

Air Pollution Control Board of Jefferson County Board Order

This Board Order is issued by the Air Pollution Control Board of Jefferson County pursuant to the authority granted in Kentucky Revised Statutes Chapter 77 Air Pollution Control.

Company: American Synthetic Rubber Company, LLC (ASRC)
4500 Camp Ground Road
Louisville, Kentucky 40216

Background and Discussion

Regulation 6.42 *Reasonably Available Control Technology Requirements for Major Volatile Organic Compound- and Nitrogen Oxides-Emitting Facilities* requires the establishment and implementation of reasonably available control technology (RACT) for certain affected facilities that emit oxides of nitrogen (NO_x) and that are located at a major stationary source for NO_x. Section 4.4 requires that each determination of RACT approved by the Air Pollution Control District of Jefferson County (District) be submitted to the U.S. Environmental Protection Agency (EPA) as a site-specific revision of the Kentucky State Implementation Plan (SIP).

A Public Hearing on this Board Order was held before the Board on November 15, 2000. Based upon the evidence presented at that hearing, the Board determined that approval of this Board Order and submittal as a site-specific revision of the Kentucky SIP were appropriate.

Now therefore be it ordered that:

1. The attached NO_x RACT Plan applicable to the ASRC is approved by the District. The ASRC shall comply with this plan.
2. Compliance with the attached NO_x RACT Plan shall be deemed compliance with the requirements of Regulation 6.42 section 1.2, section 1.3, Section 2 to the extent that this Section applies to section 4.3, section 4.3, and Section 5 to the extent that this Section applies to verification of compliance with the requirements pursuant to section 4.3.
3. This Board Order shall not be deemed or construed to be the result of any violation of any federal, state, or local statute, regulation, or ordinance for any purpose whatsoever.
4. The ASRC has reviewed this Board Order and consents to all its requirements and terms.

5. The effective date of this Board Order and the attached NO_x RACT Plan is January 1, 2001.

Dated this 20th day of December, 2000.

Air Pollution Control Board
of Jefferson County

American Synthetic Rubber Company, LLC

By: _____
Robert W. Powell, M.D.
Chairman

By: _____
M. Paul Serridge
President

Air Pollution Control District
of Jefferson County

Approved as to form and legality:
Air Pollution Control District
of Jefferson County

By: _____
Jesse M. Goldsmith
Air Pollution Control Officer

By: _____
Gaylord B. Ballard
Attorney

NO_x RACT Plan

1. The oxides of nitrogen (NO_x, expressed as NO₂) emission from Boiler #1 and Boiler #2 shall not exceed 0.50 pound per million Btu of heat input, based upon a 30-day rolling average. This limit applies at all times, including periods of startup, shutdown, or malfunction.
2. The ASRC shall calibrate, maintain, and operate a continuous emissions monitoring system (CEMS), and record the output of the system, for measuring NO_x emissions from Boiler #1 and Boiler #2. The following requirements apply to the CEMS:
 - A. The CEMS shall be operated and data recorded during all periods of operation of a boiler except for CEMS breakdowns and repairs. Data shall be recorded during calibration checks and zero and span adjustments,
 - B. The 1-hour average NO_x emission rates measured by the CEMS shall be expressed in pounds per million Btu heat input and shall be used to calculate the average emission rates under NO_x RACT Plan Element (Element) No. 1,
 - C. The 1-hour averages shall be calculated using the data points required under 40 CFR §60.13(b). At least 2 data points shall be used to calculate each 1-hour average,
 - D. The procedures under 40 CFR §60.13 shall be followed for evaluation and operation of the CEMS,
 - E. The span value for NO_x is 500, and
 - F. When NO_x emission data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data shall be obtained by using standby monitoring systems, Method 7, Method 7a, or other reference methods approved by the District to provide emission data for a minimum of 75 % of the operating hours in the boiler operating day, in at least 22 out of 30 successive boiler operating days.
3. The ASRC shall maintain the records listed in 40 CFR §60.49b (g) for Boiler #1 and Boiler #2 with the following clarifications:
 - A. The NO_x emission rates shall be expressed in pounds per million Btu heat input measured, and
 - B. The applicable NO_x emission limit is contained in Element No. 1.Each record shall be maintained for a minimum of 5 years and made available to the District upon request.
4. The NO_x (expressed as NO₂) emission from each of Boiler #3 and Boiler #4 shall not exceed 0.20 pound per million Btu of heat input. Neither boiler shall combust a fuel other than natural gas except that Boiler #4 may also combust No. 2 fuel oil.
6. The ASRC shall conduct an annual performance test for NO_x for each of Boiler #3 and Boiler #4. If the requirements of Regulation 6.42 *Reasonably Available Control Technology Requirements for Major Volatile Organic Compound- and Nitrogen Oxides-Emitting Facilities* section 5.1 are met, and subject to the annual performance test schedule reinstatement provision, performance testing may be done on a biennial schedule. Performance testing shall meet the following requirements:

- A. Emissions concentrations shall be obtained using Reference Methods of 40 CFR Part 60 Appendix A. The following methods shall be used:
 - (1) Method 3, 3A, 3B, or 3C, which is applicable for determining the concentrations of one or more of the following gases: carbon dioxide, O₂, CO, nitrogen, and methane,
 - (2) Method 4, which determines the moisture content in stack gases, if necessary for calculations due to differences caused by measuring the pollutant and either oxygen or carbon dioxide on a wet or dry basis,
 - (3) Method 7, 7A, 7B, 7C, 7D, or 7E, which provides the analytical method for determining the concentration of NO_x emissions from stationary sources, and
 - (4) Method 19, which is used in calculating the mass of pollutant per heat input.
 - B. Sampling shall be conducted as specified in 40 CFR Part 60 Appendix B Performance Specification 2 paragraphs 7.1.1, and 7.1.2, using the traverse points specified in 40 CFR Part 60 Appendix B Performance Specification 2 paragraph 3.2.
 - C. The use of other Reference Methods that are added to 40 CFR Part 60 Appendix A, alternative tests, or modifications to the Reference Methods listed in NO_x RACT Plan Element (Element) No. 6.A. may be proposed by the ASRC as part of the testing plan required by Element No. 6.E. Such methods may be used if approved in writing by the District.
 - D. Performance testing shall meet the requirements of Regulation 1.04 *Performance Tests* that are not addressed in this Element.
 - E. A notification of intent to conduct a performance test shall be submitted to the District at least 25 working days in advance of the projected starting date for the performance test. The notification shall include the proposed test methods to be used.
 - F. If a pre-test conference to discuss the proposed test methods is deemed necessary by the District, a pre-test conference shall be arranged by District personnel.
 - G. At least 10 working days' prior notice of the scheduled starting date for the performance test shall be provided to the District.
 - H. A performance test report shall be submitted to the District within 60 days of completion of performance testing. The report shall include the calculations used to determine emissions. The NO_x emission rate shall be expressed in pounds per million Btu format. The raw data shall be retained by the ASRC for a minimum of 5 years and made available to the District upon request. Selected portions of the raw data used to calculate the emissions shall be included in the report in a format provided by the District.
7. The ASRC shall keep a record identifying all deviations from the requirements of this NO_x RACT Plan and shall submit to the District a written report of all deviations that occurred during the preceding semi-annual period. Semi-annual periods shall run from January 1 to June 30 and July 1 to December 31. The report shall contain the following information:
- A. The boiler number,
 - B. The beginning and ending date of the reporting period,
 - C. Identification of all periods during which a deviation occurred,
 - D. A description, including the magnitude, of the deviation,
 - E. If known, the cause of the deviation, and

F. A description of all corrective actions taken to abate the deviation. If no deviation occurred during the semi-annual period, the report shall contain a negative declaration. Each report shall be submitted within 60 days following the end of the semi-annual period. Alternatively, a written report of all deviations that occurred during the preceding calendar quarter, or negative declaration, may be made, in which case the quarterly report shall be submitted within 30 days following the end of the calendar quarter.

8. In lieu of the requirements in this NO_x RACT Plan, the ASRC may comply with alternative requirements regarding emission limitations, equipment operation, test methods, monitoring, recordkeeping, or reporting, provided the following conditions are met:
- A. The alternative requirements are established and incorporated into an operating permit pursuant to a Title V Operating Permit issuance, renewal, or significant permit revision process as established in Regulation 2.16,
 - B. The alternative requirements are consistent with the streamlining procedures and guidelines set forth in section II.A. of *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, March 5, 1996, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards. The overall effect of compliance with alternative requirements shall consider the effect on an intrinsic basis, such as pounds per million Btu. However, alternative requirements that are developed based upon revisions to the applicable requirements contained in 40 CFR Part 60 shall be approvable pursuant to this Element,
 - C. The U.S. Environmental Protection Agency (EPA) has not objected to the issuance, renewal, or revision of the Title V Operating Permit, and either
 - D. If the public comment period preceded the EPA review period, then the District had transmitted any public comments concerning the alternative requirements to EPA with the proposed permit, or
 - E. If the EPA and public comment periods ran concurrently, then the District had transmitted any public comments concerning the alternative requirements to the EPA no later than 5 working days after the end of the public comment period.
- The District's determination of approval of any alternative requirements is not binding on the EPA. Noncompliance with any alternative requirement established pursuant to the Title V Operating Permit process constitutes a violation of the NO_x RACT Plan.

History: Approved 12-20-00; effective 1-1-01.