Ohio EPA
Division of Air Pollution Control

Interoffice communication

to: DAPC Managers; EER Contacts

from: Todd Brown, CEMS/COMS Coordinator

subject: 1st Quarter, 2011, EER Summary Report

date: July, 2011

Attached is the first quarter, 2011 excess emissions reports ("EER") summary report. Data used to compile this report were taken from all EERs received as of the morning of July 7, 2011. Second quarter 2011 EERs will be expected no later than August 15, 2011, and reports received after this date may show as late/not received in the next quarterly EER summary report.

Work on the EER data entry program continues. Unfortunately the program is not ready for universal distribution and use. For second quarter 2011 data entry, the program will be sent out to both a district and a local office for use and feedback. Hopefully we can get the kinks worked out and have it out to everybody for third quarter EER data entry.

This quarter it has been noted that there were many EER summaries submitted that classified CEMS "Downtime" in the "Excess Emissions" portion on the data summary sheet, and then put a note in the comments section as to why the downtime was being classified in a given category. Please **do not** include downtime in the excess emissions portion of the EER data sheet. There are only two downtimes that need to be reported on the EER data summary sheet: all CEMS downtime that occurred during source operation including QA/QC; and, all CEMS downtime that occurred during source operation not including QA/QC. If a further breakdown of CEMS downtime is required, you will be contacted for more details.

Also with regard to CEMS downtime, there are still quite a few EERs being submitted that are either not reporting CEMS downtime including QA/QC, or that are reporting the same amount of CEMS downtime with QA/QC as without QA/QC. Although QA/QC checks may be completed in enough time that a "valid hour" of data is collected by the CEMS, QA/QC events do need to be quantified and included in the EER summary reports. Please see the fourth quarter of 2010 EER summary report for more details if necessary.

Please review the data included in this summary for facilities within your jurisdiction. Corrections or adjustments should be sent to my attention. If you have questions regarding this report, or suggestions that would make the report more useful or easier to read, please call me at (614) 644-4839, or email me at <<todd.brown@epa.state.oh.us>>.

Ohio EPA Division of Air Pollution Control
Executive Summary as of Quarter 1, 2011

Agencies	Facilities	Sources	Monitors	Unique Combinations	REPORTING INFORMATION On Time	Late or Not Received	Percent On Time
CDO	13	22	42	44	44	0	100.00
NEDO	22	20	63	68	3	65	4.41
NWDO	33	41	89	117	117	0	100.00
TOLEDO	18	56	60	113	113	0	100.00
SEDO	20	40	101	157	157	0	100.00
PORTS	5	11	40	40	38	2	95.00
RAPCA	8	16	45	55	55	0	100.00
CLEVELAND	8	15	12	19	19	0	100.00
HCDES	19	35	98	106	106	0	100.00
CANTON	5	20	23	35	35	0	100.00
AKRON	4	8	9	13	9	4	69.23
SWDO	1	2	1	2	0	2	0.00
TOTAL	**156**	**286**	**583**	**769**	**696**	**73**	**90.51%**

AVERAGE DO **82.73%**

AVERAGE LAA **98.43%**

AVERAGE DO & LAA **90.51%**

PERCENT OF MONITORED EMISSIONS UNITS EXPERIENCING NON-EXEMPT EXCESS EMISSIONS

COUNT		PERCENT
5	1.0 TO 1.9 PERCENT NON-EXEMPT EXCESS EMISSIONS >>>>>>>	0.86
1	2.0 TO 2.9 PERCENT NON-EXEMPT EXCESS EMISSIONS >>>>>>>	0.17
2	3.0 TO 3.9 PERCENT NON-EXEMPT EXCESS EMISSIONS >>>>>>>	0.34
2	4.0 TO 4.9 PERCENT NON-EXEMPT EXCESS EMISSIONS >>>>>>>	0.34
20	5.0 PERCENT AND GREATER NON-EXEMPT EXCESS EMISSIONS>	3.43

PERCENT OF MONITORED EMISSIONS UNITS EXPERIENCING MONITOR DOWNTIME

COUNT		PERCENT
70	1.0 TO 1.9 PERCENT MONITOR DOWNTIME >>>>>>>>>>>>>>>>>	12.01
5	2.0 TO 2.9 PERCENT MONITOR DOWNTIME >>>>>>>>>>>>>>>>>	0.86
13	3.0 TO 3.9 PERCENT MONITOR DOWNTIME >>>>>>>>>>>>>>>>>	2.23
6	4.0 TO 4.9 PERCENT MONITOR DOWNTIME >>>>>>>>>>>>>>>>>	1.03
23	5.0 PERCENT AND GREATER MONITOR DOWNTIME >>>>>>>>>>	3.95

OhioEPA

> 5% CEMS Downtime

Thursday, July 07, 2011

Premise	Facility Name	Source	Monitorid	Source Time	CEMS Downtime	% Time CEMS Down
0302020012	LIMA REFINING COMPANY	P010	S162	129600	9305	7.18%
0448020007	BP OIL COMPANY - TOLEDO REFINERY	P037	S201	129600	26143	20.17%
0575010160	CARGILL INC., SIDNEY	B001	S295	128478	12087	9.41%
0575010160	CARGILL INC., SIDNEY	B002	S295	128478	12087	9.41%
0616000000	CONESVILLE - AMERICAN ELECTRIC POWER	B003	S217	88824	14760	16.62%
0616000000	CONESVILLE - AMERICAN ELECTRIC POWER	B004	P129	89562	89562	100.00%
0641090234	MINGO JUNCTION ENERGY	B001	N205	600	180	30.00%
0641090234	MINGO JUNCTION ENERGY	B001	N377	600	180	30.00%
0641090234	MINGO JUNCTION ENERGY	B002	N206	660	180	27.27%
0641090234	MINGO JUNCTION ENERGY	B002	N378	660	180	27.27%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B007	P050	129600	129600	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B008	P050	128040	128040	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B009	P052	126120	126120	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B010	P052	124320	124320	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B011	P054	106140	106140	100.00%
0641160017	W H SAMMIS - OHIO EDISON COMPANY	B013	P056	122700	122700	100.00%
0679000251	BELDEN BRICK CO	P801	S290	128580	60660	47.18%
0679000251	BELDEN BRICK CO	P802	S290	128580	60660	47.18%
0679000251	BELDEN BRICK CO	P803	S290	128580	60660	47.18%
0701000007	STUART - DAYTON POWER & LIGHT	B004	P283	10081	706	7.00%
0701000060	KILLEN - DAYTON POWER & LIGHT	B001	P000	111360	10913	9.80%
1431350064	AGRIUM NORTH BEND NITROGEN OPERATIO	P001	N440	128130	27360	21.35%
1431350817	E. I. DUPONT DE NEMOURS & COMPANY	P001	S155	91020	91020	100.00%

Total More than 5% Time CEMS Downtime: 23

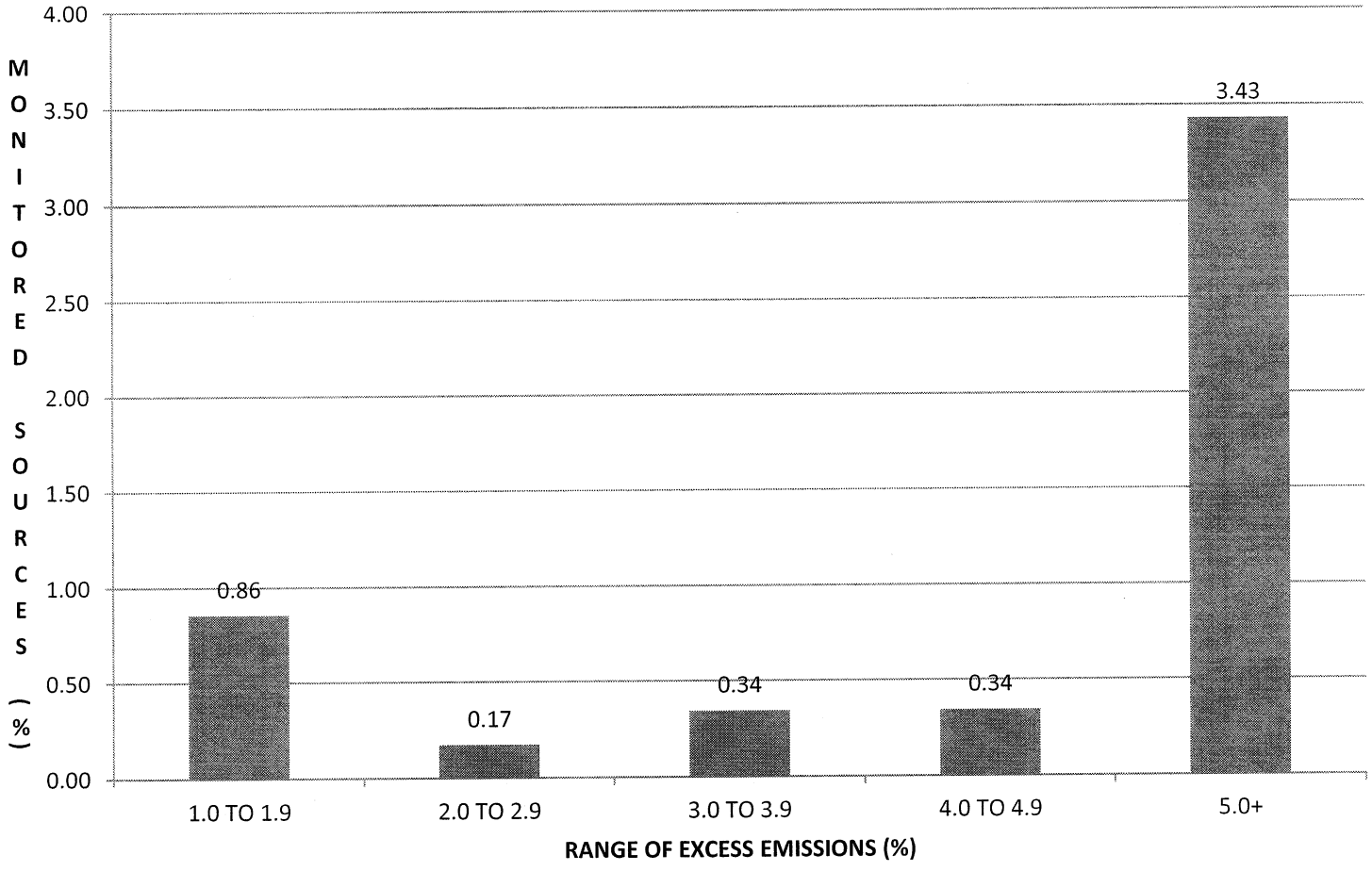
OhioEPA >5% Excess Emissions

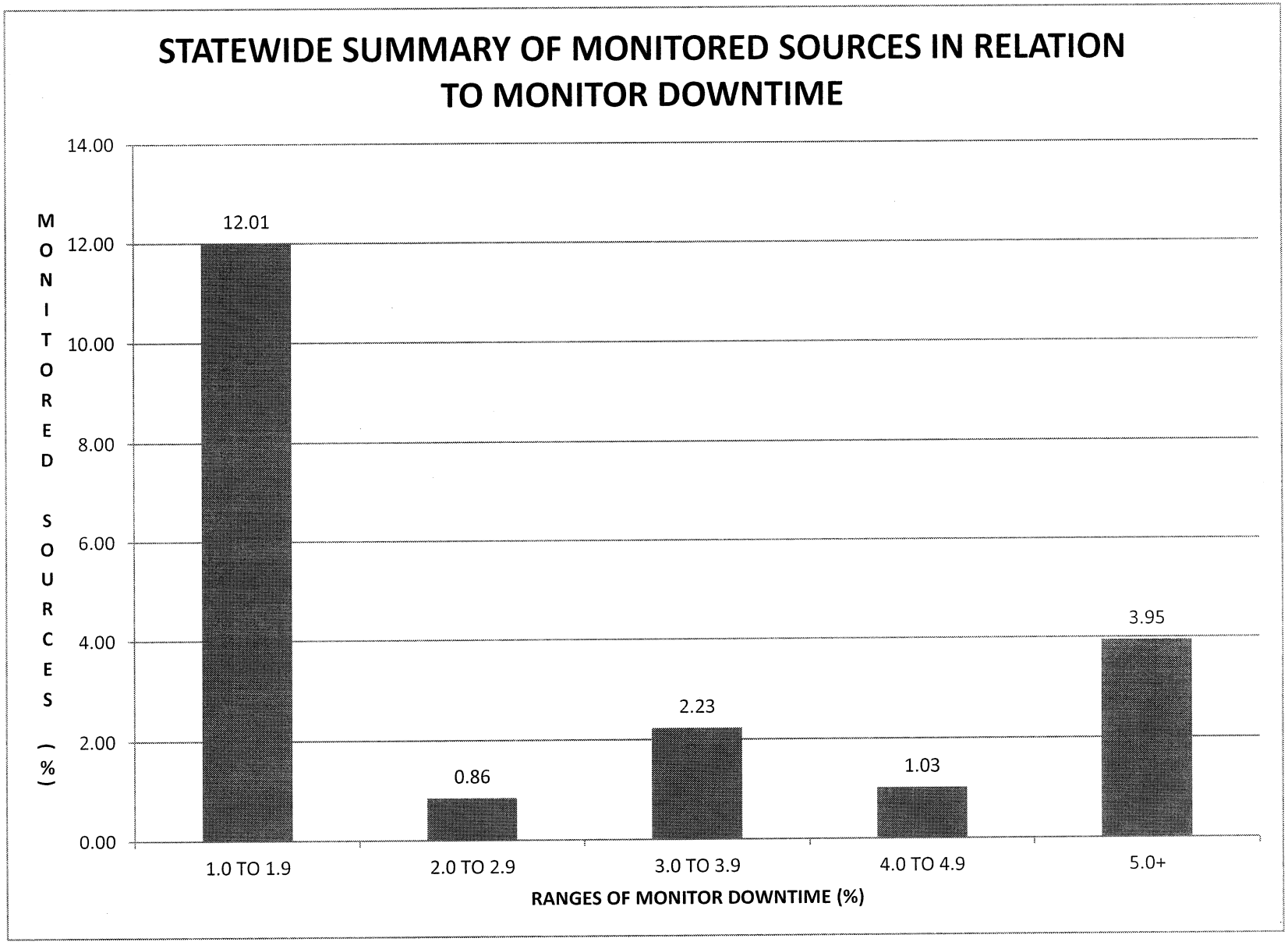
Thursday, July 07, 2011

Premise	Facility Name	Source	Monitor I.D.	Nonexempt EE Minutes	Source Time w/CEMS	%Excess Emissions
0124000132	ASA BLOOMINGBURG	B001	N463	26100	129600	20.14%
0124000132	ASA BLOOMINGBURG	B002	N463	26100	129600	20.14%
0641090010	SEVERSTAL (WHEELING PITTSBURGH STEEL)	B103	H040	12240	129600	9.44%
0641090010	SEVERSTAL (WHEELING PITTSBURGH STEEL)	B104	H040	12240	129600	9.44%
0641090010	SEVERSTAL (WHEELING PITTSBURGH STEEL)	B105	H040	12240	129600	9.44%
0641090010	SEVERSTAL (WHEELING PITTSBURGH STEEL)	B106	H040	12240	129600	9.44%
0641090010	SEVERSTAL (WHEELING PITTSBURGH STEEL)	B107	H040	12240	129600	9.44%
0641090010	SEVERSTAL (WHEELING PITTSBURGH STEEL)	B108	H040	12240	129600	9.44%
0641090010	SEVERSTAL (WHEELING PITTSBURGH STEEL)	P006	H040	12240	129600	9.44%
0641090010	SEVERSTAL (WHEELING PITTSBURGH STEEL)	P007	H040	12240	129600	9.44%
0641090010	SEVERSTAL (WHEELING PITTSBURGH STEEL)	P008	H040	12240	129600	9.44%
0641090010	SEVERSTAL (WHEELING PITTSBURGH STEEL)	P911	H040	12240	129600	9.44%
0671010028	GLATFELTER	B014	C010	4320	18343	22.73%
0671010028	GLATFELTER	B015	C010	4320	18343	22.73%
0701000007	STUART - DAYTON POWER & LIGHT	B002	P281	1012	2289	44.21%
0819750245	ANDERSONS ETHANOL	B001	N445	24660	119700	19.88%
0819750245	ANDERSONS ETHANOL	B002	N445	24660	119700	19.88%
1576002006	MARATHON ASHLAND PETROLEUM - CANTO	P011	S125	4620	91500	5.03%
1576002006	MARATHON ASHLAND PETROLEUM - CANTO	P016	S125	4620	91500	5.03%

More than 5% Excess Emissions: 19

STATEWIDE SUMMARY OF MONITORED SOURCES IN RELATION TO NONEXEMPT EXCESS EMISSIONS




STATEWIDE SUMMARY OF MONITORED SOURCES IN RELATION TO MONITOR DOWNTIME
MONITORED SOURCES (%)
14.00
12.00
10.00
8.00
6.00
4.00
2.00
0.00
12.01
0.86
2.23
1.03
3.95
1.0 TO 1.9
2.0 TO 2.9
3.0 TO 3.9
4.0 TO 4.9
5.0+
RANGES OF MONITOR DOWNTIME (%)

MISSING REPORT

Year: 2011 Qrt: 1 Total Missing: 6

Thursday, July 07, 2011

Premise	Source	Mntrid	Facility	Agency Name	Emissions unit	Qrt	Year
Akron Regional Air Quality Manage			**Missing: 4**				
1667040085	B007	P567	KENT STATE UNIVERSITY	Akron Regional Air Quality Management District	121mmBtu gas blr	1	2011
1667040085	B007	N286	KENT STATE UNIVERSITY	Akron Regional Air Quality Management District	(lb/mmBtu) 121mmBtu gas blr	1	2011
1667040085	B006	P566	KENT STATE UNIVERSITY	Akron Regional Air Quality Management District	121mmBtu gas blr	1	2011
1667040085	B006	N287	KENT STATE UNIVERSITY	Akron Regional Air Quality Management District	(lb/mmBtu) 121mmBtu gas blr	1	2011
Portsmouth Local air Agency			**Missing: 2**				
0701000060	B001	S135	KILLEN - DAYTON POWER & LIGHT	Portsmouth Local air Agency	(lb/mmBtu) Coal Boiler w/ESP	1	2011
0701000060	B001	D001	KILLEN - DAYTON POWER & LIGHT	Portsmouth Local air Agency	(particulate lb/mmBtu) Coal Boiler w/ESP	1	2011

Total Missing: 6

First Quarter, 2011
EER Action Recommendations

The following recommendations are made based expressly on excess emissions report ("EER") data from the third quarter of 2010 through the first quarter of 2011, based on all EERs received as of the morning of July 7, 2011. Source operation time, CEMS/COMS downtime, excess emissions, and the ability of a facility to correct problems from quarter to quarter were taken into account when making these recommendations. Action recommendations are only made for sources that were in operation at least 5% of the available time in the specified quarter. These are only recommendations; it is up to the district or local office to take appropriate action for any CEMS/COMS downtime or recorded excess emissions at assigned facilities. Recommendations do not take into account any actions that may already have been taken. The level of actions taken for CEMS/COMS downtime and recorded exceedences should be adjusted to take into account facility information that was not used in developing this list, such as Director's approved maintenance requests and monitor certification periods. Please be aware that this data may be the basis of future enforcement actions, so problems should be addressed accordingly.

Warning Letter

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2011	4th Quarter 2010	3rd Quarter 2010
0302020012	Lima Refining Company	B009	H2S (gr/dscf)		10.16 % DT	
		B016	H2S (gr/dscf)		10.16 % DT	
		B026	H2S (gr/dscf)		10.16 % DT	
		B027	H2S (gr/dscf)		10.16 % DT	
		B028	H2S (gr/dscf)		10.16 % DT	
		P010	Opacity		6.26 % EE	
			CO (ppm @ 0 % O2)			7.00 % EE
			SO2 (lb @ K lb feed)	7.18 % DT	29.26 % DT	
		P040	SO2 (lb/k lb S prod)		17.00 % EE	
			SO2 (ppm @ 0% O2)		6.12 % EE	
		P041	SO2 (lb/k lb S prod)		17.00 % EE	
			SO2 (ppm @ 0% O2)		6.12 % EE	
0448020007	BP Oil Company – Toledo Refinery	P037	SO2 (ppm @ 0% O2)	20.17 % DT		
0575010160	Cargill Inc., Sidney	B001	SO2 (lb/mmBtu)	9.41 % DT		
		B002	SO2 (lb/mmBtu)	9.41 % DT		

Warning Letter

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2011	4th Quarter 2010	3rd Quarter 2010
0701000007	Stuart Station - DPL	B001	Opacity		10.26 % DT	
		B004	Opacity	7.00 % DT		
0701000060	Killen Station – DPL	B001	Opacity	9.80 % DT		
			Particulate			12.06 % DT
			SO2 (lb/mmBtu)			5.24 % EE
1431350064	Agrium North Bend Nitrogen Operations	P001	NOx (lb/ton acid prod)	21.35 % DT		
1576000301	Marathon Ashland	P011	SO2 (ppm @ 0% O2)	5.03 % EE	5.43 % DT	
		P011	SO2 (lb/hr)		5.43 % DT	
		P016	SO2 (ppm @ 0% O2)	5.03 % EE	5.43 % DT	
		P016	SO2 (lb/hr)		5.43 % DT	

NOV

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2011	4th Quarter 2010	3rd Quarter 2010
0124000132	ASA Bloomingburg	B001	NOx (lb/hr)	20.14 % EE	18.16 % EE	
		B002	NOx (lb/hr)	20.14 % EE	18.16 % EE	

EAR

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2011	4th Quarter 2010	3rd Quarter 2010
0616000000	Conesville - AEP	B003	SO2 (lb/mmBtu)	16.62 % DT		
		B004	Opacity	100 % DT	100 % DT	100 % DT
			SO2 (lb/mmBtu)		10.95 % DT	8.03 % DT
		B008	Opacity		10.68 % DT	
0641090010	Severstal Steel	B103	H2S (gr/DSCF)	9.44 % EE	18.29 % EE	14.67 % EE
		B104	H2S (gr/DSCF)	9.44 % EE	18.29 % EE	14.67 % EE
		B105	H2S (gr/DSCF)	9.44 % EE	18.29 % EE	14.67 % EE
		B106	H2S (gr/DSCF)	9.44 % EE	18.29 % EE	14.67 % EE
		B107	H2S (gr/DSCF)	9.44 % EE	18.29 % EE	14.67 % EE
		B108	H2S (gr/DSCF)	9.44 % EE	18.29 % EE	14.67 % EE
		P006	H2S (gr/DSCF)	9.44 % EE	18.29 % EE	14.67 % EE
		P007	H2S (gr/DSCF)	9.44 % EE	18.29 % EE	14.67 % EE
		P008	H2S (gr/DSCF)	9.44 % EE	18.29 % EE	14.67 % EE
		P911	H2S (gr/DSCF)	9.44 % EE	18.29 % EE	14.67 % EE
0641160017	FirstEnergy - Sammis Station	B007	Opacity	100 % DT	100 % DT	100 % DT
		B008	Opacity	100 % DT	100 % DT	100 % DT
		B009	Opacity	100 % DT	100 % DT	100 % DT
		B010	Opacity	100 % DT	100 % DT	100 % DT
		B011	Opacity	100 % DT	100 % DT	100 % DT
		B012	Opacity	100 % DT	100 % DT	100 % DT
		B013	Opacity	100 % DT	100 % DT	100 % DT
0671010028	Glatfelter	B014	CO (lb/mmBtu)	22.73 % EE		
		B015	CO (lb/mmBtu)	22.73 % EE		
0679000251	Belden Brick Company	P801	SO2 (lb/hr)	47.18 % DT	38.50 % DT	
		P802	SO2 (lb/hr)	47.18 % DT	38.50 % DT	
		P803	SO2 (lb/hr)	47.18 % DT	38.50 % DT	

EAR

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2011	4th Quarter 2010	3rd Quarter 2010
0819750245	Anderson's Ethanol	B001	NOx (lb/hr)	19.88 % EE	67.89 % DT 44.99 % EE	22.58 % DT 14.22 % EE
			NOx (lb/mmBtu)		67.89 % DT	22.58 % DT
		B002	NOx (lb/hr)	19.88 % EE	67.89 % DT 44.99 % EE	22.58 % DT 14.22 % EE
			NOx (lb/mmBtu)		67.89 % DT	22.58 % DT
1431350817	E.I. Dupont De Nemours & Co.	P001	SO2 (lb/ton acid prod)	100 % DT		

Previous Issues

Premise	Facility Name	Emissions Unit ID	Parameter	1st Quarter 2011	4th Quarter 2010	3rd Quarter 2010
0278000463	WCI Steel, Warrren	B001	Opacity		6.19 % EE	
0448010035	Sunoco Terminal, Toledo	J001	THC (ppm)			36.96 % DT
0773000182	Haverhill North Coke Company	P902	SO2 (lb/hr)			9.56 % DT
		P902	Hg (lb/hr)			10.55 % DT
1667000007	Omnova Solutions	P004	THC (lb/hr)		29.84 % DT	25.60 % DT
1677010757	Akron Thermal, L.P.	B003	Opacity		11.80 % DT	55.51 % DT
		B004	Opacity		11.80 % DT	55.51 % DT

EE = CEMS recorded excess emissions *DT =CEMS downtime while emissions unit in operation*