



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
Notice of Violation Close Out
Emissions Unit P010 - Opacity
Monitor

September 14, 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 August 15, 2007 which contains a response to DAPC/NWDO's July 17, 2007 Notice of Violation (NOV). The NOV was issued for data capture less than 95 percent for the continuous opacity monitor (COM) on the fluid catalytic cracker/carbon monoxide boiler, emissions unit P010, during the first quarter 2007.

The company indicated that corrective action was taken by updating its quality assurance/quality control plan for this COM by increasing the following preventive maintenance activities to a weekly frequency:

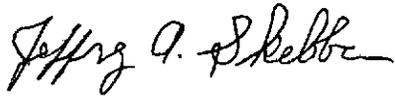
1. cleaning of the retro reflector (internal mirror);
2. checking the light beam for correct alignment;
3. cleaning the optical filters; and
4. checking the air purge system filters and replacing as needed.

Based on the corrective actions taken, and sufficient data capture for the COM during second quarter 2007, DAPC/NWDO will exercise enforcement discretion at this time. Should additional violations occur in the future, this decision by DAPC/NWDO is not a waiver of Ohio EPA's authority to seek civil penalties for these violations pursuant to ORC section 3704.06.

Mr. Roy Warnock
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If you have any questions, feel free to contact me at (419) 373-3128.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey A. Skebba".

Jeffrey A. Skebba
Environmental Specialist
Division of Air Pollution Control

/csl

pc: Tom Kalman - DAPC/CO
Lisa Holscher - DAPC/CO
Don Waltermeyer, DAPC/NWDO
DAPC/NWDO File