

ALLEGHENY COUNTY HEALTH DEPARTMENT

IN RE:

Ashland Chemical Company)	PLAN APPROVAL ORDER
2650 Neville Rd.)	AND AGREEMENT No. 227
Pittsburgh, PA 15225)	<u>UPON CONSENT</u>
)	

AND NOW, this 30th day of December, 1996,

WHEREAS, the Allegheny County Health Department, (hereafter referred to as "Department"), has determined that the Ashland Chemical Company (hereafter referred to as "ASHLAND"), 2650 Neville Road, Allegheny County, Pittsburgh, PA 15225, as the operator and the owner of a synthetic organic chemical manufacturing facility at 2650 Neville Road, Allegheny County, Pittsburgh, PA 15225 (hereafter referred to as "the facility"), is a major stationary source of oxides of nitrogen and volatile organic compounds (hereafter referred to as "NO_x" and "VOCs") emissions as defined in Section 2101.20 of Article XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control (hereafter referred to as "Article XXI"); and

WHEREAS, the Department has determined that Section 2105.06 of Article XXI, entitled "Major Sources of Nitrogen Oxides & VOCs" is applicable to ASHLAND's operations; and

WHEREAS, ASHLAND has been in full compliance at all relevant times with all relevant requirements of Section 2105.06 of Article XXI; and

WHEREAS, ASHLAND has timely submitted to the Department all of the documents required by Section 2105.06.b of Article XXI (hereafter collectively referred to as "the Proposal"); and

WHEREAS, the Department has determined, after review, that the Proposal is complete; and

WHEREAS, the Department has further determined, after review, that the Proposal, constitutes Reasonably Available Control Technology (hereafter referred to as "RACT") for control of NO_x and VOC emissions from the facility; and

WHEREAS, the Department and ASHLAND desire to memorialize the details of the Proposal by entry of this RACT Plan Approval Order and Agreement Upon Consent; and

WHEREAS, pursuant to Section 2109.03 of Article XXI, the Director of the Allegheny County Health Department or his designated representative may issue such orders as are necessary to aid in the enforcement of the provisions of Article XXI, notwithstanding the absence of any violation of any provision of Article XXI and of any condition causing, contributing to, or

creating danger of air pollution;

NOW, THEREFORE, this day first written above, the Department, pursuant to Section 2109.03 of Article XXI, and upon agreement of the parties as hereinafter set forth, hereby issues the following RACT Plan Approval Order and Agreement upon Consent.

I. ORDER

- 1.1. This Order hereby rescinds and replaces the portion of Appendix 24 of Allegheny County's portion of the Commonwealth of Pennsylvania's State Implementation Plan, entitled RACT for VOC Emissions From Synthetic Organic Chemical Manufacturing Industries (SOCMI) Air Oxidation Processes - Aristech Chemical Corp., Installation Permit No. IP-86-I-0024-P as revised. The permit was issued March 3, 1987, submitted to the U.S. EPA on July 13, 1987, approved June 16, 1993 by the U.S. EPA with an effective date of August 16, 1993.

- 1.2. All VOC and NO_x emission units and controls at the facility shall be properly operated and maintained at all times according to good engineering and air pollution control practices.

- 1.3. ASHLAND shall not at any time, with the exception of activities to mitigate emergency conditions, operate the maleic anhydride refinery still while generating VOC emissions unless all such VOC emissions are exhausted to the existing secondary condenser system on the still vacuum system vent or to, at a minimum, an equivalent control device.
- 1.4. The maleic anhydride refinery still vacuum system vent secondary condenser system shall at all times, with the exception of activities to mitigate emergency conditions, be properly operated and maintained. Coolant shall be cycled through the facility's coolant system, will be properly operated and maintained at ambient conditions. At no time will coolant inlet temperature be required to be less than 50°F.
- 1.5. At no time shall ASHLAND allow emissions of NO_x from the main boiler, (Equipment ID-401, BTU rating of 113 million), at this facility to exceed the following NO_x emission limitations:

NO_x Emissions:

<u>Lbs/MMBTU:</u>	<u>Tons/Year</u>
0.16	79

- 1.6. To determine compliance with the emission limitations referenced in paragraph 1.3 above, ASHLAND shall source perform NO_x emission testing on the subject equipment every two years according to U.S. EPA approved test methods and Section 2108.02 of Article XXI.
- 1.7. The maximum annual operation of the backup boiler, (Equipment ID-403, BTU rating of 80 million), shall be limited to 500 hours. In the event that the use of the backup boiler exceeds 500 hours in any twelve month period then ASHLAND shall conduct an annual adjustment or "tuneup" on the combustion process, to include, at a minimum:
- a. Inspection, adjustment, cleaning, or replacement of fuel-burning equipment:
 - b. Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO_x, and to the extent practicable minimize emissions of CO;

- c. Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation.

ASHLAND shall keep records of the "tuneup" that shall include, but not be limited to the following:

- a. The date of the adjustment procedure;
- b. The name of the service company and technicians or ASHLAND personal;
- c. The final operating rate or load after adjustment;
- d. The final CO and NO_x emission rates after adjustment;
- e. The final excess oxygen rate after adjustment;

- 1.8. ASHLAND shall at all times maintain records of fuel type and usage for the subject equipment listed below, including certifications from fuel suppliers for all types of liquid fuel. For each shipment of distillate oils number 1 or 2, a certification that the fuel complies with ASTM D396-78, "Standard Specifications for Fuel Oils" is required. For residual oils, minimum record keeping includes a certification of the nitrogen

content of the fuel, and identification of the sampling method and sampling protocol.

A. Main Boiler

B. Backup Boiler when operation exceeds 500 hours in any twelve month period.

C. Polyester resin plant hot oil heater and thermal oxidizer.

D. Maleic Anhydride plant thermal oxidizer.

1.9. ASHLAND shall properly operate and maintain the polyester resin plant oxidizer at all times while processing VOC emissions, with the exception of activities to mitigate emergency conditions, according to the following operating parameters:

A. A minimum destruction efficiency of ninety-five percent (95%)

B. A minimum operating temperature of one-thousand-four-hundred (1400) degrees Fahrenheit; and

C. A minimum residence time of one-half (0.5) seconds at all times.

The subject thermal oxidizer shall be equipped with instrumentation that will continuously monitor and record the oxidizer operating temperature.

1.10. ASHLAND shall properly operate and maintain the maleic anhydride thermal oxidizer at all times while processing VOC emissions, with the exception of activities to mitigate emergency conditions, according to the following operating parameters:

- A. A minimum destruction efficiency of ninety-eight percent (98%)
- B. An operating temperature range of one-thousand-four-hundred-forty-two (1,442) degrees Fahrenheit, plus or minus twenty-five (25) degrees Fahrenheit; and
- C. A minimum residence time of one-half (0.5) seconds at all times.

The subject thermal oxidizer shall be equipped with instrumentation that will continuously monitor and record the oxidizer operating temperature.

1.11. ASHLAND shall determine compliance with the requirements of paragraph 1.9 above, by emission testing. Such testing shall be conducted every five years according to U.S. EPA approved test methods and Section 2107.04 of Article XXI.

1.12. ASHLAND shall at all times maintain all appropriate records to demonstrate compliance with the requirements of both Section 2105.06 of Article XXI and this Order. Such records shall provide sufficient data to demonstrate that all requirements of both Section 2105.06 of Article XXI and the Order are being met.

1.13. ASHLAND shall retain all records required by both Section 2105.06 of Article XXI and this Order for this facility for at least two (2) years and shall make the same available to the Department upon request.

II. AGREEMENT

The foregoing Plan Approval Order shall be enforced in accordance with and is subject to the following agreement of the parties, to wit:

- 2.1. The contents of this Order shall be submitted to the U.S. EPA as a revision to Allegheny County's portion of the Commonwealth of Pennsylvania's State Implementation Plan, (hereafter referred to as "SIP").
- 2.2. Except as otherwise set forth therein, failure to comply with any portion of this Order or Agreement is a violation of Article XXI that may subject ASHLAND to civil proceedings, including injunctive relief, by the Department.
- 2.3. This Order does not, in any way, preclude, limit or otherwise affect any other remedies available to the Department for violations of this Order or of Article XXI, including, but not limited to, actions to require the installation of additional pollution control equipment and the implementation of additional corrective operating practices.

2.4. ASHLAND hereby consents to the foregoing Order and hereby knowingly waives all rights to appeal said Order, but not any future Order or action of the Department and the undersigned represents that he is authorized to consent to the Order and to enter into the RACT Plan Approval Order and Agreement Upon Consent on behalf of ASHLAND.

~~2.5. ASHLAND acknowledges and understands that the purpose of this Agreement is to establish RACT for the control of emissions of VOCs and NO_x from this facility. ASHLAND further acknowledges and understands the possibility that the U.S. EPA may decide to not accept the Agreement portion of this RACT Plan Approval Order and Agreement by Consent as a revision to the Commonwealth of Pennsylvania's SIP.~~

IN WITNESS WHEREOF, and intending to be legally bound,
the parties hereby consent to all of the terms and conditions of
the foregoing Plan Approval Order and Agreement as of the date of
the above written.

ASHLAND CHEMICAL COMPANY

By: Carol S. Eicher *KEW*

KEW (signature)

Print or type Name: Carol S. Eicher
Vice President & General Manager,
Title: Petrochemicals Division

Date: 12/11/96

ALLEGHENY COUNTY HEALTH DEPARTMENT

By: Bruce W. Dixon *12/30/96*

Bruce W. Dixon, M.D., Director
Allegheny County Health Department

and By: Thomas J. Puzniak

Thomas J. Puzniak, Manager Engineering
Air Quality Program