



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

November 20, 2007

Re: Belmont County (Portable)
Lash Paving Plant 2
Facility ID # 0607000187
Complaint Investigation Follow Up

Mr. David Lash, Jr.
Lash Paving
P.O. Box 296
Colerain, OH 43916

Dear Mr. Lash:

By letter dated June 27, 2007, Ohio EPA's Division of Air Pollution Control (DAPC), Southeast District Office, notified Lash Paving of a visible emissions violation from the portable asphalt plant (emissions unit P903) that was discovered during Ohio EPA's complaint investigation on May 31, 2007. In the June 2007 letter, Ohio EPA requested that Lash Paving conduct an emissions test of the asphalt plant to (1) determine the true maximum operating rate for this plant; (2) verify that the plant is in compliance with allowable emission limitations while using slag mixes and while operating at the maximum achievable production rate; and (3) confirm compliance w/ current permit limits in support of PTO issuance. Ohio EPA also requested data to verify whether the performance testing required by the federal New Source Performance Standards (NSPS) had been completed.

Although Lash Paving did not provide the compliance plan and schedule requested in Ohio EPA's letter, we have had several discussions, via telephone and during my visits to the Lash Paving Plants #1 and 2 in October, about the actions the company is taking to address the Plant #2 issues. To address the opacity issue, the plant operator indicated he is doing more frequent cleanouts of the scrubber system which prevents buildup on the stack he believes contributes to the release of excess particulate from the control equipment. To address the plant capacity issue, you indicated the company has been evaluating the equipment and has determined that the maximum operating rate is probably in the 150 ton per hour range, although the operator indicated there may be equipment failure if the plant is run in excess of 100 to 110 tons per hour.

To date, the company has been unable to conduct the performance test due to lack of scheduled production at Plant #2 this season as well as problems retaining and scheduling a stack testing contractor. Although Lash Paving did obtain a paving contract to be fulfilled in late October and early November, the job did not require the use of slag, so the effect of its use on the plant's compliance with its SO₂ limits could not be evaluated. Further, the company was unable to schedule a stack test at a time during that job when Ohio EPA staff was available. Therefore, as we discussed on November 2, 2007, Ohio EPA believes the requested stack testing must be postponed until spring of 2008.

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Please be advised that Lash Paving must conduct a performance test of Plant #2 within sixty (60) days after achieving the maximum production rate at which the emissions unit can be operated after startup for the 2008 paving season. The company must follow the stack testing procedures outlined in Comment #1.b in Ohio EPA's June 27, letter for this test. Also, if the company cannot demonstrate that the Method 9 opacity test required by the federal NSPS has been conducted, Lash Paving must arrange to have that performance testing done during the required emissions testing.

Should you have any questions, feel free to contact me at (740) 380-5245 or email kim.reinbold@epa.state.oh.us.

Sincerely,



Kimbra L. Reinbold
Division of Air Pollution Control
Southeast District Office

KLR/mlm