

C.H.S.J.

MEMORANDUM FEB 2 1973

DATE

January 26, 1973

SUBJECT:

BRNW REVISED COMPLIANCE
SCHEDULE

TO:

Mr. R. S. Christian

cc:

Mr. C. R. Walbridge

Mr. E. E. James

Mr. T. D. Kent

*file
BRNW
A/P*

Mr. Walbridge

*Mr. Spain - please
handle.*

*Signature ok under h.a.
regs? -- do*

Attached for your review is BRNW revised compliance
schedule covering the deficient areas as referred to
in the State's letter of November 9, 1972.

Please advise if you have any questions.

*formal delegate
if so, can it be
initial F.B.
formally delegate*

P. B. Cornell

P. B. Cornell, Manager
Baton Rouge North Works

RMT:ef

Attach.

Schultz?

TH

ASI-PR 0004177

Industrial Chemicals Division

ALLIED CHEMICAL CORPORATION

P.O. Box 271, Baton Rouge, Louisiana 70821

(504) 356-3341

Mr. John E. Trygg
Technical Secretary
Louisiana Air Control Commission
P. O. Box 60630
New Orleans, Louisiana 70160

Dear Mr. Trygg:

The attached is a revised Compliance Schedule requested by the Commission covering the deficient areas referred to in your letter of November 9, 1972.

Very truly yours,

P. B. Cornell, Manager
Baton Rouge North Works

FPT/RMT:ef

ASI-PR 0004178

BATON ROUGE NORTH WORKS
INDUSTRIAL CHEMICALS DIVISION
ALLIED CHEMICAL CORPORATION

REVISED AIR COMPLIANCE SCHEDULE

I. GENERAL

One of the principle products at this location is soda ash (sodium carbonate) a white powdery dust product. The production of this product involves the following operations: calcining, conveying, grinding, screening, packing and loading. The effect from this operation creates a fugitive particulate (dust) problem and our compliance schedule for abatement puts heavy emphasis on dust collection systems.

The Works testing program has been primarily for dust fallout within its battery limits. The reason for this measurement is due to the relatively large and dense particles which agglomerate in a humid atmosphere and falls as fugitive dust within the perimetry of the Works.

Relative to ambient standards, it is believed that fugitive particulate (dust) falls out much nearer source than can be predicated by dispersion calculations. There is also a question on the value of dispersion calculations considering the multiple sources involved in an industrial complex. The dispersion calculations should incorporate valid point source data, accountability for all variables (meteorology) and computer programs applicable to the problem. The above technique and expertise was not available at this location so that no dispersion calculations were made.

Dust fallout data over the last year indicates the soda ash fugitive dusts settle out and meet the state ambient in a distance of less than a quarter of a mile from the source and, in general, within the boundaries of our plant. Limestone dust settles at a much faster rate.

Attached for reference to this revised compliance schedule is the schedule submitted on August 23, 1972.

II. EMISSION STANDARDS

Section 18.0 - Smoke Control

1) General burning of natural gas as fuel for power generation, calcining soda ash and cracking is in compliance. These operations use natural gas which seldom produce smoke.

2) Emission of smoke from vertical kilns during intermittent charging operations is in compliance. Charging of each kiln with limestone and coke seldom exceeds Ringelmann 1.

3) Smoke generated in decoking of furnace tubes in the vinyl chloride monomer operation is not in compliance.

- a. The furnace tubes are heated and blown with air and steam twice per month for 18 hours each time. During the initial stage of this operation Ringelmann 1 is exceeded for a period of 15-20 minutes. After the initial period during intermittent spalling with air, the smoke does not exceed Ringelmann 1 for more than four minutes in sixty consecutive minutes.
- b. The decoking procedure is a shutdown and start-up operation and on this basis we are asking the commission to approve compliance status under exemption 18.4 and/or 18.6.2 based on the limited amount of smoke being emitted in an unpopulated area of the plant.

4) Flaring of Ethane and Ethylene from brine well storage system near Plaquemine, Louisiana is in compliance.

- a. Pressure release venting for repair of lines, etc., does not cause smoke to exceed Ringelmann 1 more than an aggregate time of six hours in any ten consecutive days. The location for this operation is in an unpopulated area.

5) Smoke emission from Test Burning of Standby Fuel Oil for power generation is in compliance.

- a. The standby fuel oil facilities are tested periodically for readiness in event of a natural gas outage. The smoke emitted during the changeover from gas to oil will be controlled within the limit of four minutes in any sixty consecutive minutes.

6) Flaring of gases from the Dichloroethane (EDC) and vinyl chloride operation is in compliance.

- a. Smoke emission from flaring during this operation does not exceed Ringelmann 1 more than an aggregate time of six hours in any ten consecutive days.

7) Smoke emissions from Lead Melting Furnace is in compliance.

- a. The lead recovery process used for rebuilding diaphragm cells contains some organic matter which burns off in the lead melting furnace. The smoke generated during this operation will be controlled so that a Ringelmann 1 will not be exceeded for more than four minutes in sixty consecutive minutes.

Section 19.0 - Particulate Control

1) Soda ash loading operations into ships and barges--fugitive dusts are believed to be in compliance as indicated by fallout sampling over the past year.

Light Ash Loading - Process weight 175 tons/hr.
Emissions allowable 56 lbs/hr.

Dense Ash Loading - Process weight 250 tons/hr.
Emissions allowable 60 lbs/hr.

The loading operation is located in a remote area on the east bank of the Mississippi River. The shipping area is dusty during the loading operation, however, the dust fallout is within ambient standards. Data shows 13.8 tons/square mile/30 days at the south property line station and 5.8 tons/square mile/30 days soda ash at the north property line station. Ambient state standard is 20 tons/square mile/30 days.

2) Salt drying, conveying and loading operations are in compliance.

Process weight 25,000 lbs/hr.
Emission allowed 22 lbs/hr.
Stack tests on wet scrubber 3 lbs/hr.

3) Decoking of furnace tubes in the vinyl chloride monomer operation are in compliance.

Process weight 20,000 lbs/hr.
Emission allowed 19 lbs/hr.
Calculated emissions 6 lbs/hr.

The furnace tubes are heated twice per month for 18 hours. During this time the tubes are blown with air and steam for one to two minutes every thirty minutes. Estimate 200 lbs. carbon is half burned and blown out during each 18 hour period.

4) Lime slakers producing milk of lime are in compliance.

Process weight 1,650 tons dry lime + 5500 tons water per day
Particulate emissions allowed 62 lbs/hr.
Estimated omissions None visible (steam)

5) Vertical lime kilns during charging operations are believed to be in compliance.

Process weight 2,640 tons limestone and 210 tons coke per day
Particulate emissions allowed 52 lbs/hr.

These emissions, mostly fugitive, are believed to be in compliance as estimated by visual observations and evaluation of fallout data taken over the last year. Data shows less than the 20 tons/square mile/30 days (state requirement) at the Work's battery limits.

6) Other sources of particulate fugitive dust and their respective compliance schedules were designated as Plans 1-4 and were submitted to the Air Control Commission on August 23, 1972(see attached). Following is a review of emission data in these plans.

Plan 1 - Design and install new dust collecting systems on lime kilns discharges and conveyors.

Process weight	1650 tons/day
Particulate emissions allowed	47 lbs/hour
Estimated emissions	260 lbs/hour
Expected emissions after installation of planned equipment -	
	30 lbs/hour

Plan 2 - Purchase and install three improved bag dust collector systems to replace present ones in Nos. 1, 3 and 4 elevator towers in soda ash section.

Process weight	6600 tons/day
Particulate emissions allowed	61 lbs/hour
Estimated emissions	600 lbs/hour
Expected emissions after installation of planned equipment -	
	45 lbs/hour

Plan 3 - Purchase and replace four bag dust systems in dense ash operating systems.

Process weight	1800 tons/day
Particulate emission allowed	48 lbs/hour
Estimated emissions	300 lbs/hour
Expected emissions after installation of planned equipment -	
	30 lbs/hour

Plan 4 - Design and install dust collecting systems on soda ash loadings into trucks and rail cars.

Process weight (Light Ash) loading	35 tons/hour
Particulate emissions allowed	42 lbs/hour
Estimated emissions	175 lbs/hour
Design criteria to be satisfied	30 lbs/hour

Process weight (Dense Ash) loading	70 tons/hour
Particulate emissions allowed	47 lbs/hour
Estimated emissions	88 lbs/hour
Design criteria to be satisfied	35 lbs/hour

Section 20.0 - Incinerator Standards

Question 1 through 4 under incinerator compliance schedule guidelines are not applicable as refuse is used for land fill.

Section 21.0 - Fuel Burning Equipment Standards

This item is not applicable as natural gas is used for steam and power generation.

Section 22.0 - Volatile Organic Compound Control

A supplemental schedule will be submitted based on federal approval of state regulations, as per guideline instructions.

Section 24.0 - Sulfur Dioxide Control

Sulfur dioxide from combustion of natural gas at Baton Rouge North Works and ethane gas at our brine wells near Plaquemine, Louisiana are in compliance.

Both natural gas and ethane contain less than 1 ppm sulfur. The resulting combustion products are within state standards at the property lines.

Section 25.0 - Carbon Monoxide Control

Carbon monoxide from vertical kiln operations. In compliance based on being an existing operation and classified as a priority III region.

Section 26.0 - Nitric Acid Industry Standards

Not applicable industry.

III. AMBIENT AIR STANDARDS

Section 9.0 - Suspended Particulate Level Control and

Section 10.0 - Dustfall Level Control

In reference to both of the above sections, as previously indicated, our problem area is fugitive dust. These fugitive dusts, soda ash and limestone, are relatively large, heavy particulate which settle rapidly after becoming airborne. Except for areas adjacent to the specific

Seems to be something missing - see next p.

operation our dust fallout data indicates compliance. However, in areas where compliance is not met, our original submitted compliance schedule should result in a reduction of particulate to meet state ambient standards.

Section 11.0 - Outdoor Burning Standards
Section 12.0 - Sulfur Dioxide Level Control
Section 13.0 - Carbon Monoxide Level Control
Section 16.0 - Nitrogen Oxide Level Control

These above parameters (Sections 11.0, 12.0, 13.0 and 16.0) are in compliance or are not applicable as reported in the emission standards section.

Section 14.0 - Hydrocarbon Level Control
Section 15.0 - Oxidant Level Control

A supplemental schedule covering Sections 14.0 and 15.0 will be submitted based on Federal approval of state regulations, as per guideline instructions.

IV. INCREMENTS OF PROGRESS

Increments of progress are given in the attachment of the original compliance schedule submitted.

Periodic progress reports will be made to the Technical Secretary on the status of BRNW compliance schedule at six month intervals.

vised the proposal is hereby adopted to read as set forth below. As these amendments are intended to relieve a restriction they shall become effective immediately.

1. As amended 29 CFR 1910.111(a) (2) (i) and (b) (1) read as follows:

§ 1910.111 Storage and handling of anhydrous ammonia.

(a) **General**

(2) **Definitions.** As used in this section:

(i) "Appurtenances"—All devices such as pumps, compressors, safety relief devices, liquid-level gaging devices, valves and pressure gages.

(b) **Basic rules.**

(1) **Approval of equipment and systems.** Each appurtenance shall be approved in accordance with paragraph (b) (1) (i), (ii), (iii), or (iv) of this section.

(i) It was installed before February 8, 1973, and was approved, tested, and installed in accordance with either the provisions of the American National Standard for the Storage and Handling of Anhydrous Ammonia, K61.1, or the Fertilizer Institute Standards for the Storage and Handling of Agricultural Anhydrous Ammonia, M-1, in effect at the time of installation; or

(ii) It is accepted, or certified, or listed, or labeled, or otherwise determined to be safe by a nationally recognized testing laboratory, such as, but not limited to, Underwriter's Laboratories Inc. and Factory Mutual Research Corporation; or

(iii) It is a type which no nationally recognized testing laboratory does, or will undertake to, accept, certify, list, label, or determine to be safe; and such equipment is inspected or tested by any Federal, State, municipal, or other local authority responsible for enforcing occupational safety provisions of a Federal, State, municipal or other local law, code, or regulation pertaining to the storage, handling, transport, and use of anhydrous ammonia, and found to be in compliance with either the provisions of the American National Standard for the Storage and Handling of Anhydrous Ammonia, K61.1, or the Fertilizer Institute Standards for the Storage and Handling of Agricultural Anhydrous Ammonia, M-1, in effect at the time of installation; or

(iv) It is a custom-designed and custom-built unit, which no nationally recognized testing laboratory, or Federal, State, municipal or local authority responsible for the enforcement of a Federal, State, municipal, or local law, code or regulation pertaining to the storage, transportation and use of anhydrous ammonia is willing to undertake to accept, certify, list, label or determine to be safe, and the employer has on file a document attesting to its safe condition following the conduct of appropriate tests. The document shall be signed by a registered professional engineer or other person having special training or experience sufficient to permit him to

terly and annual reports filed with the Commission. Changes have first been made by the Commission. **PART 1207—COMMON AND CONTRACT MOTOR CARRIERS OF PASSENGERS** Instruction revised 3/1/73

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order shall be given to the general public by depositing a copy in the Office of the Secretary of the Commission at Washington, D.C., and by filing a copy with the Director, Office of the Federal Register, for publication in the FEDERAL REGISTER.

(Secs. 204, 220, 49 Stat. 546, as amended; 563, 320, 322.) By the Commission, Division 2.

[SEAL] ROBERT L. OSWALD, Secretary.

PART 1206—COMMON AND CONTRACT MOTOR CARRIERS OF PASSENGERS Instruction "2-3 Accounting period" is revised to read:

G. H. WISE, Acting Administrator, Animal and Plant Health Inspection Service. Doc. 73-2506 Filed 2-7-73; 8:45 am]

19—FOREIGN QUARANTINE NOTICES

(a) Each carrier shall file on the basis of either (1) year of 12 months ending December 31, or (2) counting year of this year ending at the close of the days of each calendar year. (b) A carrier shall file a notice of termination of Quarantine contained in the first promulgation of the States from sweetpotato research, which shall be in the form of a notice of termination of Quarantine.

Fertilizer Institute, 1015, 18th Street NW., Washington, DC 20036.

(Sec. 8, Pub. L. 91-596, 84 Stat. 1593 (29 U.S.C. 655))

Signed at Washington, D.C., this 2d day of February 1973.

CHAIN ROBBINS, Acting Assistant Secretary of Labor.

NOTE: Incorporation by reference provisions approved by the Director of the Federal Register on January 23, 1973.

[FR Doc. 73-2506 Filed 2-7-73; 8:45 am]

Title 32—National Defense CHAPTER XVI—SELECTIVE SERVICE SYSTEM

PART 1641—DUTY OF REGISTRANTS Registrants Classification Procedures Correction

In FR Doc. 72-20793 appearing at page 25714 in the issue for Saturday, December 2, 1972, in § 1641.7 the sixth line, reading "the 26th anniversary of the date of his", should be transposed so as to become the third line of that section.

Title 32A—National Defense, Appendix CHAPTER XI—OIL IMPORT APPEALS BOARD

OIAB—RULES AND PROCEDURES Correction

In FR Doc. 73-1630 appearing at page 2684 in the issue for Monday, January 29,

Inspector, who will make a decision after consulting with Regional Counsel. If an attempt is made to compel the production of matters, decline to produce the information or matter, and state it may be exempted and cannot be disclosed or produced without specific approval of the Regional Chief Inspector, who will make a decision after consulting with Regional Counsel. The Postal Service will offer every possible assistance to the courts, but the questions of disclosing information for which an exemption may be claimed is a matter of discretion. (5 U.S.C. 552, 39 U.S.C. 401)

ROGER P. CRAIG, Deputy General Counsel.

[FR Doc. 73-2476 Filed 2-7-73; 8:45 am]

Title 40—Protection of Environment CHAPTER I—ENVIRONMENTAL PROTECTION AGENCY

PART 52—APPROVAL AND PROMULGATION OF IMPLEMENTATION PLANS

Miscellaneous Amendments

On October 28, 1972 (37 FR 23087), the Agency amended its disapproval of the State of Louisiana's implementation plan control strategy for photochemical oxidants (hydrocarbons) in the Southern Louisiana-Southeast Texas Air Quality Control Region and promulgated regulations to deal with the remaining deficiency in that control strategy. Specifically, the Agency approved State of

RULES AND REGULATIONS

Louisiana Regulations 22 and A23 (Control of Volatile Organic Compound Emissions from New and Existing Sources), disapproved the control strategy as incomplete in that it failed to provide for adequate control of hydrocarbon emissions, and prescribed emission limitation and compliance schedule regulations for waste gas disposal sources not covered by the approved State regulations, in order to supplement the State's control strategy.

The amendments to 40 CFR 52.973(b) set forth below are designed to clarify the meaning of certain terms used in the regulation, to correct the Agency's inadvertent failure to expressly exclude ethylene producers from the regulation, and to correct a cross reference. The intended applicability of the regulation is also clarified by the exemption of certain organic compounds which are known to have little or no photochemical reactivity.

This notice also includes revisions to the regulation for review of new and modified sources promulgated for Louisiana on October 28, 1972. These revisions allow the Administration to waive requirements for performance tests after the new or modified source commences operation. It is recognized that compliance with applicable emission limitations can be determined in certain circumstances without the need for performance testing. Also, the list of sources exempt from the new source review requirements is expanded to cover additional sources of minor pollutant contribution. The emissions from the additional sources exempted are similar in magnitude to those sources already exempt and are considered to have an insignificant effect on air quality.

Amendments are also set forth below changing the latest dates for attainment of the national ambient air quality standards for sulfur oxides and particulate matter in Texas. The Texas implementation plan, which contained conflicting statements concerning the intended attainment dates, has subsequently been clarified by the State by supplemental information submitted on November 10, 1972. Accordingly, the latest attainment date for the primary standards has been changed from December 1973 to July 1975, which is consistent with the Clean Air Act and with clarification provided by the State. The dates are underlined because a specific month was not provided and were therefore specified by EPA. The supplemental information indicated that secondary standards would be attained within "reasonable time"; however, no date was provided. The particulate matter and sulfur oxides control strategies for the secondary standards do not require the application of control technology beyond that which is rea-

sonably available. Thus, the latest attainment date for secondary standards is prescribed as July 1975, as required by 40 CFR 51.13(b)(1).

The attainment date table for Texas is also corrected to indicate that the sulfur dioxide air quality levels in the five priority III Regions (Austin-Waco Intrastate, Brownsville-Laredo Intrastate, Metropolitan Dallas-Fort Worth Intrastate, Metropolitan San Antonio Intrastate, and the Texas portion of the Shreveport-Texarkana-Tyler Intrastate Region) are "presently below secondary standards." The attainment dates for the sulfur dioxide ambient air quality standards for these Regions were erroneously listed as December 1973.

Since the amendments have no significant effect on the attainment or maintenance of national standards and impose no additional regulatory burden, the Agency finds that good cause exists for not issuing a notice of proposed rule making, inasmuch as it is unnecessary and for making the amendments effective February 8, 1973 without a deferred effective date.

(42 U.S.C. 1857c-5)

Dated: February 2, 1973.

WILLIAM D. RUCKELSHAUS,
Administrator, Environmental
Protection Agency.

Subpart T—Louisiana

In § 52.973, paragraph (b) is revised as follows:

§ 52.973 Control strategy and regulations: Photochemical oxidants (hydrocarbons).

(b) Regulation for control of hydrocarbon emissions.

(1) The requirements of this paragraph are applicable to waste gas disposal sources, except those in ethylene producing plants, in the Louisiana portion of the Southern Louisiana-Southeast Texas Interstate Region (§ 81.53 of this chapter).

(2) No owner or operator of a waste gas disposal source to which this paragraph is applicable shall discharge or cause the discharge of organic compounds into the atmosphere in excess of 15 lbs. (6.8 kg) per day (24 hours) from a waste gas disposal source unless the waste gases are incinerated, burned by a smokeless flare, or controlled by some other method approved by the Administrator.

(3) For the purposes of this paragraph:

(i) "Organic compound" means any compound containing carbon and hydrocarbon.

(ii) "Waste gas disposal source" is any point of organic compound process emissions resulting from disposal of emergency and waste gases from petroleum refineries and other hydrocarbon processing plants.

(4) The requirements of paragraph (b)(2) of this section are not applicable to waste gas streams which contain only the following organic compounds, singly or in combination: C-C, n-paraffins, saturated halogenated hydrocarbons, perchloroethylene, benzene, acetylene, acetone, cyclohexanone, ethyl acetate, diethylamine, isobutyl acetate, isopropyl alcohol, methyl benzoate, 2-nitropropane, phenyl acetate, and triethylamine.

In § 52.976, paragraph (b)(8)(iv) is added and paragraph (b)(9)(iii) is revised. As amended, § 52.976 reads as follows:

§ 52.976 Review of new sources and modifications.

(b) . . .

(8) . . .

(iv) The Administrator may waive the requirement for performance tests if the owner or operator of a source has demonstrated by other means to the Administrator's satisfaction that the source is being operated in compliance with State and Federal regulations which part of the applicable plan.

(9) . . .

(iii) Fuel burning equipment, other than smokehouse generators, which have a heat input of not more than 250 million B.t.u. per hour (62.5 billion gm-cal) and burns only gaseous fuel containing not more than 0.5 grains H₂S per standard cubic feet (5.7 grams standard cubic meters); has a heat input of not more than 1 million B.t.u. per hour (250 million gm-cal/hr) and burns only distillate oil; or has a heat input not more than 350,000 B.t.u. per hour (88.2 million gm-cal/hr) and burns other fuel.

Subpart SS—Texas

In § 52.2270, paragraph (c)(2) is revised to read as follows:

§ 52.2270 Identification of plan.

(c) . . .

(2) July 31 and November 10, 1975.

Section 52.2279 is revised as follows:

§ 52.2279 Attainment dates for national standards.

The following table presents the dates by which the national standards are to be attained. These dates are the information presented in Texas, except where noted.

Industrial Chemicals

Morristown, N. J.

Mr. C. R. Walbridge

LOUISIANA AND EPA AIR COMPLIANCE PLANS

Industrial Chemicals

Baton Rouge North Works

December 11, 1972

Mr. von Frank 12/13
(letter copy sent 12/14/72 K9)

ICD- N/P

Baton Rouge

Mr. Walbridge

file -

Attached for your information are the following:

1) EPA letter of request for compliance schedule of waste gas disposal systems for ethylene users.

TDK

DEC 14 1972

2) Louisiana State Air Control Commission request for updating of BRNW compliance schedule where deficient, except for volatile organic portion.

3) Latest adoption of Revisions to Louisiana Implementation Plan received at Louisiana Air Control meeting on November 21, 1972.

4) Two copies of LCA news letters regarding the actions taken by LCA on the waste gas disposal issue.

5) Copy of LCA letter to EPA and newspaper report of recent Louisiana Air Control Meeting.

The latest information received (12/7/72) on the volatile organics issue is the probable revision by EPA towards the LCA's proposed plan with state support on the waste gas disposal clause for ethylene users.

In view of the confusion between LCA, State Air Control Commission and EPA on the ethylene users exemption, development of a compliance plan for organics is in question. Under the waste gas disposal clause developed by LCA with state approval, BRNW may be exempt and in compliance with the state plan which proposes that "any waste gas stream containing organic compounds from any ethylene producing plant or other ethylene emission source shall be burned at 1300°F (704°C) for 0.3 second or greater in a direct flame afterburner or an equally effective device. This section does not apply to emergency reliefs and vapor blowdown systems." The state has accepted the LCA's addition to the above for ethylene users which says "all waste streams from ethylene user plants which contain 5% by volume or more ethylene and which will support their own combustion in air shall be disposed of by burning or other acceptable means. The Commission may waive

December 11, 1972

this requirement when the products of combustion will create a more serious air pollution problem. This section does not apply to emergency reliefs and vapor blowdown systems."

However, the Works is not in compliance with the EPA version published on October 28, 1972 which states that "no person shall discharge or cause the discharge of organic compounds into the atmosphere in excess of 15 lbs. (6.8Kg) per day (24 hours) from a waste gas disposal system unless the waste gas stream is incinerated by a smokeless flare or other device approved by the Administrator." The federal version requires that when a facility is in compliance a letter so stating compliance be sent to EPA by December 31, 1972. If the facility is not in compliance, a schedule for compliance is required by February 26, 1973.

Hopefully, more concrete information will be forthcoming by December 15, 1972 from EPA which is reconsidering the LCA/State recommendation, however, during the interim a schedule is being prepared based on the EPA version which would require abatement of any emission containing organics. This would require a substantial capital investment to reduce all organic emissions to EPA requirements.

Please advise if you have any questions.

ORIGINAL SENT
P. B. CORNELL

P. B. Cornell, Manager
Baton Rouge North Works

RMT:ef

cc: Mr. E. E. James
Mr. T. D. Kent

(w/o att)

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