



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8481 FAX: (419) 352-8468
www.epa.state.oh.us

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

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

October 17, 2008

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 2008, Excess Emissions Report (EER) submitted by Lima Refining Company on July 28, 2008, 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 continuous emission monitor (CEM) data capture less than the minimum acceptable 95 percent for the following emissions unit:

P010 – 94.0 percent data capture for the fluid catalytic cracker/carbon monoxide boiler nitrogen oxides CEM which is located on the regenerator flue gas outlet prior to the carbon monoxide boiler (6.0 percent CEM down time)

The excessive CEM down time is a violation of the following:

1. Part III, term A.III.7. for emissions unit P010 in permit to install No. 03-17408 which became effective on January 31, 2008; and
2. Ohio Revised Code 3704.05.

Based on information received from the company, the CEM down time was caused primarily by the following:

- calibration drift greater than 10 percent for 1,517 minutes on April 21 and 22, 2008, due to back pressure that developed when the consultant who performed the annual relative accuracy test audit removed their analyzer from the sample loop;
- light source failure for 2,857 minutes from May 25 to May 27, 2008;

Mr. Roy Warnock, Vice President & General Manager
October 17, 2008
Page 2

- calibration drift greater than 10 percent for 1,133 minutes on June 19 and 20, 2008, due to relinearization activities; and
- calibration drift greater than 10 percent for 1,392 minutes on June 25 and 26, 2008 due to drift occurring after a cylinder gas audit.

The company completed the following corrective actions:

- April 22, 2008: successful manual calibration after lining out the back pressure;
- May 27, 2008: replaced light source;
- June 20, 2008: recalibrated analyzer to the proper calibration gas; and
- June 26, 2008: recalibrated analyzer to the proper calibration gas.

The company took prompt corrective actions to minimize CEM down time. Based on these actions, we have determined that the compliance plan is acceptable. The actions taken have corrected the violations and this emission 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.

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: Tom Kalman - DAPC/CO
Don Waltermeyer - DAPC/NWDO
(DAPC-NWDO File

0302020012

Lima Refining Co.

10/17/08

7006 3450 0001 0611 1414

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)
 For delivery information visit our website at www.usps.com

Postage	\$ 42	Postmark Here
Certified Fee	270	
Delivery Point Fee	220	
Total P. Value & Fees	\$ 5.32	

To: MR. WARNOCK - Lima Refining Co.
1150 S. METCALF STREET
Lima, Ohio 45804-1145

PS Form 3800, August 2006 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <u>Wanda Pilitto</u> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <u>Wanda Pilitto</u> C. Date of Delivery <u>10/20/08</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to: <u>MR. ROY WARNOCK</u> <u>VICE PRESIDENT & GENERAL MANAGER</u> <u>LIMA Refining Company</u> <u>1150 SOUTH METCALF STREET</u> <u>Lima, Ohio 45804-1145</u></p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

7006 3450 0001 0611 1414