



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Allen County
INEOS USA LLC
Premise #0302020015 371
Warning Letter Close Out/HPF

July 20, 2007

Mr. Jean Phaneuf, Site Director
INEOS USA LLC
P.O. Box 628
Lima, Ohio 45802-0628

Dear Mr. Phaneuf:

The Division of Air Pollution Control/Northwest District Office (DAPC/NWDO) has reviewed INEOS USA LLC's letter dated May 18, 2007, which contains a response to DAPC/NWDO's April 19, 2007, warning letter. The warning letter was issued for excessive carbon monoxide (CO) emissions during the fourth quarter 2006 for the CO continuous emission monitor (CEM) on the acrylonitrile plant No. 2 absorber off gas incinerator (AOGI), emissions unit P035.

The company indicated the corrective actions it has taken include the following:

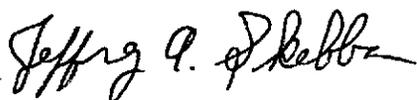
Date of Excess CO Emissions	Corrective Action
October 30 and 31, 2006; and December 13, 2006	changes in propylene purity from adjacent refinery were beyond the control of INEOS; manually adjusted the combustion temperature in the AOGI to the extent possible, which kept AOGI operating to minimize excess emissions
November 28 and 29, 2006	Operations staff misdiagnosed the reason for reduction in AOGI combustion temperature, actual cause was incomplete combustion, not a reduction in natural gas supply amount; improved electronic control systems and operator training on these control systems to reduce potential for AOGI shutdowns; installed a new regulator on natural gas header, installed new wiring on AOGI natural gas feed control valve
November 30, 2006 and December 1, 2006	excess CO emissions caused by steam leak discovered in the AOGI preheat section, conducted repairs on steam pipe system

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Date of Excess CO Emissions	Corrective Action
December 6 through 8, 2006	power outage and resultant AOGI shut down were beyond the control of INEOS, AOGI brought back on-line as soon as practical after power restored

Based on the corrective actions taken, DAPC/NWDO will exercise enforcement discretion at this time. Should additional violations occur in the future, this decision by DAPC is not a waiver of Ohio EPA's authority to seek civil penalties for these violations pursuant to ORC section 3704.06. If you have any questions, feel free to contact me at (419) 373-3128.

Sincerely,



Jeffrey A. Skebba
Environmental Specialist
Division of Air Pollution Control

/l/r

pc: Todd Brown, DAPC/CO
Don Waltermeyer, DAPC/NWDO
[DAPC/NWDO File](#)