

COMMONWEALTH OF PENNSYLVANIA
Department of Environmental Protection
Southwest Regional Office

MEMO

TO Air Quality Permit File **OP-03-00185**

FROM Jesse S. Parihar
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Air Quality Program



THROUGH Thomas J. Joseph, P.E.
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Mark R. Gorog, P.E.
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DATE January 04, 2017

RE **Comment/Response Document**
Vista Metals, Inc.
Kittanning Plant
East Franklin Township, Armstrong County
Auth #1134927; APS #914006; PF #512621

Vista Metals, Inc. ("Vista") operates a carbide metal manufacturing process at the Kittanning Powder Plant ("Kittanning") located in West Hills Industrial Park on Nolte Drive in East Franklin Township, Armstrong County. The facility custom mixes tungsten carbide with nickel and/or cobalt using a heptane solution. Powder materials are routed to the mill room where heptane is added to form slurry. Materials are reduced to the desired size, and then filtered through a screen in the dryer room. Heptane is volatilized by steam heat in the dryer units where more than 90% is recovered for reuse. The finished carbide powder is then sealed and transported to their McKeesport facility for final processing and manufacturing of cutting tools and dies.

In accordance with 25 Pa. Code §127.44-46, "Intent to issue Notice" the operating permit for this facility was published in the *Pennsylvania Bulletin* on November 19, 2016. On November 22, 2016, a copy of the approved review memo and the proposed plan approval were sent to the applicant and the Department's inspector, and District supervisor.

The required 30-day public comment period closed as of close of business on December 19, 2016. On December 15, 2016, the following comments were received from John K. Baillie, Staff Attorney - Group Against Smog and Pollution (GASP) on the proposed State Only Operating Permit No. 03-00185:

Comment # 1: The permit should limit the amount of heptane that may be lost by the facility in terms of gallons to ensure that the facility's annual emission limit for VOCs is practically enforceable.

Department Response #I: The Department concurred with the commentator and will modify the current condition as follows:

- Section C, # 009: Volatile Organic Compound (VOC) emissions from the facility shall not exceed either 49.9 tons (or 17,632.5 gallons) in any 12 consecutive month period.
- Section C, #016: The operator shall maintain a daily log of the gallons of heptane drawn from the heptane storage tank, and the gallons recovered and returned to the tank. This log shall be used to compile a “Monthly VOC Emissions” tally sheet recording the amount of heptane lost. The USEPA’s number of 5.66 lbs/gallon shall be used to calculate the lbs emitted. The data from the “Monthly VOC Emissions” tally shall be compared to the gauge tape from the heptane delivery truck to judge the accuracy of the flow meters.

Comment # II. The permit should require that the facility operates its condensers at all times.

Department Response # II: The Department does not agree with the commentator and determined that the condensers cannot run at all times as explained below:

The condensers at the facility are heat exchangers that condense heptane from its gaseous state to its liquid state by decreasing the temperature of the gas. They are unpowered devices that only operate when an external vacuum pump is engaged to pull vapors past the cooling tubes. Heptane in its gaseous state is only available to be pulled through the condensers by the vacuum pump when a dryer pot with powder slurry is loaded on the dryer and the dryer is turned on. When the powder in the dryer pot is dry, heptane in its gaseous state is no longer present. The vacuum pump is then shut off and the dryer pot unloaded from the dryer. Drying powder is an intermittent process that happens as needed throughout the day. Therefore, the condensers cannot run at all times.

Comment # III. The permit should require that the facility continue work practices and operate controls that improve the recovery efficiency of the condensers.

Department Response #III: The Department agrees that an owner/operator is required to maintain air contamination sources and air cleaning devices in a manner consistent with good operating practices. As such, and although Vista is already subject, the compliance requirements of 25 PA Code Section 127.444 were added to the operating permit.