



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
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**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7012 2210 0000 5209 4968
RETURN RECEIPT REQUESTED**

9/19/13

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

**RESOLUTION OF VIOLATIONS
NOTICE OF VIOLATION FOLLOW-UP LETTER**

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.

On 8/2/13, CDAQ issued a Notice of Violation (NOV) to SPC citing failure 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 specified in Renewal Permit to Install/Operate PTIO #: P0094430.

The NOV requested that SPC submit hard copies of:

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

Additionally, CDAQ requested 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.
- 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 requested the submission of a new Permits to Install/Operate (PTIO) applications for EUs F001 and F002 to determine if they were correctly permitted.

On 8/27/13, the requested Quarterly Deviation Reports and amended PER were submitted through Ohio EPA Air Services.

On 8/30/13, CDAQ received electronic versions of the monitoring and recordkeeping logs.

On 9/10/13, CDAQ confirmed receipt of PTIO applications for F001 and F002 through Ohio EPA Air Services. The CDAQ Permitting section is currently reviewing the applications for completeness and accuracy.

On 9/18/13, CDAQ received supplemental samples of the recordkeeping logs that demonstrated inclusion of notations indicating presence or absence of VE during daily observations.

The corrective action plan was received and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

CDAQ issues this letter with Ohio EPA's concurrence and 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 LK

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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Monthly Dryer and Cooler Collector Differential Pressure Readings month 9 / year 2013

Date	D coll	D coll	C coll	C coll	Note:
1-Sep					N.O.
2-Sep					N.O.
3-Sep	4.3	3.6	1.4	1.4	N.C
4-Sep	3.8	4.2	1.7	1.7	N.C
5-Sep	4.0	3.5	1.8	1.4	N.C
6-Sep	3.9	4.1	1.6	1.8	N.C - SOME DUST FINE GRADE
7-Sep		3.9	1.6	1.5	N.C
8-Sep					INSTALLED COOLER - 100% EXHAUST
9-Sep	4.0	3.7	1.6	1.4	FR. BLADES - IN & ON ORDER
10-Sep	3.9	4.0	1.8	1.5	DRY CONDITIONS - VE AT SCREEN 250 R
11-Sep	4.1	4.0	1.8	1.6	DRY CONDITIONS - VE AT SCREEN 250 R
12-Sep	3.9	4.0	1.7	1.7	N.C - SOME DUST FINE GRADE
13-Sep	3.6	4.0	1.6	1.7	NVEP - 52, VEP -
14-Sep	4.1	4.0	1.9	1.8	NVEP - 52
15-Sep					N.O.
16-Sep	4.0	3.9	1.9	1.6	NVEP - 52, VEP - 62+80 AT SCREENER.
17-Sep					
18-Sep					
19-Sep					
20-Sep					
21-Sep					
22-Sep					
23-Sep					
24-Sep					
25-Sep					
26-Sep					
27-Sep					
28-Sep					
29-Sep					
30-Sep					

N.O. = NOT OPERATING

~~N.C. = NO CONDENSATION~~

NVEP = NO VISIBLE EMISSIONS PERCENT

Monthly Dryer and Cooler Collector Differential Pressure Readings month _____ / year _____

NVEP = no visible emissions present, VEP = visible emissions present + location + source, NO = not operating

Date	D coll	D coll	C coll	C coll	Note:
1-Sep					
2-Sep					
3-Sep					
4-Sep					
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8-Sep					
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