



HODGE DWYER & DRIVER

ATTORNEYS AT LAW

KATHERINE D. HODGE
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September 11, 2009

VIA CERTIFIED MAIL
(Return Receipt Requested)

Attn: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3511

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SEP 14 2009

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

RE: Supplemental Environmental Project
Completion Report
In the Matter of: Vesuvius USA Corporation
Charleston, Illinois
Docket No. CAA-05-2008-0040
Our File No. – VESU:003

To Whom It May Concern:

Pursuant to paragraph 45 of the Consent Agreement and Final Order ("CAFO"), enclosed please find the Supplemental Environmental Project ("SEP") Completion Report ("Report") in the above-referenced matter. Due to recent changes in personnel at the company, Vesuvius USA Corporation ("Vesuvius") was unable to locate a few of the documents referenced in the enclosed Report. Nevertheless, Vesuvius feels that its expenditures related to the SEP are well documented through the large amount of other supporting information that is enclosed with the Report.

If you should have any questions, please do not hesitate to contact me.

Sincerely,


Katherine D. Hodge

KDH:amb
enclosure

pc: Regional Hearing Clerk (via U.S. Mail; w/enclosure)
Susan Prout, Esq. (via U.S. Mail; w/o enclosure)
Julie K. Armitage, Esq. (via U.S. mail; w/o enclosure)

VESU:003/Corr/USEPA Ltrs/USEPA Ltr02 – SEP Report

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:

**Vesuvius USA Corporation
Charleston, Illinois,**

Respondent.

Docket No. CAA-05-2008-0040

**Proceeding to Assess a Civil Penalty
Under Section 113(d) of the Clean Air
Act, 42 U.S.C. § 7413(d)**

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SUPPLEMENTAL ENVIRONMENTAL PROJECT COMPLETION REPORT

**REGIONAL HEARING CLERK
ENVIRONMENTAL
PROTECTION AGENCY**

NOW COMES Vesuvius USA Corporation ("Vesuvius"), and provides this Supplemental Environmental Project ("SEP") Completion Report, pursuant to paragraph 45 of the Consent Agreement and Final Order ("CAFO") that was filed with the Regional Hearing Clerk in In the Matter of: Vesuvius USA Corporation, Charleston, Illinois, Docket No. CAA-05-2008-0040, on September 26, 2008. For its SEP Completion Report, Vesuvius provides the following:

A. A detailed description of the SEP as completed;

For its SEP, Vesuvius installed a Regenerative Thermal Oxidizer ("RTO") to reduce total volatile organic compounds ("VOC") and greenhouse gas ("GHG") emissions from its Charleston, Illinois facility. Specifically, Vesuvius replaced the existing mix plant incinerator ("FI-6") at the facility with the RTO. The RTO now controls VOC emissions from the run cycle of Tube Dryers TD-2 and TD-3. Vesuvius also installed piping to vent the purge cycle VOC emissions from Tube Dryers TD-2 and TD-3 to the RTO. The following chronology is provided to describe Vesuvius' process for completion of the SEP. The purchase orders, invoices and other documents referenced below are attached hereto.

October 22, 2008 - Vesuvius obtains corporate approval to proceed with installation of RTO.

October 22, 2008 - Vesuvius purchases RTO from Kono Kogs, Inc. for \$118,900.00. (Purchase Order ("PO") # 425215 OP)

- Electronic funds transfer history detail report, dated October 28, 2008, down payment of \$59,450.00
- Wire Transfer Log Sheet, dated December 19, 2008, second payment of \$47,560.00 (also, Invoice # 4457, dated December 15, 2008, for \$47,560.00)

- Invoice # 4568, dated June 15, 2009, final payment of \$11,890.00
- October 30, 2008 - Vesuvius hires Bodine Electric of Decatur for installation of electrical conduit and wiring for the RTO. (PO # 426654 OP for \$5,810.00 original amount, but change orders increased total by additional \$10,866.23)
- Invoice # 09027, dated December 19, 2008, for \$5,810.00
 - Invoice # 10435, dated February 25, 2009, for \$2,532.66
 - Invoice # 10437, dated February 25, 2009, for \$3,713.89
 - Invoice # 10436, dated February 25, 2009, for \$4,619.68
- October 30, 2008 - Vesuvius purchases PLC interface programming for RTO and Mix Plants from MT Systems. (PO # 426549 OP for \$3,000.00)
- Invoice # 6477, dated December 2, 2008, for \$3,000.00
- November 12, 2008 - Vesuvius purchases Variable Speed DC Drive for Old Mix Plant from Springfield Electric Supply Company. (PO # 428491 OP for \$3,159.25)
- Invoice # S2486639.001, dated November 14, 2008, for \$3,159.25
- November 14, 2008 - Vesuvius hires Merz Heating & Air Conditioning, Inc. for ductwork for the RTO. (PO # 429000 OP for original amount of \$120,750.00, but change orders increased total amount by \$14,633.00)
- Invoice # 9872J, dated December 22, 2008, for \$120,750.00
 - Invoice # 10022J, dated February 27, 2009, for \$450.00
 - Invoice # 10008J, dated February 27, 2009, for \$3,705.00
 - Invoice # 9973J, dated February 27, 2009, for \$433.00
 - Invoice # 9972J, dated February 27, 2009, for \$2,932.00
 - Invoice # 9971J, dated February 27, 2009, for \$616.00
 - Invoice # 9970J, dated February 27, 2009, for \$1,419.00

- Invoice # 10012J, dated February 27, 2009, for \$5,108.00
- December 4, 2008 - Vesuvius notifies the United States Environmental Protection Agency (“USEPA”) and the Illinois Environmental Protection Agency (“IEPA”) that no construction permit is required by 35 Illinois Administrative Code § 201.146(hhh), when one control device replaces another control device and overall emissions are reduced.
- December 15, 2008 - AKRA Builders Inc. starts and completes construction of concrete pad for the RTO. (PO # 426653 OP for \$8,428.00)
- Invoice # 08347, dated December 22, 2008, for \$8,428.00
- December 23, 2008 - R&J Transport, Inc. delivers the RTO to Vesuvius. (PO # 433837 OP, dated December 17, 2008, for \$2,895.00)
- Invoice # 31514, dated December 23, 2008, for \$2,895.00
- December 23, 2008 - Vesuvius hires Neal Machinery Erectors Inc. for the rigging and mechanical installation of the RTO. (PO # 428997 OP for \$3,900.00)
- Invoice # 3885, dated December 24, 2008, for \$3,900.00
- January 7, 2009 - Vesuvius hires Wente Plumbing & Heating Company, Inc. for compressed air and natural gas piping to the RTO. (PO # 434655 OP for \$3,400.00)
- Invoice # 15580, dated February 20, 2009, for \$3,400.00
- January 22, 2009 - Vesuvius sends stack test protocols to IEPA for approval.
- February 16, 2009 - Kono Kogs, Inc. starts up the RTO in “run mode.” (PO # 436544 OP for \$6,000.00, but change orders increased the amount by \$5,679.79) [Could not locate copies of these change orders.]
- Invoice # 3506, dated February 24, 2009, for \$11,679.79
- March 4, 2009 - Vesuvius sends revised stack test protocols to IEPA incorporating Mix Plant rooms as Potential Total Enclosures. [Could only locate a copy of the February 20, 2009 Platt Environmental letter to J. Woodall at Vesuvius regarding test protocol, but not the e-mail from March 4, 2009, where Vesuvius sent revised test protocol to IEPA.]

- March 18, 2009 - Kono Kogs, Inc. starts up the RTO in “clean mode.” (PO # 436544 OP used for this start up also.)
- Invoice # 3513, dated April 15, 2009, for \$3,781.36
- April 10, 2009 - IEPA approves stack test protocols for the RTO.
- July 8, 2009 - Platt Environmental Services, Inc. performs stack tests on the RTO. (PO # 434897 OP for \$12,727.00)
- Invoice # 16196, dated August 13, 2009, for \$12,727.00
- July 29, 2009 - Platt Environmental Services, Inc. submits VOC Control Efficiency Compliance Test Report to Vesuvius containing RTO stack test results.
- July 31, 2009 - Vesuvius forwards Platt Environmental Services, Inc. VOC Control Efficiency Compliance Test Report to IEPA.

B. A description of any operating problems and the actions taken to correct the problems;

N/A

C. Itemized costs of goods and services used to complete the SEP documented by copies of invoices, purchase orders, or canceled checks or other documents that specifically identify and itemize the individual costs of the goods and services;

As discussed in Section A above, Vesuvius has completed the SEP. Table 1 summarizes the costs involved therein.

Table 1
SEP Costs

PO #	Description	Invoiced Amount
425215 OP	Kono Kogs--RTO	\$118,900.00
426654 OP	Bodine Electric—RTO Electrical Work	\$16,676.23
426549 OP	MT Systems—RTO Interface Programming	\$3,000.00
428491 OP	Springfield Electric—Variable Speed Drive	\$3,159.25
429000 OP	Merz Heating & Air—Ductwork	\$135,383.00
426653 OP	AKRA Builders—Concrete pad	\$8,428.00
433837 OP	R&J Transport-Trucking	\$2,895.00
428997 OP	Neal Machinery—Mechanical rigging	\$3,900.00
434655 OP	Wente Plumbing & Heating—Piping	\$3,400.00
436544 OP	Kono Kogs—“Run Mode” start up	\$11,679.79

436544 OP	Kono Kogs—"Clean Mode" start up	\$3,781.36
434897 OP	Platt Environmental—Stack Test	\$12,727.00
	Total Invoiced Amount	\$323,929.63

D. Certification that Vesuvius has completed the SEP in compliance with this CAFO; and

Respondent, Vesuvius USA Corporation, certifies that the SEP has been fully implemented in accordance with the CAFO that was filed with the Regional Hearing Clerk on September 26, 2008.

E. Description of the environmental and public health benefits resulting from the SEP (quantify the benefits and pollution reductions, if feasible).

The SEP completed by Vesuvius has resulted in the installation of a replacement control device that also controls previously uncontrolled emission activities at the Charleston, Illinois facility. Specifically, the SEP has resulted in reduced emissions of approximately 10 tons per year ("tpy") of VOCs and approximately 236 tpy of GHG.

CERTIFICATION

I certify that I am familiar with the information in this document and that, based on my inquiry of those individuals responsible for obtaining the information, it is true and correct to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Dated: SEPT. 10, 2009

By: Donald M. Satina
Donald M. Satina, Esq.
Assistant Secretary
Vesuvius USA Corporation

VESU:003/Misc/SEP Completion Report – clean version

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