

**ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM**

March 15, 2013

**SUBJECT:** Ashland Inc.  
2650 Neville Road  
Pittsburgh, PA 15225  
Allegheny County

**Title V Operating Permit No. 0037a**

**TO:** Sandra L. Etzel  
Chief Engineer

**FROM:** JoAnn Truchan  
Air Quality Engineer

**FACILITY DESCRIPTION:**

The Ashland Inc. Neville Island facility, located at 2656 Neville Road, Neville Township, PA, is a manufacturer of polyester resins. The Polyester Resins Plant consists of two (2) reactors, three (3) cooling tanks, and three (3) thinning tanks. Emissions from the Polyester Resins process are controlled by a 3.7 MMBtu/hr thermal oxidizer, which also acts as an incinerator for aqueous wastes. The Terminal portion of the facility loads, stores, and off-loads various materials (including plasticizers and 2-ethyl hexanol) from other Ashland facilities. No plasticizers are produced on-site. In addition to numerous above-ground storage tanks, the facility also has one 75 MMBtu/hr natural gas-fired boiler, one 16.5 MMBtu/hr natural gas-fired hot oil heater, and a 2,000 gallon/minute cooling tower.

The facility is a synthetic minor source of hazardous air pollutants (HAPs); and a minor source of particulate matter (PM), particulate matter less than 10 µm in diameter (PM<sub>10</sub>), particulate matter less than 2.5 µm in diameter (PM<sub>2.5</sub>), nitrogen oxides (NO<sub>x</sub>), and sulfur oxides (SO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOCs) as defined in Article XXI, §2101.20. Synthetic minor status will be maintained with a limit on resin production in the Polyester Resins Plant and throughput limits on all HAPs in the Although the facility is not a major source of any criteria pollutants, it is still subject to Title V under 40 CFR Part 62, §62.14830. The facility is also a minor source of greenhouse gas emissions (CO<sub>2e</sub>) as defined in the U.S. EPA Greenhouse Gas Tailoring Rule.

**AMENDMENT DESCRIPTION**

Changes were made to the Title V Operating Permit to correct the following typographical errors:

- Condition V.A.2.h – removed semicolon.
- Condition V.A.5.b – revised the word “facilities” to read “facility’s”.
- Section V.H Description – revised the temperature for plasticizer from 140 °F to 316 °F; and the temperature for phthalic anhydride from 160 °F to 320 °F.
- Condition V.H.1.6) – revised the maximum loading temperature for phthalic anhydride from 160 °F to 320 °F.

**AMENDMENT COMPONENTS:**

1. Title V Operating Permit #0037, issued February 22, 2013
2. Correspondence, dated March 8, 2013

**RECOMMENDATION:**

All applicable Federal, State, and County regulations have been addressed in the permit application, and the facility is not in violation of the provisions of Article XXI, §2102.04.k. The Title V Operating Permit amendment for Ashland Inc. should be approved with the emission limitations, terms and conditions in Permit No. 0037a. Furthermore, since all amended sections are to correct typographical errors made by the Department, the amended permit should be issued via Administrative Amendment under §2103.14.b and §2103.24.b with no additional fees assessed to the facility.