

SOUTHWEST REGIONAL OFFICE

MEMO

TO Air Quality Permit File SOOP # 04-00084
Anchor Hocking, LLC

FROM Sheila A. Shaffer *SAS*
Air Quality Engineering Specialist
Air Quality Program

THROUGH Mark R. Gorog, P.E.. *MRG*
Regional Program Manager
Air Quality Program

DATE July 13, 2015

RE Comment and Response Document
Monaca Borough, Beaver County
APS# 804798; AUTH # 964766; PF# 238606

Background

On February 19, 2013, the Department received a State Only (Synthetic Minor) Operating Permit (SOOP) application from Trinity Consultants on behalf of Anchor Hocking, LLC (Anchor) for their glass manufacturing facility located in Monaca Borough, Beaver County. Anchor has complied with the municipal notification requirements contained in 25 Pa. Code §127.413 and the application fee requirements contained in 25 Pa. Code §127.703(b)(3). On March 17, 2015, the Department received a revised initial SOOP application to incorporate Plan Approval PA-04-00084C. On May 7, 2015, the application was determined to be Administratively Complete.

Anchor is currently operating under a Title V Operating Permit that was issued on October 26, 2010 and expires on October 26, 2015 as well as Plan Approval PA-04-00084C issued on February 20, 2014 and expires August 20, 2015.

During the review of Anchor's SOOP application the results of the source testing, required in Plan Approval PA-04-00084C, were not approved by the Department's Source Testing Section. However, at this time, the results have been approved and are provided in Table 1.

Table 1: PA-04-00084C Test Results Summary

Pollutant	Measured	Limit
Total PM ₁₀ (lb/ton-glass)	0.070	0.5
SO ₂ (lb/ton-glass)	0.026	0.47
Ammonia (ppmvd corrected to 15% O ₂)	1.24	10
Total PM _{2.5} (gr/dscf)	0.0013	-

Results are based on a glass production rate of 12.44 tons glass per hour (298 tons per day).

Also during the review of Anchor’s SOOP application, the CEMs monitoring plan was still being reviewed. At this time the CEMS test protocol and monitoring plan has been approved by the Department’s Source Testing Section. Anchor will commence submitting quarterly reports in accordance with 25 Pa. Code §129.308(d) and §129.309(a).

Recommendation

On May 30, 2015, the Notice of Intent to Issue was published in the PA Bulletin for a 30-day public comment period. The proposed Operating Permit renewal was submitted to Anchor for review as well as the Department’s Air Quality Specialist Scott Beadway. The following comments were received:

Comment 1: Scott Beadway, the Department’s Air Quality Specialist for this site, and Anchor’s representative noted mapping for Source IDs 101, 102, 104, 110, 114, 119 and 120 were not incorporated into the proposed SOOP.

Response 1: The Department has updated and included the mapping for all sources noted.

Comment 2: Scott Beadway requested the most stringent NOx emission limit be highlighted in the SOOP since there are three applicable NOx emission limits.

Response 2: The Department is relocating Section C, Condition #009, *“The facility’s NOx emissions shall not exceed 5 lbs per ton of glass produced and 279 tons per consecutive 12 month period.”* and Section D, Source ID 103, Condition #023, *“(a) Except as specified in § § 129.303, 129.304(c), 129.305, 129.306 and 129.307, the owner or operator of a glass melting furnace may not operate the glass melting furnace in a manner that results in NOx emissions in excess of ... (2) 7.0 pounds of NOx per ton of glass pulled for pressed or blown glass furnaces...”* to the Miscellaneous Section of the SOOP.

The most stringent NOx limit is Section D, Source ID 103, Condition #003, *“The Owner/Operator may not operate the glass melting furnace in a manner that results in emissions in excess of the following limits ...a. 1.36 pounds of NOx per ton of glass pulled on a rolling 30-day average...”* Compliance with the NOx emission rate of 1.36 lb/ton ensures compliance with the 5 lb/ton and 7.0 lbs/ton limits. Additionally, Condition #007 of Section C limits the annual facility-wide NOx emissions to 99.0 tons.

Comment 3: Anchor's representative requested the following condition be reduced from an hourly to a daily recordkeeping requirement: Section D, Source ID 103, Condition #012, *"The following parameters shall be monitored and recorded once every hour during all periods of operation: glass production rate, cullet charge rate, natural gas consumption, oxygen consumption, and operating temperatures. Records of operating data shall be retained on-site for period of five (5) years and shall be made available to the Department upon request."* Anchor feels with the monitoring of NOx emissions on a continuous basis warrants the request.

Response 3: The condition will remain the same as in the proposed SOOP and not be reduced to daily. The requirement for hourly recordkeeping is necessary as Anchor is authorized to bypass the CADF system, situations provided in the SOOP and approved by Source Testing Program, where the CEMs will not record the NOx emission rate. This condition will provide factors to determine the emission rate during those situations and has been retained during all modes of operation to maintain consistency.

Through further review, it is noted that Anchor is no longer (since 2008) subject to 40 CFR Part 68 EPA Provisions for Chemical Accident Prevention Subpart G-Risk Management Plan. Up until 2008, Anchor stored a propylene oxide which exceeded the 10,000 pound threshold listed in §68.130. Anchor does store ammonia onsite but is below the threshold quantity of 20,000 pounds. Therefore, Section D, Source ID 103, Condition #015 is not applicable to Anchor and has been removed from the Operating Permit.

On May 4, 2015, an initial operating permit inspection/plan approval inspection was performed by Mr. Alex Sandy, Air Quality Engineering Specialist. Mr. Sandy did not note any violations at the time of his inspection. It is my recommendation that the State Only (Synthetic) Operating Permit for Anchor Hocking, LLC (Anchor), SOOP 04-00084, be issued.

A copy of this permit for this former Title V facility now operating as a synthetic minor will be sent to EPA upon final action on this authorization.