



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Scott J. Nally, Director

Re: Erie County
 0322010062
 Huron Lime, Inc.
Stack Test
Resolution of Violation

January 11, 2013

Mr. Chris Kitts
 Huron Lime, Inc.
 P. O. Box 451
 Huron, Ohio 44839

Dear Mr. Kitts:

The stack test conducted on November 19-21, 2012, on Ohio EPA emissions unit Nos. P901, P902, and P903 (Lime Kilns), has been reviewed. The testing of P902 and P903 was conducted in conformance with Ohio EPA methods and procedures. The testing of P901 was not witnessed by the Ohio EPA; however based on the information in the test report it appears to have been conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data are accurate:

Critical Test Data - PM
(In Three Run Averages)

Emission Unit	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
P901	69.3 lbs/hr*	100 lbs/hr*	13.7 TPH	15 TPH
P902	69.3 lbs/hr*	100 lbs/hr*	13.85 TPH	15 TPH
P903	69.3 lbs/hr*	100 lbs/hr*	13.75 TPH	15 TPH

*combined results for P901, P902, and P903

Also, the following parameters were recorded during the testing of the following emission units:

Kiln 1 Parameter	Required Value	Actual Value
Scrubber Pressure Drop	>16 inches of water	18 inches of water
Scrubber Pump Amperage	>23 amps	35.5 amps
Water Flow to I.D. Fan	>4 gpm	4 gpm
Water Flow to Quench Unit	>275 gpm	400 gpm

^a Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

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Kiln 2 Parameter	Required Value	Actual Value
Scrubber Pressure Drop	>16 inches of water	20 inches of water
Scrubber Pump Amperage	>23 amps	36 amps
Water Flow to I.D. Fan	≥4 gpm	4 gpm
Water Flow to Quench Unit	>275 gpm	400 gpm

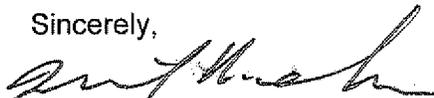
Kiln 3 Parameter	Required Value	Actual Value
Scrubber Pressure Drop	>16 inches of water	20 inches of water
Scrubber Pump Amperage	>23 amps	32 amps
Water Flow to I.D. Fan	≥4 gpm	4 gpm

The compliance demonstration is acceptable and satisfies the compliance demonstration requirements contained in the Title V operating permit effective October 21, 2008. In accordance with Engineering Guide #16, Huron Lime, Inc., is required to test the three kilns (P901, P902, and P903) for particulate emissions annually. It is required that testing this year for particulate emissions be conducted within one year of the previous testing date (November 19-21, 2012).

Additionally, by Huron Lime, Inc. conducting this stack test, the Notice of Violation issued on August 8, 2012, has been resolved. Please note that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for the violation noted in the NOV letter. The decision on whether to pursue or decline to pursue such penalties regarding this are dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Thank you for your cooperation in this matter. Please feel free to contact this writer at (419) 373-3069 if you have questions or comments.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/cg

pc: Robert Teer, DAPC, NWDO
DAPC, NWDO Stack File
ec: Miranda Garlock, DAPC, NWDO
Jay Liebrecht, DAPC, NWDO
Tom Sattler, DAPC, NWDO
Robert Teer, DAPC, NWDO
Mohammad Smidi, DAPC, NWDO
Jennifer Jolliff, DAPC, NWDO
Bruce Weinberg, DAPC, CO
Molly DeSalle, US EPA Region 5
Chris Kitts, Huron Lime, Inc.
Tammy Endlish, Endlish Environmental & Energy, LLC