



GROUP AGAINST SMOG & POLLUTION

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June 26, 2017

VIA EMAIL

Allegheny County Health Department
Air Quality Program
301 39th St., Bldg. 7
Pittsburgh, PA 15201
aqpermits@alleghenycounty.us

**Re: Comments of Group Against Smog and Pollution and the
Environmental Integrity Project, Regarding the draft Title V
Operating Permit for Universal Stainless & Alloy Products, Inc.
(Permit # 0027)**

Dear Sir or Madam:

Please accept these comments regarding the draft Title V Operating Permit ((#0027) (the “Permit”) for Universal Stainless & Alloy Products, Inc. (the “Facility”), which I am submitting on behalf of the Group Against Smog and Pollution. According to the notice posted on its website, the Allegheny County Health Department (the “Department”) is accepting comments on the Permit through June 26, 2017.

Very truly yours,

/s

John K. Baillie
Staff Attorney

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION REGARDING
THE DRAFT TITLE V OPERATING PERMIT FOR
UNIVERSAL STAINLESS & ALLOY PRODUCTS, INC. (#0027)**

I. THE PERMIT SHOULD BE REVISED TO INCLUDE OPERATING LIMITS FOR FAN MOTOR AMPERAGE AND DAMPER POSITION BASED ON THE RESULTS OF THE PERFORMANCE TEST REQUIRED BY § V.A.2.a

A Title V Operating Permit must require “testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit.”¹ A test that is performed once every five years may be sufficient to assure compliance with the terms and conditions of a Title V Operating Permit if the Permit requires that the test be used to establish operating parameters relating to the emissions of each pollutant, and also requires that those parameters be monitored on a basis sufficient to assure compliance.² However, in the absence of such monitoring, “infrequent testing” may not be sufficient to assure compliance with the Permit’s emission limits.³ The monitoring requirements of a Title V Operating Permit that lacks testing and monitoring that are sufficient to assure compliance must be supplemented to assure compliance.⁴

The Permit establishes hourly and annual emission limits from the Facility’s Melt Shop for total particulate matter (“PM”); PM₁₀; PM_{2.5}; carbon monoxide (“CO”); and volatile organic compounds (“VOCs”).⁵ The Permit requires the Facility perform tests for PM/PM₁₀, CO, and

¹ 40 C.F.R. § 70.6(c)(1); *cf.* 25 Pa. Code § 127.441(c) (operating permit shall contain “requirements related to monitoring, recordkeeping and reporting required by the Clean Air Act and the regulations thereunder”).

² *See In the Matter of Kentucky Syngas, LLC*, 2012 EPA CAA Title V LEXIS 4, *165 (June 22, 2012).

³ *See In the Matter of Luke Paper Co.*, 2010 EPA CAA Title V LEXIS 7, *14-15 (Oct. 18, 2010).

⁴ *See In the Matter of CITGO Refinery & Chems. Co.*, Petition V1-2007-01 (May 28, 2009), at 6-7, *quoted in Luke Paper Co.*, *supra* note 3 at *13-14.

⁵ § V.A.1.e.

VOC emissions from the Melt Shop Baghouse's exhaust once every five years.⁶ When such a performance test is conducted, the Facility is required to monitor and record the positions of the dampers in the Melt Shop Baghouse, the differential pressure drop across each component of the Melt Shop Baghouse, and the amperage for each fan motor in the Melt Shop Baghouse.⁷

Presumably, the performance test is required to establish operating parameters for PM/PM₁₀, CO, and VOC emissions from the Melt Shop Baghouse's exhaust that are needed for the Facility to comply with emission limits for the Melt Shop Baghouse. However, the Permit does not consistently incorporate such operating parameters as restrictions. For example, although the Facility is required to monitor and record the fan motor amperes once per shift,⁸ the Permit does not establish operating limits for the fan motors based on amperage (or any other parameter). Similarly, the Permit requires that the Facility record the position of the dampers for the Melt Shop Baghouse during the performance test, but does not incorporate any restrictions regarding the position of the dampers. By way of contrast, the Permit does require the Facility to comply with parameters for differential drop across the Melt Shop Baghouse's compartments that are established by the five-year performance test.⁹

The performance test required by the by Permit will not assure compliance with the Permit's hourly and annual limits for PM/PM₁₀, CO, and VOC emissions from the Melt Shop Baghouse's exhaust because the test is to be conducted only once every five years and because the Permit does not include all operating parameters established by the test as operating restrictions that can be monitored continuously. To assure compliance with those limits, the

⁶ See § V.A.2.a (requiring performance test for PM/PM₁₀, CO, and VOCs on baghouse exhaust); § V.A.2.n (test required by § V.A.2.a to be performed every five years).

⁷ § V.A.2.a.

⁸ § V.A.3.i and V.A.3.p.

⁹ See § V.A.1.c.4).

Permit must be revised to include operating limits for fan motor amperage and damper position based on the results of the performance test required by § V.A.2.a.

II. THE PERMIT MUST EITHER REQUIRE MONITORING OF PM_{2.5}, NO_x, SO_x, CHROMIUM, NICKEL, LEAD, AND MANGANESE EMISSIONS FROM THE MELT SHOP BAGHOUSE OR REQUIRE PERFORMANCE TESTING TO ESTABLISH OPERATING PARAMETERS THAT WILL ASSURE COMPLIANCE WITH EMISSION LIMITS

In addition to limits for PM/PM₁₀, CO, and VOCs, the Permit also establishes hourly and annual emission limits from the Facility's Melt Shop for: sulfur oxides ("SO_x"); nitrogen oxides ("NO_x"); chromium; nickel; lead; and manganese.¹⁰ The Department's review memo does not explain how the hourly and annual limits on PM_{2.5}, SO_x, NO_x, chromium, nickel, lead, and manganese emissions from the Melt Shop Baghouse were determined.

The Permit does not require that PM_{2.5}, SO_x, NO_x, chromium, nickel, lead, or manganese emissions from the Melt Shop Baghouse be monitored.¹¹ The Permit does not require performance testing that could determine operating parameters that can be monitored to assure that the exhaust from the Melt Shop Baghouse complies with the Permit's hourly and annual emission limits for those pollutants,¹² as it does for emissions of PM/PM₁₀, CO, and VOCs. Nor does the Permit require that the Facility determine the chromium, nickel, lead, or manganese content of the scrap that it melts to produce steel,¹³ which might be used to estimate emissions of those pollutants.

Compliance with a Title V Operating Permit cannot be determined using production information (such as tons of steel produced) and emission factors alone, even when the emission

¹⁰ § V.A.1.e.

¹¹ *See* § V.A.3.

¹² *See* § V.A.2.

¹³ *See id.* and § V.A.3.

factors are based on performance tests conducted at the source itself,¹⁴ because emission factors cannot accurately forecast malfunctions, breakdowns, or operator error that may affect compliance at a specific time.¹⁵ To satisfy Title V's requirement that a permit have "testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit,"¹⁶ the Permit must either require monitoring of PM_{2.5}, NO_x, SO_x, chromium, nickel, lead, and manganese emissions from the Melt Shop Baghouse, or require performance testing which will be used to establish operating parameters and monitoring requirements for the Melt Shop Baghouse that assure compliance with the Permit's hourly and annual emission limits for those pollutants. The Permit must be revised accordingly.

III. THE PERMIT MUST BE REVISED TO REQUIRE THE FACILITY TO MONITOR AND RECORD HOURLY NATURAL GAS CONSUMPTION BY SOURCES THAT CREATE EMISSIONS BY COMBUSTING NATURAL GAS

The Facility includes several sources that create emissions solely or primarily by combusting natural gas to produce heat; emissions from those sources for any given time period will thus be determined in large part by the amounts of natural gas that they consume during that period. The Permit establishes an hourly emission limit for each such source, but does not require that the Facility monitor and record the amounts of natural gas that the sources consume on an hourly basis. Further, the Permit record does not establish that natural gas consumption by the sources remains constant from hour to hour. Accordingly, without hourly monitoring and reporting, it will be impossible to determine whether the sources have been operated to comply

¹⁴ See *In the Matter of Fort James Camas Mill*, 2000 EPA CAA Title V LEXIS 14, *32 (Dec. 22, 2000).

¹⁵ Cf. *In the Matter of Chevron Prods. Co., Richmond, California Facility*, 2005 EPA CAA Title V LEXIS 6, *63-64 (March 15, 2005) (stating "[f]or all practical purposes, a single emission factor that was developed to represent long-term average emissions can not forecast the occurrence and size of leaks in a collection of heat exchangers and is therefore not predictive of compliance at any specific time").

¹⁶ 40 C.F.R. § 70.6(c)(1); cf. 25 Pa. Code § 127.441(c) (operating permit shall contain "requirements related to monitoring, recordkeeping and reporting required by the Clean Air Act and the regulations thereunder").

with their hourly emission limits. The Permit should be revised so that the Facility is required to monitor and record such sources' consumption of natural gas on an hourly basis.¹⁷

The sources in the Facility that create emissions solely by combusting natural gas for which the Permit establishes hourly emission limits without requiring hourly monitoring and recording of natural gas consumption include:

- **§ V.E: Electro-Slag Remelt Holding Furnace.** The Permit establishes hourly emission limits,¹⁸ but requires that the Facility record natural gas consumption on only monthly and annual bases.¹⁹
- **§ V.H: Annealing Furnaces and Plate-Warming Furnaces.** The Permit establishes hourly emission limits,²⁰ but requires that the Facility record natural gas consumption on only monthly and annual bases.²¹
- **§ V.I: Reheat Furnaces.** The Permit establishes hourly emission limits,²² but requires that the Facility record natural gas consumption on only monthly and annual bases.²³
- **§ V.M: Miscellaneous Space Heating Units.** The Permit establishes hourly and annual emission limits,²⁴ but only requires that the Facility keep an estimated record of natural gas usage, without specifying for which periods of time.²⁵
- **§ V.N: AOD Relining Heater.** The Permit establishes hourly emission limits,²⁶ but requires that the Facility record natural gas consumption on only monthly and annual bases.²⁷

¹⁷ See *In the Matter of Wheelabrator Baltimore, L.P.*, 2010 EPA CAA Title V LEXIS 4, *33 (Apr. 14, 2010) (determining that it an annual stack test was not adequate to assure compliance with continuous emission limits).

¹⁸ § V.E.1.c.

¹⁹ § V.E.4.b.

²⁰ § V.H.1.f.

²¹ § V.H.4.b.

²² § V.I.1.g.

²³ § V.I.4.b.

²⁴ § V.M.1.c.

²⁵ § V.M.4.b.

²⁶ § V.N.1.e.

²⁷ § V.N.4.a.

- **§ V.O: Transfer Ladle Heater.** The Permit establishes hourly emission limits,²⁸ but requires that the Facility record natural gas consumption on only monthly and annual bases.²⁹

²⁸ § V.O.1.e.

²⁹ § V.O.4.a.