



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

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

August 25, 2010

Certified Mail 7009 1680 0002 4297 3206

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

Dear Ms. Rodgers:

The stack test conducted on July 9, 2010, on Ohio EPA emissions unit No. P027 (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
(In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
NO _x	1.94 lbs/hr 0.029 lb/MMBtu	12.32 lbs/hr 0.11 lb/MMBtu	66.63 MMBtu/hr	112 MMBtu/hr
CO	25.4 lbs/hr	20.16 lbs/hr	66.63 MMBtu/hr	112 MMBtu/hr

^aMaximum 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.

Emissions unit P027 was being operated in violation of its allowable emissions rate for CO (violation of the Title V term and condition A.1 (1), OAC rule 3745-31-05, and Ohio Revised Code 3704.05). It will therefore be necessary to retest this unit.

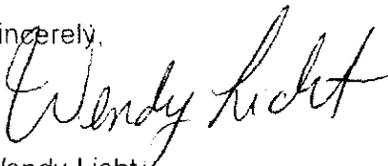
Ms. Aimee Rodgers
 August 24, 2010
 Page Two

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 September 27, 2010. 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: Wendy Licht, DAPC-NWDO
 Tom Kalman, DAPC-NWDO
 Robert Teer, DAPC-NWDO
 Tom Sattler, DAPC-NWDO
 Lisa Holscher, US EPA
 DAPC-NWDO File
 Stack File

ec: Jay Liebrecht
 Robert Teer
 DAPC Follow-up File

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
1. Article addressed to: Mrs. Aimee Rodgers US Gypsum Co. 121 ... Gypsum, Ohio 43312		A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name) TANDY YUNG	
2. Article # 7009 1680 0002 4297 3206		C. Date of Delivery 8-30-10 D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:	
3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D.		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input type="checkbox"/> No	
2. Article # 7009 1680 0002 4297 3206		3. Date of Delivery 8-30-10	
PS Form 3811, February 2004		Return Receipt	