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

JUN 30 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lloyd Meyer, President Chicago Division
Ozinga Ready Mix, Inc.
2222 South Lumber Street
Chicago, Illinois 60616

Re: Administrative Order EPA-5-16-113(a)-IL-09

Dear Mr. Meyer:

Enclosed is an executed original of the Administrative Consent Order regarding the above captioned case. If you have any questions about the Order, please contact me at (312) 886-3850.

Sincerely,

Nathan Frank
Chief
Air Enforcement and Compliance Assurance Section (IL/IN)

Enclosure

cc: Yasmine Keppner-Bauman
Illinois Environmental Protection Agency (by electronic mail)

Nancy J. Rich, Esq.
Katten, Muchin, Rosenman LLP (by electronic mail)
Nancy.Rich@kattenlaw.com

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**EPA-5-16-113(a)-IL-09**
	)	
	)	
Ozinga Ready Mix Concrete, Inc.	)	**Proceeding Under Sections 113(a)(1) and**
Chicago, Illinois	)	**114(a)(1) of the Clean Air Act**
	)	**42 U.S.C. §§ 7413(a)(1) and 7414(a)(1)**
	)	
	)	
	)	

Administrative Consent Order

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency, Region 5, is issuing this Order to Ozinga Ready Mix Concrete., Inc. (Ozinga) under Sections 113(a)(1) and 114(a)(1) of the Clean Air Act (CAA), 42 U.S.C. §§ 7413(a)(1) and 7414(a)(1).

2. This Order applies to the facilities listed in Appendix A that are owned and operated by Ozinga.

I. Statutory and Regulatory Background

3. Each state must submit to the Administrator of EPA a plan, called a State Implementation Plan (SIP), for attaining and maintaining the National Ambient Air Quality Standards under Section 110 of the CAA, 42 U.S.C. § 7410.

4. On February 21, 1980, EPA approved Illinois Pollution Control Board (IPCB) Rule 203(f)(1) [now 35 Ill. Admin. Code § 212.301] as part of the federally enforceable SIP for the State of Illinois. See 45 *Fed. Reg.* 11472, 11495. 35 Ill. Admin. Code § 212.301 states that, "No person shall cause or allow the emission of fugitive particulate matter from any process,

including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the emission source."

5. On July 14, 1999, EPA approved 35 Ill. Admin. Code § 212.302 as part of the federally enforceable SIP for the State of Illinois. See 64 *Fed. Reg.* 37847, 37851. The rule at 35 Ill. Admin. Code § 212.302 states that "[s]ections 212.304 through 212.310 and 212.312 of this Subpart shall apply to ... manufacturing operations (SIC major groups 20 through 39...), which are located in the areas defined by the boundaries of the following townships ... in the following counties: Cook: All townships."

6. On February 21, 1980, EPA approved IPCB Rule 203(f)(3)(C) [now 35 Ill. Admin. Code § 212.306 (Traffic Areas)] as part of the federally enforceable SIP for Illinois. This regulation became federally effective on February 21, 1980. 45 *Fed. Reg.* 11472, 11495. The rule at 35 Ill. Admin. Code § 212.306 requires, among other things, that all normal traffic pattern roads and parking facilities which are located on manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Admin. Code §§ 212.309 and 212.310.

7. On February 21, 1980, EPA approved 35 Ill. Admin. Code § 212.308 as part of the federally enforceable SIP for the State of Illinois. 45 *Fed. Reg.* 11472, 11495. The Rule at 35 Ill. Admin. Code § 212.308 is set forth in the Illinois SIP at Rule 203(f)(3)(Ea) and states that "[c]rushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations

shall be sprayed with water or a surfactant solution, utilize choke-feeding or be treated by an equivalent method in accordance with an operating program."

8. On July 14, 1999, EPA approved 35 Ill. Admin. Code 212.309 (Operating Program) as part of the federally enforceable SIP for Illinois. This regulation became federally effective on September 13, 1999. 64 *Fed. Reg.* 37847, 37851. The rule at 35 Ill. Admin. Code § 212.309 states "[t]he emission units described in Sections 212.304 through 212.308 and Section § 212.316 of this subpart shall be operated under the provisions of an operating program, consistent with the requirements set forth in Sections 212.310 and 212.312 of this Subpart... Such operating program shall be designed to significantly reduce fugitive particulate matter emissions."

9. On February 21, 1980, EPA approved 35 Ill. Admin. Code § 212.310 as part of the federally enforceable SIP for the State of Illinois. 45 *Fed. Reg.* 11472, 11495. 35 Ill. Admin Code § 212.310 is set forth in the Illinois SIP at Rule 203(f)(3)(F) and describes the minimum requirements of a fugitive particulate matter operating program to include:

a. "The name and address of the source;

b. The name and address of the owner or operator responsible for execution of the operating program;

c. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;

d. Location of unloading and transporting operations with pollution control equipment;

e. A detailed description of the best management practices utilized to achieve compliance with this Subpart, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;

f. Estimated frequency of application of dust suppressants by location of materials; and

g. Such other information as may be necessary to facilitate the Agency's review of the operating program."

10. On July 14, 1999, EPA approved 35 Ill. Admin. Code § 212.316 (Emission Limitations for Sources in Certain Areas) as part of the federally enforceable SIP for the State of Illinois. This regulation became federally effective on September 13, 1999. 64 *Fed. Reg.* 37847, 37851.

11. The rule at 35 Ill. Admin. Code § 212.316 applies to the operations specified in Section § 212.302 that are located in the areas defined in Section § 212.324(a)(1). The rule at 35 Ill. Admin. Code § 212.316(c) states that no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area (except those at certain quarries) to exceed an opacity of 10 percent.

12. The rule at 35 Ill. Admin. Code § 212.302 states that Sections 212.304 through 212.310 and 212.312, applies to, among other things, manufacturing operations (SIC major groups 20 through 39) located in the geographical areas defined in Section 212.324(a)(1).

13. On March 11, 1998, EPA approved 35 Ill. Admin. Code 212.324 (Process Emission Sources in Certain Areas) as part of the federally enforceable SIP for Illinois. 63 *Fed. Reg.* 11842, 11847.

14. The rule at 35 Ill. Admin. Code § 212.324(a)(1) defines three geographical areas, one in the vicinity of Lake Calumet in Cook County, Illinois: That area bounded by boundaries from Universal Transmercator (UTM) coordinate 445000mE, 4622180mN, east to 456265mE, 4622180mN, south to 456265E, 4609020N, west to 445000mE, 4609020mN, north to 445000ME, 4622180mN.

15. On March 11, 1998, EPA approved 35 Ill. Code Part 212, Subpart A (General), Section 212.109 (Opacity Measurement Methods) as part of the federally enforceable SIP for Illinois. 63 *Fed. Reg.* 11842, 11847.

16. The rule at 35 Ill. Admin. Code § 212.109 states that opacity measurements from roadways shall be conducted in accordance with Method 9, 40 C.F.R. Part 60, Appendix A except that the number of readings required for each vehicle pass shall be three, taken at five (5)-second intervals. The first reading shall be at the point of maximum opacity and the second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings shall be averaged.

17. Under Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating a SIP. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

18. The Administrator of EPA may require any person who owns or operates an emission source to make reports; install, use and maintain monitoring equipment; sample emissions; and provide information required by the Administrator under Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Air and Radiation Division.

II. Findings-2255 S. Lumber Street

19. Ozinga owns and operates a concrete batch manufacturing plant, SIC 3273, located at 2255 South Lumber Street, Chicago, Illinois (the Lumber Facility). The Lumber Facility's Standard Industrial Classification (SIC) Code is 3273 (ready-mixed concrete manufacturing).

20. Emissions from the Lumber Street Facility are subject to the fugitive particulate matter regulations in the Illinois SIP at IPCB Rule 203(f)(1) and 203(f)(3)(C) and (F) and 35 Ill. Admin. Code §§ 212.301, 212.302, 212.306, 212.309, and 212.310, and Section 114 of the CAA.

21. At all times relevant to this Order, the Lumber Street Facility was subject to the provisions of the Illinois SIP at 35 Ill. Admin. Code §§ 212.301, 212.302, 212.306, 212.308, 212.309, and 212.310, and Section 114 of the CAA.

22. On March 6, 2014, EPA representatives performed an inspection of the Facility and observed the following:

a. Fugitive particulate matter emissions were observed while materials were removed from one of the piles onsite that was close to Lumber Street;

b. Fugitive particulate matter emissions were generated as a materials handler moved materials from a barge in the river to a pile;

c. Conveyors were not enclosed;

d. There was an unknown odor; and

e. Some of the various raw material storage piles appeared to not be wet.

23. On June 16, 2014, EPA conducted offsite observations of the Lumber Facility and saw particulate matter emissions from the road, which crossed Ozinga's property line on the western side of the Facility's property when the concrete trucks left the Facility. As the trucks left the Lumber Facility, dust from the roads blew onto Lumber Street.

24. On July 21, 2014, EPA conducted offsite observations of the Lumber Facility and saw particulate matter emissions from barge loading off-loading operations, which crossed Ozinga's property line and blew into the South Branch of the Chicago River.

25. After the inspection and observations, EPA asked facility personnel for the current Fugitive Particulate Matter Operating Program ("Program"). Although Ozinga provided EPA

with the facility's operating program dated September 11, 2009 on June 1, 2015, at the inspection the facility provided a document dated November 6, 1987, which did not include current information about the following:

a. A map or diagram of the facility showing approximate locations of storage piles, conveyor loading operations, normal pattern access areas surrounding storage piles and all normal traffic patterns within the facility;

b. Locations of unloading and transporting operations with pollution control equipment;

c. Pollution controls and best management practices for the particulate matter emissions from the crushing plant and portable concrete plant;

d. Estimated frequency of application of dust suppressants by location of materials.

The current operating program of record dated September 11, 2009, contains the information required in subparagraphs (a) through (d) above.

26. On October 8, 2014, EPA sent Ozinga a Request for Information pursuant to Section 114 of the CAA. The Request required Ozinga to answer the Request within 30 calendar days of receipt of the Request.

27. On June 1, 2015, Ozinga submitted its response to EPA's October 8, 2014, Request for Information, approximately six months late.

28. On May 28, 2015, EPA again inspected the Lumber Facility and observed the following:

a. Fugitive particulate matter emissions were coming off the west end of the facility across Lumber Street; and

b. Vehicles leaving the facility grounds were generating fugitive particulate emissions from the internal roadway.

III. Violations-Lumber Street

29. Ozinga violated Rule 203(f)(3)C) of the Illinois SIP [35 Ill. Admin. Code § 212.306] on March 6, 2014, June 16, 2104, and May 28, 2015, as observed by EPA's inspector by not cleaning the roads of the Lumber Facility, which are paved, so as to prevent particulate matter emissions.

30. Ozinga violated Rule 203(f)(l) of the Illinois SIP [35 Ill. Admin. Code § 212.301], on June 16, 2014, July 21, 2014, and May 28, 2015, as observed by EPA's inspector, by causing particulate matter to cross the property line of the Lumber Facility.

31. Ozinga violated 35 Ill. Admin. Code § 212.309 and Rule 203(f)(3)(F) of the Illinois SIP [35 Ill. Admin. Code § 212.310] by not using best management practices at the Facility to significantly reduce particulate matter emissions.

32. Ozinga violated Rule 203(f)(3)(F) of the Illinois SIP [35 Ill. Admin. Code § 212.310] by not having available its current Fugitive Particulate Matter Operating Program when requested by EPA's inspector

33. Ozinga violated Section 114 of the CAA by failing to comply with a Request for Information issued on October 8, 2014, by the due date, November 9, 2014. 42 U.S.C. § 7414(a)(1).

34. On March 31, 2015, EPA issued to Ozinga a Notice of Violation (NOV) alleging violations of the Illinois SIP at 35 Ill. Admin. Code §§ 212.309, 212.310, 212.306, and 212.301.

35. On March 31, 2015, EPA issued to Ozinga an Administrative Order pursuant to Section 113(a)(1) of the CAA, requiring Ozinga to comply with the requirements of the Section 114 Request within 20 days. 42 U.S.C. § 7414(a)(1)

36. On May 21, 2015, representatives of Ozinga and EPA discussed the March 31, 2015 NOV and the March 31, 2015 Administrative Order.

IV. Findings-1818 East 103rd Street

37. Ozinga owns and operates a concrete manufacturing plant at 1818 East 103rd Street, Chicago, Illinois (the 1818 East 103rd Street Facility). The 1818 East 103rd Street Facility's SIC Code is 3273.

38. The 1818 East 103rd Street Facility is located within the following geographical area: that area bounded by lines from UTM coordinate 445000mE, 4622180mN, east to 456265mE, 4622180mN, south to 456265E, 4609020N, west to 445000mE, 4609020mN, north to 445000ME, 4622180mN.

39. Emissions from the traffic areas at the 1818 East 103rd Street Facility are subject to the fugitive particulate matter regulations in the Illinois SIP at 35 Ill. Admin. Code §§ 212.302, 212.306, 212.309, and 212.316 and the opacity measurement methods in 35 Ill. Admin. Code § 212.109.

40. At all times relevant to this Order, the 1818 East 103rd Street Facility was subject to the provisions of the Illinois SIP at 35 Ill. Admin. Code §§ 212.302, 212.306, 212.309, and 212.310.

41. On September 9, 2014, EPA conducted an inspection of the 1818 East 103rd Street Facility. During the inspection, the inspector observed the following:

a. Vehicles were driving on Facility roadways generating fugitive particulate matter;

b. Significant amounts of stones were present on the paved areas of the Facility; and

c. The Facility representative stated that the roadways and yard are swept and watered once per week by an outside company.

42. During the EPA inspection, the EPA inspector took opacity measurements of vehicles driving on the internal roadways using 40 C.F.R. Part 60, Appendix A, Method 9. The inspector took three readings for each of six vehicle passes. The readings were taken at five (5) second intervals. The readings were taken from a standing position at least 15 feet away from the plume. The results are shown below:

Vehicle	1st Pass Opacity (%)	2nd Pass Opacity (%)	3rd Pass Opacity (%)	12-Reading (Four Vehicle) Average Opacity (%)
First	20	20	15	21.7 (4th, 5th, 6th, 1st)
Second	20	15	0	19.6 (5th, 6th, 1st, 2nd)
Third	30	20	15	19.6 (6th, 1st, 2nd, 3rd)
Fourth	20	20	20	17.9 (1st, 2nd, 3rd, 4th)
Fifth	20	30	15	18.8 (2nd, 3rd, 4th, 5th)
Sixth	30	30	20	22.5 (3rd, 4th, 5th, 6th)

43. When requested by the EPA inspector, the 1818 East 103rd Street Facility representative provided the inspector with the Facility's Fugitive Particulate Matter Emission Control Plan, dated September 11, 2009.

44. Section 3.2 of the 1818 East 103rd Street Facility's Fugitive Particulate Matter Emission Control Plan states that roads are swept two days per week in favorable conditions. Section 3.2 of the Plan also states that water is a component of the control plan. Section 3.3 of the Facility's Fugitive Particulate Matter Emission Control Plan states that roadways and parking areas are swept and watered as needed to maintain an opacity of less than 10 percent.

V. Violations-1818 East 103rd Street

45. At the 1818 East 103rd Street Facility, Ozinga caused or allowed fugitive particulate matter emissions from its internal roadways of 17.9 to 22.5 percent opacity on September 9,

2014, as an average of 12 readings, three readings per vehicle for six vehicles, in excess of the 10 percent limit, in violation of 35 Ill. Admin. Code § 212.316(c).

46. Ozinga violated 35 Ill. Admin. Code § 212.306 by not cleaning its roadways on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Admin. Code § 212.309.

47. On March 11, 2015, EPA issued to Ozinga an NOV alleging violations of the Illinois SIP at 35 Ill. Admin. Code §§ 212.309, 212.310, and 212.306.

48. On May 21, 2015, representatives of Ozinga and EPA discussed the March 11, 2015 NOV.

VI. Compliance Program

49. Within 30 days of the effective date of this Order, Ozinga shall submit for EPA's approval a revised and updated fugitive particulate matter operating program for the Lumber Street Facility and a revised and updated fugitive particulate matter operating program for the 1818 East 103rd Street Facility. The Fugitive Particulate Matter Operating Programs shall contain the information required by 35 Ill. Admin. Code § 212.310. Upon EPA's approval of each Fugitive Particulate Matter Operating Program, Ozinga shall comply with the EPA approved Fugitive Particulate Matter Operating Program for each facility.

50. Within 15 days of EPA's approval of the Fugitive Particulate Matter Operating Programs for the Lumber Street and 1818 East 103rd Street Facilities, Ozinga shall submit to the IEPA its Fugitive Particulate Matter Operating Programs for IEPA review. If IEPA requests additional control measures required under the EPA-approved SIP for fugitive particulate matter operating programs, Ozinga shall incorporate these into the EPA approved fugitive particulate

matter operating program for the facility or facilities at issue, submit a copy of the modified program to EPA, and implement the modified program(s) immediately.

51. Within 90 days of EPA's approval of the fugitive particulate matter operating program discussed in paragraph 49, above, Ozinga shall create, revise, and/or update, as appropriate, its Fugitive Particulate Matter Operating Program for each of its concrete plants in Illinois that is subject to the EPA-approved SIP as listed in Appendix A. The Revised Fugitive Particulate Matter Operating Programs shall contain the information required by 35 Ill. Admin. Code § 212.310. Ozinga must send the plans to EPA in electronic form for the Chicago Division facilities listed on Exhibit A no later than 180 days after EPA's approval of the fugitive particulate matter operating programs for the Lumber and 1818 East 103rd Street Facilities. Ozinga must send the plans to EPA in electronic form for the other Illinois facilities listed on Exhibit A no later than 240 days after the effective date of this Order.

Periodic Reporting and Monitoring

52. After the effective date of this Order, and for one year thereafter, Ozinga shall submit a total of four electronic reports to EPA: 1) three quarterly reports by the 15th day of July, October, and January and 2) one final report one year after the effective date of this Order. The reports shall include:

a. The status of the submittal of the fugitive particulate matter operating programs to IEPA, as set forth in Paragraph 50;

b. The status of Ozinga's efforts to revise and update all the fugitive particulate matter operating programs for its Illinois concrete plants, in accordance with Paragraph 51 of the Order; and

c. Copies of Ozinga's inspection and recordkeeping logs required by each facility's Fugitive Particulate Matter Operating Programs, relevant to the most recent quarterly (January-March, April – June, July-September, and October-December) period.

53. Ozinga shall submit all information required hereunder under an authorized signature with the following certification:

> I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment for knowing violations.

54. Ozinga shall send all electronic reports required by this Order to the following: rosen.linda@epa.gov, cantello.nicole@epa.gov and r5airenforcement@epa.gov. Paper or documents or compact disks (CD) must be submitted to:

> Attention: Compliance Tracker (AE-17J)
> Air Enforcement and Compliance Assurance Branch
> U.S. Environmental Protection Agency, Region 5
> 77 W. Jackson Boulevard
> Chicago, Illinois 60604

General Provisions

55. This Order does not affect Ozinga's responsibility to comply with other federal, state and local laws.

56. This Order does not restrict EPA's authority to enforce the Illinois SIP or any other section of the CAA.

57. While not admitting to the allegations in the NOVs or this Administrative Order, Ozinga agrees to the terms of this Order and the requirements herein.

58. While not admitting to the allegations in the NOVs or this Administrative Order, Ozinga agrees to the terms of this Order and the requirements herein.

59. Nothing in this Order limits the EPA's authority to seek appropriate relief, including penalties, under Section 113 of the CAA, 42 U.S.C. § 7413, for Ozinga's violation of the Illinois SIP.

60. Failure to comply with this Order may subject Ozinga to penalties of up to $37,500 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.

61. The terms of this Order are binding on Ozinga, its assignees and successors. Ozinga must give notice of this Order to any successors in interest prior to transferring ownership.

62. Ozinga may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information it submits to EPA. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If Ozinga fails to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it. Emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. "Emission data" is defined at 40 C.F.R. § 2.301.

63. This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic recordkeeping efforts, please furnish documents as an electronic copy on CD or thumb drive. If not possible, provide your response to this Order without staples; paper clips and binder clips, however, are acceptable.

64. EPA may use any information submitted under this Order in an administrative, civil judicial or criminal action.

65. For purposes of this Order and enforcement of this Order, Ozinga waives any right to judicial or administrative review of this Order and any jurisdictional defenses to EPA's enforcement of it. Ozinga neither admits nor denies the Findings listed above, and agrees to be bound by the terms of this Order.

66. This Order is effective on the date of signature by the Director of the Air and Radiation Division.

June 27, 2016
Date

Lloyd K. Meyer
Lloyd Meyer, President
Ozinga Ready Mix, Inc.-Chicago

6/30/16
Date

Edward Nam
Acting Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent the Administrative Consent Order, EPA-5-16-113(a)-IL-09, by certified mail, return receipt requested, to:

Lloyd Meyer, President, Chicago Division
Ozinga Ready Mix Concrete, Inc.
2222 South Lumber Street
Chicago, Illinois 60616

I also certify that I sent a copy of the Administrative Consent Order, EPA-5-16-113(a)-IL-09, by E- mail to:

Yasmine Keppner-Bauman, Acting Manager
Bureau of Air, Compliance Unit
Illinois EPA
Yasmine.keppner-baumann@illinois.gov

Gill Soffer
Katten, Muchin, Rosenmann LLP
Gil.soffer@kattenlaw.com

Nancy J. Rich
Katten, Muchin, Rosenmann LLP
Nancy.rich@kattenlaw.com

On the 1 day of July 2016.

Loretta Shaffer
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7673 8088