

**Minutes
Public Hearing
of the
Louisville Metro Air Pollution Control Board
December 17, 2014**

A public hearing of the Louisville Metro Air Pollution Control Board was called to order on December 17, 2014, at 10:00 a.m. in the Board Room of the Louisville Metro Air Pollution Control District, 850 Barret Avenue, Louisville, Kentucky by the Vice Chairman, Mr. Steve Thomas.

General Statement, Rules and Purpose

The Vice Chairman read the opening announcements, rules and purpose of the public hearing which was to review an Agreed Board Order with American Synthetic Rubber Company.

1. Agreed Board Order with American Synthetic Rubber Company

Terri Phelps, Enforcement Supervisor, asked the Board to consider and adopt a proposed Agreed Board Order that alleged American Synthetic Rubber Company had violated its District operating permit and District regulations and directed the company to pay an administrative penalty.

American Synthetic Rubber Company, a division of Michelin North America, owns and operates a manufacturing facility pursuant to a Title V operating permit issued by the District. The company reported to the District on ten occasions from 2010 to 2014 accidental releases of hazardous air pollutants from equipment in synthetic rubber production that is required by the operating permit and federal regulations to be operated as a closed system. All emissions from this system are to be routed to the thermal oxidizer or the flare, but in each of the ten upset events, either toluene or 1, 3 butadiene, or both were emitted to the atmosphere.

In each case, the company reported the upset and excess emissions to the District, including an analysis of the root cause of the upset and steps it has taken or will take to prevent reoccurrence of the event.

The company also reported to the District eight instances in 2013 where it failed to make a first attempt to repair a leak of a hazardous air pollutant within five days. In each case, the leak was repaired within 15 days, as required.

In several of the cases mentioned, the company failed to completely report the excess emissions or missed repair attempt, but has now completed its reporting obligation in each case.

Ms. Phelps said the company agreed to pay an administrative settlement of \$27,000 and the District would recommend that the Board adopt the Agreed Board Order as proposed.

Statements

Mr. Guillaume Coiraton, Chief Operating Officer of American Synthetic Rubber Company, addressed the Board stating that ASRC respectfully disagreed with some of the other matters cited in the Notice of Violation or with the position taken by the District concerning those matters. However, after discussions with District staff, ASRC decided not to spend time or resources disputing those matters and have agreed with the requirements of the Agreed Board Order.

Adjourn

The public hearing adjourned at 10:07 a.m.

Robert Powell, M.D.
Chairman

Rachael Hamilton
Secretary-Treasurer