



**Environmental
Protection Agency**

John Kasich: Governor
Mike DeWine: Lt. Governor
Lynn M. Kistner: Director

March 1, 2012

CERTIFIED MAIL

Mr. Michael T. Heher
Division Manager
Carbon Limestone Landfill, L.L.C.
8100 South Stateline Road
Lowellville, OH 44436

RE: Notice of Violation for Working Face and Paved Roadway Fugitive Particulate Exceedences: DAPC Facility ID: 02 50 07 0850

Dear Mr. Heher:

Carbon Limestone violated the requirements of its permits-to-install (PTIs) by emitting excessive fugitive particulate emissions on February 22, 2012 and February 24, 2012, and need to take action to prevent future exceedences.

Visible Fugitive Particulate Exceedance on Paved Roadways

PTI P0105125 issued August 5, 2009, allows for no visible particulate emissions except for one minute in any sixty-minute period from the paved roadways and parking areas, emissions unit F001.

During the afternoon of February 22, 2012, I documented two minutes and 17 seconds of visible particulate emissions during a 15 minute period from the paved roadway south of the scale house and south of the overhead bridge. At no time between 7:10 AM and 2 PM was a water truck observed treating roadways. A copy of the Method 22 observation sheet is enclosed for your review.

After the observation period, I brought the findings to your attention at the office. Within 15 minutes, the water truck treated the paved roadways eliminating the dust. Carbon Limestone Landfill returned to compliance with the visible particulate emissions limitation in PTI P0105125.

Visible Fugitive Particulate Exceedance on the Working Face

PTI 02-22526 issued December 22, 2008, limits visible fugitive particulate emissions to 20 % opacity, as a three-minute average from the working face, emissions unit F002.

During the afternoon of February 22, 2012, I noted excessive fugitive emissions from the working face. No Method 9 readings were taken at this time. After the observation period, I brought the findings to your attention at the office. You initiated an inquiry on the type and source of material accepted during my observation period.

MR. MICHAEL HEHER
MARCH 2, 2012
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During February 24, 2012, excessive fugitive particulate emissions were observed once again on the working face, both from truck dumping and from the small dozer working the material. Method 9 readings documented a period of 27% opacity as a three-minute average from working face. Additional time of high opacity occurred immediately prior to the beginning of the observation period but was undocumented. A copy of the Method 9 observation sheet is enclosed for your review.

Action Necessary to Prevent Future Violations

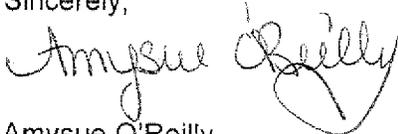
Additional action is needed to prevent future violations. Please review with the responsible facility personnel the requirements to observe the roadways for fugitive particulate emissions daily and the necessity to implement control measures when the roads dry out. Specifically, consider implementing a morning and afternoon check on the roadways or other appropriate method to ensure that roadways are treated when necessary.

In addition, please review the methods available to minimize or eliminate fugitive dust on the working face. Within 21 days of the date of this letter, please provide a written response including a compliance plan describing what measures will be taken to ensure future compliance with the visible emission limitations on the roadways and at the working face.

Be advised that violations of state air pollution regulations are punishable by a civil penalty of \$25,000 per violation. Issuance of this notice does not excuse past violation of federal, state and local laws regarding air pollution. This office reserves the right to pursue violations of air pollution regulations in the form of a referral to Ohio EPA's Central Office.

Should you have any questions concerning this letter, please contact me at (330) 963-1298.

Sincerely,



Amysue O'Reilly
Environmental Specialist
Division of Air Pollution Control

AO:bo

enclosures(2)

pc: Tim Nytra, Allied Waste

ec: Misty Koletich, Ohio EPA, DAPC-NEDO
Tim Fischer, Ohio EPA, DAPC-NEDO
Tom Kalman, Ohio EPA, DAPC-CO
Curt Holes, Air Quality Specialist
Allison Giancola, Ohio EPA, DSWIM-NEDO

SOURCE NAME											
Carbon Limestone											
SOURCE ID NUMBER											
F002 working face											
OBSERVATION DATE				START TIME				STOP TIME			
2/21				17:46				18:24			
MIN	SEC	0	15	30	45	MIN	SEC	0	15	30	45
1	0	5	0	0	31						
2	0	6	0	0	32						
3	3	0	0	0	33						
4	5	6	10	0	34						
5	10	0	0	0	35						
6	5	0	0	5	36						
7	0	0	0	0	37						
8	0	0	5	0	38						
9	0	0	0	0	39						
10	3	15	35	0	40						
11	0	5	0	0	41						
12	0	0	0	5	42						
13	0	0	10	5	43						
14	6	0	0	0	44						
15	0	0	0	0	45						
16	5	0	0	0	46	25	40	10	20		
17	6	0	0	0	47	10	15	10	15		
18	0	5	0	0	48	5	0	10	15		
19	0	0	0	0	49	20	35	35	5		
20	0	6	0	5	50	5	15	0	15		
21	0	0	5	0	51	70	60	15	35		
22	0	0	0	0	52	15	5	30	30		
23	0	0	0	0	53	15	0	0	0		
24					54	0	5	3	10		
25					55	5	6	0	3		
26					56	0	0	6	0		
27					57	0	0	0	0		
28					58	5	5	10	5		
29					59	0	10	10	5		
30					60	0	5	15	0		

hot
bed

ip

mostly but not
red

5%
3%

SOURCE NAME											
SOURCE ID NUMBER											
OBSERVATION DATE				START TIME				STOP TIME			
MIN	SEC	0	15	30	45	MIN	SEC	0	15	30	45
1					31						
2					32						
3					33						
4					34						
5					35						
6					36						
7					37						
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27					57						
28					58						
29					59						
30					60						

SOURCE NAME											
SOURCE ID NUMBER											
OBSERVATION DATE				START TIME				STOP TIME			
MIN	SEC	0	15	30	45	MIN	SEC	0	15	30	45
1					31						
2					32						
3					33						
4					34						
5					35						
6					36						
7					37						
8					38						
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28					58						
29					59						
30					60						

* dark dust moved by small kjozen North of top

SOURCE NAME	
SOURCE ID NUMBER F007	
PROCESS EQUIPMENT Working Face	OPERATING MODE
CONTROL EQUIPMENT	OPERATING MODE
DESCRIBE EMISSION POINT START Fug @ face STOP "	
HT ABOVE GROUND LEVEL START 3' STOP 3'	HT RELATIVE TO OBSERVER START 0' STOP 0'
DISTANCE FROM OBSERVER START STOP	DIRECTION FROM OBSERVER START STOP
DESCRIBE EMISSIONS START 200' STOP 200'	
EMISSION COLOR START Brown STOP Red	PLUME TYPE: CONTINUOUS <input type="checkbox"/> FUGITIVE <input checked="" type="checkbox"/> INTERMITTENT <input type="checkbox"/>
WATER DROPLETS PRESENT: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>	IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START Fug @ 3.5' STOP 4'	
DESCRIBE BACKGROUND START Garbage STOP "	
BACKGROUND COLOR START dark STOP	SKY CONDITIONS START Overcast STOP
WIND SPEED START 3-5 STOP	WIND DIRECTION START S STOP
AMBIENT TEMP START 45° STOP "	WET BULB TEMP RH %
Source Layout Sketch Draw North Arrow Emission Point X Sun ☉ Wind → Plume ← Stack ⊥ 140° Sun Locator Line	

SOURCE NAME	
SOURCE ID NUMBER	
PROCESS EQUIPMENT	OPERATING MODE
CONTROL EQUIPMENT	OPERATING MODE
DESCRIBE EMISSION POINT START STOP	
HT ABOVE GROUND LEVEL START STOP	HT RELATIVE TO OBSERVER START STOP
DISTANCE FROM OBSERVER START STOP	DIRECTION FROM OBSERVER START STOP
DESCRIBE EMISSIONS START STOP	
EMISSION COLOR START STOP	PLUME TYPE: CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>
WATER DROPLETS PRESENT: NO <input type="checkbox"/> YES <input type="checkbox"/>	IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START STOP	
DESCRIBE BACKGROUND START STOP	
BACKGROUND COLOR START STOP	SKY CONDITIONS START STOP
WIND SPEED START STOP	WIND DIRECTION START STOP
AMBIENT TEMP START STOP	WET BULB TEMP RH %
Source Layout Sketch Draw North Arrow Emission Point X Sun ☉ Wind → Plume ← Stack ⊥ 140° Sun Locator Line	

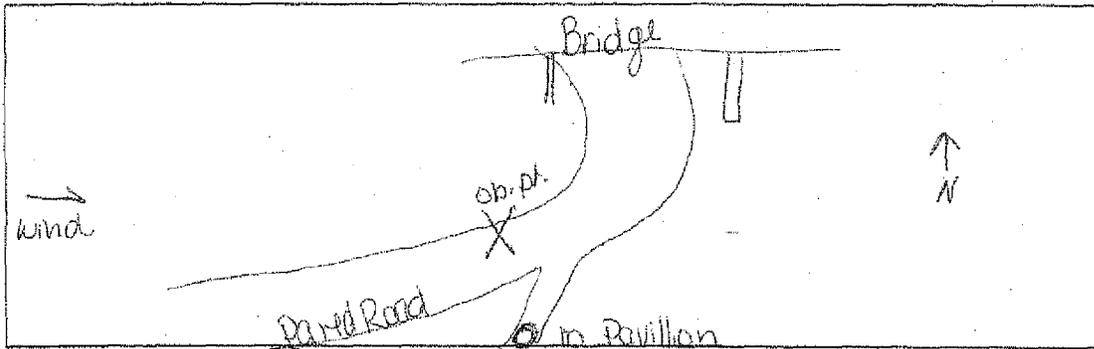
SOURCE NAME	
SOURCE ID NUMBER	
PROCESS EQUIPMENT	OPERATING MODE
CONTROL EQUIPMENT	OPERATING MODE
DESCRIBE EMISSION POINT START STOP	
HT ABOVE GROUND LEVEL START STOP	HT RELATIVE TO OBSERVER START STOP
DISTANCE FROM OBSERVER START STOP	DIRECTION FROM OBSERVER START STOP
DESCRIBE EMISSIONS START STOP	
EMISSION COLOR START STOP	PLUME TYPE: CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>
WATER DROPLETS PRESENT: NO <input type="checkbox"/> YES <input type="checkbox"/>	IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START STOP	
DESCRIBE BACKGROUND START STOP	
BACKGROUND COLOR START STOP	SKY CONDITIONS START STOP
WIND SPEED START STOP	WIND DIRECTION START STOP
AMBIENT TEMP START STOP	WET BULB TEMP RH %
Source Layout Sketch Draw North Arrow Emission Point X Sun ☉ Wind → Plume ← Stack ⊥ 140° Sun Locator Line	

OBSERVER'S NAME (PRINT) Amysue O'Reilly		ORGANIZATION	
OBSERVER'S SIGNATURE Amysue O'Reilly	DATE 2/24/2017	CERTIFIED BY	DATE

ADDRESS

FUGITIVE OR SMOKE EMISSION INSPECTION OUTDOOR LOCATION	
Company <u>Carbon Limestone</u>	Observer <u>Amyse O'Reilly</u>
Location <u>Lowellville</u>	Affiliation <u>Ohio EPA</u>
Company representative _____	Date <u>2-22-2012</u>
Sky Conditions <u>clear</u>	Wind direction <u>W</u>
Precipitation <u>none</u>	Wind speed <u>3-5</u>
Industry <u>Landfill Roadways</u>	Process unit <u>Paved Roadways</u>

Sketch process unit; indicate observer position relative to source and sun; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	sun observer	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation			
# trucks / auto	1:38 PM	15 min	2:17 sec
	1:53 PM		

