



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

March 17, 2008

**RE: Washington County
Degussa Engineered Carbons
0684010049 P005 and P006
Notice of Violation
HPV- GC8, M1A
CERTIFIED: 70063450000190560839**

Mr. Donnie Loubiere
Degussa Engineered Carbons
11135 State Route 7
Belpre, Ohio 45714

Dear Mr. Loubiere:

On January 9, 2008, Almega Environmental, Inc. performed particulate, sulfur dioxide, nitrogen oxides, carbon monoxide and volatile organic compounds emission compliance tests at Degussa Engineered Carbons, 11135 State Route 7, Belpre on the units 1 and 2 dryers (Emissions Unit P005 and P006). This test was required pursuant to Section V.4 of PTI 06-06770 issued on November 11, 2007. Ohio EPA received the test report on February 11, 2008. The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Method(s) 1-6, 7E, 10 and 25. The results of the test showed the source to be out of compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions for sulfur dioxide and nitrogen oxide emissions.

Our test review shows the following:

	Particulate	SO2	NOX	CO	VOC
A. Tested Emission Rate-lbs/hr:	3.75	334.2	67.7	14.7	1.5
B. Allowable Emission Rate-lbs/hr:	6.8	290.4	56.0	299.8	19.5
C. Source Operating Rate-lbs/hr:	16,786				
D. Isokinetic Rate:	Run #1 - 106%; Run #2 - 99%; Run #3 - 100%				

Please submit to this office, within 30 days of receipt of this letter, a plan and schedule for achieving compliance. Submit this plan to the attention of Michael Carper.

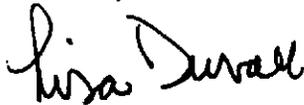
Acceptance by Ohio EPA of a compliance plan and schedule does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

Mr. Donnie Loubiere
Degussa Engineered Carbons
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Please refer any questions concerning the above requirements to Michael Carper, Ohio EPA Southeast District Office, at 740-380-5299.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Duvall".

Lisa Duvall
Environmental Specialist
Division of Air Pollution Control

LD/mlm

cc: Michael Carper (Emissions Unit File Copy)
Dean Ponchak, DAPC-SEDO w/ CETA summary attachment
Bruce Weinberg, DAPC-SEDO
Lisa Holscher, U.S. EPA Region V
Tom Kalman, DAPC-CO
Test Report File Copy

DIVISION OF AIR POLLUTION CONTROL-SEDO

CETA APPENDIX K DATA

Stack Test Review Summary Form

FACILITY INFORMATION

FACILITY NAME: Degussa Central Stack- P005 and P006

COUNTY: Washington

FACILITY ID: 0684010049

SCC: 3 01 005 99

EMISSION TEST INFORMATION

POLLUTANT(S) TESTED: Particulate, SO2, NOX, CO and VOC

INTENT TO TEST (ITT) NOTIFICATION SUBMITTED: No date stamp

SCHEDULED TEST DATE FROM ITT: Jan. 8, 2008

TESTING FIRM: Almega Environmental Inc.

DATE TEST CONDUCTED: January 9, 2008

DAPC-SEDO TEST OVERSIGHT

NAME OF DAPC-SEDO STAFF WITNESS: Dean Ponchak

WERE ALL RUNS WITNESSED? YES

*IF NO PROVIDE EXPLANATION:

IS STACK TEST FIELD FORM COMPLETE? YES

WERE AUDIT SAMPLES TAKEN? NO

EMISSION UNIT INFORMATION

EMISSION UNIT ID#: P005 and P006

EMISSION UNIT DESCRIPTION: unit 1 and 2 dryers-Central Stack

EMISSION UNIT MONITORING AND CONTROL

LIST EU MONITORING EQUIPMENT: none

LIST EU CONTROL EQUIPMENT: baghouse

TEST REPORT

TEST REPORT REVIEWER: Lisa Duvall

DATE TEST REPORT RECEIVED AT SEDO: Feb. 11, 2008

POLLUTANT: particulate TEST METHOD: 1-5
ALLOWABLE EMISSION RATE (UNITS): 6.8 lb/hr
AVERAGE TEST EMISSION RATE (UNITS): 3.75 lb/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: dependent on feedstock
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 2,817 gph
16,786 lbs/hr
TEST PASSED YES
DATE TEST RESPONSE LETTER SENT TO FACILITY: February 29, 2008

POLLUTANT: sulfur dioxide TEST METHOD: 6
ALLOWABLE EMISSION RATE (UNITS): 290.4 lb/hr
AVERAGE TEST EMISSION RATE (UNITS): 334.2 lb/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: dependent of feedstock
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 2,817 gph
16,786 lbs/hr
TEST PASSED NO
DATE TEST RESPONSE LETTER SENT TO FACILITY: February 29, 2008

POLLUTANT: NOX TEST METHOD: 7E
ALLOWABLE EMISSION RATE (UNITS): 56.0 lbs/hr
AVERAGE TEST EMISSION RATE (UNITS): 67.7 lbs/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: dependent of feedstock
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 2,817 gph
16,786 lbs/hr
TEST PASSED NO
DATE TEST RESPONSE LETTER SENT TO FACILITY: February 29, 2008

POLLUTANT: carbon monoxide TEST METHOD: 10
ALLOWABLE EMISSION RATE (UNITS): 299.8 lbs/hr
AVERAGE TEST EMISSION RATE (UNITS): 14.7 lbs/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: dependent of feedstock
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 2,817 gph
16,786 lbs/hr
TEST PASSED YES
DATE TEST RESPONSE LETTER SENT TO FACILITY: February 29, 2008

POLLUTANT: VOC TEST METHOD: 25
ALLOWABLE EMISSION RATE (UNITS): 19.5 lbs/hr
AVERAGE TEST EMISSION RATE (UNITS): 1.5 lbs/hr
MAXIMUM PERMITTED OPERATING RATE FOR EU: dependent on feedstock
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 2,817 gph
17,786 lbs/hr
TEST PASSED YES
DATE TEST RESPONSE LETTER SENT TO FACILITY: February 29, 2008

I HEREBY VERIFY THAT THE INFORMATION CONTAINED WITHIN THE STACK TEST REPORT HAS BEEN REVIEWED AND IT HAS BEEN DETERMINED THAT THE TEST PROCEDURES, ANALYSES, AND CALCULATIONS ARE:

AN ACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED TESTING METHODOLOGY

AN UNACCEPTABLE DEMONSTRATION OF CONFORMANCE WITH THE APPROVED TESTING METHODOLOGY

February 19, 2008

Lisa Duvall

Date of Review

Reviewed by