



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



ATTACHMENT #1

STATE OF CONNECTICUT	)	
DEPT.OF ENVIRONMENTAL PROTECTION	)	
	)	<u>STATE ORDER NO. 8012</u>
VS.	)	
	)	November 18, 1986; Proposed Order
AMERICAN CYANAMID COMPANY	)	December 21, 1987; Final Order
WALLINGFORD, CONNECTICUT	)	

IN THE MATTER OF STATE ORDER NO. 8012

WHEREAS, the American Cyanamid Company Polymer Products Division, (hereinafter, the "Company") a New Jersey Corporation doing business at South Cherry Street, Wallingford, Connecticut operates chemical processing equipment subject to the standards and limitations of the Administrative Regulations for the Abatement of Air Pollution (hereinafter, "Regulations"); and

WHEREAS, the Company operates equipment which emits Volatile Organic Compounds (VOC) in excess of one hundred (100) tons per year at its Wallingford facility in three separate Departments: Thermoplastics, Thermosetting and Resins; and

WHEREAS, Section 22a-174-20(ee) of the Regulations requires a demonstration of Reasonably Available Control Technology (RACT) for any premises with "actual" emissions, as currently defined by the Administrative Regulations for the Abatement of Air Pollution of Volatile Organic Compounds in excess of one hundred (100) tons per year. The discharges of volatile organic compound emissions are required to be limited by RACT by 12/31/85 unless a compliance plan is filed under Section 22a-174-20(ee)(3); and

WHEREAS, the company was issued State Order No. 958 which required that investigation, testing and research be conducted sufficient to permit a RACT determination to be completed and submitted for all VOC emission points; and

WHEREAS, on May 1, 1986, as required by State Order No. 958, the Company submitted a proposal and timetable for the completion of certain modifications which upon implementation will demonstrate Reasonably Available Control Technology for the reduction of VOC emissions; and

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WHEREAS, review of the Company's RACT proposal has been conducted by representatives of the Connecticut Department of Environmental Protection's Air Compliance Unit and it has been determined that the Company's proposal represents the lowest emission limitation that is reasonably achievable considering technological and economic feasibility and therefore constitutes Reasonably Available Control Technology; and

WHEREAS, the Department has given consideration to the various VOC reduction measures already implemented to date and although the Company has proposed that RACT is currently being attained, the additional VOC reduction measures referenced by this order are determined to represent RACT; and

WHEREAS, the Company and the Department acknowledge final approval of this RACT proposal by the United States Environmental Protection Agency as a revision to Connecticut's State Implementation Plan.

NOW, THEREFORE, by authority of Section 22a-178, et. seq., of the Connecticut General Statutes and Section 110(a) of the Clean Air Act, as amended, 42 USC Section 7410(a), the Commissioner of the Department of Environmental Protection (hereinafter "Commissioner") hereby orders the American Cyanamid Company to take the following action with respect to Volatile Organic Compound emission reductions from its Thermoplastics Department, Thermosetting Department and Resins Department. The specific requirements of this order which are deemed necessary for full and complete implementation of the RACT proposal which is approved by this order are further delineated by the Compliance Timetable which is hereby incorporated by reference in this order. The general requirements of this order are as follows:

1. Complete installation of air pollution control equipment on any VOC emission source whose maximum real emissions exceed forty (40) pounds per day or five thousand (5,000) pounds per year. Initial evaluation of these sources was provided by the Company to the Commissioner in the May 1, 1986 RACT report, as required by State Order No. 958. The requirements of the final evaluation are noted in Part III of the Compliance Timetable.

2. Complete upgrading of any existing air pollution control equipment to the overall reduction limits required by this State Order.
3. Submit refined documentation for all VOC emissions sources for which an exemption pursuant to this order is being sought. Any source emitting less than 40 lbs. VOC per day and 5000 lbs. per year is exempt from any RACT requirements. For the purpose of determining the need to comply with RACT requirements, VOC emission points which are similar or identical in nature shall be considered a single aggregate source if technically and economically feasible. Any VOC emission point whose real emissions could exceed either threshold level must have defined, enforceable operating limitations as a condition of this order. The limitations developed for any such equipment will be determined RACT for purposes of this order.
4. Complete emission evaluation by testing, detailed engineering evaluation or mass balance calculation in a DEP-approved manner for all existing air pollution control equipment which is not being upgraded as a requirement of this order to demonstrate compliance with the required overall VOC reduction level.
5. Complete emission evaluation in a DEP-approved manner for all equipment modified or installed pursuant to the Company's RACT proposal to demonstrate compliance with the required overall VOC reduction level.
6. All air pollution control equipment installed or modified as a requirement of this order or existing equipment must demonstrate a minimum overall VOC reduction of eighty-five percent (85%).
7. Complete installation of equipment or implement operating procedures sufficient to confirm compliant operation of the control equipment required by this order.
8. Complete and submit an operations and maintenance plan noting the performance evaluation procedures and maintenance to be performed on all control equipment.

9. The Company, at its option, may fulfill the requirements of this Order through terminating the operation of any VOC emission source on or before December 31, 1987.
10. Compliance with the terms of this order does not excuse the Company from complying with any future source specific VOC reduction requirements and/or the requirements of Section 22a-174-29 of the Regulations concerning Hazardous Air Pollutants.

Failure to complete any step or steps (other than Progress Report requirements) detailed in this order and the accompanying Compliance Timetable by the specified date(s) shall be a violation of an Order of the Commissioner and may subject the American Cyanamid Company to liability for civil assessments pursuant to Section 22a-6b (a)(3) of the Connecticut General Statutes and Section 22a-6b-603 of the Department's Regulations. Failure to submit a satisfactory Progress Report by the date(s) set forth in the Compliance Timetable shall subject the Company to liability for civil assessment pursuant to Section 22a-6b (a)(3) of the General Statutes and Section 22a-6b-601 of the Department's Regulations. Departmental action under this authority in no way prevents the Commissioner from seeking, in addition or separately, an injunction enforcing this State Order together with penalties of up to five thousand dollars (\$5,000) per week in court proceedings under Section 22a-180 of the General Statutes.

Questions concerning the terms of this Order should be addressed to Steven E. Peplau, Enforcement Section, Air Compliance Unit. Any future correspondence should make reference to this State Order.

Entered as a final decision of the Commissioner of Environmental Protection this 22 day of December, 1987.

Leslie Carothers  
Leslie Carothers  
Commissioner  
Dept. of Environmental Protection

American Cyanamid Co.  
Wallingford, Connecticut

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STATE ORDER NO. 8012  
December 21, 1987

As a duly authorized representative of the American Cyanamid Company, I hereby consent to the terms and conditions of this order and do hereby waive the right to appeal this order pursuant to Section 22a-174-12 (b)(4) of the Regulations this 6th day of January 1988.

American Cyanamid Co.

By:

*Donald W. Feltz* *WDF*  
*1/4/88*

President

Title:

Polymer Products Division

LC

Encs.

**COMPLIANCE TIMETABLE**

TYPE OF SOURCE:     MAJOR             MINOR             PROCEDURAL             OTHER \_\_\_\_\_

PRIME CONTACT: Jack P. Ryland	SOURCE NAME: American Cyanamid Co.,
TITLE OF CONTACT PERSON: Plant Manager	Polymer Products Div.
SOURCE ADDRESS: P. O. Box 425	PREMISE NO.: 189-027    CLIENT NO.: 000007
So. Cherry Street	ORDER NO.: 8012            DATE ISSUED: 12/1/87
Wallingford, Conn. 06492	N.V. NO.: 90325            DATE ISSUED: - - - -
TELEPHONE NO.: 284-4238 (Tom Archer)	EQUIPMENT TYPE: Entire Premise Chemical
VIOLATION SUBSECTION: 22a-174-20 (ee)	Manufacturing Equipment
	REG. NO.: - - - -            INSPECTOR AND NO.: DN-#56

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
	<p>The American Cyanamid Company is subject to the requirements of Sec. 22a-174-20 (ee)(1) concerning a demonstration of Reasonably Available Control Technology (RACT) for the control of Volatile Organic Compounds (VOC's). RACT has been determined to consist of an overall eighty-five percent reduction in VOC emissions from any process source, or emission point with a potential to emit greater than forty (40) pounds per day or five thousand (5,000) pounds per year, uncontrolled. VOC emission sources subject to this RACT determination are identified in Part III of this Order. Any additional VOC emission sources revealed at a subsequent date or as determined during the final review required by Part II of this compliance timetable shall be included in the RACT review. The Company may propose operating restrictions if a VOC emission point has never exceeded 40 lbs./day or 5000 lbs./year on an actual basis, however, similar or identical sources must be aggregated for review for exemption under the terms of this order and subject to the 85% overall reduction requirement. The following timetable notes completion dates, reporting requirements, testing requirements and related limitations.</p>			

<b>COMPLIANCE TIMETABLE</b>
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SOURCE NAME: American Cyanamid Co.	PREMISE NO.: 189-027	CLIENT NO.: 000007
VIOLATION SUBSECTION: 22a-174-20 (ee)	ORDER NO.: 8012	DATE ISSUED: 12/1/87

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
	<p><u>Part I - LEAK DETECTION PROGRAM</u></p> <p>American Cyanamid shall develop a leak detection program for minimizing fugitive VOC emissions. The key parameters which shall be addressed are: leak definition, equipment to be inspected, inspection (test) methods, inspection frequency, corrective actions when leaks occur and recordkeeping. When a leak has been detected which requires corrective action, the leak shall be repaired within fifteen (15) days. The Company can make a request to the Commissioner to delay a repair of a fugitive emission source until the next turnaround if the repair is infeasible for technical or safety reasons without a complete or partial shutdown of the process unit. At a minimum, the leak detection program shall be performed quarterly. All records generated by this program shall be maintained on file for a minimum of three years and be made available to the Commissioner of the Department of Environmental Protection or his staff upon request. Attached and incorporated by reference to this State Order is Appendix B, the "VOC" Fugitive Emission Control Program procedures submitted to the Department by the Company.</p> <p>1) Initiate the development of a leak detection program for minimizing VOC emissions.</p> <p>2) Complete and implement a DEP-approved leak detection program for minimizing fugitive VOC emissions.</p>	<p>Underway</p> <p>12/31/87</p>		
	<p><u>Part II - EMISSION INVENTORY</u></p> <p>1) Initiate the preparation of an emissions inventory summary for <u>all</u> VOC emission points in the Thermoplastic, Resins and Thermoset Departments utilizing a structured, <u>identical</u> format which provides, at a minimum;</p> <p>a) source identification or other equipment identification</p> <p>b) flow rates (cfm)</p>	<p>Underway</p>		

**COMPLIANCE TIMETABLE**

SOURCE NAME: <b>American Cyanamid Co.</b>	PREMISE NO.: <b>189-027</b>	CLIENT NO.: <b>000007</b>
VIOLATION SUBSECTION: <b>22a-174-20 (ee)</b>	ORDER NO.: <b>8012</b>	DATE ISSUED: <b>12/1/87</b>

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
	<p>c) pounds of VOC/hr. emitted (controlled and uncontrolled)</p> <p>d) type of control equipment</p> <p>e) control efficiencies</p> <p>f) hours of operation/day</p> <p>g) days of operation/year</p> <p>h) representative or typical VOC composition and method(s) used to determine emissions</p> <p>i) other process parameters as may be necessary</p> <p>This form must be used by each Department and provide three (3) blank columns for DEP use. This inventory shall be updated in a timely manner as changes occur.</p> <p>2) Complete and submit the final emissions inventory</p> <p><u>Part III - CONTROL EQUIPMENT INSTALLATION</u> (new equipment and modifications to existing equipment)</p> <p>RACT has been determined by the Department to consist of an overall 85 percent reduction in VOC emissions from any process source or emission point with a potential to emit greater than forty (40) pounds per day or five thousand (5000) pounds per year, uncontrolled. Several processes have been found to exceed the above criteria and are required to either be connected to new or existing control equipment. Below is a listing of the involved equipment and the timetable for installation.</p>	12/31/87		



**COMPLIANCE TIMETABLE**

SOURCE NAME: American Cyanamid Co.	PREMISE NO.: 189-027	CLIENT NO.: 000007
VIOLATION SUBSECTION: 22a-174-20 (ee)	ORDER NO.: 8012	DATE ISSUED: 12/1/87

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
	<u>Building 5B - Resins</u>			
	<u>Source</u> <u>Vent #</u>			
	102-4                            11			
	101-11A                          21			
	101-11B                          23			
	<u>Building 6 - Resins</u>			
	<u>Source</u> <u>Vent #</u>			
	No. 65                            46			
	No. 71                            21			
	<u>Building 10 - Thermoplastic</u>			
	<u>Source</u> <u>Vent #</u>			
	BR-201                            11			
	BR-201A                          75			
	120-516                          99			
	VP-701                          141			
	VP-702                          167			
	VP-703                          168			
	BD Blower                        147			
	<u>Building 10A - Thermoplastic</u>			
	<u>Source</u> <u>Vent #</u>			
	1st zone (Ex-602)                48			
	2nd zone (Ex-602)                44			
	Vac Pump                          59			

<b>COMPLIANCE TIMETABLE</b>
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SOURCE NAME: American Cyanamid Co.	PREMISE NO.: 189-027	CLIENT NO.: 000007
VIOLATION SUBSECTION: 22a-174-20 (ee)	ORDER NO.: 8012	DATE ISSUED: 12/1/87

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
	1) Initiate development and implementation of an emission evaluation program by stack emission testing, detailed engineering evaluation or mass balance calculations in a DEP-approved manner to confirm compliance with the 85% overall VOC reduction requirement for both existing control equipment and the new units being installed as a direct requirement of this order.	Underway		
	2) Begin implementation of RACT program through the issuance of purchase orders for all required equipment and control apparatus for existing sources and sources which require RACT under this order.	Underway		
	3) Initiate the preparation of an operations and maintenance manual for any involved control equipment sufficient to permit company personnel to verify compliance as well as providing enforceable limitations based on previous emission evaluation for DEP personnel to verify during facility inspections.	Underway		
	4) Begin installation or modification of control equipment where required.	Underway		
	5) Submit Intent to Test forms for any equipment which requires stack emission testing.	12/31/87		
	6) Complete installation of all equipment and control apparatus.	12/31/87		
	7) Submit an operations and maintenance manual noting compliance verification measures for all equipment and control apparatus as determined through a DEP-approved emissions evaluation program.	12/31/87		
	8) Be in compliance with the requirements of Section 22a-174-20(ee) as represented by this order.	12/31/87		
	9) Complete emission testing program and submit all emission test reports and emission estimates not previously submitted by May 1, 1988.	5/1/88		

## COMPLIANCE TIMETABLE

SOURCE NAME: American Cyanamid Co.	PREMISE NO.: 189-027	CLIENT NO.: 000007
VIOLATION SUBSECTION: 22a-174-20 (ee)	ORDER NO.: 8012	DATE ISSUED: 12/1/87

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
	<p><u>PART IV - Murray M 64 SERIES BOILER</u></p> <p>VOC'S are collected in two storage tanks resulting from the condensing of distillates from various plant processes. These stored VOC's (fuel alcohol and toluene) are used as fuel and at the same time are destroyed in the Murray M64 Series Waste solvent boiler. This industrial boiler has a maximum rated heat input of nineteen (19) million BTU per hour. In 1986, this boiler consumed 727,000 gallons of fuel alcohols, 270,000 gallons of toluene and 3,000 gallons of #6 fuel oil (used for startups). EPA studies on destruction of VOC liquid wastes in industrial boilers have shown destruction efficiencies as high as 99.99 percent. Comparing similar data and using best engineering practice, it appears that American Cyanamid's Murray Series Boiler can easily achieve a VOC destruction efficiency greater than 90 percent which is the minimum destruction efficiency the Department will accept. The Department has determined that incineration by the Murray M64 Series Boiler of fuel alcohols and toluene represents RACT. The Department will require the continued use of the current temperature device located in the stack of the boiler. A temperature profile study of the radiant section of the boiler and/or stack emission test has been performed to determine the stack temperature necessary to ensure a minimum of ninety (90) percent destruction of VOC's is occurring. A recordkeeping system shall be maintained which records the stack temperature every two hours to ensure that the boiler is continuing to destroy ninety (90) percent of the VOC's. A temperature recorder has been installed at the economizer inlet. This temperature shall not fall below 400° F and shall be considered the minimum temperature necessary to ensure a ninety (90) percent destruction efficiency of VOC by the boiler as shown by the temperature profile study. If a decrease in temperature below 400° F occurs, the Company will be allowed sixty (60) minutes to correct the problem and bring the temperature back</p>			

<b>COMPLIANCE TIMETABLE</b>
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SOURCE NAME: American Cyanamid Co.	PREMISE NO.: 189-027	CLIENT NO.: 000007
VIOLATION SUBSECTION: 22a-174-20 (ee)	ORDER NO.: 8012	DATE ISSUED: 12/1/87

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
	to 400° F. If not corrected within sixty minutes the boiler shall be shutdown immediately. The above temperature conditions are not applicable during the startup period when oil is being used to bring the boiler up to temperature.			
1.	Complete temperature measurements and temperature profile to determine the stack temperature necessary to ensure a ninety (90) percent destruction efficiency of VOC's.	Completed		
2.	Complete the implementation of the recordkeeping system to record the stack temperature every two hours to ensure a ninety (90) percent destruction efficiency of VOC in the boiler.	12/31/87		
3.	Compliance with these requirements does not relieve American Cyanamid from compliance with any applicable State or Federal requirements governing the disposal of hazardous waste. If the Company is required to install Continuous Emission Monitoring equipment to comply with 40 CFR, Part 266, Subpart D titled "Hazardous Waste Burned in Boilers and Industrial Furnaces," the recordkeeping requirement for the stack temperature on the boiler can be eliminated.	12/31/87		
	<u>PART V - UNCONTROLLED SOURCES</u>			
	American Cyanamid has approximately 119 process emission sources which fall into two categories. One set of sources operates 24 hours per day and 345 days per year and has never exceeded a real VOC emission rate of 40 lbs. per day or 5000 lbs. per year when emissions are being discharged at the maximum process rate. These emission points will be enforceably limited to this maximum rate. The other group of process sources could exceed a VOC emission rate of 40 lbs. per day and 5000 lbs. per year if operated at the maximum process rate but historically have never exceeded the			

**COMPLIANCE TIMETABLE**

SOURCE NAME: <u>American Cyanamid Co.</u> VIOLATION SUBSECTION: <u>22a-174-20 (ee)</u>	PREMISE NO.: <u>189-027</u> ORDER NO.: <u>8012</u>	CLIENT NO.: <u>000007</u> DATE ISSUED: <u>12/1/87</u>
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STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
	<p>above emission rates. These emission points will be enforceably restricted to VOC emissions of no greater than 40 lbs. per day and 5000 lbs. per year. If any of the sources in this group ever exceeds 40 lbs. per day or 5000 lbs. per year, RACT shall be implemented on a schedule set forth by the Commissioner which requires a minimum 85 percent reduction in VOC emissions.</p> <p>Appendix A attached to the Compliance Timetable lists each process with their maximum daily and maximum yearly enforceable VOC limitations. The company shall monitor these limitations through daily recordkeeping.</p> <p>The process equipment listed in Appendix A shall not exceed a maximum daily VOC emission rate of 1240.9 lbs. or a maximum yearly VOC emission rate of 138.35 tons.</p> <p><u>Part VI - MONITORING AND RECORDKEEPING REQUIREMENTS</u></p> <p>This section describes the monitoring and recordkeeping systems necessary to demonstrate RACT, verify that enforceable VOC emission limitations are being met and to ensure continuing compliance. All records required by this Compliance Timetable shall be kept on file for a period of three (3) years and submitted or made available immediately upon request by the Commissioner.</p> <p>The Company shall monitor its processes and pollution abatement equipment in the manner described by this Compliance Timetable and further described within State Order No. 8012. The following conditions apply until such time as this Order may be amended or otherwise altered in a manner approved by the Commissioner of Environmental Protection.</p> <p>Upon demonstrating compliance with the terms of this Order, on-going recordkeeping requirements shall consist of: an annual submittal of VOC emission data as described in the following sections with the Pre-Inspection Questionnaire unless otherwise notified by the Department.</p>			

**COMPLIANCE TIMETABLE**

SOURCE NAME: American Cyanamid Co.	PREMISE NO.: 189-027	CLIENT NO.: 000007
VIOLATION SUBSECTION: 22a-174-20 (ee)	ORDER NO.: 8012	DATE ISSUED: 12/1/87

STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
A)	<p><u>Process Sources</u> (Appendix A)</p> <p>1) Maintain a daily recordkeeping system of VOC emissions from each process expressed in lbs. VOC per day.</p> <p>2) Submit a quarterly summary of VOC emissions from each process in lbs. VOC per day for each day in the quarter for the first three quarters of 1988. Thereafter, the Company shall retain the quarterly summaries.</p> <p>3) Cumulatively total each day's VOC emissions into a total quarterly lbs. of VOC. Convert this number into tons of VOC for the quarter.</p> <p>4) On an annual basis the Company shall submit a complete record of total VOC emissions on a per process basis as listed in Appendix A.</p>			
B)	<p><u>Carbon Adsorption Units</u></p> <p>1) The Company shall continue to change the activated carbon in each carbon bed after an actual use period of twelve (12) months. The Company shall keep a record of the actual use period of each carbon bed.</p> <p>2) The Company shall perform a DEP-approved stack emission test on each carbon bed during the eleventh month of actual use for two consecutive carbon changes to determine that the activated carbon is still achieving an eighty-five (85) percent collection efficiency as required by this order.</p> <p>3) The Company shall install a continuous air flow monitor to ensure that the carbon adsorption design air flow rate of 5000 actual cubic feet per minute (ACFM) is not exceeded unless a DEP approved stack emission test is performed which shows that an eighty-five (85) percent collection efficiency is being achieved at the higher ACFM. In no case shall the air flow exceed the design capacity of 5500 ACFM.</p>			

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STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
	<p>4) The temperature of the vapor stream inlet during the adsorption cycle should be monitored to ensure that it does not exceed 110° F.</p> <p>5) The Company shall continue to record the length of all desorption cycles with the strip chart recorder.</p> <p>6) The Company shall maintain a minimum 85 percent overall control efficiency by each carbon bed. Submit the most recent stack test performed on the carbon adsorption unit to the Department.</p> <p>7) The above-referenced recordkeeping requirements shall be submitted with the quarterly reports required by Part VII of this Compliance Timetable and summarize the data which show when the carbon adsorption unit did not meet any of the above operating parameters.</p> <p>C) <u>Operation &amp; Maintenance - Scrubbers</u></p> <p>The operation and maintenance schedule to be submitted by the Company shall contain a schedule of visible inspections made to critical scrubber equipment components and any review of the operating parameters of the scrubbing system (pressure drops, gallons per minute of water gauges, etc.) and the frequency of these inspections to ensure the scrubbing system is maintaining an 85 percent overall efficiency. Any breakdown of these scrubbers, repairs made or preventative maintenance performed shall be documented as to:</p> <ol style="list-style-type: none"> <li>1) length of control equipment shutdown</li> <li>2) the amount of VOC's emitted uncontrolled if any</li> <li>3) description of the problem area</li> <li>4) the type of repairs performed to bring the system back on-line</li> </ol>			

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SOURCE NAME: American Cyanamid Co.	PREMISE NO.: 189-027	CLIENT NO.: 000007
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	<p>5) a future preventative maintenance schedule to avoid the failure again</p> <p>This operations and maintenance repair record shall be submitted quarterly for the duration of this order. Once the State Order Compliance Timetable has been completed these quarterly reports shall be maintained for three (3) years and be made available to the Commissioner or his staff on request.</p> <p>D) <u>Murray M64 Series Boiler</u></p> <p>1) Maintain a recordkeeping system to record the stack temperature every two hours to ensure that the boiler is maintaining a minimum ninety (90) percent destruction efficiency of the VOC's being injected.</p> <p>2) Develop and maintain a daily recordkeeping system on the amount of VOC consumed by the boiler and calculate the VOC reduction in pounds from incineration based on the minimum assumed efficiency of the boiler (i.e. ninety (90) percent). Report these figures with the quarterly reports required by this State Order.</p> <p>3) On an annual basis the Company shall compile a complete detailed record of total VOC's entering and destroyed in the boiler and submit this information with the Pre-Inspection Questionnaire in the same format as the quarterly reports.</p> <p><u>PART VII - PROGRESS REPORT SCHEDULE</u></p>			
1.	Be in compliance with Section 22a-174-20 (ee).	12/31/87		
2.	Submit Quarterly Progress Report Format and available quarterly emission summary.	1/15/88		
3.	Submit Quarterly Progress Report and quarterly emission summary.	4/15/88		



**COMPLIANCE TIMETABLE**

SOURCE NAME: American Cyanamid Co.	PREMISE NO.: 189-027	CLIENT NO.: 000007
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STEP	EVENTS LEADING TO COMPLIANCE	TIMETABLE	COMPLETED	VER.
4.	Submit Quarterly Progress Report and quarterly emission summary.	7/15/88		
5.	Submit Quarterly Progress Report and quarterly emission summary.	10/15/88		
6.	Complete and submit Registration or Permit Forms for any involved equipment and control apparatus as they will be operated in compliance. If Registration or Permits for any involved equipment have been completed previously submit new Forms using the same Application No. in Box No. 1 except mark "Amended" in the Box. Identify the form with this State Order. Submit these forms when compliance demonstrations have been completed on control equipment.			