



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
Warning Letter/HPF

April 19, 2007

Certified Mail

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

Dear Mr. Phaneuf:

The Fourth Quarter 2006 Excess Emissions Report (EER) submitted by INEOS USA LLC (INEOS) on January 29, 2007, has been reviewed by the Division of Air Pollution Control - Northwest District Office (DAPC/NWDO). Data summaries in the EER indicate excess carbon monoxide (CO) emissions as measured by the CO continuous emission monitor for the acrylonitrile plant No. 2 absorber off gas incinerator (AOGI). Specifically, the excess emissions were greater than five percent of the total operating time for the following emissions unit:

P035 - CO emissions from the AOGI exceeded the permit allowable limit of 5,736 pounds per rolling 24-hour period for 5.42 percent of total emissions unit operating time

The excessive CO emissions are violations of the following:

1. Part III, term A.I.1 for emissions unit P035 in the facility's final Title V administrative permit amendment which became effective on January 3, 2005;
2. CO permit allowable mass emission rate in the Air Emission Summary Table in permit to install (PTI) modification No. 03-9227 issued on June 28, 2001;
3. Applicable emission limitation for CO in section 2.C of PTI modification No. 03-9227 issued on June 28, 2001;

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4. OAC rule 3745-31-05; and
5. Ohio Revised Code 3704.05.

INEOS listed the following causes of the excess emissions:

October 30 and 31, 2006; and December 13, 2006 - poor combustion due to change in purity of the raw material feed from adjacent Valero Lima Refinery;

November 28 and 29, 2006 - automatic tripping of the AOGI from high fuel pressure;

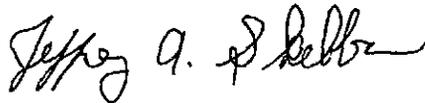
November 30, 2006 and December 1, 2006 - poor combustion due to combustion temperature being lowered during steam pipe repairs; and

December 6, 7 and 8, 2006 - power outage and AOGI shut down, and AOGI tripped off during the subsequent start up

Please submit a written response by May 21, 2007 and provide an explanation for whether any of these incidents can be prevented in the future (with the exception of the power outage incident on December 6 to 8, 2006 which was beyond the control of the facility).

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

/lb

pc: Todd Brown, DAPC/CO
Jim Orlemann, DAPC/CO
Don Waltermeyer, DAPC/CO
~~DAPC/NWDO File~~
NWDO Follow-up File
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INEOS

4/19/07

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Sender: *INEOS - USA LLC*
PO Box 628
Sumner, WA 98066

PS Form 3800, June 2002

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Mr. James Pham
INEOS - USA LLC
PO Box 628
Sumner WA 98066

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