



west virginia department of environmental protection

**WEST VIRGINIA
SOURCE SPECIFIC REQUIREMENTS –
REMOVAL OF REQUIREMENTS FOR
PERMANENTLY SHUTDOWN
FACILITIES
STATE IMPLEMENTATION PLAN (SIP)
REVISION**

**PROPOSED
JULY 2017**

West Virginia Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

Promoting a healthy environment.

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Acronyms and Abbreviations

CFR	Code Federal Regulations
CO	Consent Order
GCS	Green Coke Silo
ISG	International Steel Group
LLC	Limited Liability Company
SIP	State Implementation Plan
US	United States
USEPA	United States Environmental Protection Agency
WV	West Virginia
WVDEP – DAQ	West Virginia Department of Environmental Protection – Division of Air Quality

West Virginia Source Specific Requirements – Removal of Requirements for Permanently Shutdown Facilities – SIP Revision

1.0. INTRODUCTION

The West Virginia State Implementation Plan (SIP) at 40 CFR Part 52, Subpart XX, Section 52.2520(d) contains source specific requirements. These source specific requirements were included in the SIP over the years to allow the state to demonstrate attainment with the various national ambient air quality standards. Subsequently a number of these sources have permanently ceased operation, making these requirements unnecessary.

The following sources which had source specific SIP requirements have permanently shut down:

- Mountain Carbon Company (effective July 2, 1982);
- Standard Lafarge (CO-SIP-91-30, effective November 14, 1991);
- Follansbee Steel Corporation (CO-SIP-91-31, effective November 14, 1991);
- International Mill Service, Inc. (CO-SIP-91-33, effective November 14, 1991); and
- Columbian Chemicals Company (CO-SIP-2000-3, effective January 31, 2000).

2.0. REQUEST

The State of West Virginia is requesting that the United States Environmental Protection Agency (USEPA) approve the removal of the following source specific SIP requirements as a revision to the SIP.

Source name	Permit/order	State effective date	EPA approval date /Federal Register Citation	Citation at 40 CFR 52.2565
Mountaineer Carbon Company	Consent Order	7/2/82	9/1/82 47 FR 38532	(c)(18).
Standard Lafarge	Consent Order CO-SIP-91-30	11/14/91	7/25/94 59 FR 37696	(c)(26).
Follansbee Steel Corporation	Consent Order CO-SIP-91-31	11/14/91	7/25/94 59 FR 37696	(c)(26).
International Mill Service, Inc.	Consent Order CO-SIP-91-33	11/14/91	7/25/94 59 FR 37696	(c)(26).
Columbian Chemicals Company	Consent Order CO-SIP-2000-3	1/31/00	8/2/00 65 FR 47339	(c)(44)(i)(B)(3).

3.0. DOCUMENTATION

Mountaineer Carbon Company –

This facility was located adjacent to WV Route 2, approximately ten (10) miles south of Moundsville, in Marshall County, WV. Permits were issued for this facility under the following parent company names: Mountaineer Carbon Company, The Standard Oil Company of Ohio, SOHIO Oil Company, Hall-Buck Marine Inc., Venture Coke Company LLC, and Rain CII Carbon LLC.

Mountaineer Carbon Company was issued the following permits:

- Permit R13-0563 was issued July 16, 1980 to construct a coke fines agglomeration plant.
- Permit R13-0588 was issued November 19, 1980 to construct a calcined coke storage building on the site.

The Standard Oil Company of Ohio was issued the following permit:

- Permit R13-0662 was issued June 25, 1982 to allow for the construction of a green coke silo (GCS #6).

The SOHIO Oil Company was issued the following permit:

- Permit R-XIII-909 was issued January 23, 1987 to allow for the construction of a barge loading and unloading facility.

Hall-Buck Marine Inc. was issued the following permit:

- Permit R13-2095 was issued May 27, 1997 to allow for the installation of three (3) permanently moored deck barges, which served as a dock. In addition, a crane with a clamshell bucket and a hopper, for unloading of green coke, was mounted on one of the dock barges.

Venture Coke Company LLC was issued the following permit:

- Permit R13-2612 was issued August 3, 2005. This permit allowed for the use of a new type of petroleum coke.

Rain CII Carbon LLC was issued the following permit:

- Permit R13-2612A was issued July 31, 2008. This permit modification was an administrative update that added two (2) new heat recovery system generators and made other minor permit language changes.

The calcining operations at this facility have been shut down since January 1, 2014. The official closure date of the plant was October 9, 2015. A closure inspection of the Rain CII Carbon LLC facility was conducted on January 8, 2016. A verification of closure inspection was conducted on June 2, 2017. Refer to the Appendix which contains documentation regarding shut down, as well as photographs and the status of the site (June 2, 2017).

Standard Lafarge –

This facility was located on US Route 22 in Weirton, Hancock County, WV, approximately ¼ mile east of the intersection of WV Route 2 and US Route 22. This facility operated under the following parent company names: The Standard Slag Company, Lafarge Corporation, and Standard Lafarge.

The Standard Slag Company was issued the following permit:

- Permit R13-0506 was issued August 24, 1979 for the construction of a slag processing plant.

The Standard Slag Company was issued the following permit:

- Permit R13-0506 was issued August 24, 1979 for the construction of a slag processing plant.

Lafarge Corporation was issued the following permit:

- Permit R13-1940 was issued January 18, 1996 for the installation of a wet suppression system at the slag receiving hopper (ID No. 1) and two (2) screening stations (ID No. 2 and 19).

On September 1, 2004, a facility inspection was completed. The plant was placed as Status 41 (long-term shutdown) on June 17, 2004 due to ISG Weirton Steel's #4 blast furnace being shut down and there was no longer any slag to be processed. The plant was to re-open if the #4 blast furnace went back into operation, which it never did. On July 20, 2011, the facility status was reported as being permanently shut down. The site was purchased by Kelly Paving and all Standard Lafarge equipment had been removed. A verification of closure inspection was conducted on June 2, 2017. Refer to the Appendix which contains documentation regarding shut down, as well as photographs and the status of the site (June 2, 2017).

Follansbee Steel Corporation –

This facility was grandfathered into the West Virginia Department of Protection – Division of Air Quality's (WVDEP – DAQ) permitting program. Therefore, no permits were ever issued for the facility located in Follansbee, Brooke County, WV.

On July 12, 2012, the site was visited to confirm the permanent closure of the facility. The facility had been shut down and sold to Revere Copper from Rome, New York. Revere Copper shipped the assets they wanted to keep to their plant in New York and all remaining assets were to be auctioned off. A verification of closure inspection was conducted on May 31, 2017. Refer to the Appendix which contains documentation regarding shut down, as well as photographs and the status of the site (May 31, 2017).

International Mill Service, Inc. –

This facility was grandfathered into the West Virginia Department of Protection – Division of Air Quality’s (WVDEP – DAQ) permitting program. Therefore, no permits were ever issued for the facility located in Follansbee, Brooke County, WV.

Per a correspondence received from International Mill Service, Inc., dated June 27, 2000, the facility is no longer in operation. A verification of closure inspection was conducted on May 31, 2017. Refer to the Appendix which contains documentation regarding notification of shut down, as well as photographs and the status of the site (May 31, 2017).

Columbian Chemicals Company –

The facility was located on WV Route 2, south of Moundsville, ¼ mile north of Franklin, in Marshall County, WV. Permits had been issued for this facility under the following parent company names: Cities Service Company – Columbian Division, Columbian Chemicals Company.

Cities Service Company – Columbian Division was issued the following permit:

- Permit R13-0147 was issued May 8, 1975 for the conversion of carbon black dryer Units I, II, III and IV to oil/gas burners.

Columbian Chemicals Company was issued the following permits:

- Permit R13-0572 was issued March 26, 1982 for the replacement of the No. 3 Venturi Furnace on Unit 2 with a Carcass Furnace.
- Permit R13-2607 was issued January 13, 2005 for the installation of a tail gas collection and flaring system and construction of a tail gas-fired boiler.
- Permit R13-2607B application was withdrawn November 17, 2008.

The facility ceased the production of carbon black at the end of January 2009. A final compliance inspection of the Columbian Chemicals Company facility was conducted on February 18, 2009. On the date of the inspection, the facility was finishing packaging the remaining orders to customers. This was to be completed by February 20, 2009. After that time, a skeleton crew of ten (10) people was to remain to secure and finish-up all necessary items before the final closure of the facility. The official closure date of the plant was October 9, 2015. A verification of closure inspection was conducted on June 2, 2017. Refer to the Appendix which contains documentation regarding shut down, as well as photographs and the status of the site (June 2, 2017).

4.0. CONCLUSION

The State of West Virginia is requesting that the USEPA act in a timely manner to approve these revisions to the SIP. These revisions simply remove provisions of the SIP that no longer have any applicability.

APPENDIX

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MOUNTAIN CARBON COMPANY



west virginia department of environmental protection

WVDEP Division of Air Quality
131A Peninsula Street, Wheeling, WV 26003
Phone: 304-238-1220 Fax: 304-238-1136

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

Verification of Closure Inspection Memo

Name of Facility – Mountain Carbon (aka Venco, CII Rain)

Facility ID# - 051-00011

Location – State Rt. 2 Moundsville, WV

Photo/Inspection Date – June 2, 2017

Notes: The yard is clear of all calcined petroleum coke. Kilns
were not in operation. Gate was locked.

Name of Facility – Mountain Carbon (aka Venco, CII Rain)
Facility ID# - 051-00011





west virginia department of environmental protection

Division of Air Quality
131A Peninsula Street
Wheeling, WV 26003
Phone: 304-238-1220 Fax: 304-238-1136

Earl Ray Tomblin, Governor
Randy Huffman, Cabinet Secretary
www.wv.dep.gov

TO: Eric Weisenborn, ERPM II
FROM: Al Carducci, ERS III
DATE: January 8, 2016
FILE: Rain CII Carbon LLC Permit: R30-05100011-2010
SUBJECT: Closure Evaluation Regulation(s): 2,4,6,7,10,11,13,30
PLANT ID: 051-00011 Compliance Status: 90

On January 8, 2016, Greg Paetzold, ERS 3 and I conducted a closure inspection of the CII Carbon LLC facility located at 8245 Energy Rd., Moundsville, West Virginia. Upon arriving at the facility, we were greeted by Mrs. Bonnie Vetanze, Plant Manager, who accompanied us on an inspection of the facility grounds.

The entrance gate of the facility was half shut and a lock was attached. There was no activity taking place at the site and all small storage piles have been removed. Mrs. Vetanze informed us that the facility is up for sale.

The calcining operations have been shut down since January 1, 2014. The official closure date of the plant was October 9, 2015.

Alfred A. Carducci, ERS III

STANDARD LAFARGE



west virginia department of environmental protection

WVDEP Division of Air Quality
131A Peninsula Street, Wheeling, WV 26003
Phone: 304-238-1220 Fax: 304-238-1136

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

Verification of Closure Inspection Memo

Name of Facility - Standard Lafarge

Facility ID # - 009-00013

Location – Freedom Way Weirton, WV

Photo/Inspection Date – June 2, 2017

Notes: Tri-State Asphalt now utilizes the property for their aggregate storage piles.

Name of Facility - Standard Lafarge
Facility ID # - 009-00013



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FOLLANSBEE STEEL CORP.



west virginia department of environmental protection

WVDEP Division of Air Quality
131A Peninsula Street, Wheeling, WV 26003
Phone: 304-238-1220 Fax: 304-238-1136

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

Verification of Closure Inspection Memo

Name of Facility – Follansbee Steel

Facility ID# - 009-00024

Location – Mill Alley Follansbee, WV

Photo/Inspection Date – May 31, 2017

Notes: The plant has been demolished. Property is for lease by the
Business Development Corporation.

Name of Facility – Follansbee Steel
Facility ID# - 009-00024





INSPECTION REPORT

DEPARTMENT OF ENVIRONMENTAL PROTECTION
West Virginia Division of Air Quality

Company:	Follansbee Steel			Facility:	Follansbee
Region:	1	Plant ID#:	009-00024	Regulations:	7
Inspected By: Steven J. Sobutka				Title: Engineer Trainee	
Memo Date: July 12, 2012				Inspection Date: July 12, 2012	

On July 12, 2012, the inspector visited Follansbee Steel located in Follansbee, West Virginia. The purpose of the visit was to verify the permanent closure of the facility. The inspector had been in discussions with company officials in the prior months about the status of the facility. Prior to the visit it was understood that the company would be sold or shutdown. If sold it was likely that the equipment and other assets would be transferred to the buyer's facility.

During the visit the inspector did verify with the company that Follansbee Steel's assets were purchased by Revere Copper from Rome, New York. The Follansbee Steel representative, first name Mark, conducted a tour of the facility. The inspector did verify that acid tank had been removed and being prepared for shipment, as well as the acid scrubber. (See photos attached.) The paint coating lines had already been removed. According to Mark, Revere Copper will ship the assets they want to their plant in New York and will auction off any remaining equipment. An environmental company (didn't get the name) is handling the removal of the hydrochloric acid and other chemicals remaining on site. Once the building is empty it will probably be leased as a warehouse.



Photo 1 - Disassembled acid scrubber.



Photo 2 -

Disassembled acid bath tank.

Based on this information the compliance status of Follansbee Steel is **90** – “**source permanently shutdown**”. The facility will be removed from all future inspection lists.

Steven J. Sobutka
Engineer Trainee

Date

Inspection of Follansbee Steel
Inspected on July 12, 2012
Page 1

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Photographs Taken:	Y	ITS Updated:	Y
Visual Emissions Taken:	N	Facility Status Code:	90

INTERNATIONAL MILL SERVICE, INC.



west virginia department of environmental protection

WVDEP Division of Air Quality
131A Peninsula Street, Wheeling, WV 26003
Phone: 304-238-1220 Fax: 304-238-1136

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

Verification of Closure Inspection Memo

Name of Facility - IMS

Facility ID # - 009-00038

Location – Veterans Dr. Follansbee, WV

Photo/Inspection Date – May 31, 2017

Notes: Murphy Industries rented the property and now Mt. State Carbon uses the property for metallurgical coke storage.

Name of Facility - IMS
Facility ID # - 009-00038





WV DIV. OF ENV. PROTECTION
OFFICE OF AIR QUALITY
N. PANHANDLE REG. OFF

NON-CONFIDENTIAL

Phone: 215. 956. 5500

Fax: 215. 956. 5429

Website: www.enso.net

Michael J. Connolly

Director, Environmental Engineering

2000 JUN 30 A 10: 19

1155 Business Center Drive
Horsham, PA 19044-3454

RECEIVED

June 27, 2000

Mr. Eric Weisenborn
West Virginia Division of Environmental Protection
1911 Warwood Avenue
Wheeling, WV 26003

009-00038

FILE:	
COMPANY	IMS
FACILITY	Follansbee
REGION	1 REG. 7

**Re: Cessation of Operations
International Mill Service (IMS)
at Wheeling Pittsburgh Steel Corp. Follansbee, WV**

Dear Mr. Weisenborn:

In accordance with your request, this letter will serve as notification that IMS is no longer operating at the Wheeling Pittsburgh Steel Corporation, Follansbee, WV site. Attached is a copy of the previous notification IMS sent to your Charleston office on July 28, 1999.

If you have any questions, please do not hesitate to contact me at (215) 956-5618.

Sincerely,

Michael J. Connolly

Attachment:



NON-CONFIDENTIAL

Phone: 215. 956. 5500

Fax: 215. 956. 5429

Website: www.enso.net

Maurice R. Silvestris, P.E.
Environmental Engineer

1155 Business Center Drive
Horsham, PA 19044-3454

July 28, 1999

West Virginia Bureau of Environment
Division of Environmental Protection
Office of Air Quality
1558 Washington Street, East
Charleston, WV 25311-2599

**Subject: Application for Certificate to Operate
International Mill Service, Inc.
at Wheeling-Pitt Steel, Follansbee, West Virginia
ID No. 029 00024**

Dear Sir or Madam:

Enclosed is an Application for Certificate to Operate for the subject source without fee. The subject source is no longer in operation and International Mill Service, Inc. (IMS) has no plans to operate it in the future. IMS is not renewing the operating certificate, therefore, no fee is submitted.

Should you have any questions or comments, feel free to contact me at (215) 956-5639.

Sincerely,

Maurice R. Silvestris, P.E.
Environmental Engineer

Enclosure

cc: M. J. Connolly
D. Watt

1. COMPANY, FACILITY/SOURCE & OAQ IDENTIFICATION NUMBER	2. FEE FOR CERTIFICATE TO OPERATE
INTERNATIONAL MILL SERVICE, INC. FOLLANSBEE PLANT I.D.No. 009 00038	OPERATING YEAR July 1, 1999 - June 30, 2000 DATE DUE July 31, 1999
3. MAILING INFORMATION	FACILITY/SOURCE CATEGORY: B M
MR. MICHAEL J. CONNOLLY INTERNATIONAL MILL SERVICE, INC. 1155 BUS. CENTER DR. SUITE 200 HORSHAM PA 19044-3454	FACILITY/SOURCE DESCRIPTION: All other sources (excluding indirect affected sources) subject to air emission rules, permits, and/or registration requirements
TELEPHONE NO. 215 9565500	AMOUNT DUE: \$200.00
4. PLEASE INDICATE ANY ADDITIONS OR CORRECTIONS TO THE ABOVE INFORMATION IN THE SPACE PROVIDED:	MAKE CHECK PAYABLE TO DEP - OFFICE OF AIR QUALITY AND MAIL TO THE ABOVE ADDRESS.
	5. REMARKS: <u>SOURCE NO LONGER OPERATIVE.</u> <u>CERTIFICATE WILL NOT</u> <u>BE RENEWED.</u> <u>NO FEE PAID.</u>
6. PLEASE PROVIDE FEIN NUMBER <u>23-1884707</u> FEIN NUMBER	
7. CERTIFICATION: Please Sign Before Returning <u>MICHAEL J. CONNOLLY</u> DIR. ENV. ENGRG x <u>Michael Connolly</u> 7/28/99 215 956-5618 Name (Print or Type) Title Signature Date Telephone No.	

Pursuant to the authority vested in the Office of Air Quality by WV Code 22-5-4 and Rule 45 CSR 22 "Air Quality Management Fee Program", no person may operate nor cause to operate a facility or stationary source of air pollution without first obtaining and having in current effect a certificate to operate. Continuing to operate a facility or source without said certificate is unlawful and may result in penalties and further legal action.

FAILURE TO PAY: Failure to pay on or before the date due will result in a penalty of five percent (5%) of the fee for each month the payment is overdue. Any fee or penalty due the WVDEP - Office of Air Quality is a debt due the State of West Virginia and may be collected pursuant to law.

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COLUMBIAN CHEMICALS COMPANY



west virginia department of environmental protection

WVDEP Division of Air Quality
131A Peninsula Street, Wheeling, WV 26003
Phone: 304-238-1220 Fax: 304-238-1136

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

Verification of Closure Inspection Memo

Name of Facility – Colombian Chemical

Facility ID # - 051-00019

Location – State Rt. 2 Moundsville, WV

Photo/Inspection Date – June 2, 2017

Notes: Furnace stack has been removed. The property is now being rented by a pipeline company for storage of equipment.

Name of Facility – Colombian Chemical
Facility ID # - 051-00019





INSPECTION REPORT

DEPARTMENT OF ENVIRONMENTAL PROTECTION
West Virginia Division of Air Quality

Company:	Columbian Chemicals Company			Facility:	Marshall Plant
Region:	1	Plant ID#:	051-00019	Regulations:	2,7,10,13,30,34
Inspected By: Steven J. Sobutka				Title: Engineer Trainee	
Memo Date: March 26, 2009				Inspection Date: February 18, 2009	

On February 18, 2009 the writer, along with several inspectors from WV DEP's Division of Water & Waste Management, visited Columbian Chemicals Company located near Proctor, West Virginia in Marshall County. The purpose of the visit was to conduct a final compliance inspection of the facility before its permanent closure. The following people, along with the writer participated in a pre-inspection meeting:

- Dale Clark, Plant Manager – Columbian Chemicals
- Larry Scheinflug, Corporate Environmental Manager – Columbian Chemicals
- Jamie Fenske, Supervisor – WV DEP Division of Water & Waste Management
- Deborah Keener, Supervisor - WV DEP Division of Water & Waste Management
- Alan Kee, Inspector - WV DEP Division of Water & Waste Management
- Casey Stutler, Inspector - WV DEP Division of Water & Waste Management
- Greg Henger, Inspector - WV DEP Division of Water & Waste Management

During the meeting the company officials provided pertinent information about the closure of the facility. After concluding the pre-inspection meeting, Mr. Clark and Scheinflug conducted a tour of the facility.

The facility produces carbon black through the oil furnace process. Columbian Chemicals has ceased producing carbon black at the end of January 2009. The facility was finishing the packaging of remaining orders to customers. The facility was to complete the packaging of orders by February 20, 2009. Afterwards, only a remaining skeleton crew of 10 people would remain at the facility in order to secure and finish up all necessary items before the final closure of the facility. There are no plans to restart the facility, unless a new owner/operator could be found that would purchase the facility. The facility is a Title V source and permitted under permit #R30-05100019-2006. No permitted units were in operation except for the 1 dust collector and air cleaner used for packaging. The emission points from these two units showed no visible emissions and appeared to be operating correctly.

According to Mr. Scheinflug, Columbian Chemicals will send a letter to DAQ requesting their permits be placed as inactive due to the permanent closure. This will occur, unless a new buyer and operator for the facility can be found, in which case Columbian Chemicals would transfer the permits to the new owner.

Since the facility's production has ceased, no compliance status could be determined for current operations. Instead the writer requested several records required under the facility's Title V permit in order to make a compliance status of operations during 20008. The following sections of this report detail the review and compliance status of these records. The sections are listed in the same manner as they are in the Title V permit.

Inspection of Columbian Chemicals
Inspected on February 18, 2009
Page 1

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Photographs Taken:	N	ITS Updated:	Y
Visual Emissions Taken:	N	Facility Status Code:	90

Carbon Black Production (Section 4.0)

Permit Condition Number & Description	Inspection Findings	Compliance Status
4.1.1 - The Columbian Marshall facility shall consist of four carbon black production lines, identified as Unit 1, 2,3, 4...Minimize any fugitive escape of pollutants and shall use specified control devices. 4.2.1 - Applicable MRR requirements.	Production in all 4 units was shut down by January 26, 2009.	IN COMPLIANCE
4.1.2 - Dryers shall not exceed MDHI, hours of operation, and combust only the listed fuels.	All dryers have been shutdown. The dryers only use tail gas/NG as fuel and does not exceed hours of operation.	IN COMPLIANCE
4.1.3(a) - "Tread" production shall not exceed 11,974 lbs/hr and "carcass" production shall not exceed 30,546 lb/hr.	Tread units are Units 1&2 which have been shutdown. Carcass (units 3&4) showed average production below 30,546 lb/hr in 2008. (See attachment)	IN COMPLIANCE
4.1.3(b) - Hourly feedstock limit (lb/hr) shall not exceed 15,273 lb/hr for Units 3,4. 4.2.2 - Keep hourly feedstock oil throughput records.	Monthly records showed hourly feedstock average was below limit. (See previous attachment.)	IN COMPLIANCE
4.1.3{c} - Feedstock oil sulfur content does not exceed 2.5wt% S. 4.2.4 - Keep sulfur testing records.	Each shipment is tank is tested weekly for sulfur content and blended so not to exceed 2.5%. Records of testing since Jan. 2008 show <2.5% (See attachment.)	IN COMPLIANCE
4.1.4 - Maximum hourly and annual emissions from each source listed in A.1(a) appendix.	Based on 2008 production records, emissions should be below limits listed.	IN COMPLIANCE
4.1.5 - "Exit Gas Parameters" listed for information purposes only.	N/A	N/A
4.1.6 - All collected tail gas not used as fuel in dryers or TGB shall be vented to flare for destruction. Maximum volume of tail gas consumed by flare shall <2.938 MMscf/hr.,	Sample of records for last 7 days of production (12/16 - 12/22/08) showed that facility was meeting this limit. (See attachment.)	IN COMPLIANCE
4.1.7 - Dryers shall be designed & operated according to 40 CFR 63 Subpart YY.	No applicable requirements under this Subpart for the dryers.	IN COMPLIANCE
4.1.8 - Control devices shall meet or exceed minimum efficiencies for each device listed.	Engineering design and maintenance allows for facility to meet these requirements.	IN COMPLIANCE
4.3.1 - Perform flare compliance testing pursuant to 40 CFR 63.987(b)(1).	Done in December 2006. Records on file with DAQ.	IN COMPLIANCE

Inspection of Columbian Chemicals
Inspected on February 18, 2009
Page 2

NON-CONFIDENTIAL

Photographs Taken:	N	ITS Updated:	Y
Visual Emissions Taken:	N	Facility Status Code:	90

Product Handling (Section 5.0)

Permit Condition Number & Description	Inspection Findings	Compliance Status
5.1.1 - Product handling equipment operated to minimize any fugitive escape of PM from specified control devices.	No fugitive emissions were observed from control devices during inspection since production had ceased.	IN COMPLIANCE
5.1.2 - Maximum hourly & annual emissions from appropriate control device shall not exceed limits specified in Appendix A.	Production levels and frequent maintenance assure capture efficiencies and that emission limits will be below permitted levels.	IN COMPLIANCE
5.1.3 - "Exit Gas Parameters" listed for informational purposes only.	N/A	N/A
5.1.4 - Each bag filter identified under A.2(a) shall have a minimum collection efficiency of 99.97%.	Engineering design and maintenance keeps efficiency listed in permit.	IN COMPLIANCE
5.2.1 - Compliance with section 5.1.2 will be demonstrated by Section 4.1.3.	4.1.3 was shown to be in compliance previously.	IN COMPLIANCE

Fuel Burning Units (Section 6.0)

Permit Condition Number & Description	Inspection Findings	Compliance Status
6.1.1 - Boiler #1 NG annual usage limit: 183.96 MMft ³ , Boiler #2 NG annual usage: 87.60 MMft ³	Natural gas usage for the boilers was below permit limits for 2008. (See attachment.)	IN COMPLIANCE
6.1.2 - Emissions from boilers shall not exceed limits listed in Appendix A (A.3(a)) of permit.	Based on NG usage it appears that these emission limits will not be exceeded for 2008.	IN COMPLIANCE
6.1.3 - "Exit Gas Parameters" listed for informational purposes only.	N/A	N/A
6.1.4 - Emissions from boilers <10% opacity for 6 minute block average.	No boilers were in operation so no VE's were observed from the stack.	IN COMPLIANCE
6.1.5 - Method 9 or COMs used to determine opacity from boiler stacks in 6.1.4	According to company all supervisors are certified in Method 9. During inspection, no Method 9 readings were taken since no VE's were observed.	IN COMPLIANCE
6.1.6 - Particulate matter emissions: 0.09 times the designed heat input.	Based on fuel usage for 2008, it appears that these emission limits are being met.	IN COMPLIANCE
6.1.7a-c - Excess opacity >40% reported to Director during Start-up, Shutdown, or malfunctions.	No excess opacity occurred that required company to report to Director in 2008.	IN COMPLIANCE
6.1.8 - Sulfur dioxide emissions in excess of 3.1 times the designed heat input of boilers.	Based on fuel usage records it appears that the facility has met this emission limit.	IN COMPLIANCE
6.4.1 - Maintain records of fuel usage and start-up and shutdown times.	Fuel usage records are being kept and start-up and shutdown times are kept at the facility.	IN COMPLIANCE
6.4.2 - Records kept on-site for a period of 5 yrs.	All required records are kept on-site and will be kept for the required 5 yrs.	IN COMPLIANCE

Inspection of **Columbian Chemicals**
Inspected on **February 18, 2009**
Page 3

NON-CONFIDENTIAL

Photographs Taken:	N	ITS Updated:	Y
Visual Emissions Taken:	N	Facility Status Code:	90

Storage Tanks (Section 7.0)

Permit Condition Number & Description	Inspection Findings	Compliance Status
7.1.1 - The aggregate feedstock oil throughput for all storage tanks shall not exceed 120 MM gal/yr.	Records obtained from facility show 12 month total of 48.7 MMgal/yr for all tanks through Dec. 2008. (See attachment)	IN COMPLIANCE
7.1.2 - Emissions from storage tank usage shall not exceed limits specified in Appendix A.	Based on the actual throughput the tank emissions appear to be below the permitted levels.	IN COMPLIANCE
7.4.1 - Maintain rolling 12 month rolling totals of tank throughput.	Records are maintained as required.	IN COMPLIANCE

Oil Heaters A&B (Section 8.0)

Permit Condition Number & Description	Inspection Findings	Compliance Status
8.1.1 - Annual natural gas usage limit for each oil heater is 35.04 MMft ³ / yr.	Records showed for Heater A the usage was 15.1 MMft ³ and for Heater B the usage was 18.6 MMft ³ for 2008. (See previous boiler/oil heater gas usage attachment.)	IN COMPLIANCE
8.1.2 - Emissions from oil heaters shall not exceed limits listed in Appendix A of permit.	Based on the natural gas usage for each heater, it appears that these emission limits were not exceeded.	IN COMPLIANCE
8.1.3 - Emissions not to exceed 10% opacity.	No VE's were observed from Oil Heaters since facility ceased production.	IN COMPLIANCE
8.1.4 - Use Method 9 or COMs to determine opacity.	All supervisors are certified to read opacity per Method 9, as is the writer.	IN COMPLIANCE

Tail Gas Boiler (Section 9.0)

The tail gas boiler was never installed at the facility, therefore there are no applicable requirements for this inspection from Section 9.0 of the Title V permit.

Boiler MACT (Section 10.0)

Based on the size of the boilers and heaters at the facility, the only applicable requirement under this MACT was the timely submittal of an initial notification. This was done on March 11, 2005 therefore fulfilling this requirement. Additionally the Boiler MACT has been rescinded by US Federal Court of Appeals, so this MACT subpart would not be applicable to this facility anyway.

Generic MACT – Carbon Black & Flare MACT (Sections 11.0 & 12.0)

All required monitoring was conducted by the facility for these MACTs, including the monitoring of the presence of a pilot flame and LDAR monitoring of the required components. These were included with the Title V Semiannual Monitoring Report & 2008 Annual Certification Reports. These reports also included the start-up, shutdown, and malfunctions for the respective periods. According to the company, there were no instances of pilot light loss for the flare during 2008 under normal operations. It appears that all of the applicable MACT standards are being followed at the facility.

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Photographs Taken:	N	ITS Updated:	Y
Visual Emissions Taken:	N	Facility Status Code:	90

Miscellaneous Requirements (Section 3.0)

This section includes reporting of any odor complaints, which there were none for 2008. It also includes the monitoring of each product handling emission point. Daily visible emission observation records are being kept daily and any time emissions are noted, action is taken to fix the problem. In addition, visible emission observations are conducted daily for the flare and dryer vent stack to determine any problems. Records were sampled from the last quarter of 2008. These records showed that these observations are conducted daily and any problems which resulted in visible emissions were fixed right away. (See attached copies of records.)

Based on the information gathered during the inspection, it is the engineering judgment of the writer that Columbian Chemicals Company was compliant with all applicable air quality regulations at the time of the inspection. However since the facility is now closed a compliance status of 90 – “source permanently shut down” – is given.

Steven J. Sobutka
Engineer Trainee

March 26, 2009

LIST OF ATTACHMENTS

1. Monthly Production Records for 2008
2. Monthly Feedstock Oil Sulfur Content Testing for 2008
3. Records of Tailgas to Flare (12/16 – 12/22/08)
4. Boiler and Oil Heater Natural Gas Usage for 2008
5. 2008 Monthly Tank Throughputs
6. Daily Stack Emission Checks (Oct. - Dec. 2008)
7. Daily Combustion Stack Emissions Check (Oct. – Dec. 2008)

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Photographs Taken:	N	ITS Updated:	Y
Visual Emissions Taken:	N	Facility Status Code:	90