



**AKRON REGIONAL  
AIR QUALITY MANAGEMENT DISTRICT**

*Agent of the Ohio Environmental Protection Agency • Division of the Akron Health Department  
Serving Medina, Portage and Summit Counties*

TELEPHONE: (330) 375-2480  
FAX: (330) 375-2402

L. M. Malcolm, P.E.  
Administrator

November 14, 2007

CERTIFIED MAIL

Mr. Jay Owens  
Quikrete of Michigan  
8951 Schaefer Highway, Bldg. #4  
Detroit, MI 48228

Dear Mr. Owens:

This letter is in response to a recent complaint investigation regarding excessive emissions from the Quikrete Cleveland facility located at 2693 Lake Rockwell Road in Shalersville, Ohio (OEPA ID 1667060129). It is intended to summarize our findings and outline your obligations under Ohio air pollution regulations and serves as follow-up to a 11/6/07 facility inspection. I would like to thank Tim Ryon for his assistance and professional manner during the inspection. Akron Regional Air Quality Management District (ARAQMD) is the contractual agent for Ohio EPA responsible for enforcing air pollution regulations in Summit, Portage and Medina Counties.

The Quikrete Cleveland facility operates a Cement Packaging Plant (OEPA ID P901), Fluid Bed Dryer (OEPA ID P902), Roadways and Parking Areas (OEPA ID F001), and Storage Piles (OEPA ID F002). Each of the emissions units have effective Permits to Operate from Ohio EPA with expiration dates of 7/5/10, and were installed under Permit to Install 16-1513 with an effective date of 10/18/95. R Line Production (OEPA P903, 16-02453) was not or has yet to be installed.

Fluid Bed Dryer P902 consists of a natural gas fired sand/aggregate dryer and associated conveying. Applicable air pollution control requirements for the dryer unit include hourly mass emissions limitations for criteria pollutants and a visible emissions limitation for the stack of 20% opacity as a 6-minute average. The dryer must be of an enclosed design venting emissions to a baghouse/fabric filter. Applicable requirements for sand and aggregate conveying includes adequate moisture content and a visible emission limitation of 1 minute during any 60-minute observation period. Standards of Performance for Calciners and Dryers in Mineral Industries, 40 CFR 60, Subpart UUU, may also apply if Quikrete is considered an affected facility.

Observations of the facility in production mode reveal that the baghouse exhaust for Fluid Bed Dryer P902 emits a recurring visible emission on a twelve second interval. The visible emission is significant in terms of both opacity and frequency and brings into question the compliance status with the permit allowable particulate emissions rate of 3.49 pounds per hour. In order to resolve these compliance issues, ARAQMD is requesting Quikrete to conduct stack testing to

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Mr. Jay Owens  
November 14, 2007  
Page 2

determine the compliance status with the allowable particulate emissions limitation. Quikrete must also provide reasoning why Subpart UUU is not applicable to the plant.

Cement Packaging Plant P901 includes raw material silos and vents, bucket elevator, shaker and rotary screens, weigh hopper, mixers, cement packaging operations, and all related transfer points. Applicable air pollution control requirements for this emission unit include the installation and operation of enclosures and hoods to adequately enclose, contain, capture, and vent particulate emissions to a fabric filter. Performance of the control system must be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture. Particulate emissions from the fabric filter(s) must not exceed 2.22 pounds per hour and the building which houses this process equipment shall exhibit no visible emissions of fugitive dust to ambient air. Observations of the facility have noted significant visible particulate emissions from the building which houses the packaging plant in violation of the applicable permit requirements. Building vents situated on the east side of the tower and north side of the dryer room are caked with particulate matter indicating a history of fugitive emissions and noncompliance with the visible emissions limitation contained in the effective permit. These visible emissions violations indicate that some or all of the packaging plant control system is not in compliance with applicable permit and regulatory requirements. Operating in this manner constitutes a violation of Ohio Revised Code 3704.05 and Ohio Administrative Code rule 3745-17-08. In order to resolve this issue, Quikrete must make modifications in Cement Packaging Plant P901 to improve the performance of the emissions capture and control system to comply with applicable requirements and eliminate visible particulate emissions to ambient air. Quikrete should consider installing a powered ventilation system equipped with a baghouse/fabric filter to address the fugitive emissions in the tower.

Effective operating permits for Cement Packaging Plant P901, Fluid Bed Dryer P902, and Plant Roadways and Parking Areas F001 contain monitoring, record-keeping and reporting requirements for the purpose of identifying potential emission problems, establishing response actions, and documenting results. When requested to provide the operations log documenting these monitoring activities, Quikrete did not have any knowledge of these requirements and could not provide the logs. In addition, we have not received deviation reports required by the effective operating permits. Be advised that this constitutes a violation of ORC 3704.05.

The General Terms and Conditions of effective Ohio EPA permits provide that air contaminants emitted by permitted emissions units shall not cause a public nuisance in violation of OAC rule 3745-15-07. OAC rule 3745-15-07 establishes a public nuisance to be the emission or escape into ambient air from any regulated source air contaminant emissions that endanger the health, safety or welfare of the public or cause unreasonable injury or damage to property. It is unlawful for any person to cause, permit or maintain any such public nuisance. Based on the nature of complaints and our investigation, Quikrete is causing, permitting and maintaining a public nuisance in violation with the requirements of OAC rule 3745-15-07.

Mr. Jay Owens  
November 14, 2007  
Page 3

Please respond to this letter in writing, no later than fourteen (14) days from receipt, by submitting a compliance plan and schedule to achieve compliance with applicable air pollution control requirements. The compliance plan and schedule must contain specific steps or actions that will be undertaken by Quikrete along with corresponding target dates or deadlines. The plan must address insufficient capture and control of visible particulate matter associated with Cement Packaging Plant P901, provide for source testing to determine particulate emissions from the baghouse controlling emissions from Fluid Bed Dryer P902, and resolve monitoring, record-keeping and reporting deficiencies. Stack testing must be conducted immediately.

The acceptance of a plan and schedule to resolve air pollution violations in this case in no way waives the right of Ohio EPA or U.S. EPA to pursue additional enforcement action in this matter. Note that State law allows for monetary penalties of up to \$25,000 per day per violation. The decision to pursue or decline to pursue additional enforcement action will be made at a later date.

If you have any questions, please contact me at 330-375-2480, ext 6054.

Sincerely,



Frank J. Markunas  
Chief Air Quality Engineer

FJK

c: Lisa Holscher, US EPA  
Tom Kalman, Ohio EPA  
Lynn Malcolm, ARAQMD Administrator  
Duane LaClair, Air Quality Engineer