

ALLEGHENY COUNTY HEALTH DEPARTMENT

IN RE:

Neville Chemical Company	)	PLAN APPROVAL ORDER
2800 Neville Road	)	AND AGREEMENT NO. 230
Neville Township	)	<u>UPON CONSENT</u>
Allegheny County	)	

AND NOW, this 13th day of December, 1996,

WHEREAS, the Allegheny County Health Department, (hereafter referred to as "Department"), has determined that Neville, Chemical Company, (hereafter referred to as "Neville"), 2800 Neville Road, Neville Township, Allegheny County, PA, is the owner and operator of a synthetic hydrocarbon resin manufacturing facility at 2800 Neville Road, Neville Township, Allegheny County, PA 15225 (hereafter referred to as "the facility"), and is a major stationary source of volatile organic compounds and oxides of nitrogen emissions (hereafter referred to as "VOCs & NO<sub>x</sub>") 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 NO<sub>x</sub> & VOCs" is applicable to Neville's operations at this facility; and

WHEREAS, Neville has been in full compliance at all relevant times with all relevant requirements of Section 2105.06 of

Article XXI; and

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

**WHEREAS**, the Department has determined the proposal to be complete; and

**WHEREAS**, the Department has further determined, after review of the submitted proposal, that it constitutes Reasonably Available Control Technology (hereafter referred to as "RACT") for control of VOC and NO<sub>x</sub> emissions from the facility; and

**WHEREAS**, The Department and Neville 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 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 a 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. All existing VOC and NO<sub>x</sub> emission units and control equipment shall be properly operated and maintained at all times according to good engineering practices at all times, with the exception of activities to mitigate emergency conditions.
- 1.2. Neville shall at no time operate the C-5 Process while generating VOC emissions unless all such emissions are processed through refrigerated condensers. Such condensers shall be properly maintained and operated at all times while treating VOC emissions, with the exception of activities to mitigate emergency conditions, with an average monthly coolant inlet temperature no greater than 60°F.
- 1.3. Neville shall at no time operate the following

process equipment while generating VOC emissions unless all such emissions are processed through water-cooled condensers. Such condensers shall be properly maintained and operated at all times while treating VOC emissions with the exception of activities to mitigate emergency conditions, with an average monthly inlet coolant temperature no greater than 90°F:

- a. Resin Rework Tanks
- b. Screen Cleaning Unit

1.4. The Continuous Polymerization Unit No. 20 shall not operate while generating VOC emissions, unless such emissions are treated by water cooled and refrigerated condensers, with the exception of activities to mitigate emergency conditions. The water cooled and refrigerated condensers shall be properly operated and maintained with average monthly coolant inlet temperatures not exceeding 90°F and 60°F, respectively.

1.5. The Packaging Centers No. 2, 3 and 5 shall be properly maintained and operated at all times, with the exception of activities to mitigate emergency conditions. Proper operation shall include the use of covers on all kettles after

the initial kettle charging and during process operations.

- 1.6. Neville shall perform an annual adjustment or "tuneup" on Boilers No. 4, 6 and 7 once every twelve (12) months, (hereafter referred to as "annual tune-up"). Such annual tune-up shall include:
- a. Inspection, adjustment, cleaning, or necessary replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation; and
  - b. Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of  $\text{NO}_x$ , and to the extent practicable minimize emissions of carbon monoxide (hereafter referred as "CO"); and
  - c. Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation.

Neville shall maintain the following records of the annual tune-up for the subject equipment:

- a. the date of the annual tune-up;
- b. the name of the service company and/or individuals performing the annual tune-up;
- c. the operating rate or load after the annual tune-up;
- d. the CO and NO<sub>x</sub> emission rate after the annual tune-up; and
- e. the excess oxygen rate after the annual tune-up.

1.7. Neville shall maintain records of fuel type and usage for each combustion unit including certifications from fuel suppliers for all types of liquid fuel. For each shipment of distillate oils number 1 or 2, a certification from the fuel supplier that the fuel complies with ASTM D396-78 "Standard Specifications for Fuel Oils" is required. For residual fuels, minimum record keeping includes a certification from the fuel supplier of the nitrogen content of the fuel, and identification of the sampling method and sampling protocol. For fuels that are co-products of the facility's processes, minimum record keeping shall include the nitrogen content of the fuel and identification of the sampling method and protocol.

- 1.8. Neville shall conduct a Leak Detection and Repair (LDAR) program at the facility at all times when facility operation may result in fugitive emissions of VOCs. Such LDAR program shall consist of the following:
- a. Components applicable to the LDAR program shall be all accessible valves and pumps in light oil service.
  - b. The subject components shall be monitored visually and with a VOC analyzer and shall be tagged or labeled using Neville's component identification system.
  - c. Initially, each non difficult/unsafe subject component shall be monitored on a monthly basis. Any component for which a leak is not detected for two successive months shall be monitored on a quarterly basis. Any component for which a leak is not detected for two successive quarters shall then be monitored on an annual basis. Difficult/unsafe components shall be monitored annually.
  - d. Visual leaks are determined if the component is visually leaking or dripping product from the component. Leaks determined using the analytical test method are an instrument

reading exceeding 10,000 parts per million, by volume.

- e. If a component is designated as leaking by either the visual or analytical method, the component will not be designated as a "leaker", instead, 1) a first attempt of repair of the component will be performed for the purposes of stopping or reducing leakage, using best available practices, until the component can achieve non-leaking status. 2) Should this attempt fail, the component will be repaired or replaced and the monitoring will revert to the previous inspection schedule. Two successful monitoring events will allow the new or repaired component to again move up the progression of monthly, quarterly and annual inspection frequency.
- f. Recordkeeping of labeled or tagged monitoring components will be maintained, and include the type of component with available specifications, dates of monitoring, instrument readings, and location of the component.



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

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

## II. AGREEMENT

The foregoing 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 US EPA as a revision to the Commonwealth of Pennsylvania's SIP.

2.2. Failure to comply with any portion of this Order or Agreement is a violation of Article XXI that may subject Neville 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 Plan Approval Order and Agreement 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. Neville hereby consents to the foregoing Order and hereby knowingly waives all rights to appeal said Order, and the undersigned represents that he is authorized to consent to the Order and to enter into this Agreement on behalf of Neville.

~~2.5. Neville acknowledges and understands that the purpose of this Agreement is to establish RACT for the control of emissions of VOCs from this facility. Neville further acknowledges and understands the possibility that the U.S. EPA may decide to not accept the Agreement portion of the 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 RACT Plan Approval Order and Agreement as of the  
date of the above written.

NEVILLE CHEMICAL COMPANY

By: *Z. V. Osiecki*  
(signature)

Print or type Name: Z. V. Osiecki

Title: V.P. - Plant Engineering  
& Environmental Services

Date: December 13, 1996

ALLEGHENY COUNTY HEALTH DEPARTMENT

By: *Bruce W. Dixon 12/13/96*

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

and By: *Thomas J. Puzniak*

Thomas J. Puzniak, Manager, Engineering  
Air Quality Program

