

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

OCT 15 2019

DATE:

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Vertellus Integrated Pyridines, LLC, Indianapolis, Indiana

FROM: Charles Hall, Environmental Engineer *C. Hall*
AECAB (MN/OH)

THRU: Brian Dickens, Section Chief
AECAB (MN/OH)

TO: File, Vertellus Integrated Pyridines, LLC, Indianapolis, Indiana

BASIC INFORMATION

Facility Name: Vertellus Integrated Pyridines, LLC

Facility Location: 1500 South Tibbs Avenue, Indianapolis, Indiana

Date of Inspection: 25 September 2019

EPA Inspector:

1. Charles Hall, Environmental Engineer

Other Attendees:

1. David Zier, Compliance Manager, Indiana Department of Environmental Management
2. Jim Gross, Environmental Specialist, Vertellus
3. Tamra Kress, Environmental Manager, Vertellus
4. Dave Wilkes, Facilities Manager, Vertellus (for process description only)

Contact Email Address: tkress@vertellus.com

Purpose of Inspection: inspection of the hazardous waste burning liquid fueled boilers (HWLFB)

Facility Type: chemical plant

Regulations Central to Inspection: The National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors (HWC MACT)

Arrival Time: 0830 hours EDT

Departure Time: 1225 hours EDT

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Gross and Kress, unless otherwise noted.

Company Ownership: Vertellus Integrated Pyridines, LLC (Vertellus) acquired the facility and its manufacturing assets from Vertellus Agriculture & Nutrition Specialties LLC on or about September 30, 2016.

Process Description: Vertellus collects liquid hazardous waste from its production processes in three above-ground storage tanks. Vertellus continuously circulates the hazardous waste to prevent separation of the waste into layers and to maintain a consistent viscosity. Vertellus collects and analyzes two samples of the hazardous waste per month. Kress and Gross believe that the concentrations of arsenic, cadmium, chlorine, chromium, lead and mercury in the hazardous waste are consistent. The higher heating value of the hazardous waste consistently ranges from 14,000 to 16,000 British thermal unit per pound. Vertellus fires some natural gas continuously to maintain boiler stability in the event of an automatic waste feed cut off. The HWLFBs, identified as Boilers 70K, 30, and 28K, have heat input ratings of 91.8 million British thermal units per hour (mmBTU/hr), 39.3 mmBTU/hr, and 36.8 mmBTU/hr, respectively. They have maximum steam production rates of 70,000 pounds per hour at a maximum operating pressure of 300 pounds per square inch gauge (psig), 30,000 pounds per hour at maximum operating pressure of 250 psig, and 28,000 pounds per hour at maximum operating pressure of 250 psig, respectively. None of the HWLFBs are equipped with any air pollution control devices. Each HWLFB is equipped with continuous emission monitors for carbon monoxide and oxygen. Vertellus continuously monitors the steam load and combustion zone temperature and of each HWLFB.

Staff Interview: Hall and Zier noted that the primary reason for the inspection was to investigate whether the HWLFBs should be subject to the major source standards for HWLFBs instead of the area standards. Gross and Kress asked the inspectors to look at Section D.0 of the permit which limits the facility's potential to emit to 24.9 tons of hazardous air pollutants per year.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations: None of the HWLFBs were burning hazardous waste at the time of the inspection. Consequently, the inspector did not record the 1-hour rolling average carbon monoxide emission concentration for any of the HWLFBs.

Photos and/or Videos were not taken during this inspection.

Field Measurements were not taken during this inspection.

CLOSING CONFERENCE

Requested Documents:

- An aerial diagram of the facility annotated with the location of the hazardous waste storage tanks and HWLFBs;
- The results of the most recent comprehensive performance test;
- A copy of the table of contents for the operating refresher training; and
- A list of industrial process refrigeration equipment that use chlorofluorocarbon refrigerants.

Concerns: See Staff Interview above.

SIGNATURES

Lead Inspector: Charles Hall Date: 02 October 2019
Section Chief: Brian DeSteno Date: 10/15/19