



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

Re: Erie County
 Premise No. 0322010062
 Huron Lime, Inc.
 Stack Test
 Notice of Violation (NOV/HPV-GC8)

September 19, 2013

CERTIFIED MAIL

Mr. Christopher Kitts, General Manager
 Huron Lime, Inc.
 P. O. Box 451
 Huron, Ohio 44839

Dear Mr. Kitts:

The stack test conducted on June 4-6, 2013, on Ohio EPA emissions unit Nos. P901 (Rotary Lime Kiln No. 1), P902 (Rotary Lime Kiln No. 2), and P903 (Rotary Lime Kiln No. 3), 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)

Kiln	Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
P901	HCl	0.059 lb/ton lime	0.057 lb/ton lime	14.7 TPH	15 TPH
P902	HCl	0.022 lb/ton lime	0.072 lb/ton lime	14.8 TPH	15 TPH
P903	HCl	0.056 lb/ton lime	0.093 lb/ton lime	14.3 TPH	15 TPH
P901- P903	SO ₂	0.182 lb/ton lime*	4.0 lbs/ton lime*	Same rates as the HCl tests	15 TPH per kiln

*Combined results for three kilns

^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.

Also, the following parameters were recorded during the testing of the kilns:

Parameter	Required Value	Actual Value		
		Kiln 1	Kiln 2	Kiln 3
Scrubber Pressure Drop	>16 inches of water	20 inches of water	22 inches of water	20 inches of water
Scrubber Pump Amps	>23 amps	33 amps	34.5 amps	31.5 amps
Scrubber Water Flow to ID Fan	>4 gpm	4 gpm	4 gpm	4 gpm
Scrubber Water Flow to Quench Unit	>275 gpm	440 gpm	405 gpm	

Emissions unit P901 was being operated in violation of its allowable emission rate for HCl. Failure to meet the allowable HCl emission rate is a violation of the Title V permit P0109165 issued December 20, 2011, the Permit to Install P0108309 issued August 16, 2011, OAC rule 3745-31-05(D), 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 facility submitted a written response dated September 4, 2013, that indicated the facility will retest P901 (Kiln 1) for HCl. The facility plans to retest P901 for HCl during the already planned particulate matter testing scheduled for the week of October 7, 2013. DAPC received a revised Intent to Test (ITT) on September 5, 2013, which indicates HCl testing for P901 will be conducted on October 8, 2013.

Please note that the submission of the requested information to respond to this letter does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for this violation. The decision whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Mr. Christopher Kitts, General Manager
September 19, 2013
Page 3

Please feel free to contact me at (419) 373-3069 or Miranda.Garlock@epa.ohio.gov if you have any questions.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/llr

Certified Mail Receipt Number 7009 1410 0001 1835 2152

pc: Robert Teer, DAPC-NWDO
DAPC, NWDO Stack File
DAPC, NWDO File
Follow-up File

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