



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  
Premise No. 0302020012  
Valero Lima Refinery  
Notice of Violation/HPF

June 27, 2007

**CERTIFIED MAIL**

Mr. Mark Skobel  
Vice President and General Manager  
Valero Lima Refinery  
1150 South Metcalf Street  
Lima, Ohio 45804-1145

Dear Mr. Skobel:

The stack test conducted on May 15, 2007, for Ohio EPA emissions unit P025 - benzene NESHAPS sewer system (including oil/water separator) with thermal oxidizer, has been reviewed and found to have been conducted in conformance with Ohio EPA methods and procedures.

Our test review confirms the following reported data as accurate:

**Critical Test Data  
(In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate ****	Maximum Source Operating Rate
sulfur dioxide (SO <sub>2</sub> )	77.2 ppm *	20 ppm *	2,687.1 gpm **	2,687.1 gpm **
volatile organic compounds (VOC)	< 0.02 lb/hr; ≥ 99.99% DRE	1.0 lb/hr; 99% DRE ***	2,687.1 gpm **	2,687.1 gpm **

\* ppm = parts per million, dry basis, 0% excess air

\*\* gpm = gallons per minute

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\*\*\* DRE = destruction efficiency

\*\*\*\* variable waste stream to thermal oxidizer, value listed is maximum operating rate achieved during test

Based on these most recent results, the emissions of SO<sub>2</sub> are still exceeding the allowable emission rate of 20 ppm, dry basis at 0% excess air. This emissions unit continues to be operated in violation of the following permit terms and regulations for emissions unit P025:

Part III, terms A.I.1 and A.I.2.d in the Title V permit;

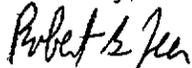
40 CFR 60.105(a)(3)(ii), for the equivalent emission standard in 40 CFR 60.104(a)(1); and

ORC 3704.05.

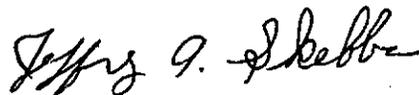
A compliance plan was submitted by Valero for this emissions unit on May 11, 2006, based upon two previous stack tests which showed emissions limit violations for SO<sub>2</sub>. The Division of Air Pollution Control reviewed the compliance plan and the schedule for installing the gas compressor to control the NESHAPS sewer system vapors, and the plan was found to be acceptable. The plan is being incorporated into a consent decree being issued by U.S. EPA, for which Ohio EPA is a party. Thus, no further action is necessary at this time.

Please be advised that the submission of the information received to date regarding return to compliance for this emissions unit 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 Jeffrey Skebba at (419) 373-3128.

Sincerely,



Robert G. Teer  
Division of Air Pollution Control



Jeffrey A. Skebba  
Division of Air Pollution Control

/llr

pc: Tom Kalman - DAPC/CO  
Lisa Holscher - U.S. EPA Region V  
Don Waltermeyer - DAPC/NWDO  
(DAPC-NWDO File >  
Tom Sattler - DAPC/NWDO  
Wendy Licht - DAPC/NWDO  
Robert Teer - DAPC/NWDO  
Stack File

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Valero

6/27/07

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To: Mr. Frank Krober - Valero Refinery  
 1150 S. Metcalf Street  
 Lima, Ohio 45804-1145

PS Form 3800, August 2006 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- 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.

1. Name of Addressee:  
 Mr. Frank Krober  
 Valero Refinery  
 1150 S METCALF STREET  
 Lima, Ohio 45804-1145

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
 Agent  
 Addressee

B. Received by (Printed Name) C. Date of Delivery  
 Frank Krober 6/28/07

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