



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: Allen County
ISP Lima LLC
Premise #0302020343
Warning Letter/HPF-GC7

June 9, 2010

CERTIFIED MAIL

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

Dear Mr. Gasperetti:

The company's Title V permit requires completion of stack testing for emissions unit N006, butanediol manufacturing plant No. 1 scrubber off gas boiler (SOGB). Specifically, this emissions unit required testing for volatile organic compounds and carbon monoxide within six months prior to the permit expiration date of January 3, 2010. Thus, testing was required to be completed no later than July 3, 2009. To date, this testing has not occurred. This is a violation of term A.V.2.a in the Title V permit which became effective on January 3, 2005.

We are aware that economic conditions prevented butanediol production from reaching 90 percent of plant maximum when the test was supposed to be conducted. The company could have avoided the violation by requesting a Director's letter for extension of the test date, when it first became aware that testing needed to be postponed due to this situation.

The company has tentatively scheduled the testing for July 27, 2010. In addition to submitting an intent to test notification at least 30 days prior to the test date, the following corrective action is also required:

- Submit by July 16, 2010, in Air Services, revised Title V deviation reports for third quarter 2009, fourth quarter 2009 and first quarter 2010, and list the deviation for test delay as commencing on July 4, 2009 (not January 4, 2010) with ongoing deviation until the test is completed and;

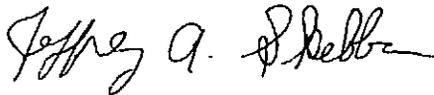
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- Submit by July 16, 2010 in Air Services, a revised Title V Annual Compliance Certification report for 2009, listing the third quarter 2009 and fourth quarter 2009 test delay deviations.

Please note, however, that submittal of the deviation reports 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, 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
Don Waltermeyer - DAPC/NWDO
DAPC:NWDO:File }
NWDO Follow-up File
Certified Receipt Number 7007 2560 0000 4485 7854