



GROUP AGAINST SMOG & POLLUTION

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VIA EMAIL (nnahar@pa.gov)
Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222
Attention: Ms. Noor Nahar, Air Quality Engineering Specialist

**Re: Comments of Group Against Smog and Pollution, Regarding Draft
Title V Operating Permit for Summerill Tube Corporation
(Permit # 65-00173)**

Dear Ms. Nahar:

Please accept these comments regarding the draft Title V Operating Permit (# 65-00173) for Summerill Tube Corporation, which I am submitting on behalf of the Group Against Smog and Pollution. According to the notice posted in the February 25, 2017 Pennsylvania Bulletin, the Department is accepting comments on the Permit through March 27, 2017.

Very truly yours,

/s

John K. Baillie

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION
REGARDING THE DRAFT TITLE V OPERATING PERMIT FOR
SUMMERILL TUBE CORP. (# 65-00173)**

I. THE PERMIT SHOULD SPECIFY SOURCE-BY-SOURCE AND FACILITY-WIDE EMISSION LIMITS

Although the Department has determined the potential annual emissions from each source within Summerill Tube Corporation's plant in Scottsdale, Westmoreland County (the "Facility") that are expressed in terms of tons per year,¹ the draft Title V Operating Permit for the Facility (the "Permit") specifies an annual emission limit that is expressed in terms of tons per year for only one such source, the source group that includes the Facility's lubricant coating area and vapor degreaser.² The only other emission limits in the Permit that are specific to the Facility appear to be limitations on the amount of particulate matter in the effluent gas from the vapor degreaser³ and process and finish acid dip tanks.⁴ The Permit does not include hourly or annual Facility-wide emission limits.

A Title V Operating Permit must include "emissions limitations ... that assure compliance with all applicable requirements at the time of permit issuance."⁵ The Permit should be revised to specify annual emission limits on both a source-by-source basis and a facility-wide basis, based on calculations that the Department has already performed and included in the Review Memo. Such emission limits will help assure that the Facility complies with the Permit's other applicable operating restrictions and limitations.

¹ See Review Memo (Feb. 17, 2017) (the "Review Memo"), at 4-6.

² See Permit, at 48 (limiting VOC emissions from the lubricant coating area and acid dip tank to 47 tons per year).

³ See *id.*, at 40.

⁴ See *id.*, at 47.

⁵ 40 C.F.R. § 70.6(a)(1).

II. THE “SOURCE CAPACITY/THROUGHPUT” LIMITS FOR THE LUBRICANT COATING AREA AND VAPOR DEGREASER SHOULD BE INCLUDED AS RESTRICTIONS

The Permit identifies “Source Capacity/Throughput” amounts for the process and finish acid dip tanks,⁶ the lubricant coating area,⁷ and the vapor degreaser,⁸ but does not include corresponding operating restrictions.

A Title V Operating Permit must include terms and conditions necessary to assure that the source is properly operated.⁹ If the proper operation of the Facility’s acid dip tanks, lubricant coating area, and vapor degreaser depend on the Facility’s compliance with the “Source Capacity/Throughput” limits already identified in the Permit, the Facility’s Title V Operating Permit should unambiguously restrict the throughput for each source accordingly.

III. THE PERMIT MUST SPECIFY THAT THE TOLUENE CONTENT OF LUBRICANTS USED IN THE LUBRICANT COATING AREA NOT EXCEED 70%

According to the Review Memo, the Permit’s emission limit for VOCs and toluene is based on the assumption that the concentration of toluene in the lubricants used in the Facility’s lubricant coating area will not exceed 70%.¹⁰ However, the Permit does not restrict the toluene content of such lubricants.

⁶ Permit, at 4 and 37-38.

⁷ *Id.*, at 4 and 39.

⁸ *Id.*, at 4 and 40.

⁹ 25 Pa. Code § 127.441(a); *accord* 40 C.F.R. § 70.6(a)(1) (requiring that “[a] Title V Operating Permit must include “those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance”).

¹⁰ Review Memo, at 5.

A Title V Operating Permit must include terms and conditions necessary to assure that the source is properly operated.¹¹ Thus, to assure compliance with the Permit's emission limit for VOCs and toluene, the Permit should restrict the toluene content of such lubricants to 70%.

IV. THE PERMIT SHOULD REQUIRE THE OPERATION OF THE WET SCRUBBERS THAT HAVE BEEN INSTALLED TO CONTROL EMISSIONS FROM THE PROCESS AND FINISH ACID DIP TANKS

Also according to the Review Memo, “[w]et scrubbers have been installed to control emissions from the process and finish acid tanks.”¹² The Permit does not, however, include an express requirement that such scrubbers be operated.¹³

A Title V Operating Permit must include “those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance.”¹⁴ In Pennsylvania, a facility may not install an “air cleaning device,” such as a wet scrubber, without obtaining a plan approval from the Department.¹⁵ Having been issued a plan approval, a facility must operate in accordance with it.¹⁶ Accordingly, a facility that has installed a properly-approved air cleaning device is required to operate it, and the facility's operating permit must include that requirement.¹⁷ The Permit must be revised to require that the wet scrubbers be

¹¹ 25 Pa. Code § 127.441(a); *accord* 40 C.F.R. § 70.6(a)(1) (requiring that “[a] Title V Operating Permit must include “those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance”).

¹² Review Memo, at 2.

¹³ *See* Permit, at 37-38 and 47 (imposing source level requirements and source group restrictions on the operation of the process and finish acid dip tanks).

¹⁴ 40 C.F.R. § 70.6(a)(1).

¹⁵ *See* 25 Pa. Code § 127.11.

¹⁶ *See* 25 Pa. Code § 127.444 (stating that a source may not operate without operating approved air cleaning devices).

¹⁷ *See* 25 Pa. Code § 127.443(b) (stating that a source's operating permit must require compliance with the plan approval for the source).

operated to control emissions from the process and finish acid dip tanks in accordance with the plan approval for the wet scrubbers.

V. THE PERMIT MUST INCLUDE MONITORING AND TESTING REQUIREMENTS TO ASSURE COMPLIANCE WITH THE LIMIT ON THE CONCENTRATION OF PARTICULATE MATTER IN THE ACID DIP TANKS' EFFLUENT GAS

The Permit limits “the concentration of particulate matter in the effluent gas “emitted by the process and finish acid dip tanks,”¹⁸ but does not require that the level of particulate matter in that effluent gas be tested or monitored to ensure compliance with that limit.¹⁹

A Title V Operating Permit must require testing and monitoring “sufficient to assure compliance with the terms and conditions of the permit.”²⁰ Accordingly, because the Permit limits the concentration of particulate matter in the effluent gas from the Facility’s process and finish acid dip tanks, the Permit must also require testing or monitoring to ensure that limit is not exceeded.

VI. THE PERMIT MUST SPECIFY THAT THE SCRUBBING MEDIUM USED IN THE ACID DIP TANK SOURCE GROUP IS MONITORED CONTINUOUSLY

The Review Memo states that the pH level of the scrubbing medium associated with the process and finish acid dip tanks is monitored “continuously”²¹ to assure compliance with the Permit’s requirement that the pH level of that scrubbing medium be kept between 7 and 10.5.²² However, the Permit itself does not specify how frequently the pH level of the scrubbing

¹⁸ Permit, at 47.

¹⁹ *See id.*, at 37-38 and 47.

²⁰ 40 C.F.R. § 70.6(c)(1).

²¹ Review Memo, at 4.

²² Permit, at 47.

medium is to be monitored.²³ The Permit must be revised to reflect that the pH level of the scrubbing medium associated with the process and finish acid dip tanks occurs continuously, as stated in the Review Memo.

²³ *See id.*, at 37-38 and 47.