



State of Louisiana

OFFICE OF THE GOVERNOR

Baton Rouge

70804-9004

EDWIN W. EDWARDS
GOVERNOR

POST OFFICE BOX 94004
(504) 342-7015

July 18, 1986

Mr. Dick Whittington
Regional Administrator
U.S. Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, TX 75270

Attention: Kathi Moore
105 Project Officer

Dear Mr. Whittington:


I am submitting herewith the Louisiana State Implementation Plan (SIP) revision for compliance with the National Ambient Air Quality Standards for lead relative to emissions from the facility of Ethyl Corporation, Baton Rouge, East Baton Rouge Parish, Louisiana.

The Secretary of the Department of Environmental Quality has already adopted the revised SIP and the amended compliance order was issued on January 31, 1986. All public notification requirements were adhered to.

We are requesting your approval of this SIP revision. Your assistance in this matter is greatly appreciated.

Kindest regards.

Sincerely,


EDWIN W. EDWARDS

EWE:cd

cc: Ms. Patricia L. Norton, Secretary
Department of Environmental Quality
Post Office Box 94066
Baton Rouge, LA 70804-9066

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DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF AIR QUALITY AND NUCLEAR ENERGY
AIR QUALITY DIVISION

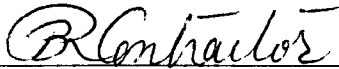
This is to certify that a public hearing was held on December 18, 1985, for the attached Louisiana State Implementation Plan revision for compliance with National Ambient Air Quality Standards (NAAQS) for lead relative to emissions from the facility of Ethyl Corporation located in Baton Rouge, East Baton Rouge Parish, Louisiana.

Said hearing was conducted in accordance with the provisions of 40 CFR 51.4 Public Hearings, as amended.

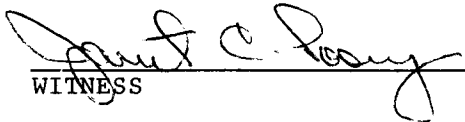
A 30 day public notice was published on November 7, 1985 in the STATE TIMES (Baton Rouge), providing opportunity for public comment.



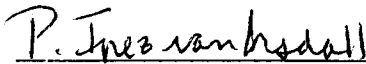
Patricia L. Norton, Secretary
Dept. of Environmental Quality



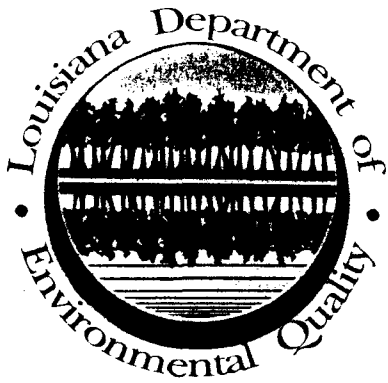
WITNESS



WITNESS



WITNESS



PATRICIA L. NORTON
SECRETARY

OFFICE OF AIR QUALITY AND NUCLEAR ENERGY

GREG J. GASPERECZ
ASSISTANT SECRETARY

February 10, 1986

CERTIFIED MAIL - P 165 142 227

Mr. M. M. Koenecke
Plant Manager
Ethyl Corporation
Post Office Box 870
Baton Rouge, Louisiana 70821

Dear Mr. Koenecke:

Enclosed please find an amended Compliance Order issued to Ethyl Corporation by the Department of Environmental Quality, Office of Air Quality and Nuclear Energy, Air Quality Division, concerning the Lead Ambient Air Concentration. The Order was approved at the December 18, 1985, public hearing of the Louisiana Air Quality Division.

If there are any questions regarding this Order, please contact Bharat Contractor of my staff at (504) 342-8940.

Sincerely,

Gustave Von Bodungen
Administrator

GVB/DW/bpw

cc: U. S. Environmental Protection Agency
Chris Roberie

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

IN THE MATTER OF
ETHYL CORPORATION
POST OFFICE BOX 341
BATON ROUGE, LOUISIANA 70821

PROCEEDINGS UNDER THE LOUISIANA
ENVIRONMENTAL QUALITY ACT,
LA. R.S. 30:1051 ET SEQ

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* AMENDED COMPLIANCE ORDER
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The COMPLIANCE ORDER dated October 31, 1983, issued to Ethyl Corporation by the Assistant Secretary, Office of Environmental Affairs, Louisiana Department of Natural Resources is hereby amended in its entirety and continued in effect as follows under the authority granted by the Louisiana Environmental Quality Act (hereinafter referred to as "the Act"), La. R. S. 30:1051 et seq., and particularly Section 1073 C(3) of the Act.

FINDINGS OF FACT

I.

Ethyl Corporation (hereinafter referred to as "the Respondent") operates a chemical manufacturing plant in Baton Rouge, East Baton Rouge Parish, Louisiana.

II.

Respondent did operate the following seven lead emission point sources at the Baton Rouge plant.

<u>Source Id. No.</u>	<u>Description</u>
LA 22	Reverberatory Furnace A
LA 23	Reverberatory Furnace B
LA 24	Reverberatory Furnace C
LA 25	Reverberatory Furnace D1
LA 26	Reverberatory Furnace D2
LA 27	Reverberatory Furnace E
LA 28	Rotary Furnace

III.

Atmospheric dispersion modeling, using meteorological data of 1975 through 1979, has disclosed that Respondent was allowing lead to become airborne from its furnaces in the lead alkyl production unit in amounts which the model projected to have caused the ambient air quality standard of 1.5 ug/m³ to be exceeded in violation of Section 10.1.3 of the Air Quality Regulations and Section 1087 of the Act.

IV.

Respondent was issued a COMPLIANCE ORDER on October 31, 1983 by the Assistant Secretary, Office of Environmental Affairs, Department of Natural Resources. The COMPLIANCE ORDER was based on atmospheric dispersion modeling using the Industrial Source Complex Model (short term option) for the airborne lead particles from its furnaces in the lead alkyl production unit.

V.

The COMPLIANCE ORDER required Ethyl to raise the stack of each reverberatory furnace listed in paragraph II above to 179 feet with a schedule to complete construction by September 1, 1986.

VI.

In a letter of June 26, 1985, respondent informed the Secretary, Department of Environmental Quality that lead alkyl production ceased at the Baton Rouge facility on that same date. Respondent is now in cleaning up operations at this facility which involves burning of lead sludge in two (2) of the reverberatory furnaces and the rotary furnace. These operations are in effect for a maximum of eight (8) hours daily. Dispersion modeling has indicated that at the resultant greatly reduced lead emissions, the maximum quarterly lead concentrations are much less than the ambient air quality standard of 1.5 ug/m³.

VII.

Respondent, in the letter of June 26, 1985, requested that the requirement for conducting stack sampling of the lead furnaces on or before July 1, 1985, be deleted. Respondent also requested that the requirement of emission reduction by appropriate controls and ground level concentration reduction by raising stacks be deleted from the COMPLIANCE ORDER of October 31, 1983.

ORDER

Based on the foregoing FINDINGS OF FACT, Respondent is hereby ORDERED:

I.

To immediately cease operations of reverberatory furnaces C, D1, D2 and E which are source I.D. Nos. LA-24, LA-25, LA-26 and LA-27 respectively.

II.

To emit not more than a quarterly average total of 0.22 grams of lead per second from the furnaces in the lead alkyl facility, effective immediately. This emission limitation is to be achieved by implementing the use of reverberatory furnaces A and B and the rotary furnace for lead sludge smelting service (Source I.D. Nos. LA-22, LA-23 and LA-28) for not more than an aggregate total of 120 hours per any given calendar week.

III.

To submit written annual reports to the Air Quality Division pursuant to Section 17.13 of the Air Quality Regulations until Respondent's operations at this facility are permanently discontinued. Emission rates shall be calculated using production rates and scrubber performance values in a manner equivalent to that outlined in the April, 1984, Particulate Emissions report submitted to the Louisiana Air Quality Division. The emission rates shall be part of the annual reports, which also shall include the production schedule outlined in II above. Ethyl shall maintain records of compliance on site and make the data available to the Air Quality Division staff for inspection. Such data shall be maintained for at least two years.


IV.

To be hereby notified that failure or refusal of Respondent to comply with this ORDER and the provisions herein will subject it to possible enforcement procedures under Section 1073 of the Act which could result in the assessment of civil penalties in an amount not to exceed \$50,000 for each day of continued non-compliance.

V.

This ORDER is effective upon receipt.

Done at Baton Rouge, Louisiana, this 31st day of January, 1986.



PATRICIA L. NORTON
SECRETARY
DEPARTMENT OF ENVIRONMENTAL QUALITY