



REGION 5

CHICAGO, IL 60604

VIA ELECTRONIC MAIL
DELIVERY RECEIPT REQUESTED

Tom Froman
Plant Manager
ACS Technical Products, Inc.
420 South Colfax Avenue
Griffith, Indiana 46319

tfroman@acstech.com

Re: Information Request under Section 114 of the Clean Air Act
ACS Technical Products, Inc.
Griffith, Indiana

Dear Tom Froman:

Pursuant to Section 114(a) of the Clean Air Act ("CAA"), 42 U.S.C. § 7414(a), the U.S.

Environmental Protection Agency is requiring ACS Technical Products, Inc. ("ACS" or "you") to submit information about your facility at 420 South Colfax Avenue, Griffith, Indiana. ACS owns and operates an emission source at the Griffith, Indiana facility.

This information is needed to determine whether the ACS facility is in compliance with the requirements of the CAA and its implementing regulations. Section 114(a) authorizes the Administrator of the EPA to require any person who owns and operates an emission source, whom the Administrator believes may have information necessary for the purposes set forth in Section 114(a), or who is subject to any requirement of the CAA, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the CAA. This authority has been duly delegated to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit.

You must send this information to us according to the schedule in Appendix B.

ACS must send all required information by electronic mail to r5airenforcement@epa.gov, dunovic.sasa@epa.gov and schenandoah.jason@epa.gov. If you are unable to make your submission to these addresses due to email size restrictions, if you intend to assert a claim of business confidentiality for any of the information responsive to this request as explained below, or if there are other problems, use these email addresses to make additional arrangements to send any required information.

ACS must submit all required information accompanied by the following certification, signed and dated by a responsible official of ACS:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, the EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject ACS to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.


You should direct any questions about this information request to Sasa Dunovic at dunovic.sasa@epa.gov or (312) 353-8723 or Jason Schenandoah at schenandoah.jason@epa.gov or (312) 886-9506.

Sincerely,

**MICHAEL
HARRIS**

Michael D. Harris
Division Director

Enforcement and Compliance Assurance Division

 Digitally signed by MICHAEL
HARRIS
Date: 2024.06.26 14:54:11 -05'00'

Enclosure

- EPA Small Business Resources Information Sheet

cc: Janusz Johnson, Chief
Air Compliance Branch
Office of Air Quality
Indiana Department of Environmental Management
jjohnson@idem.IN.gov

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify the EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for the EPA use in repurposing text.

2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.
3. Provide submission through electronic mail to the addresses provided above.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question.
5. Do not submit any documents you intend to claim as Confidential Business Information (CBI) through email. If you intend to claim any portion of your response to this request as CBI, please contact r5airenforcement@epa.gov, dunovic.sasa@epa.gov and schenandoah.jason@epa.gov to make other arrangements for submission of this information.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or Indiana State Implementation Plan (SIP).

1. The term “Facility” shall mean ACS Technical Products facility located at 420 South Colfax Avenue, Griffith, Indiana.
2. The term “Hazardous Air Pollutant (HAP)” means any air pollutant listed in or pursuant to section 112(b) of the CAA.
3. The term “Volatile organic compounds (VOC)” means any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates and ammonium carbonate, which participates in atmospheric photochemical reactions, except those compounds of carbon specified in 40 C.F.R. § 51.100(s), which have been determined to have negligible photochemical reactivity.
4. The term “Volatile organic liquid” or “VOL” means any organic liquid that can emit volatile organic compounds into the atmosphere.
5. The term “Vessel” means each tank, reservoir, or container used for the storage of VOLs but does not include either of the following:

- a. Frames, housing, auxiliary supports, or other components that are not directly involved in the containment of liquids or vapors.
- b. Subsurface caverns or porous rock reservoirs.

Appendix B

Information You Are Required to Submit to the EPA

ACS Technical Products, Inc. (ACS) must conduct testing and submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) in accordance with the schedules and requirements specified below:

1. ACS must submit a test protocol(s), conduct emission and wastewater testing, and submit all other information requested in accordance with the following schedule and requirements:

Submit Testing Protocol(s)	Within 60 calendar days of receipt of this request
Notification of Intent to Test	Not less than 21 calendar days before commencing testing
Complete Testing	Within 60 calendar days of receiving EPA approval of testing protocol
Submit Testing Report	Within 30 calendar days of completion of testing

2. Within 60 days of receiving EPA approval of the Testing Protocol(s) described in Item 4, ACS must perform testing at each sampling point specified in Table 1, below (“Emissions & Wastewater Testing”). During the Emissions & Wastewater Testing, ACS must monitor and record the operational conditions, and test in accordance with the numbers and durations of test runs specified in Table 1, below.

Table 1: Summary of Sampling Points and Testing Requirements

Process/Unit	Sample type and sampling Point(s)	Pollutant (CAS Number)	Number of Runs and Run Duration
<p>Vessels with condensers: C-1, C-3X, C-5, C-17, C-18, C-55, E-1, E-2.</p>	<p>Sample emissions at all emission points to the atmosphere</p>	<p>Toluene (108883), Ethylene Oxide (75218), 1,4-dioxane (123911), Acetaldehyde (75070), Formaldehyde (50000), and Volatile Organic Compounds (VOCs).</p>	<p>For continuous operations: Three valid test runs. Minimum sample time of 1 hour per run.</p> <p>For batch operations: Three valid test runs. Minimum sample time of 1 hour or the duration of the batch cycle, whichever is shorter.</p> <p>For batch cycles longer than 1 hour, the runs should be spaced to represent the range of batch emissions (high, average, and low), covering the entire time needed to complete one batch, including but not limited to reactor loading, reaction phases, discharging, etc.</p>
<p>Process Separation Vessels 6013 and 6018</p>	<p>Sample vapor space of both vessels</p>	<p>Toluene (108883), Ethylene Oxide (75218), 1,4-dioxane (123911), Acetaldehyde (75070), Formaldehyde (50000), and Volatile Organic Compounds (VOCs).</p>	<p>Three samples from each vessel taken at the beginning, middle, and end^a of the batch cycle.</p>
<p>Wastewater Oxidation Vessels 6009 and 6011</p>	<p>Sample liquid at Vessel 6009 intake and Vessel 6011 discharge</p>	<p>Toluene (108883), Ethylene Oxide (75218), 1,4-dioxane (123911), Acetaldehyde (75070), Formaldehyde (50000), and Volatile Organic Compounds (VOCs).</p>	<p>Three water samples from each intake and discharge taken at the beginning, middle, and end^a of the batch operations testing.</p>

a. At least 1 hour after the end of the batch operations testing, but no later than 2 hours after the end of batch operations testing.

3. To conduct the testing required in Item 2, ACS must use the testing methods specified in Table 2, below:

Table 2. Summary of Required Test Methods and Alternative Methods

Pollutant (CAS number)/Parameter	Required Method ^a	Testing Location ^b	Reported Units of Measure
Ethylene Oxide (75218) 1,4-dioxane (123911)	U.S. EPA Method 320 ^c . Validate according to Section 13.0 of Method 320. Alternatively, Other Test Method 47 (OTM-47) may be used.	Vessels with condensers	lb/hr and ppmvd, ppbvd or pptvd
Toluene (108883) Acetaldehyde (75070) Formaldehyde (50000)	U.S. EPA Method 18. You must use the adsorbent tube procedure as written in Section 8.2.4 of Method 18, and you must also conduct the recovery study specified in Section 8.4.3 of Method 18.	Vessels with condensers	lb/hr and ppmvd
VOCs	U.S. EPA Method 25A. Calibrate the measuring instrument with propane. The low level and high level calibration gases (see sections 7.1.3 and 7.1.5 of Method 25A) must bracket the measured concentrations. Additional testing may be performed to quantify methane and ethane if present.	Vessels with condensers	lb/hr and ppmvd
O ₂ and CO ₂	U.S. EPA Method 3A. Alternatively, U.S. EPA Method 3B.	Vessels with condensers	Volume % dry
Moisture	U.S. EPA Method 4 or U.S. EPA Method 320.	Vessels with condensers	Volume %
Air Flow Rate	U.S. EPA Method 2, simultaneous with each pollutant test run. Alternatively, U.S. EPA Method 2A, 2B, 2C, 2D, 2F, or 2G, as appropriate.	Vessels with condensers	acfm, scfm and dscfm

Liquid Flow Rate	Method that captures instantaneous flow when samples are taken	Wastewater Oxidation Vessel 6009 intake and Vessel 6011 discharge	gpm
Liquid Flow Rate	Method that measures continuous flow during the batch cycle	Process Separation Vessels 6013 and 6018	gpm
Toluene (108883) Ethylene Oxide (75218) 1,4-dioxane (123911) Acetaldehyde (75070) Formaldehyde (50000) Volatile Organic Compounds (VOCs)	U.S. EPA Method TO-15/TO-15A ^d	Process Separation Vessels 6013 and 6018	ppmv and, where appropriate, ppbv or pptv
Toluene (108883) Ethylene Oxide (75218) 1,4-dioxane (123911) Acetaldehyde (75070) Formaldehyde (50000) Volatile Organic Compounds (VOCs)	U.S. EPA Method 8260 ^e	Wastewater Oxidation Vessel 6009 intake and Vessel 6011 discharge	ppmv and, where appropriate, ppbv or pptv

- a. Other methods may also be used, subject to EPA approval.
- b. When the location is specified as intake and discharge, the sampling at the intake and discharge must be performed simultaneously.
- c. When U.S. EPA Method 320 is used, all compounds, including interferences, must be included in the recipe. "Recipe" shall mean those compounds initially expected to be present in the gas stream based on either screening data or facility knowledge.
- d. To minimize coelution of compounds analyze the summa canister samples within 48 hours of collection.
- e. Do not perform acid preservation.

4. ACS must conduct the Emissions & Wastewater Testing under a protocol(s) approved in advance by EPA. Within 60 days of receipt of this Request, ACS must submit to EPA the proposed test protocol for the testing required in Items 2 and 3 (the "Testing Protocol"). ACS must submit the Testing Protocol by e-mail to schenandoah.jason@epa.gov and dunovic.sasa@epa.gov. The Testing Protocol must:
 - a. Completely describe the methods and procedures for conducting the testing required in Items 2 and 3;
 - b. Identify all relevant operating parameters to be used during the Emissions & Wastewater Testing for each unit and explain how these parameters reflect the conditions described in Item 5.
 - c. Provide all relevant production data from the preceding 12 months to demonstrate that a representative production rate will be achieved during the Emissions & Wastewater Testing. This shall include but is not limited to

the total amount of each product produced (lbs or tons) and the total amount of each raw material used (lbs or tons).

- d. Explain what the expected concentration resolution will be for each compound that will be measured (e.g., ppm, ppb, or ppt).
5. During the Emissions & Wastewater Testing, ACS must operate process equipment at maximum representative operating conditions for the process (i.e., greater than 95% capacity) without creating an unsafe condition.
6. During the Emissions & Wastewater Testing, ACS must monitor and record the operating parameters and production data for all units routed to each sampling location including but not limited to: raw material usage (lbs or tons); final product produced (lbs or tons); operating temperatures; pressures; and flow rates.
7. After receiving EPA's approval of the Testing Protocol, and at least 21 days prior to commencing Emissions & Wastewater Testing, ACS must submit notification to EPA of its intent to perform the Emissions & Wastewater Testing. Submit this notice by e-mail to schenandoah.jason@epa.gov and dunovic.sasa@epa.gov.
8. Within 30 days after completion of the Emissions & Wastewater Testing, submit a complete report of the testing, including at a minimum, the following:
 - a. Summary of Results
 - i. Results of the above specified emission and wastewater tests:
 1. For Vessels with condensers specified in Table 1:
 - a. Toluene, Ethylene Oxide, 1,4-dioxane, Acetaldehyde, Formaldehyde, and total VOCs concentration results in parts per million (ppm), and, where appropriate, in parts per billion by volume (ppb) or parts per trillion (ppt) by volume, dry basis;
 - b. Toluene, Ethylene Oxide, 1,4-dioxane, Acetaldehyde, Formaldehyde, and total VOCs mass emission rate results in pounds per hour; and
 - c. The calculations for the Toluene, Ethylene Oxide, 1,4-dioxane, Acetaldehyde, Formaldehyde, and total VOCs annual average mass emission rate at each location tested.
 2. For Process Separation Vessels 6013 and 6018 specified in Table 1:
 - a. Toluene, Ethylene Oxide, 1,4-dioxane, Acetaldehyde, Formaldehyde, and total VOCs concentration results in ppm, and, where appropriate, ppb or ppt by volume, dry basis;

- b. The average flow rate through Vessels 6013 and 6018; and
 - c. The calculations for the Toluene, Ethylene Oxide, 1,4-dioxane, Acetaldehyde, Formaldehyde, and total VOCs annual average mass of air emissions from each vessel due to working losses.
- 3. For Wastewater Oxidation Vessels 6009 and 6011 specified in Table 1:
 - a. Toluene, Ethylene Oxide, 1,4-dioxane, Acetaldehyde, Formaldehyde, and total VOCs concentration results at each location tested;
 - b. The flow rate at each location tested;
 - c. The calculations for the annual average concentration of Toluene, Ethylene Oxide, 1,4-dioxane, Acetaldehyde, Formaldehyde, and total VOCs at each location tested; and
 - d. The calculations of the annual average wastewater flow rate at each location tested.
- ii. Discussion of response factors, molecular weight corrections, all calibrations, dilutions, or any other factors used to convert raw data into the reported results (including a definition of any terms such as “response factor” that can be used to describe multiple types of corrections);
- iii. Discussion of test errors; and
- iv. Discussion of any deviations from the reference test methods used during Emissions & Wastewater Testing.
- b. Facility Operations
 - i. Description of the process equipment in operation;
 - ii. Production data and operating parameters of the process units and related equipment at the time of the test as required in Item 6;
 - iii. Facility operating parameters that demonstrate that the process units were operated in compliance with Item 5;
 - iv. Discussion of any deviations from operating procedures and/or production rates; and
 - v. List and description of any maintenance or repairs made on sampling location equipment or on equipment “upstream” of sampling location equipment (i.e., equipment that is part of the process that routes product, emissions, wastewater or other materials to sampling location equipment) from the date of receipt of this Request until the date ACS completes the Emissions & Wastewater Testing.

- c. Sampling and Analytics Procedures
 - i. Sampling port location(s) and dimensions of cross-section;
 - ii. Sampling point description, including labeling system;
 - iii. Brief description of sampling procedures, including equipment and diagram;
 - iv. Description of sampling procedures (planned and accidental) that deviated from any standard method;
 - v. Brief description of analytical procedures, including calibration;
 - vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
 - vii. Quality control/quality assurance procedures, tests, and results.

- d. Appendix
 - i. Complete results with example calculations;
 - ii. Raw field data (original, not computer printouts);
 - iii. Laboratory report(s), with signed chain-of-custody forms;
 - iv. Calibration procedures and results;
 - v. Raw process and control equipment data, signed by a plant representative;
 - vi. Test log;
 - vii. Project participants and titles; and
 - viii. Copies of correspondence relating to the testing.