

Memorandum**AIR
PRODUCTS**

To:	R. C. Sander	Dept	Chemicals Administration
From:	A. J. Diglio	Dept ,Ext	Corporate Environmental/8339
Date:	12 January 1988		
Subject:	Environmental Emissions Reduction		

bcc: P. L. T. Brian
T. J. Marriott, Jr.

Bob:

This is in reply to your request for an analysis of the Chemicals environmental emissions for the years 1986 and 1987.

Table I - Emissions Analysis shows that the highest number of emissions in 1986 were Pasadena opacity (82), Escambia NPDES (27), Paulsboro opacity (20) and Paulsboro NPDES (19). In 1987, the highest number of emissions were Calvert opacity (78), Pasadena opacity (44), Escambia odor (18), Paulsboro NPDES (13) and Calvert VCM (9).

In 1987, Chemicals made excellent reductions in the following excursions: Pasadena opacity (82-44), Paulsboro opacity (20-1), Escambia NPDES (27-4), and Paulsboro NPDES (19-13). For 1988, emphasis should continue on the compliance programs (attachment 2) to reduce the emissions from:

- Calvert and Escambia VCM Emissions
- Calvert Opacity
- Pasadena Opacity
- Escambia Odors

If the compliance programs are implemented, significant reductions would occur not including the third party emissions. These are mostly leaking drums and are the subject of the "Leaking Drum Containment" program which we expect to significantly reduce leaking drums in 1988.

Isolated emissions are mostly spills and accidental releases. In 1987, 62 of these were recorded compared to 33 in 1986. Perhaps this is the result of a better tracking system. On the other hand, release and spill prevention programs should be emphasized to reduce these occurrences in 1988.

Please be advised of the BNA article (attachment 3) that shows EPA is seeking \$11.7 million penalty from Nevada Power Company for excess emissions of fly ash, carbon particles and sulfur dioxide from two generating units. Nevada Power is distressed since it already paid state penalties of \$8,000 for the excess emissions and now is being sued by EPA for the same excursions.

Please note Terry Wharton's document (attachment 4) shows analysis by categories for 1986 and 1987. He concludes that environmental emissions were up in all four categories, year to year, 1987 vs. 1986.

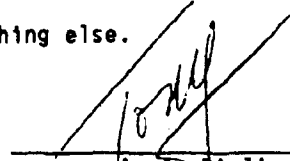
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TO: R. C. Sander
FROM: A. J. Diglio

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Indications are that if the compliance programs are implemented early in 1988 we would expect a significant reduction in emissions for the year. Proportionately, your exposure to potential public reactions, state and EPA penalties would be reduced.

Please let me know if you need anything else.


A. J. Diglio

AJD/pbr
0559v

- Attachments:
- 1) Table - Chemicals Emissions Analysis
 - 2) Environmental Compliance Programs, Fourth Quarter 1987
 - 3) Environment Reporter article "EPA Files Suit Against Nevada Power Co. Over 466 Alleged Violations of Clean Air Act", December 25, 1987
 - 4) Memo from J. T. Wharton, 30 October 1987, FY87 Environmental Emissions Status

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CHEMICALS EMISSIONS ANALYSIS

<u>EMISSIONS</u>	<u>86</u>	<u>87</u>	<u>1st Q 88</u>	<u>88</u>		
				<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
<u>Chronic Emissions</u>						
Pasadena Opacity	82	44	13			
Nitric	49	28	11	0	9	2
John Zinc	25	10	2	1	1	0
Others	8	6	0	0	0	0
Calvert Opacity	2	78	20	17	3	0
Paulsboro Opacity	20	1	0	0	0	0
Escambia NPDES	27	4	0	0	0	0
Paulsboro NPDES	19	13	0	0	0	0
Calvert VCM	6	9	1	0	0	1
Escambia VCM	4	5	1	1	0	0
Escambia Odor	1	18	7	0	7	0
<u>Total Chronic</u>	161	172	42	19	20	3
<u>Isolated Emissions</u>	33	62	11	2	6	3
<u>Total</u>	194	234	53	21	26	6
Drums	16	37	--	--	--	--
Other	10	4	--	--	--	--
TOTAL	220	275				

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ENVIRONMENTAL COMPLIANCE PROGRAMS FOURTH QUARTER 1987

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PLANT	ISSUE	REMARKS / REMEDIES
CALVERT CITY	VCM EMISSIONS (2)	TASK FORCE (CAT) RESOLVING.
	OPACITY (31)	TEST BURNS ON QUALITY COALS CONTINUE.
NEW ORLEANS PLAQUEMINE ASHLAND LAPORTE	EFFLUENT LIMITS (5)	PROACTIVE PROJECTS TO ENSURE COMPLIANCE. EACH IN VARIOUS PROJECT PHASES.
ESCAMBIA	ODOR COMPLAINTS (5)	TOTAL CONTAINMENT AND COMMUNITY RELATIONS PROGRAMS CONTINUE.
PAULSBORO	EFFLUENT LIMITS (2)	CLARIFIER INSTALLED; EFFLUENT MEETING CONSENT ORDER. NEGOTIATING WITH MOBIL FOR WASTE TREATMENT.
CHEMICALS GROUP	LEAKING CONTAINERS (16)	CAT PROGRAM. REGULATORY TRAINING FOR KEY PERSONNEL.
PASADENA	OPACITY (4)	CE APPROVED.

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EPA SEEKS \$11.65 MILLION from Nevada Power Co. for some 466 alleged violations of the Clean Air Act at the company's Reid-Gardner Generating Station near Moapa, Nev. (p. 1950).

Enforcement

EPA FILES SUIT AGAINST NEVADA POWER CO. OVER 466 ALLEGED VIOLATIONS OF CLEAN AIR ACT

CARSON CITY, Nev. — (By a BNA Special Correspondent) — The Environmental Protection Agency Dec. 1 sued Nevada Power Co. seeking \$11.65 million for some 466 alleged violations of the Clean Air Act at its Reid-Gardner Generating Station near Moapa, Nev.

The complaint charged the company with excess emissions of fly ash, carbon particles and sulfur dioxide from two of its four generating units. It also alleged failure to keep adequate records. Although EPA said the violations began in 1982, the alleged violations listed in the complaint are from Sept. 15, 1983, through March 9, 1987. The complaint seeks \$25,000 per violation per day (*U.S. v. Nevada Power Co.*, DC Nev., No. CV-S-87-361-RDF).

The list cited in the complaint includes an 11-day period in 1985 when one of the four coal-fired generating units was operated by Nevada Power without pollution control equipment. The company has already paid an \$8,000 fine for that violation, according to Lew Dodgion, administrator of the Nevada Department of Environmental Protection. In addition, Nevada Power was assessed a \$1,500 fine for two subsequent three-day periods when the pollution control equipment was bypassed, Dodgion said.

"We took enforcement actions at the state level over significant violations," Dodgion told BNA. "We've been working with [Nevada Power and] ... the excess emissions have been reduced since 1984 by a substantial amount."

Dodgion said the only complaints from residents in the sparsely-populated area concerned odors from effluent in the ash pond. "We've worked with them on that, too, and I think we have it corrected," he said.

Virginia Donohue, with EPA Region IX in San Francisco, said "most of the infractions were small. But when we did an audit and saw how many there were ... we're just looking at the sheer weight of them."

Donohue said EPA participated with the NDEP in an on-site audit of Nevada Power in 1986, but the decision to file suit came after a recent internal audit of enforcement files.

The Reid-Gardner Generating Station is located in the southeast corner of Nevada, near the Moapa River Indian Reservation and about three miles from the town of Glendale, which has a population of 309. Between 40 and 50 people live in the Indian village of Moapa and another 75 to 100 residents are scattered throughout the reservation.

Murray Westgate, spokesman for Nevada Power, said the company delivers electricity to all of southern Nevada. "We have 260,000 customers," Westgate said. He declined to comment on the suit, however, referring BNA to the company's attorney, Charles Ivey of Gibson, Dunn, and Crutcher in Los Angeles.

"It is certainly true the company will vigorously resist the claims," Ivey told BNA. "Nevada Power did have a proceeding before the NDEP and paid an \$8,000 penalty" for some of the same violations EPA cited in its complaint.

He said the company is "distressed that it went through the state level and paid penalties there and then got sued by the federal government."

Ivey said that most of the allegations in EPA's complaint are minor. "You would think that they would be overlooked, especially in view of the long history Nevada Power has working with the NDEP."

Ivey said he has contacted EPA attorneys to open settlement negotiations.

Environment Reporter, December 25, 1987

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