



State of Ohio Environmental Protection Agency

Northeast District Office

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

January 25, 2010

RE: NOTICE OF VIOLATION (NOV)  
ASPHALT PLANT (EU NO. P901)  
STACK TEST RESULTS  
ALLIED CORP PLANT NO. 74  
FACILITY ID NO. 02-50-00-1000

**CERTIFIED MAIL**

Ms. Beth L. Mowrey  
Director of Environmental Permitting and Compliance  
Allied Corp Plant No. 74  
P.O. Box 266  
Thornville, OH 43076

Dear Ms. Mowrey:

This is to inform you that we have reviewed the stack test report that was conducted at 1661 Bailey Rd. in North Jackson, Ohio on September 23, 2009. A copy of the stack test report was received by this office on November 25, 2009. Shelly Co. collected volumes of air emission samples from the baghouse exhaust stack to determine the concentrations of criteria pollutants, specifically for particulates (PE), sulfur dioxide (SO<sub>2</sub>), carbon monoxide, (CO), nitrogen oxide (NO<sub>x</sub>), and volatile organic compound (VOC). These collected samples are then analyzed for compliance determination.

The following are the stack test results for each criteria pollutant:

- **Particulate emissions:**

Based on the average of three runs, the asphalt plant demonstrated compliance with the allowable mass emissions limit of 0.04 gr/dscf. Specifically, the average emissions rate was calculated to be 0.008 gr/dscf.

- **Sulfur Dioxide emissions:**

- I. On-spec used oil:

Based on the average of three runs, the asphalt plant demonstrated compliance with the allowable mass emission limit of 21.5 lbs/hr. Specifically, the average emissions rate was calculated to be 14.88 lbs/hr.

II. Slag sulfur content:

The No. 8 blast furnace slag sulfur contents employed in the asphalt mix during the stack test were 1.24% and 1.13%. The sulfur contents demonstrated compliance with the sulfur content limit of 1.75%.

III. Slag emission factor:

Based on the average of three runs, the asphalt plant did not demonstrate compliance with the emission factor limit of 0.53 lb/ton. Specifically, the emission factor was calculated to be 1.26 lb/ton. This violates your PTI No. P0104265 (issued on 3/3/2009).

Allied Corp. is required to make all necessary steps for the plant to successfully demonstrate compliance with the permit allowable emissions limit.

A retest is required for the asphalt plant to demonstrate compliance.

- **Nitrogen Oxide emissions:**

Based on the average of three runs, the asphalt plant did not demonstrate compliance with the mass emissions limit of 17.9 lbs/hr for NO<sub>x</sub>. Specifically, the average emissions rate was calculated to be 19.41 lbs/hr. This violates your PTI No. P0104265 (issued on 3/3/2009).

Allied Corp. is required to make all necessary steps for the plant to successfully demonstrate compliance with the permit allowable emissions limit.

A retest is required for the asphalt plant to demonstrate compliance.

- **Carbon Monoxide emissions:**

Based on the average of three runs, the asphalt plant demonstrated compliance with the allowable mass emissions limit of 102.7 lbs/hr. Specifically, the average emissions rate was calculated to be 39.11 lbs/hr.

- **Volatile Organic Compound emissions:**

Based on the average of three runs, the asphalt plant demonstrated compliance with the allowable mass emissions limit of 57.9 lbs/hr for VOC. Specifically, the average emissions rate was calculated to be 27.80 lbs/hr.

MS. BETH L. MOWREY  
JANUARY 25, 2010  
PAGE 3

Allied Corp. is required to provide an acceptable compliance plan to this office within thirty (30) days of receipt of this notice, demonstrating how compliance will be accomplished for NOx and SO2. The plan should also include a date for a retest of the asphalt plant.

Please contact me at (330) 963-1273, if you have any questions in this regard.

Sincerely,



Ed Perez  
Environmental Specialist  
Division of Air Pollution Control

EP:bo

pc: Ed Fasko, Ohio EPA, DAPC, NEDO  
Tim Fischer, Ohio EPA, DAPC, NEDO  
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