



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 Close Out/HPF

July 20, 2007

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

Dear Mr. Warnock:

The Division of Air Pollution Control/Northwest District Office (DAPC/NWDO) has reviewed Lima Refining Company's letter dated May 16, 2007, which contains a response to DAPC/NWDO's April 19, 2007, warning letter. The warning letter was issued for excessive down time during the fourth quarter 2006 for the nitrogen oxides continuous emission monitor (CEM) on the CE boiler, emissions unit B026.

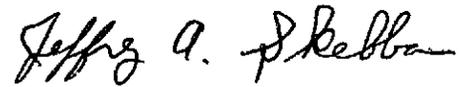
The company indicated the corrective actions it has taken include the following:

1. Tightened the fittings on the CEM sample system with manual calibration;
2. Replaced the CEM sample pump;
3. Updated the quality assurance/quality control program for this CEM (and all CEMs at the facility) to include tracking the daily calibration drift data so that the analyzer specialist on-site is notified whenever the calibration drift exceeds five percent. The drift had exceeded 10 percent during the excessive down time period in November 2006. This updated QA/QC procedure will ensure that adjustments can be made to the CEM on a daily basis to minimize down time.

Based on the corrective actions taken, DAPC/NWDO will exercise enforcement discretion at this time. Should additional violations occur in the future, this decision by DAPC is not a waiver of Ohio EPA's authority to seek civil penalties for these violations pursuant to ORC section 3704.06.

If you have any questions, feel free to contact me at (419) 373-5128.

Sincerely,

Handwritten signature of Jeffrey A. Skebba in cursive script.

Jeffrey A. Skebba  
Environmental Specialist  
Division of Air Pollution Control

/llr

pc: Todd Brown, DAPC/CO  
Don Waltermeyer, DAPC/NWDO  
(DAPC/NWDO:File)