



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 Company
Stack Test
Notice of Violation

March 26, 2008

CERTIFIED MAIL
7006 0100 0003 7708 5688

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

Dear Mr. Cvitkovich:

The stack tests conducted on October 24, 2007, and January 16, 2008, on Ohio EPA emissions unit No. P027, (112 MMBtu/hr, 28 Zone Direct Fired Natural Gas Kiln - GFP) have been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data is accurate:

October 24, 2007 Test Data (In Three Run Averages) for board w/siloxane addition

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate
PM	2.38 lbs/hr 7.0 lbs/hr (PM ₁₀)	1.57 lbs/hr no limit in permit	76,368 lbs/hr with 318 lbs/hr siloxane	96,000 lbs/hr with 480 lbs/hr siloxane
VOC	2.38 lbs/hr	0.65 lb/hr	76,368 lbs/hr with 318 lbs/hr siloxane	96,000 lbs/hr with 480 lbs/hr siloxane
NO _x	2.53 lbs/hr 0.04 lb/MMBtu	12.32 lbs/hr 0.11 lb/MMBtu	61.58 MMBtu/hr	112 MMBtu/hr*
CO	12.79 lbs/hr	20.16 lbs/hr	61.58 MMBtu/hr	112 MMBtu/hr

January 16, 2008 Test Data (In Three Run Averages) for board w/ normal wax addition

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate
PM	1.22 lbs/hr 3.74 lbs/hr (PM ₁₀)	1.57 lbs/hr no limit in permit	96,100 lbs/hr	96,000 lbs/hr
VOC	6.99 lbs/hr	0.65 lb/hr	96,100 lbs/hr	96,000 lbs/hr
NO _x	3.1 lbs/hr 0.049 lb/MMBtu	12.32 lbs/hr 0.11 lb/MMBtu	62.9 MMBtu/hr	112 MMBtu/hr*
CO	17.4 lbs/hr	20.16 lbs/hr	62.9 MMBtu/hr	112 MMBtu/hr

*Note: USG has improved board de-watering and no longer operates @ max. heat input rate.

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This emissions testing was conducted at Ohio EPA's request due to the recent PTI application the company submitted. This application, among other things, will establish some revised limits for the kiln and federally enforceable restrictions on several emission units to maintain the facility's potential to emit below PSD major source level. The company approached us with concerns that the addition of siloxane to the board (circa February 2006) may have affected emissions from the kiln. It also expressed a concern on its reliance on emission factors from AP-42 that were used to establish permit limits for the kiln in 1997.

In both stack test reports, the stack testing company, Pace Analytical, submitted the VOC results after having corrected for the moisture content in the Method 18 calculations. The testing company insisted this is the correct procedure for calculating the results. This correction results in higher VOC emission rates and, based on our experience, we are not sure that it is appropriate to do so. Therefore, our office has contacted USEPA, Research Triangle Park to get their determination on the matter.

Based on the test reports, the emissions unit was being operated in violation of its allowable emission rates for PM and VOC while producing board w/siloxane addition, and for VOC while producing board w/ wax addition. These are violations of the terms and conditions of PTI # 03-11030, the Title V permit and Ohio Revised Code 3704.05. We fully realize that USEPA's determination on the moisture correction issue could cause us to either rescind or revise this notice of violation for VOC's.

At this time, our office is requesting that the facility submit a written response to this letter which includes, at a minimum,

1. a compliance plan and schedule to correct the PM violations (we fully expect modifying the permit limits will be the resolution method),
2. an explanation as to why the VOC emission rates during the tests were much lower than the requested VOC limit of 24.62 lb/hr, per the PTI application submitted by the company last year.
3. more details on the additional testing the company is planning to conduct on the kiln's different products

Please submit this information by no later than April 30, 2008. In the meantime, we will obtain USEPA's response on the Method 18 results and write a clarifying letter. This letter will also address whether or not the addition of siloxane to the board constituted a modification under OAC rule 3745-31-01.

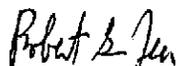
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Based on our recent conversations and meeting on March 17th, US Gypsum has agreed to conduct additional testing on the kiln should the heat inputs increase by over 10 % of those encountered during these past tests. Also, the company will conduct additional testing should the process weight rate or the silioxane addition rate increase by over 10 % of the numbers encountered during the October 24 test.

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.

You may contact Robert at (419) 373 - 3139, or Jay at (419) 373 - 3136, should you have any questions or comments regarding this letter.

Sincerely,



Robert G. Teer
Division of Air Pollution Control



Jay P. Liebrecht
Division of Air Pollution Control

/csl

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

ec: Wendy Licht

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DAPC/Jay L.
cs1

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US GYPSUM CO
Street, Apt. No.
PO Box No 121 SOUTH LAKE ST
City, State, ZIP+4 GYPSUM OH 43433

PS Form 3800, June 2002 See Reverse for Instructions

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1. Article Addressed to:

MR ANDY CVITKOVICH ENG MGR
US GYPSUM CO
121 SOUTH LAKE ST
GYPSUM OH 43433

DAPC/Jay L./cs1

COMPLETE THIS SECTION ON DELIVERY

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2. Article Number: 7006 0100 0003 7708 5688