



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

November 20, 2008

RE: Washington County  
EI Dupont De Nemours  
Facility ID: 0684000005  
Site Visit

Mr. Jeffrie D'Costa  
DuPont Unit Manager  
Little Hocking Service Station  
P.O. Box 452  
Little Hocking, Ohio 45742

Dear Mr. D'Costa:

This letter is in regards to my site visit conducted on November 6, 2008. I would like to thank you and the various employees for their assistance during my visit. The purpose of my visit was to determine if your facility is currently in compliance with all applicable federal and state air pollution laws and regulations. The following issues were noted or discussed:

1. The lack of weekly visible emission (VE) records required by the permits to operate for P004 and P006 issued on April 1, 2008. Facility personnel have been taking pressure drop readings on the baghouse in place of the weekly VE checks. During my discussions with Zach Hamlin of our office concerning this issue, he indicated that he discussed with you the possibility of modifying your permits to change the weekly VE checks to a daily pressure drop reading. If you wish to modify the monitoring and recordkeeping requirements of your permit, you must send a request to administratively modify your permits to this office. Please note that failure to complete monitoring and recordkeeping in accordance with your current permit is a violation of Ohio Administrative Code (OAC) rule 3745-15-03(A).
2. While viewing volatile organic compounds (VOC) records being maintained for emissions unit P001- Line 1, it was noted that EI Dupont's calculations indicate that Line 1 has exceeded the short term emission limit of 0.023 lb VOC/hr as established in permit to install (PTI) 06-1795 issued on January 28, 1987. Documentation on file concerning the issuance of PTI 06-1795 indicates that the emissions factor for VOC on this line was based on mass balance, which indicated that the emission rate was immeasurable. If EI Dupont has new information concerning the emission rate of VOC from Line 1 that indicates that the emission factors provided for the issuance of PTI 06-1795 were incorrect,

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then a modification to your permit may be required. I spoke to Lily Hong Zhang with your corporate office and she indicated that Line 1 may qualify for the "de minimis" exemption in accordance with OAC rule 3745-15-05. If you feel that the line meets the definition of a "de minimis" source, then please provide justification, including calculations, for your conclusion.

3. You indicated during my visit that B001-Natural Gas Boiler and P002- Butacite Dryer have not operated since January 2006. If these emissions units will no longer be operated at the facility, please submit a request to withdraw them so that we may revoke their permits. If you wish to discuss these two options, please feel free to contact me.

Within 30 days of receipt of this letter, please provide the above requested information or a plan and schedule for addressing these issues. Acceptance by Ohio EPA of the above requested information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you have any questions, please feel free to contact me at 740-380-5299 or [michael.carper@epa.state.oh.us](mailto:michael.carper@epa.state.oh.us).

Sincerely,



Michael Carper  
Environmental Specialist 2  
Division of Air Pollution Control

MC/mlm

cc: Ms. Lily Hong Zhang, DuPont Washington Works Site