

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

Re: Sandusky County
 Martin Marietta Magnesia Specialties, Inc.
 0372000127
 Stack Test
Notice of Violation/HPV-GC8

September 19, 2013

CERTIFIED MAIL

Mr. Tim Tawney, Area Operations Manager
 Martin Marietta Magnesia Specialties, Inc.
 755 Lime Road
 Woodville, Ohio 43469

Dear Mr. Tawney:

The stack test conducted on July 16, 2013, on Ohio EPA emissions unit No. P902 (Rotary Lime Kiln #7), has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data are accurate:

**Critical Test Data
 (In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
PM	0.0235 lb/ton stone feed	0.10 lb/ton stone feed	99.8 TPH	95.25 TPH
PM ₁₀	0.066 lb/ton stone feed	0.10 lb/ton stone feed	99.8 TPH	95.25 TPH
NO _x	5.4 lbs/ton lime	4.1 lbs/ton lime	99.8 TPH	95.25 TPH
SO ₂	0.109 lb/ton lime	1.7 lbs/ton lime	99.8 TPH	95.25 TPH
CO	0.154 lb/ton lime	2.0 lbs/ton lime	99.8 TPH	95.25 TPH
VOC	2.3 lbs/hr as propane	9.0 lbs/hr	99.8 TPH	95.25 TPH

^a Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

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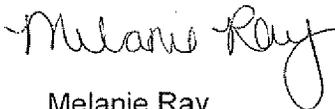
The emissions unit was being operated in violation of its allowable emissions rate for NO_x. Failure to meet the allowable NO_x emission rate is a violation of Permit to Install 03-17089, issued on November 13, 2008, OAC rules 3745-31-10 through 3745-31-20, and Ohio Revised Code 3704.05. It will therefore be necessary to retest this unit or take other appropriate action to achieve compliance with the applicable emission limitation.

The company met with the Northwest District Office in May 2013, prior to conducting the stack test, to discuss ongoing problems with this emissions unit since its initial startup. One of the main issues at that time was the need for the replacement of a gear box which was on order, but had a 6 month lead time. During a facility inspection on September 12, 2013, the company indicated that the gear box had arrived and plans for its installation were already in place. At this time, this office is requesting that the facility submit a compliance plan and schedule for replacing the gear box and getting the kiln operating as expected and retesting the emissions unit. This information shall be submitted within two weeks of receipt of this letter.

Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case.

Please feel free to contact me with any questions and/or comments at (419) 373-4111 or email melanie.ray@epa.state.oh.us

Sincerely,



Melanie Ray
Division of Air Pollution Control

/l/r

pc: Robert Teer, DAPC-NWDO
DAPC, NWDO Stack File
DAPC, NWDO File
Follow-up File
Certified Mail Receipt Number 7009 1410 0001 1835 2138

ec: Bruce Weinberg, DAPC-CO
Brian Dickens, US EPA, Region V
Mark Budge, DAPC-NWDO
Jay Liebrecht, DAPC, NWDO
Jennifer Jolliff, DAPC-NWDO
Robert Teer, DAPC, NWDO
Tom Sattler, DAPC, NWDO
Melanie Ray, DAPC, NWDO