



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
Lima Refining Company
Premise #0302020012
Warning Letter/HPF

September 25, 2007

CERTIFIED MAIL

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

Dear Mr. Warnock:

The second quarter 2007 Excess Emissions Report (EER) submitted by Lima Refining Company on July 24, 2007, has been reviewed by the Division of Air Pollution Control - Northwest District Office (DAPC/NWDO). Data summaries in the EER indicate continuous emission monitor (CEM) data capture less than the minimum acceptable 95 percent for the aromatics fuel gas hydrogen sulfide CEM which is used to monitor refinery fuel gas quality for the following emissions units:

- B022 - hot oil belt heater;
- B024 - isomerization heater; and
- B029 - reactor feed furnace for diesel hydrotreater unit

This CEM had 94.61 percent data capture (5.39 percent CEM down time) during the second quarter 2007. The excessive CEM down time is a violation of the following:

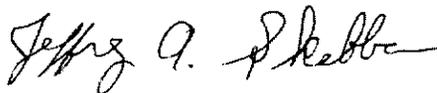
1. Part III, monitoring and record keeping term A.III.1 for emissions units B022 and B024 in the facility's final Title V permit modification which became effective on November 28, 2005;
2. Part III, monitoring and record keeping term A.III.2 for emissions unit B029 in permit to install No. 03-16188 (modification issued on May 25, 2006); and
2. Ohio Revised Code 3704.05.

The excessive CEM down time was caused primarily by corrosion of internal analyzer parts from hydrogen sulfide reaching these parts during analyzer flame out conditions. Corrective actions were completed in June 2007, which included replacing the ignitor, column valve, sample valve and sample shut off valve. In addition, the internal assembly was cleaned to remove corrosion.

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The company took prompt corrective actions and DAPC/NWDO will exercise enforcement discretion at this time. If the succeeding quarters EER's for this CEM indicate data capture of at least 95 percent, then the issue is considered resolved. 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: Tom Kalman, DAPC/CO
 Don Waltermeyer, DAPC/CO
 DAPC/NWDO File
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