



# Department of Environmental Quality

*To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.*



Matthew H. Mead, Governor

John Corra, Director

April 25, 2011

Mr. Randy Pitts,  
Plant Manager  
General Chemical Corporation  
P.O. Box 551  
Green River, WY 82935

Re: Notice of Violation

Dear Mr. Pitts:

Enclosed you will find a Notice of Violation (NOV) issued to General Chemical Corporation at the Green River Trona Plant for the failure to comply with the particulate emission limits for the GR-1-D and GR-2-C Calciners required by permit 3-1-123. Particulate emission sampling results for the GR-1-D and GR-2-C Calciners showed particulate emissions in excess of 15 lb/hr limit.

As the Department and this Division consider the failure to comply with air quality permit requirements to be a serious matter, and I am recommending that the Department refer this violation to the State Attorney General's office requesting a suit be filed in District Court to recover appropriate penalties.

If you would like to discuss settlement of this issue prior to action on the referral by the Attorney General's office, please contact Ms. Karen Godman, Air Quality Compliance Program Principal, at 307-777-8601 no later than ten (10) days after receipt of this letter.

Should you have any questions or comments regarding this matter, please feel free to contact me or Ms. Karen Godman.

Sincerely,

Steven A. Dietrich  
Administrator  
Air Quality Division

cc: Bob Gill  
Tony Hoyt  
Nancy Vehr  
Keith Guille

Herschler Building · 122 West 25th Street · Cheyenne, WY 82002 · <http://deq.state.wy.us>

ADMIN/OUTREACH (307) 777-7758 FAX 777-7682	ABANDONED MINES (307) 777-6145 FAX 777-6462	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7369 FAX 777-6927	LAND QUALITY (307) 777-7756 FAX 777-5864	SOLID & HAZ. WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
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**BEFORE THE  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
STATE OF WYOMING**

**IN THE MATTER OF THE NOTICE OF VIOLATION** )  
**ISSUED TO GENERAL CHEMICAL CORPORATION** ) **DOCKET NO. 4832-11**  
**MR. RANDY PITTS, PLANT MANAGER** )  
**P.O. BOX 551** )  
**GREEN RIVER, WYOMING 82935-0551** )

**NOTICE OF VIOLATION**

**NOTICE IS HEREBY GIVEN THAT:**

1. The Department of Environmental Quality, Division of Air Quality, has found General Chemical Corporation (General Chemical) to be in violation of permit 3-1-123 issued in accordance with W.S. 35-11-801 of the Wyoming Environmental Quality Act and Chapter 6, Section 3 of the Wyoming Air Quality Standards and Regulations in the operation of the Green River Trona Plant located in Sweetwater County, Wyoming.

2. W.S. 35-11-801 states, "In granting permits, the director may impose such conditions as may be necessary to accomplish the purpose of this act which are not inconsistent with the existing rules, regulations and standards."

3. Chapter 6, Section 3 of the Wyoming Air Quality Standards and Regulations prescribes the applicability and procedures for issuing permits to major sources under Wyoming's operating permitting program.

4. Operating permit 3-1-123 was issued to General Chemical on June 10, 2008. Condition F5 of permit 3-1-123 requires that all sources listed in Table I shall not exceed the limits specified. Table I limits allowable emissions from the GR-1 #2 Calciner with ESP control (GR-1-D) and GR-2 #4 Calciner with ESP control (GR-2-C) for particulate at 15.00 lb/hr.

5. General Chemical performed particulate emissions sampling on the both the GR-1-D and GR-2-C Calciners on on October 28 & 29, 2010. The Air Quality Division's review of the stack test report determined General Chemical exceeded the permitted particulate emission limit with a measured emission rate of 22.48 lb/hr, (149.9% of the 15 lb/hr limit) on GR-1 #2 and a measured emission rate of 16.33 lb/hr, (108.9% of the 15 lb/hr limit) on GR-2 #4.

6. Said violation consists of particulate emissions from the GR-1-D and GR-2-C Calciners in excess of that allowed by permit 3-1-123.

7. Under W.S. 35-11-901(a), any person who violates any provision of Article 2 of [the Environmental Quality Act] ... or any rule, regulation, standard or permit adopted pursuant to those provisions, or who violates any determination or order of the council pursuant to Article 2 of [the Environmental Quality Act] ... is subject to a penalty not to exceed ten thousand dollars (\$10,000.00) for each violation for each day during which the violation continues, a temporary or permanent injunction, or both a penalty and an injunction.

8. This notice is being sent to you pursuant to W.S. 35-11-701(c), which requires that, in any case of failure to correct or remedy an alleged violation, the Director of the Department of Environmental Quality shall cause a written notice to be issued and served upon the person alleged to be responsible.

DATED this 28<sup>th</sup> day of APRIL, 2011.

  
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Steven A. Dietrich  
Administrator  
Air Quality Division

  
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John V. Corra  
Director  
Department of Environmental Quality

Please direct all inquiries to Steven A. Dietrich, Administrator, Division of Air Quality, Department of Environmental Quality, Herschler Building, 4th Floor, 122 W. 25th Street, Cheyenne, Wyoming 82002. (Telephone: 307/777-7393)