



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: Ottawa County  
0362000078  
U. S. Gypsum  
**Notice of Violation (NOV)**

October 29, 2008

CERTIFIED MAIL

Mr. Andy Cvitkovich, Engineering Manager  
U. S. Gypsum Company  
121 South Lake Street  
Gypsum, Ohio 43433

Dear Mr. Cvitkovich:

This letter is an addendum to the NOV sent to USG on October 9, 2008. It clarifies and expands upon the violations previously cited based on new information received during our meeting on October 23, 2008. The purpose of the meeting was to discuss the past permitting of the GFP project and the various modifications/new permits that are necessary and/or requested by the company.

We initially discussed the past permitting of the GFP project and the issues pertaining to how the facility's potential-to-emit (PTE) should be calculated. Ohio EPA's Division of Air Pollution Control (DAPC) recognizes the evolution of the new source review permitting process and will raise these issues with our Central Office. We will keep the company informed of our progress.

We also discussed the product formulation history for the GFP kiln, emissions unit No. P027 and how formulation changes affect emissions. Originally, the company produced a board formulated with and without a wax addition. Based on recent stack test results, emissions from both products exceeded the VOC limit established in PTI # 03-11030 (The PTI limit was calculated solely based upon AP-42 emission factors for the combustion of natural gas.). The company brought this to our attention and it is now apparent that compounds in the formulation, especially the wax, releases VOC's above what was originally anticipated. From a permitting perspective, the company must submit a PTI application to administratively modify (increase) the VOC limit.

In 2006, USG came up with a new product with a formulation that included the addition of siloxane. According to recent stack test, this change in the method of operation resulted in an increase of PM/PM<sub>10</sub> emissions above permit limits.

Mr. Andy Cvitkovich, Engineering Manager  
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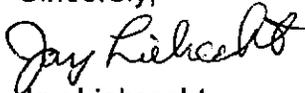
The formulation change is, by definition, considered a "modification" and the company failed to obtain a PTI prior to this modification. This is a violation of OAC rules 3745-31-02, 3745-77-02 and ORC 3704.05. The company now must submit the appropriate applications to obtain these permits.

During the installation of the emissions units associated with the GFP project in 1999, the company also installed blue and black inking stations as part of the GFP line. USG also recently installed a green inking station. All three of these inking stations are air contaminant sources and were installed and operated before obtaining the proper air permits. These are violations of OAC rules 3745-31-02, 3745-77-02 and ORC 3704.05. The company now must submit the appropriate applications to obtain these permits.

This office is requesting the facility submit a written response to this letter by November 28, 2008, which includes, at a minimum, a hard copy permit to install application for the kiln, proposing new allowables and a hard copy PTI application for each of the inking stations. Please be advised that the submission of the requested information to respond to this letter 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 the company have any questions regarding this letter, please feel free to contact me at (419) 373 -3136.

Sincerely,



Jay Liebrecht  
Division of Air Pollution Control

//lr

pc: Don Waltermeyer, DAPC-NWDO  
Tom Kalman, DAPC-NWDO  
Lisa Holscher, US EPA  
NWDO Follow-up File  
DAPC-NWDO File

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| Total     | \$532 |                                      |

ADDRESSEE - U.S. GYPSUM CO.  
 121 SOUTH LAKE STREET  
 CHICAGO, IL 60606-4343

PS Form 3811, August 2006 See Reverse for Instructions

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