



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

February 17, 2012

CERTIFIED MAIL

Ms. Debra Kay Neal, Environmental, Health & Safety Manager
Guardian Lima, LLC
2485 Houx Parkway
Lima, Ohio 45804

Re: NOTICE OF VIOLATION – STACK TEST/(HPV/M1A)/RETURN TO COMPLIANCE
Facility ID: 0302020341
Guardian Lima, LLC
Location: 2485 Houx Parkway
Lima, Ohio 45804
Allen County

Dear Ms. Neal:

The stack test conducted on June 14-16, 2011, on Ohio EPA emissions unit Nos. B001 (Natural Gas-Fired Boiler), F002 [Dried Distillers Grains with Solubles (DDGS) Truck and Railcar Loadout], P001 (Hammermill), P002 (Ethanol Production Operations), P901 and P902 (Grain Receiving, Handling and Storage), and P903 (DDGS Handling and Cooling) has been reviewed. The testing that Ohio EPA witnessed was conducted in conformance with Ohio EPA methods and procedures. Testing that was not witnessed by Ohio EPA [emissions units B001, P002 (fermentation scrubber only) and P903] appears to have been conducted in conformance with Ohio EPA methods and procedures based on the information in the test report. Our review confirms the following reported data is accurate:

Critical Test Data
(In Three Run Averages)

Emission Unit	Pollutant	Actual Emission Rate	Allowable Emission Rate ^a	Source Operating Rate	Maximum Source Operating Rate ^b
B001	NO _x	0.85 lb/hr	2.27 lbs/hr	63.6 mmBtu/hr	63 mmBtu/hr
B001	CO	0.01 lb/hr	2.33 lbs/hr	63.6 mmBtu/hr	63 mmBtu/hr
F002	PM	0.00032 gr/dscf ^d	None established	93.4 tons/hr	75 tons/hr
P001	PM	0.00037 gr/dscf ^d	0.01 gr/dscf ^d	59.77 tons/hr	72 tons/hr
P002	PM	1.50 lbs/hr	1.02 lbs/hr	26 tons/hr DDGS	25 tons/hr DDGS
P002	NO _x	7.84 lbs/hr	5.88 lbs/hr	26 tons/hr DDGS	25 tons/hr DDGS
P002	CO	2.48 lbs/hr	9.88 lbs/hr	26 tons/hr DDGS	25 tons/hr DDGS
P002	SO ₂	0.26 lb/hr	9.13 lbs/hr	26 tons/hr DDGS	25 tons/hr DDGS

Emission Unit	Pollutant	Actual Emission Rate	Allowable Emission Rate ^a	Source Operating Rate	Maximum Source Operating Rate ^b
P002	VOC (RTO) ^c	1.45 lbs/hr 98.9% control efficiency	1.56 lbs/hr 95% control efficiency	26 tons/hr	25 tons/hr
P002	VOC (scrubber)	4.24 lbs/hr 99.31% control efficiency	13.23 lbs/hr 99% control efficiency	5,958.7 gallons/hr ethanol	6,800 gallons/hr ethanol
P901 & P902	PM	0.00049 gr/dscf ^d	0.01 gr/dscf ^d	261.3 tons/hr	250 tons/hr
P903	VOC	0.27 lb/hr	2.6 lbs/hr	93.8 tons/hr	75 tons/hr

Notes:

^a Allowable emission rates based on the permit that was effective at time of stack testing.

^b Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

^c RTO = regenerative thermal oxidizer

^d gr/dscf = grains per dry standard cubic foot

At the time of testing, emissions unit P002 was being operated in violation of its allowable emission rates for PM and NO_x in permit to install No. P0105072, term 1.b)(1)g., OAC rule 3745-31-05(A)(3)(a) and Ohio Revised Code 3704.05. Ohio EPA has since processed and issued permit to install and operate (PTIO) No. P0109188 on January 3, 2012 to modify the emissions limits for emissions unit P002 for PM and NO_x to 2.00 lbs/hr and 10.00 lbs/hr respectively. Thus, the violations have been resolved.

The operating rates of P001 - hammermill (59.77 tons/hr) and P002 - ethanol plant (5,958.7 gallons/hr for fermentation scrubber testing) are acceptable for the purposes of this test. However, if these rates are exceeded by ten percent or more in the future it might be necessary to perform another stack test.

Also, the following parameters were recorded during the testing of the following emission units:

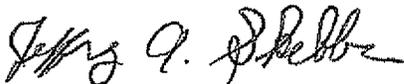
Emission Unit	Parameter	Actual	Required
P001	Baghouse Pressure Drop	1.24 inches water	2.0 - 4.0 inches water
P002	Scrubber Pressure Drop	1.88 inches of water	No requirement
P002	Water Flow Rate to Scrubber	9,870.6 gal/min	No requirement
P901 & P902	Baghouse Pressure Drop	1.95 inches of water	2.0 - 4.0 inches of water

Since the pressure drops were outside of previously established operating ranges for emissions units P001, P901 and P902, we are requesting a written response by March 2, 2012. Please provide an explanation for why the pressure drop deviated from the required range, and state whether the range needs to be changed, based on current facility design. Any changes can be done through the permit modification No. P0108834, which is currently being processed at the Northwest District Office. The stack test should also be used to establish an appropriate pressure drop range for the scrubber controlling emissions unit P002. Please include a required range in the written response.

With the issuance of PTIO No. P0109188, the stack testing emissions limitation violations for emissions unit P002 have been resolved. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

If you have any questions, please contact me at (419) 373-3128.

Sincerely,



Jeffrey A. Skebba
Division of Air Pollution Control

/llr

pc: Tom Kalman, DAPC, CO
William MacDowell, U.S. EPA, Region V
Robert Teer, DAPC, NWDO
DAPC, NWDO File
DAPC, NWDO Stack File
NWDO Follow-up File
Certified Mail Receipt Number 7009 1410 0001 1834 0227

ec: Jennifer Jolliff, DAPC, NWDO
Tom Sattler, DAPC, NWDO
Jay Liebrecht, DAPC, NWDO