



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 Korteski, Director

Re: Allen County
Lima Refining Company
Premise #0302020012
Warning Letter/HPF

November 4, 2009

CERTIFIED MAIL

Mr. Roy Warnock, Vice President & General Manager
Lima Refining Company
1150 South Metcalf Street
Lima, Ohio 45804-1145

Dear Mr. Warnock:

The Second Quarter 2009 Excess Emissions Report (EER) submitted by Lima Refining Company on July 16, 2009 (received in Air Services on July 29, 2009) has been reviewed by the Division of Air Pollution Control - Northwest District Office (DAPC/NWDO) and our Central Office (DAPC/CO). Data summaries in the EER indicate excess opacity for the following emissions unit:

P010 – opacity values for the electrostatic precipitator (ESP) exhaust on the fluid catalytic cracker/carbon monoxide boiler exceeded the allowable 20 percent as a six-minute average for 7.45 percent of total source operating time (9,762 minutes of non-exempt values during the quarter)

The excessive opacity values are violations of the following:

1. Part III, term A.I.1 for emissions unit P010 in the facility's final Title V permit modification which became effective on November 28, 2005; and
2. Ohio Revised Code 3704.05.

The following table summarizes the primary causes for the excessive opacity values as documented in the company's July 16, 2009 quarterly excess emission report:

Date of Excess Opacity	Cause	Corrective Action
4/27/09 to 4/30/09	Carbon monoxide boiler shut down – excess oxygen level safety concern	Adjusted combustion controls and conducted soot blowing
6/9/09 to 6/11/09	Failure of electrical grids B and C on ESP	Repair of electrical grids during Fall 2009 maintenance turnaround
6/16/09 to 6/20/09	Carbon monoxide boiler shut down - lost both combustion air fans	Installed new turbine rotor and completed fan repairs

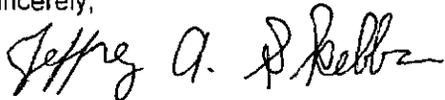
Please submit a written response by December 11, 2009, and provide a summary of repair activities for electrical grids B and C on the ESP, with the completion date.



Mr. Roy Warnock
November 4, 2009
Page Two

Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date. Should you have any questions or comments, feel free to contact me at (419) 373-3128.

Sincerely,



Jeffrey A. Skebba
Environmental Specialist
Division of Air Pollution Control

/lb

pc: Tom Kalman - DAPC/CO
Todd Brown - DAPC/CO
Lisa Holscher - U.S. EPA Region V
Don Waltermeyer - DAPC/NWDO
~~DAPC/NWDO File~~
NWDO Follow-up File
7009 0820 0000 0591 9457