

The District received public comments to the proposed EMPs per Regulation 12, Rule 13 and Regulation 6, Rule 4 during the respective public comment periods. Below is a summary of comments that concern the reduction of fugitive emissions of odors and particulate at one or more of the metal facilities. Comments raised about operations at one facility may be applicable to operations at other facilities:

### **Regulation 12, Rule 13**

#### **Asphalt Coating Operations**

- EMPs of metal foundries that produce cast iron metal pipes should include asphalt coating operations as a source of fugitive emissions of odors and VOC emissions.
- EMPs should identify measures to capture, control and minimize asphalt coating emissions. A facility's temperature assessment during the coating process should be included as a component in the EMP.
- A description of the asphalt coating and the asphalt coating additives should be included in the EMP.

#### **Baghouse Maintenance Activities**

- Baghouse source testing should be conducted for PM, lead and other hazardous materials.
- Manufacturer's recommendations for maintenance activities and operations should be included in the EMP.

#### **Systems for Air Capture and Collection**

- EMPs should provide details on air intake systems for all air pollution controls, such as baghouses, to ensure adequate collection of emissions.

#### **Scrap Metal**

- All scrap metal received at a facility should be screened of metal contaminants. EMPs should identify specific metals, such as lead, zinc and aluminum, as toxic contaminants.

### **Regulation 6, Rule 4**

- EMPs should describe management practices for the collection and disposal of water runoff from piles, vehicles and equipment, similar to the best management practices required by a facility's storm water permit.
- Areas that contain shredder residue should be enclosed, and all material piles should be covered when not in operation.
- EMPs should address the management and monitoring practices associated with loading of shredder residue onto trucks or other forms of conveyance at a facility.
- EMPs should provide details about the monitoring frequency and recordkeeping as part of a facility's visible emissions monitoring. Recordkeeping should include and describe any corrective measures that are identified to prevent and reduce fugitive emissions.
- Scrap acceptance policies and brochures should be revised to include specific appliances and parts that may be a significant source of PCB contaminants.