



City of Cleveland  
Frank G. Jackson, Mayor

Department of Public Health  
Division of Air Quality  
75 Erieview Plaza, Suite 200  
Cleveland, Ohio 44114-1839  
216/664-2297 • Fax: 216/420-8047  
www.clevelandhealth.org

SERVING OHIO EPA AS AGENCY 13  
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7003 1010 0004 2923 7254  
RETURN RECEIPT REQUESTED

January 8, 2010

Steve Jones  
Agmet LLC  
7800 Medusa St.  
Oakwood Village, OH 44146

NON-HPV  
EMISSIONS VIOLATION

FACILITY ID: 13-18-40-7499

NOTICE OF VIOLATION: Exceeding pounds per hour and tons per year Organic Compound (OC) emission limitations

Dear Mr. Jones:

On December 10, 2009, the Cleveland Division of Air Quality (CDAQ) inspected Agmet LLC (Agmet) located at 7800 Medusa Street in Oakwood Village. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations or air permit conditions.

CDAQ has determined that emission unit (EU) P001: rotary calcining kiln is operating out of compliance with the allowable OC emission limitations established in permit-to-install (PTI) 13-02967. Stack test results show the actual pounds per hour (lbs/hr) and tons per year (tpy) emissions of OC exceed these limitations:

- September 20, 2007, stack test results state that the actual OC emissions from P001 are 1.32 lbs/hr, which exceeds the 0.625 lbs/hr emission limitation for OC established in PTI 13-02967.
- Operating hours were reported by Agmet to be 7,421 hours for the year 2008. At the rate of 1.32 lbs/hr for 7,421 hours, the actual annual OC emissions for P001 is 4.90 tpy, which exceeds the 2.74 tpy allowable emission limitation for OC established in PTI 13-02967.

These emission limitation exceedances are violations of PTI 13-02967, Permit Terms and Conditions – Air Emission Summary.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Agmet submit a corrective action plan which includes how the facility will discontinue exceeding the lbs/hr and tpy emission limitations for OC on EU P001 to the following enforcement representative:



Ryan Olinek  
Cleveland Division of Air Quality  
75 Erieview Plaza, 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

Your written response to this letter must be received by CDAQ within fourteen (14) days of your receipt of this letter. If there is insufficient time to correct the alleged violations, your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and/or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

CDAQ also requests that Agmet submit an updated permit-to-install/operate (PTIO) application for P001. A PTIO application and associated forms can be downloaded from the following website: <http://www.epa.ohio.gov/dapc/fops/eac/eacforms.aspx>. Please note that all permit applications submitted to CDAQ must include original signatures. Photocopied signatures are not valid; the application will not be accepted by CDAQ and will be returned to you if original signatures are not provided.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). OCAPP can be contacted at <http://www.epa.ohio.gov/ocapp> or 614-644-3469 or 800-329-7518. CDAQ makes no guarantee that the facility will meet the qualifying guidelines established by OCAPP.

OCAPP can also provide assistance to facilities that want to investigate methods of pollution prevention to reduce raw material usage and waste production. Again, there is no charge for their services.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation 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 Ryan Olinek at 216-664-3315 or Megan Murphy at 216-664-4258. All correspondence with CDAQ must include the Ohio EPA facility identification number for Agmet: 13-18-40-7499.

Sincerely,

*Linda Jimmy for G.B.*

George Baker  
Chief of Enforcement

GB/ro

cc: Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V  
Facility File and L:\Data\Facilities\1318407499\2009-12-10 NOV.doc

UNITED STATES POST SERVICE OH 441

15 JAN 2010 PM 12



• Sender: Please print your name, address, and ZIP+4 in this box •

Cleveland Division of Air Quality  
75 Erieview Plaza 2nd Floor  
Cleveland, OH 44114, G

JAN 19 2010

attn: Megan Murphy

13 18 40 7499 2009-12-10 NOV

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Steve Jones  
 Agmet, LLC.  
 7800 Medusa St.  
 Oakwood Village, OH 44146

2. Article Number  
(Transfer from service label)

7003 1010 0004 2923 7254

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

Cindy Kaleal

 Agent Addressee

B. Received by (Printed Name)

Cindy Kaleal

C. Date of Delivery

D. Is delivery address different from item 1?  YesIf YES, enter delivery address below:  No

3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

February 9, 2010

7800 Medusa Street | Oakwood Village | OH 44146  
P: (440) 439-7400 | F: (440) 439-7446 | W: agmet1.com

Mr. Ryan Olinek  
Cleveland Division of Air Quality  
75 Erieview Plaza, 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

Certified Mail Return Receipt  
Article No. 7002 2410 0003 3574 5311

Re: Telephone Meeting Of February 2, 2010  
Notice of Violation, January 8, 2010  
Facility ID: 13-18-40-7499, Agmet, LLC

FEB 11 2010

Dear Mr. Olinek

Thank you for your telephone meeting of this past Tuesday, February 2, 2010. The call clarified your agency's expectation regarding a Corrective Action Plan in response to the NOV letter of January 8, 2010. This letter will confirm our plans for corrective action as requested.

As we discussed, Agmet LLC does not believe the 2007 stack tests that underlies the January 8<sup>th</sup> NOV letter is representative of emissions under representative operating conditions for a number of reasons. As a result, we are closely reviewing the equipment and operating procedures. After this review, Agmet, LLC will perform another stack test that we expect to confirm that the source operates within existing permit emission limits.

Agmet, LLC, is already in the process of inspecting and servicing operating components of the Rotary Calciner Kiln (EU P001). We are conducting in house tasks and contracting with outside vendors to inspect and service the processing system in an expeditious manner in order that an emission performance test may be conducted in a timely fashion. It appears that on-site inspections and recommendations will take about 45-60 days to complete.

Contracting with an emission testing lab and filing an Intent to Test Notification will take an additional 30-45 days. Using these current work projections we would be able to conduct an emission test in about 90 days. This time frame will also help ensure accurate results as most of the cold weather will then be behind us.

Additionally, the submission of an updated electronic PTIO application (PTI-13-02967, P001) is currently under way. Agmet, LLC, should be able to have an updated PTIO application in the EBiz system within the next 30 days.

Please call me if you have any questions or concerns.

Thank You

A handwritten signature in black ink, appearing to read "Steve Jones", written in a cursive style.

Steve Jones  
Chief Operating Officer  
Agmet, LLC

**OLINEK, RYAN**

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**From:** Baker, George  
**Sent:** Monday, February 01, 2010 4:26 PM  
**To:** OLINEK, RYAN  
**Subject:** RE: Agmet.

Excellent.

Thanks Ryan.

George P. Baker  
Chief of Air Pollution Enforcement  
Cleveland Department of Public Health  
Division of Air Quality  
75 Erieview Plaza - 2nd Floor | Cleveland, Ohio 44114  
(office) 216 - 664 - 4010 | (fax) 216 - 420 - 8047  
GBaker@city.cleveland.oh.us | [www.clevelandhealth.org](http://www.clevelandhealth.org)

Serving as Ohio EPA Agency 13 for Cuyahoga County

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**From:** OLINEK, RYAN  
**Sent:** Monday, February 01, 2010 4:23 PM  
**To:** Baker, George  
**Subject:** Agmet.

George,

FYI. Spoke with Steve Jones from Agmet.

He needed some clarification regarding a) why we were requesting the PTIO application (which was not part of the violation, our permitting section just needed an updated application) and b) the proper way to go about getting our office to come out to witness a stack test (ITT submittal, etc; sounds like they're planning to stack test as part of their CAP).

Steve said that I had alleviated the need for a meeting. I told him that if he had further questions to contact me directly.

Let me know if you need anymore information on this or if you want me to pass along further information.

Thanks,  
Ryan

2/2/2010

January 25, 2010

Mr. George Baker  
Chief of Enforcement  
Cleveland Division of Air Quality  
75 Erieview Plaza, 2<sup>nd</sup> Floor  
Cleveland, Ohio 44114-1839

**Certified Mail, Return Receipt Requested**Article No. 7002 2410 0003 3574 5304

**Re: Notice of Violation, January 8, 2010**  
**Facility ID: 13-18-40-7499, Agmet LLC**

Dear Mr. Baker:

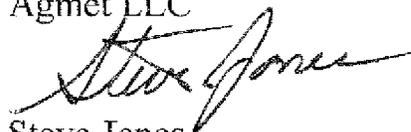
We are in receipt of your NOV Letter of January 8, 2010.

Agmet LLC is requesting a meeting to clarify items presented in the NOV Letter and to discuss an appropriate corrective action plan consistent with our PTL.

You may contact me directly to arrange the meeting time and place. Thank you.

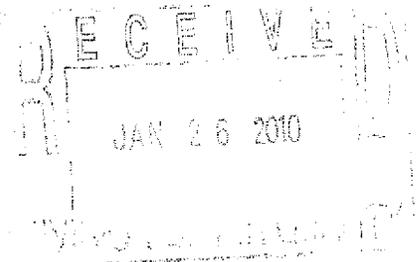
Sincerely,

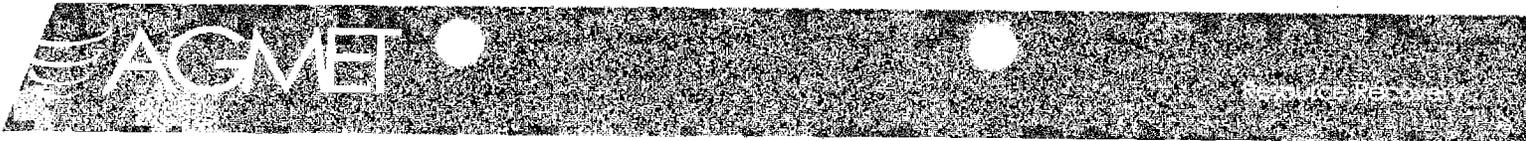
Agmet LLC



Steve Jones  
General Manager

**Cc:** Michael J. Krzywicki, CDAQ  
John Paulian, Ohio EPA Central Office  
Lisa Holscher, U.S. EPA Region V





7800 Medusa Street | Oakwood Village | OH 44146  
P: (440) 439-7400 | F: (440) 439-7446 | W: agmetll.com

March 15, 2010

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**Article No.**

Mr. Ryan Olinek  
Cleveland Division of Air Quality  
75 Erieview Plaza, 2<sup>nd</sup> Floor  
Cleveland, OH 44114-1839

RE: Intent to Test Notification for Agmet LLC (EU P001)

Dear Mr. Olinek:

Enclosed is the OEPA, Intent to Test Notification, for the Rotary Calciner Kiln (EU P001) at Agmet LLC located in Oakwood Village, OH.

The purpose of the Testing Program is for compliance demonstration. The test program will be for, USEPA Method 5, Method 9, and Method 25A. The date for testing is May 11, 2010.

If any change, scheduling, or clarification is necessary, please call.

Respectfully Submitted,

Agmet LLC

Steve Jones  
Operations General Manager

RECEIVED  
MAR 17 2010

# INTENT TO TEST NOTIFICATION

(One Emissions Unit Per Sheet)

## AGENCY USE ONLY

Date Received \_\_\_\_\_  
Assigned \_\_\_\_\_

Facility Premise No. 1318407499  
Emission Unit PTI No. P001  
SCC Number 3-05-150-04 Calcining General

Proposed Test Date May 11<sup>th</sup>, 2010  
Proposed Start Time 8:00 AM

### A. Facility Information

Name Agmet, LLC.  
Address 7800 Medusa St., Oakwood, OH. 45873  
Contact Person Mr. Steve Jones  
Telephone 440-439-7400 (Cell) \_\_\_\_\_  
E-mail sjones@agmet1.com

### Testing Firm Information:

Name Custom Stack Analysis, LLC.  
Address P.O. Box 3750, Alliance, OH. 44601  
Contact Person Mr. James Gray  
Telephone 330-525-5119 (Cell) \_\_\_\_\_  
E-mail stacks@customstackanalysis.com

### B. Testing Location Information

Name Agmet, LLC.  
Contact Person Mr. Steve Jones

Address 7800 Medusa St., Oakwood, OH. 45873  
Telephone Number 440-439-7400 (Cell) \_\_\_\_\_

### C. Test Plan and Emissions Unit Information Table: List the applicable information under each respective column heading.

| Emission Unit #/Description | Control Equipment | Monitoring Equipment | Pollutant(s) to be Tested | EPA Test Method(s) | Number of Sampling Points | Total Time for Sample Run | Number of Sampling Runs |
|-----------------------------|-------------------|----------------------|---------------------------|--------------------|---------------------------|---------------------------|-------------------------|
| P001                        | Baghouse          | Pressure Drop        | Particulate               | 1-5                | 24                        | 60 min.                   | 3                       |
|                             |                   |                      | Opacity                   | 9                  | 1                         | 60 min.                   | 3                       |
|                             |                   |                      | VOC                       | 25A                | 1                         | 60 min.                   | 3                       |

Are any modifications, or alternatives as spelled out within the test methods, being proposed? Yes  No  If "no", then no modifications or alternatives, however minor, will be accepted. If yes, list each test method and section being modified, and attach a detailed modification description and justification: \_\_\_\_\_

Source is testing to comply with (check all that apply):  State PTI  State PTO  Title V  NSPS  MACT  BIF  Title IV  Other: \_\_\_\_\_

D. What is the maximum rated capacity or throughput of the emissions unit given in its permit-to-install or permit-to-operate? 6.0 TPH Total  
Has the facility scheduled production or throughput so that the emissions unit can be operated at the maximum capacity given in its permit-to-install or permit-to-operate during the test? Yes  No  If no, attach explanation.

Specify how operating rate will be demonstrated during testing? Plant production data sheets

Sampling Locations(s): Inlet  Outlet  Simultaneous  Will Cyclonic flow check(s) be conducted? Yes  No

Fuel Sampling: Coal-Proximate  Ultimate  Other  If other, specify: \_\_\_\_\_

Emission rate to be calculated using: F-Factor  Ultimate Coal Analysis  Other  If other, specify: lb/hr and gr/dscf

Has any maintenance or parts replacement been performed on the emissions unit or the control equipment within the last year? Yes  No   
If yes, briefly describe: \_\_\_\_\_

(Note: Some maintenance, such as installing new filter bags in a baghouse, or replacing the activated carbon in an absorber, may disqualify the emissions unit from a performance test until a sufficient amount of time has elapsed to ensure a test which will be representative of normal operation.)

E. Sample train Calibration: All affected measuring and monitoring equipment should be calibrated within 60 days of the scheduled test.

## F. Sample Train Information:

1. See attachments.
2. Glass fiber filter media for particulate collection.
3. Pyrex probe and nozzle.
4. Acetone to be used to clean probe, filter holder and nozzle for particulate collection.

## G. Laboratory Analysis:

### **METHOD 5:**

Particulate samples were collected following EPA Methods 1-5. Three 60 minute test repetitions were performed. The equipment used for testing consisted of a Burrell Model B orsat Analyzer and a Custom Stack Analysis Stack Train Sampler (EPA type). A type "S" pitot and a heated sampling probe were used with the sampling train. All equipment was calibrated in the laboratory prior to the test. The sampling nozzle and the pitot tubes were measured on the day of the test. All calibrations can be found in the appendix. The dust laden gases are passed through a heated pyrex probe and a heated glass four inch filter holder containing Gelman Type A-E fiberglass filter media. The gases leaving the filter were collected in a series of four impingers packed in ice. The first, third, and fourth impingers were the modified Greenburg-Smith type and the second one was a standard Greenburg-Smith type. The first and second impinger contained 100 ml of distilled water. After leaving the third and fourth empty impingers the gases passed through a "Drierite" column containing about 500 grams of calcium sulfate ( $\text{CaSO}_4$ ) desiccant to remove any remaining water vapor. The dry gas then passed through the hose portion of the umbilical cord to a Custom Stack Analysis Model #3000 "Stacksampler" module. In the module the gas was moved through the system by a leakless air pump to a Rockwell 175-S dry test meter. The dry test meter exhausted to a calibrated orifice to measure the flow rate of the gases passing through the sampling apparatus. A type "S" pitot tube was attached to the sheath of the heated probe and nozzle. The orifice pressure taps and the pitot tube were connected to a Dwyer duell 10 inch combination inclined-well type manometer. One half of the manometer measured the orifice differential pressure ( $\hat{H}$ ) and the other half measured the flue gas velocity head ( $\hat{P}$ ). The temperature of the flue gas was measured by a type "K" thermocouple connected to a Marlin Digital Temperature controller. The  $\text{CO}_2$  and  $\text{O}_2$  levels were analyzed using a Burrell "Industrial" Model B orsat analyzer.

### **Method 9:**

This method involves the determination of plume opacity by qualified observers. The observer shall record the name of the plant, emissions location, type of facility, observer's name and affiliation, a sketch of the observers position relative to the source, and the date on a field data sheet. The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition and plume background are recorded on a field data sheet at the time of the opacity readings. Observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. Observer will not continuously look at the plume but momentarily at 15 second intervals. Recording observations shall be recorded to the nearest 5 percent at 15 second intervals. A minimum of 24 observations shall be made. Observers are certified by being tested in 5 percent increments to 25 different black plumes and 25 different white plumes. Opacity certifications will be provided in final report.

### **METHOD 25A:**

This method will be used to measure the total VOC concentration expressed in terms of ppm propane. A gas sample is extracted from the source through a stainless steel probe, through a heated sample line (teflon), to a flame ionization analyzer. The main components of Method 25A are the same as Method 204B with the exception of a non heated sample probe.

The sampling system is heated up to the proper operating temperature. Within two hours of the start of the test the FIA is calibrated. The calibration range or span is selected to be from 1.5 to 2.5 times the expected concentration. Three calibration ranges are then selected as follows: Low level 25-35% of the span, Mid level 45-55% of the span, and a High level 80-90% of the span. A zero and a high level calibration gas is then injected at the valve assembly and the FIA is adjusted to these levels. Then all four gases are introduced into the analyzer and recorded. If the responses are within 5% of the expected values then the analyzer is responding correctly. The sample probe is located in the center of the stack and sealed in place and the test is started. The test lasts for 60 minutes. At the end of the test run a drift check is ran. The zero gas and the mid level calibration gas is injected at the valve assembly. The analyzer responses are then recorded. The drift check is acceptable if the results are within 3% of the span value. These checks are performed before and after each test run.

H. Description of Operations:

Rotary calcining of filter cake

I. Stack and Vent Description:

See attachments.

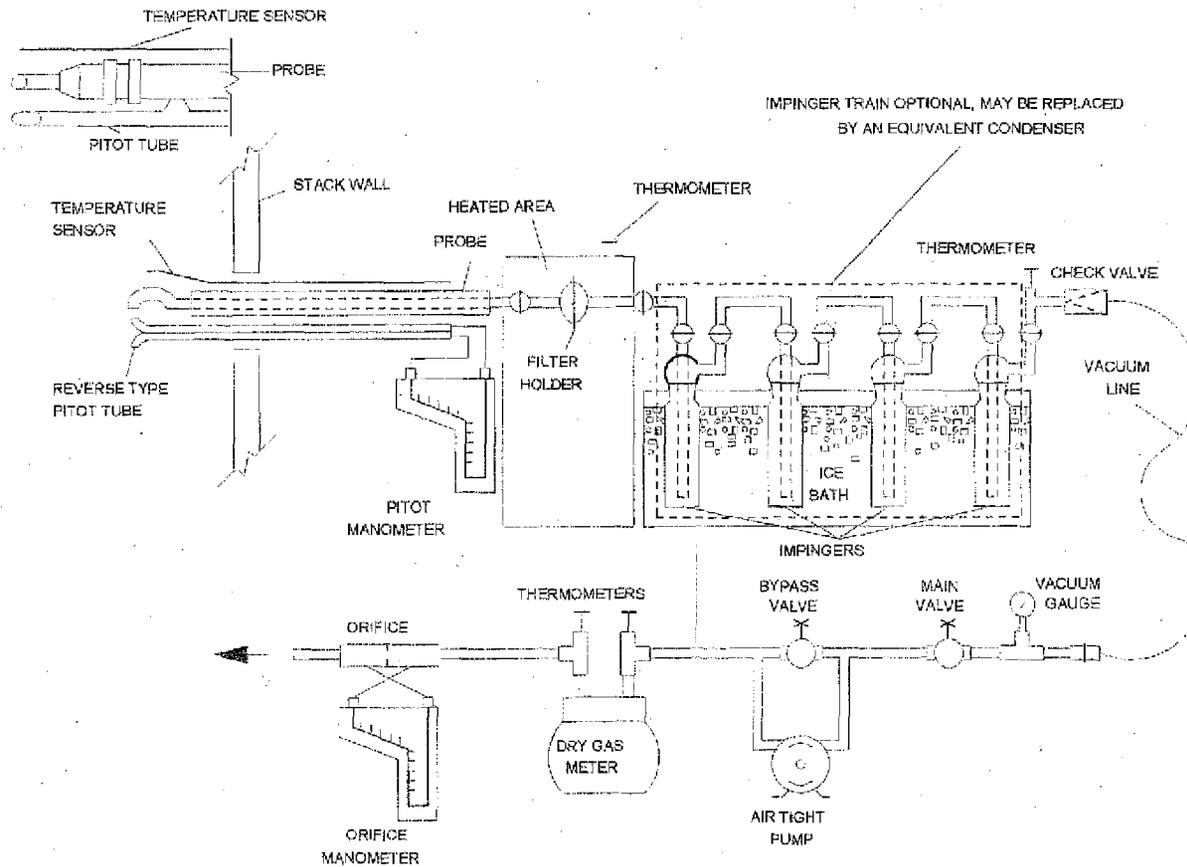
J. Safety

Describe all possible safety hazards including such items as the presence of toxic fumes, high noise levels, areas where eye protection is required, etc.

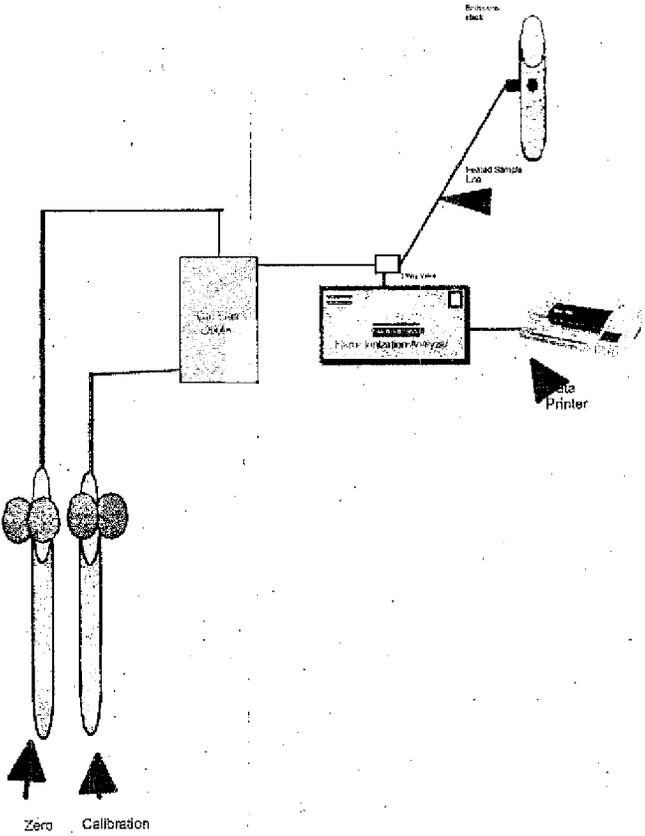
Note: Conditions considered unsafe at the time of the test will cause postponement.

Safety Glasses, Hard Hat & Steel Toed Safety Shoes should be worn on site.

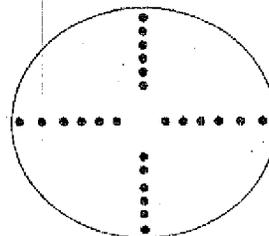
# 5 Sampling System



# 25A Sampling System



## Location of Sampling Points



| Location       | Baghouse Outlet |
|----------------|-----------------|
| Upstream       | 28'             |
| Downstream     | 18'             |
| Stack Diameter | 53.5 Inches     |
| Sample Point # |                 |
| 1              | 1.1 Inches      |
| 2              | 3.6             |
| 3              | 6.3             |
| 4              | 9.5             |
| 5              | 13.4            |
| 6              | 19              |
| 7              | 34.4            |
| 8              | 40              |
| 9              | 44              |
| 10             | 47.2            |
| 11             | 49.9            |
| 12             | 54.4            |