



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 31 2014

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Stacey Rader  
Area Environmental Manager  
Carmeuse Lime, Inc.  
3964 County Road 41  
Millersville, Ohio 43435

Re: Finding of Violation  
Carmeuse Lime, Inc.  
Millersville, Ohio

Dear Ms. Rader:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Carmeuse Lime, Inc. (you) under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3).

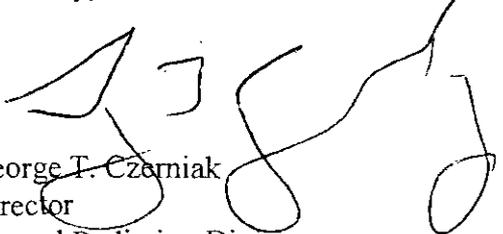
Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action:

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Kushal Som. You may call him at 312.353.5792 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



George T. Czerniak  
Director  
Air and Radiation Division

Enclosure

cc: Bob Hodanbosi  
Department of Air Pollution Control  
Ohio Environmental Protection Agency



6. The Title V permit lists applicable emissions and limitations under Condition 8(b)(1)(d) for Kiln 1 and 2.
7. The NESHAP for Lime Manufacturing Plants at 40 C.F.R. Part 63, Subpart AAAAA applies to lime kilns at lime manufacturing plants.
8. The NESHAP, at 40 C.F.R. § 63.7090 and Table 1, requires that particulate matter (PM) emissions at existing lime kilns with wet scrubbers emit less than 0.60 pounds of PM per ton of stone feed.
9. Condition 8(b)(1)(d) of the Title V permit cites 40 C.F.R. Part 63, Subpart AAAAA, and lists the following federally enforceable emission limit for Kilns 1 and 2:
  - 0.60 pounds particulate matter PM per ton of stone feed

Factual Background

10. Carmeuse Lime, Inc. owns and operates a lime manufacturing facility located at 3964 County Road 41, Millersville, Ohio (the facility).
11. Carmeuse Lime began operating at the facility in 1952.
12. The facility consists of two rotary kilns that vent to scrubbers for PM control.
13. The kilns are each an "emission unit," as that term is defined at Section 40 C.F.R. § 63.7143. "Lime kiln" means the device, including associated preheater, used to produce a lime product from stone feed by calcination. Kiln types include, but are not limited to, rotary kiln, vertical kiln, rotary hearth kiln, double-shaft vertical kiln, and fluidized bed kiln.
14. Carmeuse Lime conducted the PM testing on Kiln 1 on November 19, 2013, following EPA Reference Method 5.
15. The results of the PM testing at Carmeuse Lime were provided to EPA in an E-mail dated March 18, 2014.
16. Test results for Kiln 1 are as follows:

Run	PM Average (lb/tsf)
Run #1	0.881
Run #2	0.915
Run #3	0.846
<b>Average</b>	<b>0.881</b>

17. During the PM testing, the average lime production in tons per hour was 25.49 tons of stone feed per hour.

### Violations

18. Kiln 1 averaged 0.881 pounds of PM per ton of stone feed produced during the November 19, 2013 PM testing in violation of the facility's Title V permit, condition 8(b)(1)(d) and 40 C.F.R. § 63.7090 (Table 1). Both condition 8(b)(1)(d) of the Title V permit and 40 C.F.R. Part 63, Subpart AAAAA at 40 C.F.R. § 63.7090 (Table 1), limits PM emissions from Kiln 1 and 2 to 0.60 pounds of PM per ton of stone feed.

### Environmental Impact of Violations

19. These violations have caused an excess emission of particulate matter. Particulate matter emitted from lime kilns has been shown to contain hazardous air pollutant metals: such as nickel and manganese.

Particulate matter, especially fine particulates, contain microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems. Particulate matter exposure contributes to:

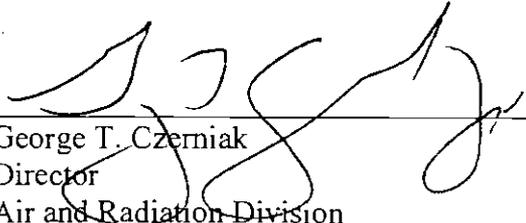
- irritation of the airways, coughing, and difficulty breathing;
- decreased lung function;
- aggravated asthma;
- chronic bronchitis;
- irregular heartbeat;
- nonfatal heart attacks; and
- premature death in people with heart or lung disease.

Manganese metals can affect the nervous system, and can lead to slower visual reaction time, poorer hand steadiness, and impaired eye-hand coordination.

Nickel metal exposure can result in respiratory effects, including a type of asthma specific to nickel, decreased lung function, and bronchitis.

Date

3/31/14

  
George T. Czerniak  
Director  
Air and Radiation Division

**CERTIFICATE OF MAILING**

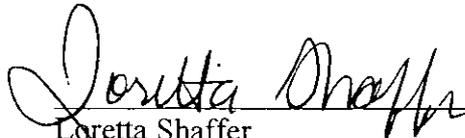
I, Loretta Shaffer, certify that I sent a Finding of Violation, No. EPA-5-14-OH-11, by Certified Mail, Return Receipt Requested, to:

Ms. Stacey Rader  
Carmeuse Lime, Inc.  
3964 County Road 41  
Millersville, OH 43435

I also certify that I sent copies of the Notice of Violation by first-class mail to:

Bob Hodanbosi  
Department of Air Pollution Control  
Ohio Environmental Protection Agency  
50 West Town Street  
Suite 700  
Columbus, Ohio 43215

On the 2 day of April 2014.



Loretta Shaffer  
Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70091680 0000 7670 0702