UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MA 02109-3912

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE

MAR 17 2014

Dennis Demers, President
Shelburne Limestone Corporation
P. O. Box 359, Essex Junction, VT 05453

Re: Clean Air Act Reporting Requirement

Dear Mr. Demers:

The United States Environmental Protection Agency ("EPA") is evaluating whether the facilities owned by the Shelburne Limestone Corporation ("Shelburne Limestone") are in compliance with the Clean Air Act (the "Act") and state and federal regulations promulgated under the Act. Specifically, EPA is evaluating whether Shelburne Limestone is in compliance with the National Emission Standards for Hazardous Air Pollutants found at 40 CFR Part 63, the New Source Performance Standards found at 40 CFR Part 60, as well as the federally enforceable Vermont State Implementation Plan.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

Therefore, within 60 days of the date Shelburne Limestone receives this reporting requirement, Shelburne Limestone is required to provide all of the information outlined below. Specifically, provide a separate response to each numbered paragraph or subparagraph below. Where possible, please provide responses in an electronic spreadsheet format (preferably Microsoft Excel).

1. Provide the following ownership information:
    a. List the name, address, and a brief description of the operations conducted at each facility that Shelburne Limestone owns and/or operates in New England;
    b. Describe the ownership and business structure;
    c. Indicate the date and state of incorporation;
    d. List any partners or corporate officers;

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e. List any parent and subsidiary corporations; and
f. Provide the number of employees and SIC codes for the type of work conducted at each facility.

For each facility owned or operated by Shelburne Limestone:

2. Provide the following production and air pollution emission information:
    a. Annual emissions (in tons per year) from the facility for each year from 2009 through 2013 for the following pollutants:
        i. Nitrogen oxides (NOx);
        ii. Volatile organic compounds (VOCs);
        iii. Sulfur dioxide (SO2);
        iv. Carbon monoxide (CO);
        v. Particulate matter (PM); and
        vi. Hazardous air pollutants (HAPs).
    b. The method used to calculate annual emissions, including any emission factors used and their basis;
    c. A list of the dates of any and all air emissions tests conducted to measure emissions of VOCs, NOx, CO, SO2, HAP and/or PM, including filterable and condensable particulate; and
    d. Copies of any air emission test reports.

3. Provide the following information about each limestone and non-metallic minerals kiln or dryer including any kilns or dryers taken out of service:
    a. The type of kiln or dryer, including the name of the manufacturer, model number, etc.;
    b. The physical size of the kiln or dryer;
    c. The date the kiln or dryer was constructed;
    d. The date the kiln or dryer began operation
    e. The date the kiln or dryer was taken out of service (if relevant);
    f. The date the kiln or dryer was re-lined or re-bricked;
    g. The maximum capacity of the kiln or dryer (in tons/hr);
    h. The maximum heat input capacity of the kiln or dryer from fuel firing (in MMBtu/hr); and
    i. The type(s) of fuel used.

4. Provide the following information about each piece of combustion equipment including any combustion equipment taken out of service:
    a. The name of the manufacturer, model number, and rated capacity of the combustion equipment;
    b. The date the combustion equipment was purchased;
    c. The date that installation of the combustion equipment was completed;
    d. The date the combustion equipment began operating;
    e. The date the combustion equipment was taken out of service (if relevant); and
    f. The type and amount of fuel burned by the combustion equipment from January 1, 2009 to December 31, 2013.

5. Provide the following information about each stationary source reciprocating internal combustion engines ("RICE"), as defined at 40 CFR 63.6585:
    a. The manufacturer and model number;
    b. The type and quantity of fuels burned;
    c. The year the RICE were purchased and installed;
    d. The purpose of the RICE (e.g.; for emergency power or primary power);
    e. The number of hours per year that the RICE operated; and
    f. The number of hours each RICE ran to produce electricity for use on-site or for sale to another entity.

6. Provide the following information about all process and support equipment, including: mineral processing equipment, such as rock crushers; screening devices; and conveyors; as well as fuel pumps; storage tanks; etc.:
    a. The name of the manufacturer, model number, rated capacity of the equipment;
    b. The date the equipment was purchased;
    c. The date the installation of the equipment was completed; and
    d. The date the equipment began operating at the facility.

7. Provide a list of all capital expenditures greater than $100,000 from January 1, 2000 to the present. This list should contain:
    a. The type of equipment, including the name of the manufacturer, model number, size of the equipment, production rate, and any other operational specifications of the equipment;
    b. A brief description of each project;
    c. The date the equipment was purchased;
    d. The date the installation of the equipment was completed; and
    e. The date the equipment began operating at the facility.

8. For facilities that are subject to the Standards of Performance at Non-Metallic Mineral Processing Plants found at 40 CFR, Part 60, Subpart OOO, provide:
    a. Annual production of limestone and non-metallic minerals, as defined at 40 CFR §60.671 (in tons per year), for years 2009 through 2013;
    b. Copies of any reports submitted to the Administrator as required by Subpart OOO;
    c. The following information about each piece of equipment covered by Subpart OOO:
        i. The date the equipment became an "affected facility" as defined in 40 CFR § 60.670;
        ii. The emissions increase associated with the start-up or modification that triggered Subpart OOO;
        iii. The date of installation of any continuous opacity monitoring system (COMS);
        iv. A table of all 6-minute averages from the COMS since the last particulate emissions test (or 3-years), whichever is shorter; and
        v. The date of any Method 5 test and the 6-minute average readings recorded

during such test since the equipment became an affected facility.

9. For any equipment resurfacing, painting, or cleaning operations (including by not limited to vehicles, barrels, roll-off bins, etc.,) provide:
    a. A list of the make, model, and capacity (in gallons per hour) of all spray guns; and
    b. A list of the types of coatings used, including the VOC and HAP content of each coating (in pounds per gallon).

10. For any solvent degreasing units or parts washers, provide:
    a. The make, model, capacity (in gallons) of each unit; and
    b. The material safety data sheet (MSDS) of the solvent used in each unit.

Be aware that if Shelburne Limestone does not provide the information in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information to:

Susan Studlien
US EPA Region 1
Mail Code OES04-2
5 Post Office Square Suite 100
Boston, Massachusetts, 02109-3912
Attn: Abdi Mohamoud

If you have any questions regarding this Reporting Requirement, please contact Abdi Mohamoud at (617) 918-1858, or have your attorney call Tom Olivier at (617) 918-1737.

Sincerely,

Susan Studlien

Susan Studlien, Director
Office of Environmental Stewardship

cc: John Wakefield, VT DEC