



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievue Plaza, Second Floor
Cleveland, Ohio 44114-1839
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www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7012 2210 0000 5209 4906
RETURN RECEIPT REQUESTED**

8/2/13

Charles Canestraight, President
Sand Products Corporation
560 Mart St.
Muskegon, MI 49440

HIGH PRIORITY FACILITY

**RE: Whiskey Island, Dock #1
FACILITY ID: 13-18-00-3287**

NOTICE OF VIOLATION: Failure to electronically submit Quarterly Deviation Reports (QDRs) since October 2012; Failure to record actual pressure drop inches of water (H₂O”) across both multiclones on a daily basis; Failure to conduct and record daily Fugitive Visible Emissions (VE) checks; Failure to correctly cite above noted deficiencies in the Annual Permit Evaluation Report (PER)

Dear Mr. Canestraight:

On 7/23/13 and 7/25/13, the Cleveland Division of Air Quality (CDAQ) inspected Sand Products Corporation (SPC) located at Whiskey Island, Dock #1 in Cleveland. This letter serves as notification that you are operating a source in violation of the following applicable air statutes, air regulations, or air permit conditions.

SPC has failed to accurately conduct inspections and record/report operational restrictions for emissions unit (EU) P001: 100 TPH Natural Gas Fired, Fluidized Bed Sand Dryer and Cooler as cited in Renewal Permit to Install/Operate PTIO #: P0094430. Specifically:

- PTIO #: P0094430, Part C, (1)(d)(2) states: “The permittee shall record the pressure drop across the multiclone dust collectors on a daily basis.” SPC provided records indicating that daily checks were being conducted to ensure the pressure drop was within the 1.0 to 5.0 H₂O”range, but did not indicate actual pressure drop in H₂O”.
- PTIO #: P0094430, Part C, (1)(d)(6) states: “ The permittee shall perform daily checks for visible emissions of fugitive dust from the non-stack egress points from the building housing this emissions unit...The presence or absence of any visible emissions shall be noted in an operations log.” Additionally, Part C, (1)(d)(6)(a-e) provides guidance on how to document the details if fugitive VE is present and a VE incident has occurred. SPC failed to conduct the daily checks, maintain a VE log and record details if a VE incident transpired.



- PTIO #: P0094430, Part C, (1)(e)(4) states: “The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ... The reports shall be submitted electronically through Ohio EPA Air Services each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September)”. SPC has failed to submit the Quarterly Deviation Reports for the 3rd and 4th quarters of 2012 and the 1st and 2nd quarters of 2013.
- Additionally, PTIO #: P0094430, Part C, (1)(e)(5) states: “ The permittee shall include in the annual PER information that (a) identify all days during which any visible emissions of fugitive dust were observed from the non-stack egress points from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions.” SPC failed to conduct daily VE checks and did not note the deficiency in the PER.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that SPC submit:

- A two week sample of pressure drop readings across both multiclones that includes the actual H₂O” values.
- A two week sample of the fugitive VE check log that includes provisions for reporting the details of a fugitive VE incident as specified in PTIO #: P0094430, Part C, (1)(d)(6)(a-e).

to the following enforcement representative:

Dave DeChant
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Also, CDAQ requests that SPC electronically submit the following information through Ohio EPA Air Services:

- Quarterly Deviation Reports for the 3rd and 4th quarters of 2012 and the 1st and 2nd quarters of 2013.
- And, an amended PER identifying the failure to conduct daily fugitive VE checks and corrective actions.

And, as discussed at the time of the Full Compliance Evaluation specific to EUs F001: Paved Roads and Parking Areas and F002: Raw Sand Storage Piles that are currently on Registration Status. In accordance with Ohio Administrative Code (OAC) Rule 3745-31-08(D), CDAQ requests the submission of a new Permits to Install/Operate (PTIO) applications for EUs F001 and F002 to determine if they are correctly permitted.

Permit-to-install/operate (PTIO) applications must be completed through the Ohio EPA eBusiness Center at <https://ebiz.epa.ohio.gov/>.



Your electronic submissions (reporting and applications) along with the two week samples for VE checks and pressure drop readings must be received by CDAQ and/or electronically submitted, as appropriate, within thirty (30) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars (\$25,000) or imprisonment for not more than one year, or both, for each violation.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Dave DeChant at 216-664-3213. All correspondence with CDAQ must include the Ohio EPA facility identification number for Sand Products Corporation: 13-18-00-3287.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/dd

cc: Sarah Buzas, CDAQ
George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
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