



State of Louisiana
Department of Environmental Quality



BUDDY ROEMER
Governor

PAUL TEMPLET
Secretary

Mr. H. T. Thurber
American Cyanamid Company
10800 River Road
Westwego, Louisiana 70094

Dear Mr. Thurber:

RE: Revision to Bubble Permit No. 1896 M-1

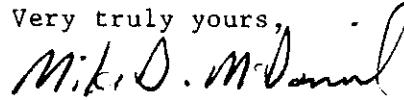
This is to inform you of minor adjustments to emission rates covered by Permit No. 1896 M-1 for The American Cyanamid Fortier Plant, Westwego, Jefferson Parish, Louisiana. The revision is in response to Cyanamid's adjustment of emissions due to changes in throughput for the Methanol Tank, Source 12-79, as stated in the Letter dated December 12, 1988. The revision also addresses concerns expressed by EPA in their proposed approval published in Volume 53, No. 200 of the Federal Register, Monday, October 17, 1988. This permit is subject to the conditions and limitations specified in the attached briefing sheet and data sheets. A new application must be submitted if emissions exceed those established in this permit.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

The permit number cited below should be referenced in future correspondence regarding this subject.

Done this 20th day of July, 1989.

Permit No.: 1896 (M-2)

Very truly yours,

Mike D. McDaniel, Ph.D.
Assistant Secretary

MMcD:ATT:jsb
cc: Southeast Regional Office

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

American Cyanamid Company
Westwego, Jefferson Parish, Louisiana

BACKGROUND:

American Cyanamid Company operates a chemical manufacturing facility in Westwego, Jefferson Parish, Louisiana. The facility includes storage tanks for crude and bulk acrylonitrile which are subject to control requirements under LAC 33.III.2103. In August, 1979 American Cyanamid requested approval of an alternate control scheme for thirteen acrylonitrile tanks since the Environmental Protection Agency was considering regulations on acrylonitrile under NESHAP. If regulated under NESHAP, controls more stringent than those in Section 22.3 would be required. American Cyanamid proposed offsetting the emission until NESHAP regulations were finalized. In addition, American Cyanamid proposed offsetting the emissions from one methanol tank.

In September, 1979 the Air Quality Division approved Cyanamid's proposal to offset the tank emissions since hydrocarbon emission reductions in excess of those required by the SIP had been achieved. The bubble was submitted to EPA, Region 6 as a formal SIP revision in July, 1982.

In July, 1984 EPA requested information under Section 114 of the Clean Air Act and found American Cyanamid in violation of Louisiana Regulation 22.3. EPA contends that the emission reduction credits (ERC's) used in the trade may not be valid.

Permit no. 1896, issued October 17, 1984 included the use of other ERC's to offset the methanol tank emissions. The acrylonitrile tanks were controlled by March 1, 1985 as required by the Order issued September 28, 1984, and verified by American Cyanamid's letter of March 28, 1985.

The ERC's used in the trade are from the change in service to tanks 36-79, 37-79 and 38-79. These tanks were used to store dimethylamine, a raw material in the manufacture of synthetic resins. The tanks are now permitted for non-VOC storage and emissions are limited to 0.0 tons per year each. Currently, the tanks are empty and emit no VOC's.

ORIGIN:

In response to the publication of a proposed approval in the Federal Register of Permit 1896 M-1, American Cyanamid submitted to the Air Quality Division an updated emission rate for the Methanol Tank based on current throughput. The November 17, 1988 submittal initiated this revision.

DESCRIPTION:

The emissions from tanks 36-79, 37-79 and 38-79 have been changed in accordance with the September 1985 AP-42 calculation method. The listed emissions for tank 12-79 has been similarly changed using 17.60F as the diurnal temperature change.

The methanol tank emits 12.13 tons per year and is in compliance by virtue of the permanent, one way bubble. The emission trade is summarized in Attachment I.

RECOMMENDATION:

The Air Quality Division recommends approval of this permit, making the emission trade enforceable and permanent.

PUBLIC NOTICE:

No public notice is anticipated since no change in existing emissions or operation is included in this action.

AMERICAN CYANAMID COMPANY
WESTWEGO, JEFFERSON PARISH, LOUISIANA

SPECIFIC CONDITIONS

1. Permittee shall maintain on site available for inspection for a period of two years a record of the contents other than water of tanks 36-79, 37-79, and 38-79. The record shall include the vapor pressure of the contents indicating a non-VOC status as defined in 40 CFR 60 New Source Performance Standards, Subpart Kb-Standards of Performance for Volatile Organic Liquid Storage Vessels-60.111b(f). Sufficient records to determine compliance by the use of the formulas in "Compilation of Air Pollutant Emission Factors, Third Edition" (AP-42) must also be kept.
2. Permittee shall include a synopsis of the data satisfying Specific Condition 1 in its annual report to the Air Quality Division.

**REVISED
ATTACHMENT I**

**AMERICAN CYANAMID COMPANY
Emission Reduction Credit Transaction
Permit Number 1896**

ACTUAL

<u>SOURCE</u>	<u>BEFORE BUBBLE</u>	<u>AFTER BUBBLE</u>	<u>CHANGE</u>
36-79	6.06	0.00	- 6.06
37-79	5.26	0.00	- 5.26
38-79	1.31	0.00	- 1.31
12-73	12.13	12.13	0.00
Air Quality Benefit	-	-	-
Total	24.76	12.13	-12.63

ALLOWABLE

<u>SOURCE</u>	<u>BEFORE BUBBLE</u>	<u>AFTER BUBBLE</u>	<u>CHANGE</u>
36-79	6.06	0.00	- 6.06
37-79	5.26	0.00	- 5.26
38-79	1.31	0.00	- 1.31
12-73	0.97	12.13	+11.16
Air Quality Benefit	-	1.21	+ 1.21
Total	13.60	13.34	- 0.26

LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.505. If the emissions are determined to be greater than those allowed by the permit or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The permit application and the attached data sheets establish the emission and operating limitations and are a part of the permit. The synopsis and data sheets are based on Permit 1896 M-1 and American Cyanamid's letter dated December 12, 1988.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - (a) construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - (b) if construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.

- V. The permittee shall submit semi-annual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Louisiana Air Quality Division.

LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS

- VI. The permittee shall notify the Department of Environmental Quality, Air Quality Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Division's test manual or any other methods approved by the U.S. EPA. Any deviation from or modification of the methods used for testing shall have prior approval from the Louisiana Air Quality Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate, but in no event later than 180 days after initial start-up (or restart-up after modification). The Air Quality Division Surveillance Section shall be notified at least thirty (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Division within forty-five (45) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up of each project or unit, report to the Louisiana Air Quality Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least two (2) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Air Quality Division with the following information in writing within five (5) days of such conditions:
- a. Description of noncomplying emission(s);
 - b. Cause of noncompliance;
 - c. Anticipated time the noncompliance is expected to continue, or, if corrected, the duration of the period of noncompliance;
 - d. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 - e. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.

LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS

- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- 1) Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - 2) Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - 3) Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and,
 - 4) Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII. 4) above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agent in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.918 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Louisiana Air Quality Division, within ninety (90) days after the event, to amend this permit.

AIR QUALITY DATA SHEET
PAGE 1

AMERICAN CYANAMID COMPANY
WESTWEGO, JEFFERSON PARISH, LOUISIANA

Location of plant: 15 UTM: 763.1 Km E 3317.6 Km N

Description of location: 10800 River Road in Westwego, Louisiana.

Estimated starting date of construction: N/A Estimated date operation will begin: N/A

Type of Dispersion Calculations Used: N/A

EFFECTS ON AMBIENT AIR

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Air Quality Standard

NEW NA	OR MODIFIED	EMISSION SOURCES	<u>Chemical Manufacturing</u> (Type of Source)		
Stack I.D.#	Description	Operating Rate (Maximum)	Operating Schedule Hrs/Day	Days/Wk	Wks/Yr
36-79	Non-VOC Storage	27.5 K gal.	24	7	52
37-79	Non-VOC Storage	10.8 K gal.	24	7	52
38-79	Non-VOC Storage	2.23 K gal.	24	7	52
12-79	Methanol Tank	553 K gal.	24	7	52

AIR QUALITY DATA SHEET - PAGE 2

American Cyanamid Company
(Company's Name)

Westwego
(Nearest Town)

Jefferson
(Parish)

MAXIMUM/AVERAGE EMISSIONS ARE LISTED USING THE UNITS LBS/HR

STACK		PERMITTED EMISSIONS				FEET	°F	CFM
ID	TSP	SO ₂	NO _x	HC	CO	HEIGHT	TEMP.	FLOW RATE
36-79	-	-	-	0.00	-	NA	Ambient	NA
37-79	-	-	-	0.00	-	NA	Ambient	NA
38-79	-	-	-	0.00	-	NA	Ambient	NA
12-79	-	-	-	2.77	-	NA	Ambient	NA

AIR QUALITY DATA SHEET
PAGE 3

AMERICAN CYANAMID COMPANY
WESTWEGO, JEFFERSON PARISH, LOUISIANA

STACK I.D.	TONS PER YEAR					
	TSP	SO ₂	NO _x	HC	CO	OTHER
36-79	-	-	-	0.0	-	-
37-79	-	-	-	0.0	-	-
38-79	-	-	-	0.0	-	-
12-79	-	-	-	12.13	-	-