

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Air Quality

**Amended
RACT APPROVAL**

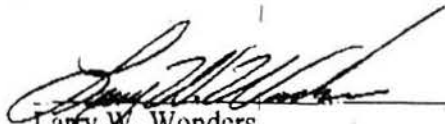
PERMIT NUMBER : PA 10-021

Owner:	INDSPEC Chemical Corporation	Source & Air Cleaning Device	See attached pg. 5
Address:	133 Main Street Petrolia PA 16050		
Attention:	Mr. Terry Melis Manager of Environmental Affairs	Location:	Petrolia Plant Butler Co.

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P. L. 2119, as amended, and with Chapter 127 of the Rules and Regulations of the Department of Environmental Protection, the Department on **October 19, 1998** approved plans for installation of the above indicated air contamination source(s) and for achieving compliance with the requirements of 25 Pa Code Section 129.91 through 129.95.

The operating permit is subject to the following conditions:

1. The pollution control devices are to be installed in accordance with the plan submitted with the application (as approved herein).
2. The facility shall implement the RACT Plan by May 31, 1995, as defined in 25 PA Code Section 129.91. The implementation schedule may be extended only upon the execution and approval of a Consent Decree between the facility and the Department
3. See attached.


 Larry W. Wonders
 Regional Air Quality Manager

- ~~4. This plan approval authorizes temporary operation of the source(s) covered by this plan approval providing the following conditions are met~~
- ~~a) The Department must receive written notice from the owner/operator of the completion of construction and the operator's intent to commence operation at least five (5) working days prior to the completion of construction. The notice should state when construction will be completed and when the operator expects to commence operation.~~
- ~~b) Operation is authorized only to facilitate the startup and shake down of sources and air cleaning devices to permit operations pending the issuance of an operating permit or to permit the evaluation of the source(s) for compliance with all applicable regulations and requirements.~~
- ~~c) This condition authorizes temporary operation of the source(s) for a period of 180 days from the date of start up, provided the Department receives notice from the operator pursuant to subpart (a) above, and provided this plan approval does not expire prior to the end of the 180 day period.~~
- ~~d) The owner/operator may request an extension if compliance with all applicable regulations and plan approval requirements have not been established. The extension request shall be submitted in writing at least 15 days prior to the end of this period of temporary operation, a detailed schedule for establishing compliance and the reasons why compliance has not been established.~~
5. This RACT Approval supersedes the previous RACT Approval issued December 7, 1995.
6. The facility shall install combination flame arrestor conservation vents on the four ether feed tanks (work tanks) T-869, T-870, T-1085, and T-1086.
7. The VOC emissions from the four work tanks in condition #6 in the extraction area shall be reduced by 96.5%.
8. The facility shall comply with the following emission limits:

<u>Source</u>	<u>NOx limit</u>
boiler #3	0.51 #/MMBTU 25.5 #/hr 111.7 TPY
boiler #7	0.14 #/MMBTU 8.4 #/hr 15.6 TPY
boiler #8	0.51 #/MMBTU 60.2 #/hr 263.6 TPY
boiler #9	0.11 #/MMBTU 22 #/hr 96.4 TPY

The tons per year limits in condition No. 8 shall be calculated on a 12-month rolling basis.

9. The #7 boiler shall not burn more than 223 mmcf of natural gas per year (based on a 12 month rolling total). The facility shall keep records of the natural gas burned by the #7 boiler based on a 12 month rolling total. The records shall be kept by the facility for a minimum of 5 years.
10. Boiler #3 and boiler #8 shall be operated and maintained in accordance with the manufacturer's recommendations. The sources shall also be operated and maintained in accordance with good air pollution control practices.
11. The applicant shall install, operate and maintain continuous monitoring systems to monitor the NOx emissions for the #9 boiler. The NOx monitor shall be maintained and operated in compliance with the requirements of the Department's CEM Manual, 25 Pa. Code Chapter 139, and 40 CFR Part 60, Subpart Db.
12. Within 30 days after installation of NOx and VOC controls, a test procedure and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples shall be submitted to the Department.
13. Within 60 days of the installation of the NOx and VOC controls, stack tests shall be performed in accordance with the provisions of Chapter 139 to show compliance with the NOx emission limits in condition #8 above (for the #7 boiler) and the 96.5 % reduction in condition # 7 above. The sources shall be tested at least once every five years except for the combustion units rated greater than 100 MMBTU/hr. The combustion units rated greater than 100 MMBTU/hr shall be stack tested on an annual basis to comply with the requirements of 25 Pa Code Section 129.91 (i).
14. At least two weeks prior to the tests, the Department shall be informed of the date and time of the tests.
15. Within 60 days after completion of the tests, two copies of the complete test report, including all operating conditions, shall be submitted to the Department for approval.
16. The Department reserves the right to revise the emission limits established above based on actual emission rates and the emissions during stack testing.
17. INDSPEC shall monitor and record the amount of steam produced, the pressure at which it is produced, the boiler efficiency and the heat input to boiler #4 and #5. The maximum heat input to these boilers shall not exceed 49.5 MMBTU/hr.
18. The presumptive NOx sources shall be maintained and operated in accordance with manufactures specifications. The sources shall also be operated and maintained in accordance with good air pollution control practices.

19. This RACT approval applies to the emission of NOx and VOC pollutants only. Emission of other pollutants, including criteria pollutants, shall be governed by the existing Plan Approvals, Operating Permits, and applicable requirements and other Rules and Regulations of the Department which are incorporated herein by reference and made part of this permit.
20. The facility shall comply with the record keeping requirements of 25 PA Code Section 129.95.

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INDSPEC Chemical Corp.

Source and Air Cleaning Device**Emission Source Type****RACT Control**

24 storage tanks (attached table 2)

extraction area

conservation vents on 4 other feed tanks

process piping

LDAR Program

boiler #3

Operated and maintained in accordance with manufacturer's recommendations. Operated and maintained in accordance with good air pollution control practices.

boiler #4

de-rate to 49.5 MMBTU

boiler #5

de-rate to 49.5 MMBTU

boiler #6

presumptive RACT/ annual tune up and adjustment

boiler #7

no cost effective controls

boiler #8

Operated and maintained in accordance with manufacturer's recommendations. Operated and maintained in accordance with good air pollution control practices.

boiler #9

Low NOx Burners installed

1 SUMMARY OF TANK EMISSIONS
INDSPEC CHEMICAL CORPORATION

Table 2: Summary of Tanks with >100 lb/yr PTE

Tank #	Material	Actual Emissions (lb/yr)	Potential Emissions (lb/yr)
2-519	T-1611 Adhesives (RDL 058)	35.4	233.3
	T-2017 Resorcinol (Hill Plant Feed Tank)	63.3	417.0
	T-1057 Resorcinol (Hill Plant Feed Tank)	17.8	117.8
	T-994 Unstripped crude	96.5	138.0
1-935	T-1205 New Melt	345.4	493.9
1-240	T-528 Melt	137.9	107.2
	T-1514 Phenol	181.9	250.1
	T-844 Resorcinol	208.4	298.0
3-303	T-1027 Benzene	225.6	322.6
	T-2036 Gasoline	256.5	366.8
3-302	T-1026 Benzene	319.4	456.7
3-701	T-1059 Formalin (50% Formaldehyde)	562.6	804.5
	T-1530 Emulsion	594.1	849.6
1-864	T-922 Emulsion	610.3	872.7
1-863	T-923 Emulsion	610.3	872.7
1-941	T-2003 East Raffinate Storage	745.0	1065.4
1-992	T-1108 Raffinate	1372.0	1962.0
1-940	T-1094 West Raffinate Storage	1610.0	2302.3
3-110	T-1029 Ether Storage Tank	5600.0	8008.0
3-111	T-1028 Ether Storage Tank	5600.0	8008.0
1-813	T-1085 Middle Ether Feed Tank	15800.0	22594.0
1-814	T-1086 South Ether Feed Tank	15800.0	22594.0
1-815	T-870 North Ether Feed Tank	15800.0	22594.0
1-816	T-869 Ether/Water Decanter Tank	15800.0	22594.0

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