



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievue Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7009 3410 0002 1934 1462
RETURN RECEIPT REQUESTED**

4/11/11

Randy Helmick
ASK Chemicals
2191 W. 110th St.
Cleveland, OH 44102

FACILITY ID: 13-18-00-0303

RECEIPT OF CORRECTIVE ACTION PLAN: Failure to conduct one-time boiler tuning as specified for Emissions Units (EUs) B005 & B006; Failure to submit a permit to install/operate (PTIO) application for tote loading operation (8 stations)

Dear Mr. Helmick:

On 3/9/11, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that ASK Chemicals submit verification/results of the one-time boiler tuning conducted in accordance with the specifications of PTI#13-04681, Part II(E)(2) and a completed PTIO application for the tote loading operation. CDAQ is in receipt of a narrative response to the noted violations dated 3/24/11.

Specific to the one-time boiler tuning, ASK Chemicals contends that "...this boiler tuning was completed as required by the PTI. However, because ASK Chemicals was unable to locate the record of the completion of original testing, the boiler was retested on March 22, 2011. A record of the test results will be maintained in the plant files." PTI#13-04681, Part II(E)(2) states "The results of the one-time initial tuning shall be submitted to the Cleveland DAQ."

Additionally, regarding the request for a PTIO application for the tote loading operation, ASK Chemicals referred to the Federally Enforceable State Operating Permit (FESOP) application submitted to CDAQ by their predecessor Ashland Inc. in 2003. The response indicated that "In this application, the emissions from the tote filling operation were included with emission unit P021." CDAQ will evaluate the tote loading operation when the FESOP (now known as a Federally Enforceable Permit to Install/Operate [FEPTIO]) is processed.

You are expected to comply with providing a copy of the one-time boiler tuning results for EUs B005 and B006 to CDAQ within 7 days of receipt of this letter. Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action.



Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action. Please submit any future correspondence related to this matter to the following enforcement representative:

Dave DeChant
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Dave DeChant at 216-664-3213. All correspondence with CDAQ must include the Ohio EPA facility identification number for ASK Chemicals: 13-18-00-0303.

Sincerely,

Linda Kimmy
Field Enforcement Manager, CDAQ

LK/dd

cc: Nicole Hamilton, ASK Chemicals
George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
~~Facility File and L:\Data\Facilities\1318000303\2011-1-21 RCAP.docx~~

DeChant, Dave

From: Nicole M Hamilton [NMHamilton@ashland.com]
Sent: Thursday, April 21, 2011 4:21 PM
To: DeChant, Dave
Cc: Kimmy, Linda; Randy Helmick
Subject: RE: ASK Chemicals - Facility ID 13-18-00-0303 - Boiler Tuning

I have confirmed that the plant was running both natural gas and distillate during all 3 tuning events.

As we discussed on the phone the eff number listed on the report for the tuning conducted by the plant was calculated by the meter used during tuning.

We look forward to receiving the close out letter from CDAQ.

Thanks,
Nicole

**Nicole Hamilton | Project Portfolio Manager | Ashland Inc. | phone: 614.790.1938
| nmhamilton@ashland.com**

From: "DeChant, Dave" <DDeChant@city.cleveland.oh.us>
To: Nicole M Hamilton/EHS/CORP/Ashland@Ashland
Cc: "Kimmy, Linda" <LKimmy@city.cleveland.oh.us>
Date: 04/21/2011 03:23 PM
Subject: RE: ASK Chemicals - Facility ID 13-18-00-0303 - Boiler Tuning

Ms. Hamilton,

Thank you for providing the attached boiler tuning information.

CDAQ would appreciate some clarification regarding testing conditions. Specifically, were both boilers tested while being fired with natural gas and phenolic resin distillate simultaneously or with one or the other? Also, please indicate or provide sample calculations demonstrating how the Efficiency % reported in the 4/12 - 4/14 testing was determined.

Please contact me directly if you have any questions.

Dave DeChant
Environmental Enforcement Specialist II
City of Cleveland Department of Public Health
Division of Air Quality

216-664-3213

4/21/2011

From: Nicole M Hamilton [<mailto:NMHamilton@ashland.com>]
Sent: Wednesday, April 20, 2011 4:17 PM
To: DeChant, Dave
Cc: Randy Helmick
Subject: ASK Chemicals - Facility ID 13-18-00-0303 - Boiler Tuning
Importance: High

Dave,
Attached please find three sets of boiler tuning results for the ASK Chemicals LP facility located at 2191 W. 110th Street in Cleveland, OH.

ASK Chemicals hires Air Compliance Testing to complete the boiler tuning and ACT conducted the initial tuning event on 03/21/2011. However, ASK Chemicals has reason to believe that the results from the first boiler tuning event are not accurate. Upon receipt of the aforementioned test results, ASK Chemicals decided to purchase their own meter to tune the boiler. The results of the boiler tuning completed by ASK Chemicals on 04/12, 13 & 14 are also attached. Based on the results of the in-house tuning, Ashland decided to have Air Compliance Testing (ACT) come back into the plant to complete the tuning using our equipment calibrated to their standards. The results of this third and final tuning which was completed on 04/20/2011 are also attached.

ASK Chemicals believes that the attached results demonstrate compliance with the condition in our permit to conduct a one time boiler tuning.

Should you have any questions regarding this data please feel free to contact us.

Regards,
Nicole

Nicole Hamilton | Project Portfolio Manager | Ashland Inc. | phone: 614.790.1938
| nmhamilton@ashland.com

This e-mail contains information which may be privileged, confidential, proprietary, trade secret and/or otherwise legally protected. If you are not the intended recipient, please do not distribute this e-mail. Instead, please delete this e-mail from your system, and notify us that you received it in error. No waiver of any applicable privileges or legal protections is intended (and nothing herein shall constitute such a waiver), and all rights are reserved.

This e-mail contains information which may be privileged, confidential, proprietary, trade secret and/or otherwise legally protected. If you are not the intended recipient, please do not distribute this e-mail. Instead, please delete this e-mail from your system, and notify us that you received it in error. No waiver of any applicable privileges or legal protections is intended (and nothing herein shall constitute such a waiver), and all rights are reserved.

CTM-03 Field Data

Plant Ashland Specialty Chemical
 Location B006 (2)

Run Number <u>1 (30%)</u>					Run Number <u>2 (45%)</u>					Run Number <u>3 (60%)</u>				
Run Start Time <u>10:15</u>					Run Start Time <u>10:40 10:44 37</u>					Run Start Time <u>11:07</u>				
Run End Time <u>10:25</u>					Run End Time <u>10:54</u>					Run End Time <u>11:17</u>				
Time	O2	CO2	NOx	CO	Time	O2	CO2	NOx	CO	Time	O2	CO2	NOx	CO
0	—	—	56	11	0	—	—	36	160	0	—	—	104	19
1	—	—	54	16	1	—	—	42	164	1	—	—	104	19
2	—	—	55	14	2	—	—	65	122	2	—	—	104	19
3	—	—	57	17	3	—	—	64	150	3	—	—	104	19
4	—	—	58	14	4	—	—	63	145	4	—	—	104	19
5	—	—	59	16	5	—	—	64	166	5	—	—	104	19
6	—	—	54	15	6	—	—	63	161	6	—	—	104	19
7	—	—	55	15	7	—	—	63	134	7	—	—	104	19
8	—	—	55	15	8	—	—	63	129	8	—	—	104	19
9	—	—	58	14	9	—	—	61	141	9	—	—	104	19
10	—	—	54	14	10	—	—	63	142	10	—	—	104	19

CTM-03 Field Data

Plant Ashtand Specialty Chemical
 Location Boos (1)

Run Number <u>1 (60%)</u> Run Start Time <u>8:12 9:13 88</u> Run End Time <u>9:23</u>					Run Number <u>2 30%</u> Run Start Time <u>10:00</u> Run End Time <u>10:10</u>					Run Number <u>3 (45%)</u> Run Start Time <u>10:29</u> Run End Time <u>10:39</u>				
Time	O2	CO2	NOx	CO	Time	O2	CO2	NOx	CO	Time	O2	CO2	NOx	CO
0			20	00	0			50	00	0			31	00
1			19	00	1			48	00	1			28	00
2			18	00	2			45	00	2			25	00
3			17	00	3			42	00	3			22	00
4			16	00	4			39	00	4			19	00
5			15	00	5			36	00	5			16	00
6			14	00	6			33	00	6			13	00
7			13	00	7			30	00	7			10	00
8			12	00	8			27	00	8			7	00
9			11	00	9			24	00	9			4	00
10			10	00	10			21	00	10			1	00

Boiler #1								
Dist	4/12/2011		4/13/2011		4/14/2011		M/60 PM	
	M/60 AM	M/60 PM	M/50 AM	M/60 PM	M/60 AM			
O2	4.7	5.3	4.8	4.8	5.8	%	4.1	%
CO	0	0	0	0	0	ppm	0	lb/M Btu
Eff	77.4	77.6	78.3	77.7	77.1	%	78.3	%
CO2	9.2	8.8	9.1	9.1	8.5	%	9.5	%
T-Stk	551	538	527	555	542	Deg.F	545	Deg.F
T-Air	67.4	76.5	75.6	82	73.6	Deg.F	79	Deg.F
EA	25.7	30.4	26.4	26.5	34.4	%	21.4	%
CO(0)	0	0	0	1	0	ppm	0	ppm
NO	19	19	26	23	19	ppm	0.03	lb/M Btu
NO2	0	0	1	0	0	ppm	0	lb/M Btu
NOx	19	19	27	23	19	ppm	0.03	lb/M Btu
SO2						ppm		lb/M Btu
NO(0)	24	25	34	29	26	ppm	26	ppm
NO2(0)	0	0	1	0	0	ppm	0	ppm
NOx(0)	25	25	34	30	26	ppm	26	ppm
SO2(0)						ppm		ppm

Boiler #2								
Gas	4/12/2011		4/13/2011		4/14/2011			
	A AM	A PM	A AM	A PM	A AM	A PM		
O2	5.6	5.5	5.1	5.8	7.4	%	6.4	%
CO	0	0	0	0	0	ppm	0	lb/M Btu
Eff	77.2	75.2	78.4	78.8	78.2	%	78.4	%
CO2	8.7	8.7	8.9	8.5	7.6	%	8.2	%
T-Stk	541	618	517	494	471	Deg.F	492	Deg.F
T-Air	70.3	75	77.6	82.9	75.7	Deg.F	80.1	Deg.F
EA	32.3	31.8	29	33.9	48.6	%	38.9	%
CO(0)	0	0	0	0	0	ppm	0	ppm
NO	75	84	76	83	68	ppm	0.11	lb/M Btu
NO2	0	0	1	0	0	ppm	0	lb/M Btu
NOx	75	84	77	84	68	ppm	0.11	lb/M Btu
SO2						ppm		lb/M Btu
NO(0)	102	114	101	115	105	ppm	103	ppm
NO2(0)	0	0	1	1	0	ppm	0	ppm
NOx(0)	102	114	102	116	105	ppm	104	ppm
SO2(0)						ppm		ppm

CTM-030 Field Data

boxed #2

Plant Ashland Specialty Chemical Co.
 Location B

571°					576°					463°				
Run Number 1					Run Number 2					Run Number 3				
Run Start Time 1406					Run Start Time 1418					Run Start Time 1432				
Run End Time 1416					Run End Time 1428					Run End Time 1442				
Time	O2	CO2	NOx	CO	Time	O2	CO2	NOx	CO	Time	O2	CO2	NOx	CO
0	6.51	8.06	45	967	0	8.70	6.17	27	1770	0	5.02	8.85	73	579
1	6.52	8.03	47	1006	1	9.82	6.01	27	—	1	6.18	8.25	71	27
2	6.53	7.98	46	832	2	11.05	5.86	26	—	2	5.08	8.53	74	18
3	6.54	7.91	42	822	3	10.51	5.83	25	—	3	6.31	8.14	74	15
4	6.55	8.17	42	904	4	10.41	5.80	27	3250	4	6.23	8.22	77	14
5	6.56	7.89	41	1002	5	11.46	5.30	24	1641	5	6.32	8.17	73	15
6	6.57	8.39	44	863	6	10.41	5.80	28	2447	6	6.47	7.83	65	12
7	6.58	8.18	42	879	7	11.52	5.27	23	—	7	6.61	8.01	74	10
8	6.59	7.50	38	1041	8	11.01	5.40	28	—	8	6.32	8.17	75	10
9	6.60	8.38	43	903	9	11.36	5.54	22	1345	9	5.83	8.44	70	8
10	6.61	8.23	41	882	10	11.23	5.40	32	—	10	7.51	7.51	72	8
11	6.62	8.22	40	749	11	10.46	5.86	29	—	11	6.91	7.84	72	6
12	6.63	7.44	36	740	12	10.52	5.84	31	—	12	6.30	8.13	72	6
13	6.64	8.22	39	827	13	11.95	5.24	29	4213	13	6.59	7.71	73	6
14	6.65	8.62	43	988	14	13.30	4.49	30	1242	14	6.13	8.23	75	6
15	6.66	8.17	40	906	15	11.71	3.76	31	—	15	6.44	8.10	74	5
16	6.67	7.83	39	837	16	11.83	5.07	27	4879	16	7.75	7.37	64	4
17	6.68	7.81	38	1063	17	11.46	5.00	26	—	17	7.75	7.45	70	5
18	6.69	8.14	42	886	18	11.19	5.40	27	3671	18	6.09	7.85	72	4
19	6.70	7.51	37	796	19	11.83	5.23	24	1782	19	7.21	7.67	70	4
20	6.71	7.80	39	923	20	12.21	4.05	24	1746	20	7.40	7.57	71	4

8.0 MMBtu/hour-rated Boiler (B005)						
25% of Load (474°F)		50% of Load (516°F)		75% of Load (512°F)		
NOx (ppmvd)	CO (ppmvd)	NOx (ppmvd)	CO (ppmvd)	NOx (ppmvd)	CO (ppmvd)*	
52	2	30	25	28	>5000	
60	1	34	25	28	>5000	
59	1	31	25	28	>5000	
65	2	28	25	26	1407	
68	2	29	25	30	>5000	
62	2	32	23	28	1473	
63	2	30	23	27	863	
71	2	29	23	26	3950	
65	3	31	24	25	>5000	
64	2	31	23	29	>5000	
67	3	27	23	26	>5000	
67	3	29	22	20	1544	
65	3	28	23	27	1198	
71	3	27	28	23	436	
68	3	27	25	30	4817	
70	3	27	25	31	793	
70	3	28	29	27	2620	
69	3	29	23	27	707	
72	3	29	22	30	>5000	
68	3	31	22	7	>5000	
70	3	28	21	5	>5000	
AVERAGE	66	2	29	24	25	>3324

* During 75% of Load, several CO readings exceeded the 5000 ppmvd limit.

8.0 MMBtu/hour-rated Boiler (B006)					
25% of Load (463°F)		50% of Load (541°F)		75% of Load (546°F)	
NOx (ppmvd)	CO (ppmvd)	NOx (ppmvd)	CO (ppmvd)	NOx (ppmvd)	CO (ppmvd)*
73	59	45	967	27	4790
71	47	47	1006	27	>5000
74	18	46	832	26	>5000
74	15	42	822	25	>5000
77	14	44	944	27	3250
73	15	41	1082	34	1641
65	12	41	863	28	2947
74	10	42	879	23	>5000
75	10	38	1041	28	>5000
70	8	43	903	32	4385
72	8	41	920	32	>5000
72	6	40	799	29	>5000
72	6	36	780	31	>5000
75	6	39	927	29	4213
75	6	43	988	30	1842
74	5	40	906	31	>5000
64	4	39	837	27	4879
70	5	38	1063	26	>5000
72	4	42	886	27	3681
70	4	37	796	34	4782
71	4	39	933	31	2746
AVERAGE	72	13	41	30	>4246

* During 75% of Load, several CO readings exceeded the 5000 ppmvd limit.

Table 1.1 - Boiler Tuning

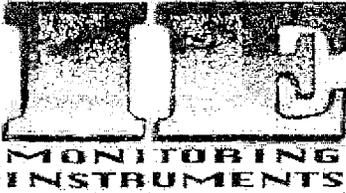
CTM-030 Field Data

Boiler #1

Plant Ashland Specialty Chemical Co.
Location A

5000
- = 24000 PPM CO

5760 Run Number 1					5120 Run Number 2					4740 Run Number 3				
Run Start Time 1305					Run Start Time 1335					Run Start Time 1350				
Run End Time 1315					Run End Time 1345					Run End Time 1400				
Time	O2	CO2	NOx	CO	Time	O2	CO2	NOx	CO	Time	O2	CO2	NOx	CO
0	6.78	7.05	30	26	0	12.0	5.0	28	OVER RANGE	0	8.24	7.06	52	2
30	4.12	7.24	34	26	30	8.78	6.23	28	-	30	8.27	7.08	60	1
1.0	6.90	7.9	31	25	1	9.75	6.25	28	-	1	9.21	6.55	59	1
1.5	7.89	7.2	28	25	1.5	10.38	5.02	26	1407	1.5	8.11	7.17	65	2
2.0	6.41	8.04	29	25	2	11.20	5.01	30	-	2	9.46	7.52	68	2
2.5	5.16	8.13	32	23	2.5	9.82	6.38	28	1473	2.5	7.98	7.26	62	2
3.0	6.60	7.96	30	23	3	9.40	6.21	27	863	3	8.32	7.05	63	2
3.5	6.49	8.50	29	23	3.5	10.73	5.70	26	2950	3.5	8.28	7.15	71	2
4.0	6.05	8.58	31	21	4	10.28	5.86	25	-	4	7.49	7.52	65	3
4.5	5.38	8.70	31	23	4.5	10.55	6.28	29	-	4.5	8.75	6.81	64	2
5.0	7.10	7.35	27	23	5	10.68	5.73	26	-	5	7.71	7.36	67	3
5.5	6.03	7.92	29	22	5.5	9.72	6.27	20	7154	5.5	7.70	7.40	67	3
6.0	7.16	7.7	28	23	6	9.81	5.96	27	1198	6	8.39	7.01	65	3
6.5	8.20	7.06	27	28	6.5	10.09	5.60	23	436	6.5	8.00	7.23	71	3
7.0	7.80	7.137	27	26	7	8.50	7.03	30	1817	7	7.17	7.64	68	3
7.5	8.90	7.69	27	25	7.5	10.04	6.47	2931	793	7.5	7.07	7.73	70	3
8.0	6.21	8.13	28	29	8	10.02	6.06	27	2620	8	7.36	7.59	70	3
8.5	7.34	7.60	29	23	8.5	9.93	6.49	27	707	8.5	7.49	7.51	69	3
9.0	6.48	8.50	29	22	9	11.07	5.01	30	-	9	7.05	7.76	72	3
9.6	5.83	8.44	31	22	9.5	19.63	8.25	7	-	9.5	8.82	6.84	68	3
10	6.71	7.95	28	21	10	18.74	9.13	5	-	10	7.29	7.62	70	3



7410 Worthington-Galena Road
Worthington, Ohio 43085
Phone: (614) 436-4933
Fax: (614) 436-9144

Industrial Environmental Monitoring Instruments, Inc.

Website: www.ferents.com

Testo Fiue Gas Monitor

Instrument: Testo 350xl
Serial #: 01047657/501, 01499530/802

Date: 3/15/2011
Technician: Robert Rayner

Calibration Data

<u>Sensor</u>	<u>Zero Gas</u>	<u>Span Gas</u>	<u>Span Reading</u>
CO	Ambient Air	482 PPM	482 PPM
NO	Ambient Air	469 PPM	469 PPM
NO2	Ambient Air	49.2 PPM	49.2 PPM

Calibration Standards

<u>Cal Gas</u>	<u>Lot#</u>	<u>Expires</u>	<u>Manufacturer</u>
49.2 PPM	EB0004830	3/2011	Liquid Technology
469 NO, 470 SO2, 482 CO	EB0015489	4/30/2011	The American Gas Group

Calibration Standards are NIST Traceable
Instrument must be calibrated and operated according to manufacturers specifications