

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)
)
Dynachem, Inc.) FINDING OF VIOLATION
Maple Grove Road)
Georgetown, Illinois 61846) EPA-5-01-09-IL
)
)
)
Proceedings Pursuant to)
the Clean Air Act,)
42 U.S.C. § 7401 et seq.)

FINDING OF VIOLATION

The United States Environmental Protection Agency (U.S. EPA) finds that Dynachem, Inc. (Dynachem) is violating Section 112 of the Clean Air Act, 42 U.S.C. § 7412. Specifically, Dynachem is violating the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Organic Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (HON), at 40 C.F.R. part 63, subpart H as follows:

Regulatory Authority

1. The HON for Equipment Leaks, 40 C.F.R. part 63, subpart H (40 C.F.R. §§ 63.160-63.182), applies to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and other equipment components operating in organic hazardous air pollutant service within a subject chemical manufacturing process unit.
2. The HON, at 40 C.F.R. § 63.180, requires each owner or operator to comply with the test methods and procedures requirements provided in 40 C.F.R. § 63.180.
3. The HON, at 40 C.F.R. § 63.180(b)(1), requires that monitoring comply with Method 21 of 40 C.F.R. part 60, appendix A.

4. The HON, at 40 C.F.R. § 63.180(b)(2)(i) states that the detection instrument used for monitoring required under subpart H must meet the performance criteria of Method 21 of 40 C.F.R. part 60, appendix A.
5. The HON, at 40 C.F.R. § 63.180(b)(3) states that the instrument used for monitoring required under subpart H must be calibrated before use on each day of its use by the procedures specified in Method 21 of 40 C.F.R. part 60, appendix A.
6. Method 21 of 40 C.F.R. part 60, appendix A, requires, among other things, that the instrument response time be equal to or less than 30 seconds; that the calibration precision be equal to or less than 10 percent of the calibration gas value; that gas cylinders used for calibration have a shelf life specified; and that cylinder standards be either re-analyzed or replaced at the end of the specified shelf life.
7. Method 21 of 40 C.F.R. part 60, appendix A, states that calibration is conducted by introducing the calibration gas into the instrument sample probe and then adjusting the instrument meter readout to correspond to the calibration gas value.

Dynachem's Acid Plant Operations

8. Dynachem owns and operates an "acid plant," a chemical manufacturing process unit that manufactures phenol sulfonic acid, toluene sulfonic acid, xylene sulfonic acid, and benzene sulfonic acid, on Maple Grove Road, in Georgetown, Illinois.
9. Dynachem's acid plant is subject to the requirements of 40 C.F.R. part 63, subpart H because it manufactures as a primary product one or more of the chemicals listed in Table 1 of 40 C.F.R. § 63.100, it uses as a reactant one or more of the hazardous air pollutants listed in Table 2 of 40 C.F.R. § 63.100, and it is located on a plant site that is a major source as defined in Section 112(a) of the Clean Air Act.

Violations

10. On July 17-20, 2000, U.S. EPA inspected the Dynachem facility. On July 19, 2000, U.S. EPA observed the calibration of the portable Flame Ionization Detector (FID) that Dynachem uses to do its leak detection of the acid plant under the HON. Dynachem also recorded the calibration precision results and the instrument response time.
11. The procedures that Dynachem used during calibration did not comport with the requirements of 40 C.F.R. part 60, appendix A, Method 21, in violation of 40 C.F.R. § 63.180.
12. The calibration precision obtained during the July 19, 2000, calibration precision test was greater than the 10 percent required by 40 C.F.R. part 60, appendix A, Method 21, in violation of 40 C.F.R. § 63.180.
13. The instrument response time obtained during the July 19, 2000, calibration test was greater than the 30 seconds required by 40 C.F.R. part 60, appendix A, Method 21, in violation of 40 C.F.R. § 63.180.
14. The cylinder standard containing the 1000 ppm methane in air calibration gas did not have a specified shelf life, as required by 40 C.F.R. part 60, appendix A, Method 21, in violation of 40 C.F.R. § 63.180. The cylinder standard also appeared to have expired, in violation of 40 C.F.R. § 63.180.

3/30/01

Date


Cheryl Newton, Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, do hereby certify that a Finding of Violation, No. EPA-5-01-09 was sent by Certified Mail, Return Receipt Requested, to:

Arman Melykian, President
Dynachem, Inc.
Maple Grove Road
Georgetown, Illinois 61846

I also certify that a copy of the Finding of Violation was sent by first class mail to:

Carolyn S. Hesse
Attorney at Law
150 N. Wacker Drive, Suite 1500
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Julie Armitage, Acting Manager
Compliance and Enforcement Section
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Illinois Environmental Protection Agency
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Springfield, Illinois 62072

John Justice, Regional Manager
Field Operations Section, Region III
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2009 Mall Street
Collinsville, Illinois 62234

on the 2nd day of April, 2001.


Betty Williams, Secretary
AECAS (IL/IN)

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CERTIFIED MAIL RECEIPT NUMBER: