



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 P001 and P002  
Notice of Violation  
HPV-GC8, M1A  
CERTIFIED: 70063450000190560846**

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

Dear Mr. Loubiere:

On January 8, 2008, Almega Environmental, Inc. performed particulate, nitrogen oxides, carbon monoxide and volatile organic compounds emission compliance tests at Degussa Engineered Carbons, 11135 State Route 7, Belpre on the carbon black units 1 and 2 (Emissions Units P001 and P002). This test was required pursuant to Section V.4 of PTI 06-06770 issued 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) 1-5, 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 nitrogen oxide and volatile organic compounds emissions.

Our test review shows the following:

	Particulate	NOX	CO	VOC
A. Tested Emission Rate-lbs/hr:	0.04	52.8	235.0	11.4
B. Allowable Emission Rate-lbs/hr:	5.70	43.7	354.6	9.4
C. Source Operating Rate-lbs/hr:	16,680			
D. Isokinetic Rate:	Run #1 - 86%; Run #2 - 93%; Run #3 - 94%			

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.

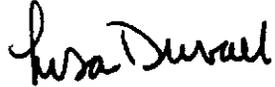
Acceptance by Ohio EPA of a compliance plan and schedule does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by Ohio EPA at a later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

Mr. Donnie Loubiere  
Degussa Engineered Carbons  
March 17, 2008  
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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,



Lisa Duvall  
Environmental Specialist  
Division of Air Pollution Control

LD/mim

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 Flare Stack- P001 and P002

COUNTY: Washington

FACILITY ID: 0684010049

SCC: 3 01 005 99

#### EMISSION TEST INFORMATION

POLLUTANT(S) TESTED: Particulate, 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 8, 2008

#### DAPC-SEDO TEST OVERSIGHT

NAME OF DAPC-SEDO STAFF WITNESS: none

WERE ALL RUNS WITNESSED? NO

\*IF NO PROVIDE EXPLANATION:

IS STACK TEST FIELD FORM COMPLETE? NO

WERE AUDIT SAMPLES TAKEN? NO

#### EMISSION UNIT INFORMATION

EMISSION UNIT ID#: P001 and P002

EMISSION UNIT DESCRIPTION: Carbon Black units 1 and 2

#### EMISSION UNIT MONITORING AND CONTROL

LIST EU MONITORING EQUIPMENT: none

LIST EU CONTROL EQUIPMENT: flare

#### 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): 5.7 lb/hr  
AVERAGE TEST EMISSION RATE (UNITS): 0.04 lb/hr  
MAXIMUM PERMITTED OPERATING RATE FOR EU: dependent on feedstock  
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 2,817 gph  
16,680 lbs/hr  
TEST PASSED YES  
DATE TEST RESPONSE LETTER SENT TO FACILITY: February 29, 2008

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POLLUTANT: NOX TEST METHOD: 7E  
ALLOWABLE EMISSION RATE (UNITS): 43.7 lbs/hr  
AVERAGE TEST EMISSION RATE (UNITS): 52.8 lbs/hr  
MAXIMUM PERMITTED OPERATING RATE FOR EU: dependent of feedstock  
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 2,817 gph  
16,680 lbs/hr  
TEST PASSED NO  
DATE TEST RESPONSE LETTER SENT TO FACILITY: February 29, 2008

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POLLUTANT: carbon monoxide TEST METHOD: 10  
ALLOWABLE EMISSION RATE (UNITS): 354.6 lbs/hr  
AVERAGE TEST EMISSION RATE (UNITS): 235.0 lbs/hr  
MAXIMUM PERMITTED OPERATING RATE FOR EU: dependent of feedstock  
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 2,817 gph  
16,680 lbs/hr  
TEST PASSED YES  
DATE TEST RESPONSE LETTER SENT TO FACILITY: February 29, 2008

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POLLUTANT: VOC TEST METHOD: 25  
ALLOWABLE EMISSION RATE (UNITS): 9.4 lbs/hr  
AVERAGE TEST EMISSION RATE (UNITS): 11.4 lbs/hr  
MAXIMUM PERMITTED OPERATING RATE FOR EU: dependent on feedstock  
AVERAGE TEST OPERATING RATE FOR THE THREE RUNS: 2,817 gph  
16,680 lbs/hr  
TEST PASSED NO  
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