



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Scott J. Nally, Director

Re: Allen County
 Premise #0302020343
 ISP Lima, LLC
Notice of Violation
HPV-GC8

September 24, 2013

Mr. Charles Gasperetti, Site General Manager
 ISP Lima, LLC
 1220 South Metcalf Street
 Lima, Ohio 45804

Dear Mr. Gasperetti:

The stack test conducted on April 23-25, 2013, on the Scrubber Offgas Boiler (SOGB), Ohio EPA emissions unit N006, has been reviewed. This test was not witnessed by the Ohio EPA; however, based on the information in the test report, the testing appears to have been conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data are accurate:

**Testing Without Liquid Injection at 1,462°F SOGB Combustion Temperature
 (Results in Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
PM	2.52 lbs/hr	6.4 lbs/hr	confidential	confidential
SO ₂	2.68 lbs/hr	5.5 lbs/hr	confidential	confidential
NO _x	7.72 lbs/hr	25.4 lbs/hr	confidential	confidential
CO	106.36 lbs/hr	205.4 lbs/hr	confidential	confidential
VOC	0.49 lb/hr as propane, >99.99% destruction efficiency (DRE)	63.0 lbs/hr, minimum of 99% DRE	confidential	confidential

^a Maximum 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.

**Testing With Liquid Injection at 1,464°F SOGB Combustion Temperature
 (Results in Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
PM	8.98 lbs/hr	6.4 lbs/hr	confidential	confidential
SO ₂	2.06 lbs/hr	5.5 lbs/hr	confidential	confidential
NO _x	7.72 lbs/hr	25.4 lbs/hr	confidential	confidential
CO	93.97 lbs/hr	205.4 lbs/hr	confidential	confidential
VOC	0.74 lb/hr as propane, 99.99% DRE	63.0 lbs/hr, minimum of 99% DRE	confidential	confidential

**Testing With Liquid Injection at 1,450°F SOGB Combustion Temperature
 (Results in Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate ^a
SO ₂	2.42 lbs/hr	5.5 lbs/hr	confidential	confidential
NO _x	9.29 lbs/hr	25.4 lbs/hr	confidential	confidential
CO	177.44 lbs/hr	205.4 lbs/hr	confidential	confidential
VOC	0.86 lb/hr as propane, 99.98% DRE	63.0 lbs/hr, minimum of 99% DRE	confidential	confidential

The above results satisfy the CO compliance demonstration requirements contained in the Title V operating permit. The testing performed without liquid injection demonstrates that the SOGB will comply with its emission limits when operated under this condition and at a lower temperature (1,462°F).

However, the testing performed with liquid injection shows the particulate matter (PM) exceeding its allowable emission rate which is a violation of Title V Permit P0105167 issued November 7, 2012, OAC rule 3745-31-05(D), and Ohio Revised Code 3704.05. The average SOGB combustion temperature during the three test runs when the PM violation occurred was 1,464 °F.

Mr. Charles Gasperetti
September 24, 2013
Page 3

In conjunction with the approval letter issued by the Division of Air Pollution Control on April 23, 2013, the company was allowed to test the SOGB with this lowered temperature, along with liquid organics injection, to determine if compliance could be demonstrated for each criteria pollutant and the VOC and hazardous air pollutant destruction efficiency. We understand that liquid organics are rarely injected, thus, the company wanted to use the approval letter to determine optimal SOGB combustion temperature for the various operating scenarios.

The April 23, 2013 letter also stated that DAPC will exercise enforcement discretion if any pollutant emission limitations are exceeded during the testing with lowered combustion temperature. Thus, DAPC does not intend to pursue further enforcement action against the company, provided it submits a written response to the following request by October 25, 2013:

1. Submit a letter stating that the company agrees to operate the SOGB without any liquid organics injection until another stack test is conducted that demonstrates compliance with the PM emission limitation of 6.4 lbs/hr.

Please be advised that submission of information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case.

If you have any questions, please contact me at (419) 373-3128 or e-mail:
jeffrey.skebba@epa.state.oh.us

Sincerely,



Jeffrey Skebba
Division of Air Pollution Control

/cg

pc: Robert Teer, DAPC, NWDO
DAPC, NWDO Stack File

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