



**Environmental  
Protection Agency**

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

May 7, 2012

**CERTIFIED MAIL**

Mr. Todd Sutton, General Manager  
PCS Nitrogen Ohio, L.P.  
P.O. Box 1901  
Lima, Ohio 45802

Re: NOTICE OF VIOLATION – non HPV  
Facility ID: 0302020370  
PCS Nitrogen Ohio, L.P.  
Location: 1900 Fort Amanda Road  
Lima, OH 45802  
Allen County

Dear Mr. Sutton:

This letter is a follow-up to the inspection conducted by Jeffrey Skebba and Andrea Moore of the Division of Air Pollution Control/Northwest District Office (DAPC/NWDO) on April 25, 2012. The purpose of the inspection was to determine the compliance status of all air contaminant emissions units located there.

Based on discussions and observations during the inspection, and a review of the company's records for the period of July 1, 2010 through March 31, 2012, (unless otherwise indicated), my findings are as follows:

1. The Compliance Assurance Monitoring (CAM) plan in the Title V permit requires inspection by the company at least once every 12 months of the spray nozzle on the scrubber for emissions unit P524 – urea prilling dryer cyclone with scrubber. The most recent inspection was completed March 15, 2011. Thus, more than 13 months has elapsed since the last inspection.

This is a violation of permit terms d)(5)a. and d)(5)b. in the Title V minor modification permit #P0108791 issued on February 23, 2012; and also 40 CFR, Part 64. It is our understanding that the company will conduct this inspection in the first half of May 2012.

The other three emissions units with CAM control device inspection requirements every 12 months are P531, P546 and P560, and these inspections have all been completed during the past 12 months.

2. Compliance was being maintained with parametric monitoring ranges established in the Title V permit for the following emissions units:
  - P524 - urea prilling drying cyclone;
  - P531 - ammonium nitrate neutralizer;
  - P546 - scrubber for urea granulation plant granulation section; and
  - P547 - scrubber for urea granulation plant evaporator
3. The baghouse and scrubber for the west urea warehouse operations, emissions unit P536, were operating and there were no visible emissions from either exhaust stack. In addition, records reviewed indicated no visible emissions incidents have occurred.
4. Compliance was being maintained with the minimum pressure drop requirement for the washed filter media scrubber on emissions unit P560 – urea plant prill tower.
5. The No. 2 nitric acid plant was operating in compliance with respective emissions limitations, production rate restriction and daily visible emission checks requirements in the Title V permit.
6. Cooling tower emissions units P571 and P572 are in compliance with total dissolved solids (TDS) and particulate emissions (PE) limitations in the Title V permit. This was verified by review of laboratory TDS results and PE calculations.
7. Leak detection and repair (LDAR) records were reviewed for components required to be monitored for emissions units P528, P529, P546, P560 and T560. The records indicated that the required monitoring frequencies have been met and currently there are no leaking components per regulatory definition. Field auditing for LDAR components was not required, since, currently there are no leaking components in active repair status.

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8. The required reports for applicable regulations in 40 CFR, Part 63, Subpart FFFF have been submitted for emissions units P524, P528, P529, P546, P547 and T560.

Please submit a written response for item No. 1 above by June 8, 2012 with documentation (i.e. – work order with supervisory signature) for completion of the scrubber spray nozzle inspection for emissions unit P524.

With the exception noted in item No. 1 above, all other emissions units appear to be in compliance with applicable air pollution control regulations of Ohio EPA at this time.

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 pursuant to ORC Section 3704.06. The Ohio EPA will make a decision whether to pursue such penalties regarding this matter at a later date.

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

Sincerely,



Jeffrey Skebba  
Division of Air Pollution Control

/cg

ec: Tom Kalman, Central Office, DAPC  
Bruce Weinberg, Central Office, DAPC  
William MacDowell, U.S. EPA, Region V  
Jennifer Jolliff, DAPC/NWDO  
Jeffrey Skebba, DAPC/NWDO  
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