



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, Ohio 43402

TELE: (419) 352-9461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

Re: Ottawa County
0362000078
U.S. Gypsum
Notice of Violation/HPF

January 18, 2007

CERTIFIED MAIL

Mr. Brad Hemminger, Project Engineer
United States Gypsum Company
121 South Lake Street
Gypsum, Ohio 43433

Dear Mr. Hemminger:

The stack test performed on December 7, 2006, for the Rotary Kiln Dryer (P001), has been reviewed and found to have been conducted in conformance with Ohio EPA approved methods and procedures. Our test review confirms the following reported data is accurate:

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

	<u>PM</u>
1. Actual Emission Rate:	0.018 gr/dscf
2. Allowable Emission Rate:	0.008 gr/dscf
3. Source Operating Rate:	15 tons/hr
4. Maximum Source Operating Rate:	16 tons/hr

Based on the stack test results, emissions unit P001 was being operated in exceedance of its allowable PM emission rate. This is a violation of the terms and conditions of PTI # 03-16225, and ORC 3704.05.

Since the last failed stack test in June, USG installed new oliophobic bags in the baghouse, and conducted a leak test on the collector. The company also updated the preventative maintenance program and began to conduct inspections of the collector on a monthly basis. Based on these actions, the results of this latest test showed a marked reduction in the PM emission rate.

Mr. Brad Hemminger, Project Manager
January 18, 2007
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This office is requesting the facility submit a written response to this letter by February 16, 2007, which includes, at a minimum, a compliance plan and schedule to correct the violation noted above. Based on our recent discussions, we are in agreement that the company's compliance plan should be a request for a higher outlet grain loading for the Rotary Kiln baghouse. USG would need to submit a request for an administrative modification of the PTI to establish a new limit to reflect this stack testing result. In addition, when submitting your Title V application for all three SIC codes, be sure to include the appropriate revisions to correct this violation.

Please be advised that the submission of USG's letter discussing resolutions to the failed stack test results does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06.

Should you have any questions or comments concerning this letter, please feel free to contact Robert at (419) 373 -3139 or Jay at (419) 373-3136.

Sincerely,



Robert G. Teer
Division of Air Pollution Control



Jay Liebrecht
Division of Air Pollution Control

//lr

pc: Don Waltermeyer, DAPC-NWDO
Tom Sattler, DAPC-NWDO
Robert Teer, DAPC-NWDO
Jay Liebrecht, DAPC-NWDO
Tom Kalman, DAPC-CO
Lisa Holscher, US EPA
NWDO Follow-up File
DAPC-NWDO File
Stack File

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Form 3800
June 2002

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 GARDNER HEDDINGHAM - U.S. GYPSUM CO.
 Street, Apt. #
 or PO Box No. 121 SOUTH LAKE STREET
 City, State, ZIP+4
 GYPSUM, OH 43433

PS Form 3800, June 2002 See Reverse for Instructions

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- 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. Article Addressed to:
 MR. GARDNER HEDDINGHAM, PROJECT ENGINEER
 GYPSUM CO. GYPSUM (OHIO)
 121 SOUTH LAKE STREET
 GYPSUM, OHIO 43433

COMPLETE THIS SECTION ON DELIVERY

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B. Received by (Printed Name) *Marshall Smith* C. Date of Delivery *01-19-07*

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