

From: Kelly.Shaheerah@epamail.epa.gov
Sent: Tuesday, October 19, 2010 8:13 AM
To: Thu Bui
Subject: Comments on Lehigh Permit

Thu,

Here are the comments on the Lehigh pre-draft title V permit. I'll call you at 9. Thanks.

Comments on Lehigh Permit

1. For the pollutant specific emission units (PSEUs) that have not been evaluated for CAM applicability, the source should determine applicability in accordance with the CAM regulations. PSEUs that are not subject to part 64 would be subject to the periodic monitoring requirements under 70.6(a)(3).

2. For PSEUs that are subject to SIP limits and post 1990 NESHAP limits for the same pollutant but subject to CAM for the SIP limits only, the statement of basis should include an analysis to show that the monitoring requirements for the post-1990 NESHAP will be sufficient for the SIP limits.

3. The statement of basis states that certain baghouses are inherent process equipment, and are exempt from part 64, because they are used for material recovery. Part 64 defines inherent process equipment as "equipment that is necessary for.....material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution control regulations.....If in order to comply with an applicable emissions limitation or standard, the process equipment must be operated at emissions reduction efficiencies higher than that normally achieved or required for the proper or safe functioning of the process or material recovery, such equipment is not inherent process equipment...." Please identify in the statement of basis whether any of the baghouses have to operate higher than that normally achieved or required for the proper or safe functioning of the process or material recovery to show compliance with the applicable emission limits.

4. Please distinguish between dust collectors and baghouses in the permit and statement of basis since they are different types of equipment, and monitoring for both device types may differ. Dust collectors, generally speaking, do not have active air moving systems and are passive in design. A baghouse on the other hand, does have active air moving equipment such as fans and ducting. Please apply these terms for each applicable emission unit consistently throughout the permit regardless of whether CAM is applicable.

5. EPA has the following comments on the CAM requirements in condition 20751 for S-383 and S-384, abated by baghouse A-384.

Condition 20751

1. The owner/operator shall abate each source with Dust Collectors or Baghouses at all times whenever these sources are in operation.
2. The pressure drop range for correct operation is between 0 and 8 inches water for A-384.
3. The pressure drop for A-384 baghouses shall be recorded on a daily basis.
4. If a pressure drop is exceeded, a Method 22 shall be conducted. If visible emissions are observed, the exceedance of the pressure drop limit and visible emission shall be reported to the Director of Compliance and Enforcement in accordance with the requirements in Standard Condition I.F.
5. The owner/operator shall inspect each baghouse completely on an annual basis. The owner/operator shall keep a record of all annual inspections and any corrective action taken.
6. The owner/operator shall keep the records required by parts 3 and 5 for at least 5 years and shall make the records available to District staff upon request

Comments on Condition 20751

1. The pressure drop range is specified at 0 to 8 inches of water column. Specifying zero as the minimum reading is invalid, as we do not know if the baghouse is operating at this point, or if it has a blown bag, or other problems. The permit should contain a more specific, non-zero range that is expected at normal operation of the emission units (e.g., 2 to 6 inches of water column). EPA recommends a two pronged monitoring approach of daily monitoring of the pressure drop gauge AND daily VE readings of opacity. In lieu of this, EPA recommends that the permit require that the baghouses either operate using bag leak detectors (e.g., a tribo-electric monitoring system) or PM CEMs for part 64 monitoring purposes.

2. Condition 20751 requires annual inspections of baghouses but must define what methods (either an inspection plan written in-house, or based on manufacturer's recommendations) are to be used. EPA also recommends that the inspections be more frequent (e.g., quarterly or semi-annually), depending on the nature of the operation or the equipment that the baghouse serves.

3. Please explain why Method 22 is used for determining opacity rather than Method 9. EPA recommends that the permit require Method 9 for daily opacity readings.

4. The permit must also contain the following additional requirements.

i) The means or device to be used to measure the pressure drop. An example would be using a magnehelic differential pressure gauge to measure the pressure drop across each baghouse in inches of water column gauge. (see 64.6(c)(1)(ii))

ii) How the data that are representative of the parameters being monitored will be obtained (such as detector location and installation specifications, if applicable). (see 64.6(c)(1)(iii) and 64.3(b)(1))

iii) Quality assurance and control practices that are adequate to ensure the continuing validity of the data. The owner or operator may consider manufacturer recommendations or requirements applicable to the monitoring in developing appropriate quality assurance and control practices. (see 64.6(c)(1)(iii) and 64.3(b)(3))

iv) Data collection procedures that will be used (e.g., computerized data acquisition and handling, alarm sensor, or manual log entries based on gauge readings), and, if applicable, the period over which discrete data points will be averaged for the purpose of determining whether an excursion or exceedance has occurred. At a minimum, the owner or operator must design the period over which data are obtained and, if applicable, averaged consistent with the characteristics and typical variability of the pollutant-specific emissions unit (including the control device and associated capture system). (See 64.6(c)(1)(iii) and 64.3(b)(4))

v) The means by which the owner or operator will define an exceedance or excursion or purposes of responding to and reporting exceedances or excursions as required by 64.7 and 64.8.

vi) The level at which an excursion or exceedance will be deemed to occur, including the appropriate averaging period associated with such exceedance or excursion. For defining an excursion from an indicator range or designated condition, the permit may either include the specific value(s) or condition(s) at which an excursion shall occur, or the specific procedures that will be used to establish that value or condition. If the latter, the permit shall specify appropriate notice procedures for the owner or operator to notify the permitting authority upon any establishment or reestablishment of the value. (see 64.6(c)(2))

vii) Requirements for ensuring maintenance of the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. (See 64.6(c)(3) and 64.7(b))

viii) Conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that emissions units S-383 and S-384 are operating. (see 64.6(c)(3) and 64.7(c))

ix) Conditions for responding to excursions or exceedances. The conditions must include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). (see 64.6(c)(3) and 64.7(d)(1)). The permit requires Method 22 test when the pressure drop range of 0 to 8 inches of water is exceeded. Please clarify whether 8 inches of water is the maximum range for the pressure gauge. If so, it theoretically cannot be exceeded. The permit must include a "safe" range between 0 and 8 (e.g., 2 and 6) for which any measurements outside this range would trigger an excursion or when an emissions exceedance is likely to occur. This range should be specific to the facility, based on testing at the facility. Excursions and exceedances trigger corrective action by the owner or operator to restore the system to normal.

x) The requirements in 64.7(d)(2) and 64.8(a).

xi) As required in 64.6(c)(3) and 64.9(a), the monitoring must be reported in the Title V semi-annual monitoring reports as specified in 70.6(a)(3)(iii) and the following, as applicable:

a) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

b) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or

c) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the exceedances occurring. Although the contents of the QIP need not be on the permit, the permit should specify how many excursions are allowed (per month, quarter, year, etc....) before a QIP is triggered.

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