



**STAR Program Request for
Modification
American Synthetic Rubber Company**

**Air Pollution Control District
August 17, 2016**



Request for Modification

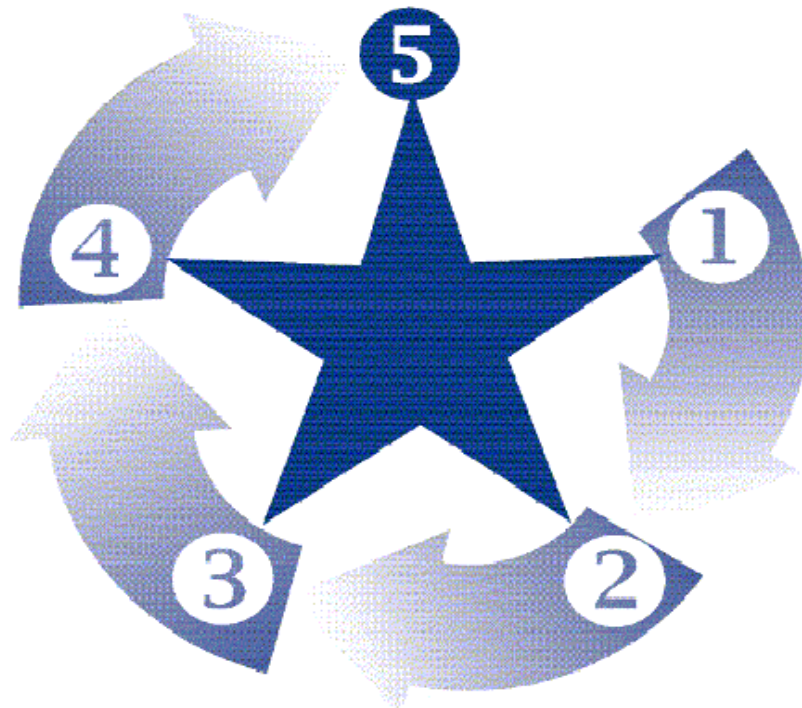
Background

- Sept. 21, 2015 - NOV 02612 issued to ASRC for fugitive emissions
- Dec. 7, 2015 – ASRC submits a Request for Modification
- May 18, 2016 – Agreed Board Order with ASRC implementing enhanced LDAR and reporting requirements for fugitive emissions
- June 15, 2016 – Public comment period began on ASRC’s Request for Modification
- July 18, 2016 – Written public comment period ended.



STAR Program

Strategic Toxic Air Reduction



- ① Emissions levels
- ② Release points
- ③ Modeling
- ④ Reduction plan
- ⑤ Compliance

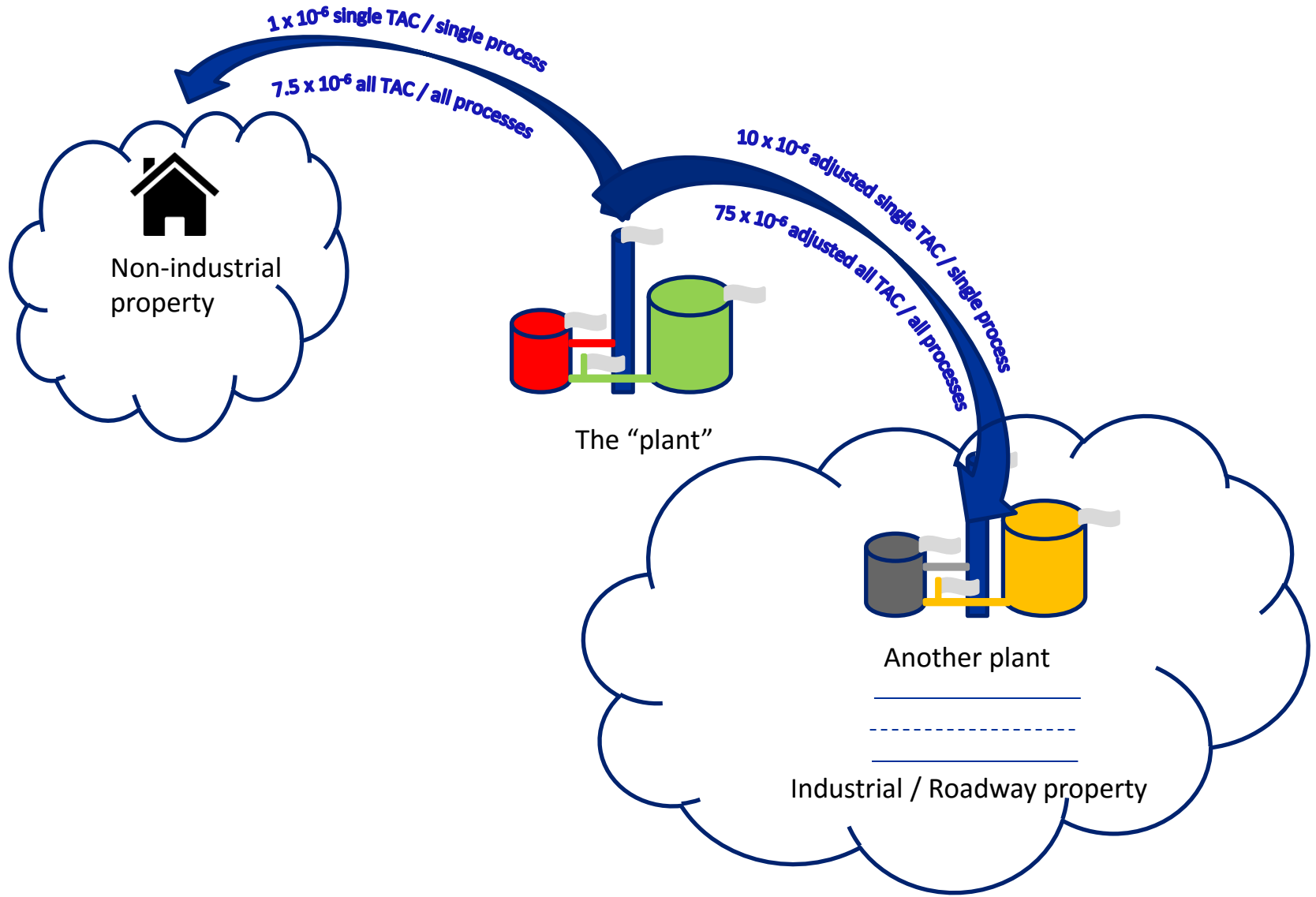
Request for Modification

Environmental Acceptability Goals

	Process or Process Equipment (P/PE)	Applicable TACs	General EA Goals EAG _C Risk (x10 ⁻⁶)	General EA Goals EAG _{NC} HQ
	Individual stationary source, individual P/PE	Individual TAC	1.0	1.0
	Individual stationary source, all P/PE	Individual TAC		1.0
	Individual stationary source, all P/PE	Total for all applicable TACs	7.5	
	Individual stationary source, all new and modified P/PE	Total for all applicable TACs	3.8	

See Appendix for explanation of notes and equations.

General Goals



Request for Modification

Proposed Modified Goals: Non-Industrial Property

	Process or Process Equipment (P/PE)	Applicable TACs	General EA Goals EAG _C Risk (x10 ⁻⁶)	Requested Modified Risk Non-Industrial EAG _C Risk (x10 ⁻⁶)
	Individual stationary source, individual P/PE: Flare	Individual TAC: 1,3-Butadiene	1.0	1.93
	Individual stationary source, individual P/PE: Fugitives	Individual TAC: 1,3-Butadiene	1.0	4.30
	Individual stationary source, all P/PE	Total for all applicable TACs	7.5	No modification requested

See Appendix for explanation of notes and equations.

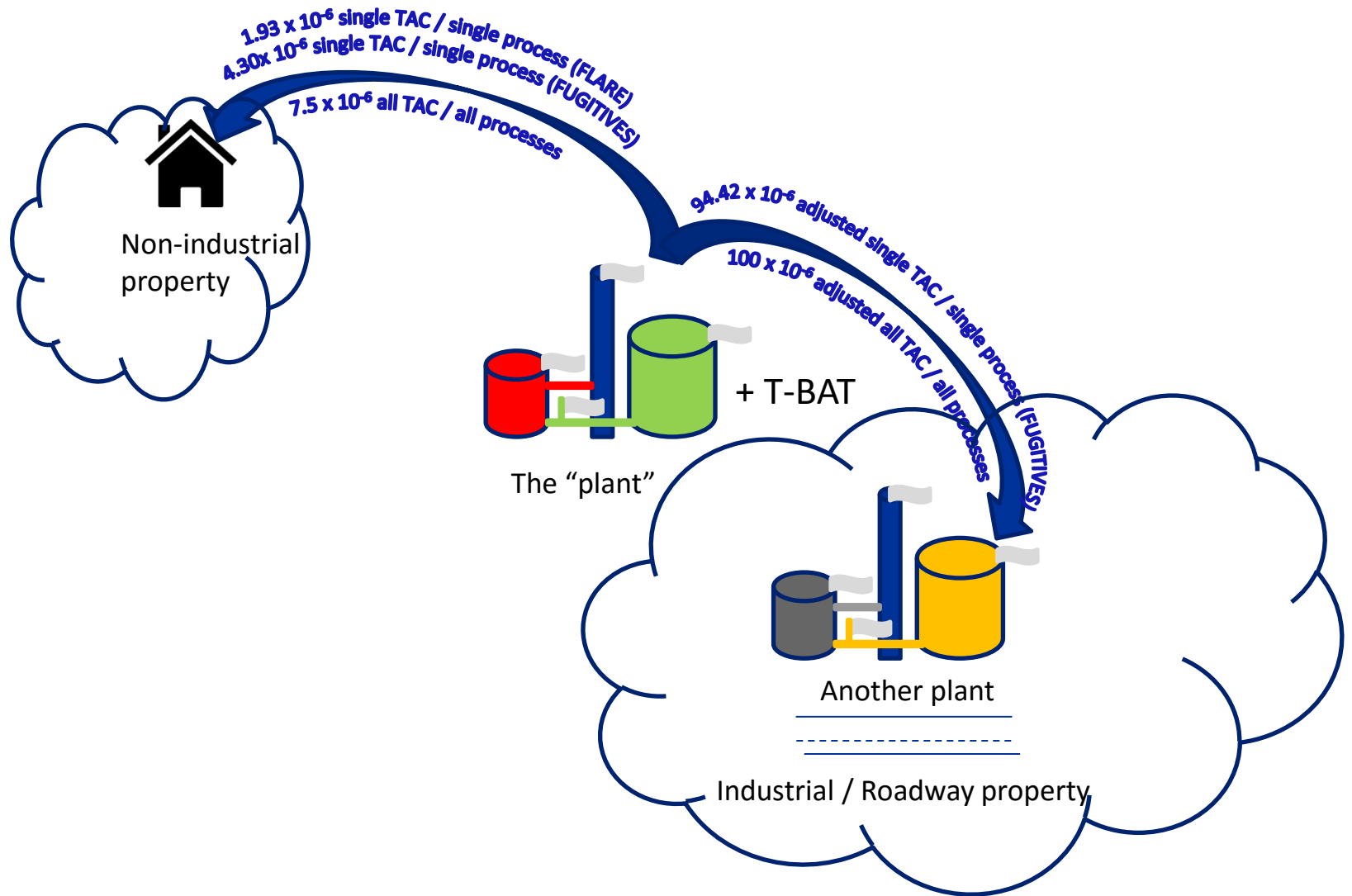
Request for Modification

Proposed Modified Goals: Industrial Property

	Process or Process Equipment (P/PE)	Applicable TACs	General EA Goals EAG _C Risk (Adjusted) (x10 ⁻⁶)	Proposed Modified Risk Non-Industrial EAG _C Risk (x10 ⁻⁶)
	Individual stationary source, individual P/PE: Flare	Individual TAC: 1,3-Butadiene	10.0	No modification requested
	Individual stationary source, individual P/PE: Fugitives	Individual TAC: 1,3-Butadiene	10.0	94.42
	Individual stationary source, all P/PE	Total for all applicable TACs	75	100

See Appendix for explanation of notes and equations.

Requested Modified Goals



Request for Modification

Best Available Technology for Toxics (T-BAT)

Steps in the process:

1. Written Request for Modification and T-BAT Demonstration
2. Opportunity for Public Review and Comment and a Public Hearing
3. If approved by the District, issuance of a permit with conditions designed to ensure compliance
4. Periodic re-evaluation of T-BAT

Request for Modification

ASRC's Proposed T-BAT

For Flare Emissions:

The use of the Flare Thermal Oxidizer is proposed as T-BAT for Flare emissions:

- Use of the Flare is limited to 876 hours
- Throughput to the Flare Thermal Oxidizer is limited 9,500,000 pounds per year

Request for Modification

ASRC's Request for Modification

For Fugitive Emissions:

The following is proposed as T-BAT for fugitive emissions from components in 1,3-Butadiene service:

- Replacement of all rupture disks*
- Reduced threshold for first attempt to fix a leak to 250 ppm
- Shortened resolution timeframes for certain leaks
- Enhanced Leak Detection and Repair (LDAR)
- More frequent reporting

Questions?

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