



AIR POLLUTION CONTROL DISTRICT
LOUISVILLE, KENTUCKY

GREG FISCHER
MAYOR

KEITH H. TALLEY, SR.
DIRECTOR

NOTICE OF VIOLATION
Case No. ENF-18-1000

October 2, 2018

Ravi Ramesh Srinivas
Plant Manager
Zeon Chemicals L.P.
4100 Bells Lane
Louisville, Kentucky 40211

Dear Mr. Srinivas:

The Louisville Metro Air Pollution Control District (District) alleges that Zeon Chemicals L.P. has violated certain District regulations. Enclosed is a copy of the Investigation / Summary report which details the allegations. KRS 77.990 authorizes the District to assess a civil penalty of up to \$10,000 per violation for each day during which the violation occurs or continues. The District hereby assesses a civil penalty of \$2,000 for the violation.

Please contact Byron Barber at Byron.Barber@louisvilleky.gov by November 2, 2018 to discuss settlement. You may request a conference and be represented by counsel.

Sincerely,

Keith H. Talley, Sr.
APCD Executive Director

Enclosure: Investigation/Summary Report

INCIDENT / VIOLATION REPORT
CASE NUMBER: ENF-18-1011
PRINTED: 9/24/2018

Case No: ENF-18-1000

Incident Date: November 30, 2017

Origin of Incident: Excess Emission Report

Case Name: Zeon Chemicals L.P.

Discovery Date: December 1, 2017

Plant ID: 0283

Incident Location: Zeon Chemicals L.P.
4100 Bells Lane
Louisville, Kentucky 40211

Responsible Party: Ravi Ramesh Srinivas
Plant Manager

Responsible Party Contact: Zeon Chemicals L.P.
4100 Bells Lane
Louisville, Kentucky 40211

REGULATORY BACKGROUND

Zeon operates a chemical plant on Bells Lane in the area of Jefferson County known as Rubbertown. They are a Title V source, subject to APCD's Strategic Toxic Air Reduction (STAR) regulation and several federal Hazardous Air Pollutant regulations, as well as generally applicable District regulations.

District Regulation 5.01 Standards for Toxic Air Contaminants and Hazardous Air Pollutants, General Provisions is a generally applicable regulation that requires the operator of a process or process equipment from which a toxic air contaminant is or may be emitted to provide the utmost care and consideration to prevent the potential harmful effects of the emissions resulting from the process or process equipment.

INCIDENT DESCRIPTION

On December 1, 2017, the District received an excess emissions report from Zeon detailing a release of 1,3 butadiene that occurred when the chemical was inadvertently transferred to the wrong tank. This incident occurred due to a manual field valve switch being improperly utilized during an attempt to add 1,3 butadiene to Poly 7 vessel (permit # 11-97-TV(R7)). According to a follow-up report from Zeon, approximately 701 pounds of 1,3 butadiene were released over approximately an 8-hour time range into the ambient atmosphere. In response to this event, Zeon implemented plans to install valve feedback and interlocks on the piping system to isolate flow of 1,3 butadiene to appropriate tanks. Zeon also presented newly published training material to its staff to ensure understanding of the importance of correct valve alignment and the benefits of physically verifying alignment. Zeon also trained its staff on the consequences of deviating from training and what corrective actions to take in case of reoccurrence when incrementally transferring acrylonitrile and 1,3 butadiene.

Violation Report

The above incident investigation shows that you have violated the following regulation(s). Your compliance status and violation penalty are indicated.

Regulation: APCD Reg. 5.01, Section 1 General Duty

Description of How this Incident Violated the Regulation:

The source failed to provide the utmost care and consideration in operating procedures when attempting to transfer 1,3 butadiene.

Penalty: \$2,000

Are they in compliance now? Y **Compliance Date:** 12/1/2017

Compliance Note: The source will pay penalty and follow through with corrective procedures to ensure reduced likelihood of reoccurrence.

Total Penalty: \$2,000