



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF CONNECTICUT)
DEPT. OF ENVIRONMENTAL PROTECTION)
VS.) STATE ORDER NO. 944
KING INDUSTRIES) Feb. 27, 1986; Proposed Order
NORWALK, CONNECTICUT) April 18, 1986; Final Order

IN THE MATTER OF STATE ORDER NO. 944

WHEREAS, King Industries (hereinafter, the "Company") a Connecticut Corporation doing business in Connecticut at Science Road, Norwalk operates manufacturing equipment subject to the standards and limitations of the Administrative Regulations for the Abatement of Air Pollution (hereinafter, "Regulations"); and

WHEREAS, the Company operates neutralization reactors, sulfonation reactors and additional miscellaneous equipment which causes emissions of Volatile Organic Compounds in excess of one hundred (100) tons per year; and

WHEREAS, Sec. 22a-174-20(ee) requires any premise with Volatile Organic Compound emissions in excess of one hundred (100) tons per year to utilize Reasonably Available Control Technology to limit the discharge of volatile organic compounds by December 31, 1985 unless an extension to implement Reasonably Available Control Technology is granted pursuant to Section 22a-174-20 (ee)(3); and

WHEREAS, the Company has proposed by letter dated September 6, 1985, to implement certain measures including process modifications and the installation of air pollution control devices as representing compliance with the requirements of Section 22a-174-20(ee); and

WHEREAS, this Department has reviewed the Company's proposal and has negotiated additional terms and conditions and has determined by this order that the Company's proposal represents the lowest emission limitation that is reasonably available considering technological and economic feasibility and therefore constitutes Reasonably Available Control Technology.

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NOW, THEREFORE, by authority of Section 22a-178, et. seq., of the Connecticut General Statutes and Section 113(d) of the Clean Air Act, as amended, 42 U.S.C. Sec. 7413(d) the Commissioner hereby orders King Industries to take the following action with respect to Volatile Organic Compound emission reductions from its process equipment. The specific requirements of this order which are necessary for implementation of the Reasonably Available Control Technology proposal approved by this order are further delineated by the Compliance Timetable which is hereby incorporated by reference in this order.

1. The Company shall continue to maintain Volatile Organic Compound (VOC) emission reductions realized in preceding years as noted by the September 6, 1985 RACT Compliance Plan under "major plant improvements."

2. The Company shall complete installation of chilled water condensers on Neutralization Reactors No. 1 and No. 3.

3. The Company shall complete installation of a scrubber on Sulfonation Reactors S101, S102 and S120.

4. The Company shall initiate certain modifications to Neutralization Reactor No. 2, and certain listed vessels and in-process storage tanks.

5. The Company shall install a continuous distillation process as a replacement for batch stills S-112 and S-122.

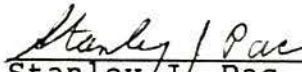
6. All emission reductions realized through implementation of the proposals of the RACT compliance plan shall be documented through the use of Department-approved emission testing techniques, material balance or other forms of calculations, or by best engineering estimates or by alternate methods approved by the Commissioner.

7. The Company shall develop and maintain operating logs and manuals which define the operating parameters necessary for continued compliance to be achieved through the specific RACT compliance alternative for each process where applicable. All records are to be kept on file for a period of three (3) years and to be made available to the Commissioner upon request.

It is acknowledged that 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 shall subject King Industries to liability for civil assessments pursuant to Sec. 22a-6b (a)(3) of the Connecticut General Statutes and Sec. 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 King Industries to liability for civil assessments pursuant to Section 22a-6b (a)(3) of the General Statutes and Sec. 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 Sec. 22a-180 of the General Statutes.

Questions concerning the terms of this Order should be addressed to David A. Nash, 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 23rd day of April 1986.



Stanley J. Pac
Commissioner
Department of Environmental
Protection