushing and Screening) had been dismantled recently and was removed from operation a few years ago. Based on this information and what was witnessed, it is requested that Carmeuse update the Facility Profile (FP) in eBusiness Center (eBiz) to best reflect the current operating status of this emissions unit.
4. It was identified during the inspection that emissions unit F006 (Mineral Extraction) is not an operation that Carmeuse has conducted in the last ten years. Therefore, it is necessary that the FP in eBiz be updated to reflect the current operating status of this emissions unit.

5. Carmeuse is failing to submit quarterly summaries that include a log of all periods of downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions units were in operation (Rotary Kilns #1 and #2). This failure is a violation of term and condition A.IV.4. of the Title V permit for each emissions unit (P005 – Rotary Kiln #1 and P006 – Rotary Kiln #2). This is also a violation of ORC §3704.05. This information was reviewed during the inspection but will need to be submitted from June 2010 to August 2012 to the attention of Ms. Ray.
6. The solid fuel handling (ball mills) are identified in the FP as emissions unit P012. This emissions unit notes that this source was installed in October 1992. There should be a separate column for visible emissions from P012 as it pertains to fugitive and baghouse. It is not apparent in the review or the records maintained that a weekly log of any visible emissions from the baghouse is being recorded for P012. Please clarify this issue. In addition, the FP does not specify that there are fugitive emissions from this emissions unit. Please update the FP to include fugitive emissions.
7. The sawdust handling and processing operation (identified as emissions unit P902 and permitted under PTI #03-17287 on July 5, 2007) was never installed. Please note that the FP needs to be updated to reflect the correct operating status of this emissions unit. In addition, Carmeuse is required to obtain a PTI before this emissions unit can be installed in the future since the original 18 months from the issuance date has passed without any installation occurring thereby rendering the permit revoked.
8. As discussed in the post-inspection meeting, emissions unit P904 which is the product loadout using a mobile transloader was issued a PTI (P0104705 on July 15, 2009) that stated this emissions unit to be subject to NSPS Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion). It is the facility's responsibility to determine which provisions of the rule apply to P904 and to verify compliance with the NSPS Subpart or to determine whether this emissions unit is exempt from those requirements. As discussed previously, this emissions unit may not be subject to that Subpart since it may be considered a non-road engine exempting it from applicability. This matter will need to be discussed further with Mr. Jan Tredway and Ms. Ray to rectify this matter and a permit modification may be necessary depending on the outcome of that discussion.
9. In reviewing the Continuous Assurance Monitoring (CAM) plan, it is evident that this plan will need to be updated and submitted to Ms. Ray in order for the processing of the Title V permit renewal to begin. The existing CAM plan dated November 2007 does not appear to be current and does not reflect the parameters established by way of stack testing.

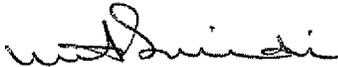
Ms. Stacey Rader
September 28, 2012
Page 4

10. As discussed during the meeting, the existing Owner/Contact information in the FP will need to be updated.

The information required above must be submitted by no later than October 31, 2012. Please be advised that the submission of information to respond to this letter does not constitute a waiver of 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.

I can be reached at (419) 373-3118 or mohammad.smidi@epa.ohio.gov if you have any questions regarding this letter.

Sincerely,



Mohammad Smidi
Environmental Specialist
Division of Air Pollution Control

/cg

ec: Bob Prystaloski
Brent Sandberg
Bruce Weinberg, DAPC-CO
Elissa Hartfield, DAPC-NWDO
Jan Tredway, DAPC-NWDO
Jennifer Jolliff, DAPC-NWDO
Melanie Ray, DAPC-NWDO
Miranda Garlock, DAPC-NWDO
Stacey Rader
William MacDowell, US EPA Region V
Certified Mail Receipt Number 70091410000118345826