



**Environmental
Protection Agency**

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

July 20, 2012

CERTIFIED MAIL

Mr. Roy Warnock, Vice President & General Manager
Lima Refining Company
1150 South Metcalf Street
Lima, Ohio 45804-1145

Re: NOTICE OF VIOLATION – HPV, GC7
Facility ID: 0302020012
Lima Refining Company
Location: 1150 South Metcalf Street
Lima, Ohio 45804-1145
Allen County

Dear Mr. Warnock:

The First Quarter 2012 Excess Emissions Report (EER) submitted by Lima Refining Company on April 30, 2012, has been reviewed by the Division of Air Pollution Control/Northwest District Office (DAPC/NWDO) and our Central Office (DAPC/CO).

Continuous emission monitor (CEM) data summaries in the EER demonstrated emissions units with CEM data capture was less than the minimum acceptable 95 percent of source operating time for the following:

1. Emissions unit B001 – Vacuum II Heater;
Emissions unit B002 – ISO Stabilizer/Splitter Heaters;
Emissions unit B003 – ISO I and II Heaters;
Emissions unit B004 – Crude II Heater;
Emissions unit B006 – U/F PRE, 1, 2 and 3 Heater; and
Emissions unit B008 – HDS Heater

94.31 percent data capture (5.69 percent CEM down time) for the LIU fuel gas mix drum hydrogen sulfide CEM used to measure refinery fuel gas quality.

2. Emissions unit B007 – Reformer Regenerator Heater

93.63 percent data capture (6.37 percent CEM down time) for the LIU fuel gas mix drum hydrogen sulfide CEM used to measure refinery fuel gas quality.

3. Emissions unit P010 – Fluid Catalytic Cracker

94.72 percent data capture (5.28 percent CEM down time) for the regenerator flue gas sulfur dioxide CEM.

The CEM down times are violations of the following:

Item No. Above	Permit Terms/Rule Violated	Permit/Effective Date
1.	C.1.d)(2), C.1.d)(4), C.2.d)(2), C.2.d)(4), C.3.d)(2), C.3.d)(4), C.4.d)(2) and C.4.d)(4)	Title V Renewal/2-1-2012
2.	C.1.d)(2) and C.1.d)(4)	Title V Renewal/2-1-2012
3.	C.20.d)(7)	Title V Renewal/2-1-2012
1., 2., 3.	Ohio Revised Code 3704.05.	Not Applicable

Primary causes and corrective actions for the CEM down times for emissions units B001-B004, and B006-B008 included:

Date	Cause	Corrective Action Completed
2/11/12	Failed armored rotameter	Replaced rotameter
2/12/12	Vaporizing regulator, valve, probe and sample line plugged	Unplugged each of these parts
3/21/12	Pressure regulating problems, failed cylinder gas audit	Back flush system, replaced gauge, calibration, reset gate times, added a regulator for future cylinder gas audits, completed successful cylinder gas audit
3/21/12 and 3/22/12	Flatline and out of control period	Increased back flush timing and raised GC flow

Primary causes and corrective actions for the CEM down times for emissions unit P010 included:

Date	Cause	Corrective Action Completed
3/15/12 to 3/20/12	Calibration and failed cylinder gas audit after two runs. Found faulty regulator on main sample line.	Replaced regulator

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Based on the corrective actions completed, we are not requiring a written response to this Notice of Violation. 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 a later date.

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: Bruce Weinberg, Central Office, Ohio EPA
John Paulian, Central Office, Ohio EPA
William MacDowell, Region 5 U.S. EPA
Certified Mail Receipt Number 70091410000118346069

ec: Jennifer Jolliff, DAPC/NWDO
Jeffrey Skebba, DAPC/NWDO