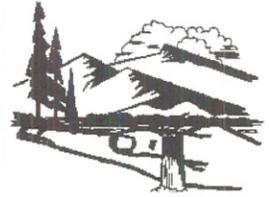




# Department of Environmental Quality

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



Matthew H. Mead, Governor

Todd Parfitt, Director

February 11, 2015

Mr. Brett Harding  
TATA Chemicals (Soda Ash) Partners  
P.O. Box 551  
Green River, WY 82935-0551

Re: Notice of Violation

Dear Mr. Harding:

Enclosed you will find a Notice of Violation (NOV) issued to TATA Chemicals (Soda Ash) Partners by the Department of Environmental Quality, Air Quality Division, for the failure to comply with permitted particulate matter limits from the GR-2 #4 Calciner with ESP controls (Source ID #GR-2-C), in violation of condition (F5)(a) of permit 3-1-123-2 at the Green River Works facility located in Sweetwater County, Wyoming.

As the Department and this Division consider the failure to comply with permit requirements to be a serious matter, 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. Ann Shed, 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. Ann Shed.

Sincerely,

Steven A. Dietrich  
Administrator  
Air Quality Division

cc: Fred DiLella  
Ann Shed  
Tony Hoyt  
Elizabeth Lyon  
Landon Brown



**BEFORE THE  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
STATE OF WYOMING**

**IN THE MATTER OF THE NOTICE OF VIOLATION )  
ISSUED TO TATA CHEMICALS (SODA ASH) PARTNERS ) DOCKET NO. 5534-15  
MR. BRETT HARDING, EHS 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 TATA Chemicals (Soda Ash) Partners to be in violation of permit 3-1-123-2 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 Works 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. Permit 3-1-123-2 was issued to TATA Chemicals (Soda Ash) Partners on February 22, 2013. Condition F5(a) of permit 3-1-123-2 limits the visible and particulate emissions from sources in Table I and specifically GR-2 #4 Calciner w/ESP control (Source GR-2-C) to a particulate matter emission limit as follows:

Source ID#	Source Description	Particulate Matter Emission Limit	
		lb/hr	gr/dscf (g/dscm)
GR-2-C	GR-2 #4 Calciner w/ ESP control	15.00	

5. Condition (F9)(A)(iii) of operating permit 3-1-123-2 states:

*"For particulate matter emissions, a Method 5 sampling train shall be used with a back half impinger catch analyzed by the protocol defined in Method 202. The Division will compare the sum of the Method 5 front half particulate catch and the inorganic (mineral) portion of the Method 202 back half of the Method 5/202 test against the particulate emission standards for each calciner."*

6. On October 22, 2014, emission testing was performed, as required by operating permit 3-1-123-2, for the #4 Calciner (Source ID# GR-2-C) located at the Green River Works facility. On December 8, 2014, the Air Quality Division received the results for October 22, 2014 stack tests in a meeting with TATA personnel. The results reflected that the front half particulate emissions were 38.37 lb/hr and the back half inorganic particulate emissions were 1.40 lb/hr. The total inorganic particulate matter (the sum of the two values) was 39.77 lbs/hr, exceeding the limit of 15.00 lb/hr, as set in operating permit 3-1-123-2.

7. Said violation consists of exceeding permitted particulate limits for the GR-2-C at the Green River Works facility. This is a violation of (F5)(a) of operating permit 3-1-123-1.

8. 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.

9. 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 11<sup>th</sup> day of FEBRUARY, 2015.



Steven A. Dietrich  
Administrator  
Air Quality Division



Todd Parfitt  
Director  
Department of Environmental Quality

Please direct all inquiries to Steven A. Dietrich, Administrator, Division of Air Quality, Department of Environmental Quality, Herschler Building, 2nd Floor, 122 W. 25th Street, Cheyenne, Wyoming 82002. (Telephone: 307/777-7393)