



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Ottawa County
0362000078
U. S. Gypsum Company
Stack Test
HPV-GC8
Notice of Violation

February 15, 2011

Certified Mail 7009 1410 0001 1839 8037

Ms. Aimee Rodgers
United States Gypsum Company
121 South Lake Street
Gypsum, Ohio 43312

Dear Ms. Rodgers:

The stack test conducted on December 21, 2010, on Ohio EPA emissions unit No. P027 (28 Zone Direct Fired Natural Gas Kiln), has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data is accurate:

Critical Test Data

Table with 5 columns: Pollutant, Actual Emission Rate*, Allowable Emission Rate*, Source Operating Rate*, Maximum Source Operating Rate^a. Rows include NOx and CO.

* Average of test runs 2 and 3. (Note: Run 1 was voided due to an exceedance of testing parameters)
** Note: This actual emission rate exceeds the proposed emission rate of 24.2 lb CO/hr in permit P0105319

Run 4 was not included in the test run average due to a production change of 5/8" board to 1/4" board. Testing on the 1/4" board was performed for NOx and CO in which the kiln heat input rate was 37.16 MMBtu/hr. The NOx and CO emission rates for this run were 1.54 and 17.42 lbs/hr, respectively.

^ Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

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The emissions unit was being operated in violation of its allowable emissions rate for CO (violation of the Title V term and condition A.I (1), OAC rule 3745-31-05, and Ohio Revised Code 3704.05). It will therefore be necessary to retest this unit.

In regards to the low source operating rate, US Gypsum has agreed to conduct additional testing on the kiln should the heat inputs increase by over 10% of those encountered during these past tests.

This office is requesting that the facility submit a written response to this letter which includes, at a minimum, a compliance plan and schedule. The facility is required to submit this information by no later than March 25, 2011. Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Please contact me as soon as possible regarding this matter at (419) 373 -3134 or via e-mail at wendy.licht@epa.state.oh.us.

Sincerely,



Wendy Licht
Division of Air Pollution Control

/cs

pc: Robert Teer, DAPC-NWDO
Tom Kalman, DAPC-CO
William MacDowell, US EPA, Region V
~~DAPC-NWDO file~~
DAPC, NWDO Stack File

ec: Jay Liebrecht, DAPC, NWDO
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NWDO Follow-up File