

July 18, 2005

United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Rios:

This is in response to your letter dated May 12, 2004, providing comments on the proposed Title V Permit Modification for Pechiney Plastic Packaging, Inc. (#A0273).

EPA's comments and the District's responses are presented below.

Comment: Source testing should be annual, not once per five years.

Response: EPA's final printing industry guidance states that once per five years is adequate. This is unchanged from the draft version available when this permit revision was proposed. Accordingly, the District takes this to be EPA's position on the issue as a general matter. The District has not merely followed an EPA guidance document, but rather has considered this situation on its individual merits. As explained in the Statement of Basis, proper maintenance of the catalytic oxidizer provides an assurance of compliance but does not guard against all modes of failure. The District is going beyond the recommendations of the guidance by requiring an annual screening test. The positive compliance history of these abatement devices supports this approach.

Comment: The permit does not require once per five year source tests.

Response: In response to EPA's comments, a once per five year source testing requirement is being added in the final revision. The failure to include such a requirement in the proposal was an oversight by the District.

Comment: The screening approach could allow Pechiney up to three attempts to demonstrate compliance. This would not account for changed conditions such as different materials being used over time.

Response: The intent of the screening provision is to detect for a failure of the catalytic oxidizer that could be expected if physical degradation of the packed bed results. Such a failure would likely be indicated by outlet concentrations well above the 10 ppm screening level, and would do so regardless of raw materials used in the printing process. Moreover, such a condition would likely be persistent over time. The annual screening test was judged by the District to be a cost-effective means of monitoring for physical failure, and goes beyond the stringency of once-per-five-year source testing.

ALAMEDA COUNTY

Roberta Cooper
Scott Haggerty
Nate Miley
Shelia Young

CONTRA COSTA COUNTY

Mark DeSaulnier
Mark Ross
(Secretary)
Michael Shimansky
Gayle B. Uilkema
(Vice-Chairperson)

MARIN COUNTY

Harold C. Brown, Jr.

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Chris Daly
Jake McGoldrick
Gavin Newsom

SAN MATEO COUNTY

Jerry Hill
Marland Townsend
(Chairperson)

SANTA CLARA COUNTY

Erin Gamer
Liz Kniss
Patrick Kwok
Julia Miller

SOLANO COUNTY

John F. Silva

SONOMA COUNTY

Tim Smith
Pamela Torliatt

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

In response to the issues raised by EPA's comment, additional language has been added to the permit condition to clarify that 1) the District must be notified before a test is conducted; and 2) that the test will be conducted under normal process conditions.

Comment: Annual source testing is needed to assure compliance with the synthetic minor limit.

Response: The District believes its proposed approach (with the addition of source tests every five years) is adequate for this purpose. The District assumes that EPA's guidance relates to use of catalytic oxidizers when used to comply with federal requirements, of which a synthetic minor limit would be one.

Comment: The District should use CPDS instead of MSDS to derive data concerning HAP content of materials used.

Response: The District is revising the permit to require use of CPDS.

Sincerely yours,

Steve Hill
Air Quality Engineering Manager