



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Re: Allen County
ISP Lima LLC
Premise #0302020343
Return to Compliance

August 26, 2010

Mr. Charles Gasperetti, Site General Manager
ISP Lima LLC
1220 South Metcalf Street
Lima, Ohio 45804

Dear Mr. Gasperetti:

This letter summarizes corrective actions that ISP Lima LLC completed in response to the warning letter issued on June 9, 2010, for emissions unit N006, butanediol manufacturing plant No. 1 scrubber off gas boiler (SOGB). These actions include:

1. Stack testing for N006 was completed on July 28, 2010, for volatile organic compounds and carbon monoxide;
2. Revised Title V deviation reports listing the stack testing delay were received in Air Services on July 15, 2010, for third quarter 2009, fourth quarter 2009 and first quarter 2010; and
3. A revised Title V Annual Compliance Certification report for 2009 listing the stack testing delay was received in Air Services on July 16, 2010.

Based on the company's response to the warning letter, and the action plan provided (completion of stack testing), we have determined that the compliance plan is acceptable. The actions taken have corrected the violations and this emissions unit is now being operated in compliance with the permit requirements. 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.

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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

/llr

pc: Lisa Holscher, U.S. EPA-Region V
Tom Kalman, DAPC-CO
Mark Budge, DAPC-NWDO
DAPC-NWDO:File