



GROUP AGAINST SMOG & POLLUTION

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July 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 Regarding the Draft
Title V Operating Permit for Braddock Recovery, Inc.
(Permit # 0265a)**

Dear Sir or Madam:

Please accept these comments regarding the draft Title V Operating Permit ((#0265a) (the "Permit") for Braddock Recovery, 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 July 26, 2017.

Very truly yours,

/s

John K. Baillie
Senior Attorney

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION
REGARDING THE DRAFT TITLE V OPERATING PERMIT
FOR BRADDOCK RECOVERY, INC. (# 0265a)**

I. THE PERMIT SHOULD IMPOSE HOURLY AND ANNUAL EMISSION LIMITATIONS ON EACH OF THE FACILITY'S PROCESSES

The Department's June 23, 2017 Technical Support Document for the Permit establishes annual and hourly limitations on the rate of emissions from each of the Facility's processes, but the Permit imposes such limitations on only one of those processes, specifically, the Rotary Kiln Dryer.

A Title V Operating Permit must include "emissions limitations and standards."¹ The Department has determined limitations on the hourly and annual rates of emissions for each of the Facility's processes and created operating restrictions that are designed to assure the Facility's compliance with those limitations. Those limitations on hourly and annual rates of emissions should also be included in the Permit.

II. THE PERMIT'S RECORDKEEPING REQUIREMENTS RELATING TO THROUGHPUT ARE NOT SUFFICIENT TO ENSURE COMPLIANCE WITH THE PERMIT'S HOURLY LIMITS ON THROUGHPUT

The Permit limits hourly throughput to the Facility's Pugmills,² Screens,³ Twenty-One Material Transfer Points,⁴ and Rotary Kiln Dryer,⁵ but does not require the Facility to record the amount of throughput to those processes on an hourly basis.⁶

¹ 40 C.F.R. § 70.6(a)(1).

² § V.A.1.a.

³ § V.B.1.b.

⁴ § V.D.1.e.

⁵ § V.E.1.f.

⁶ See § V.A.4.a.1) (requiring the Facility to record the "amount of raw materials processed during operation" without specifying frequency); § V.B (no monitoring or recordkeeping relating to hourly throughput); § V.D.4.a.1)

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.”⁷ The Permit’s recordkeeping requirements do not ensure compliance with its limits on hourly throughput to the Pugmills, Screens, Twenty-One Material Transfer Points, or Rotary Kiln Dryers because they do not require the Facility to determine and record throughput to those processes on an hourly basis. Accordingly, the Permit must be revised to require the Facility to record throughput to the Pugmills, Screens, Twenty-One Material Transfer Points, and Rotary Kiln Dryers on an hourly basis.

III. WEEKLY MONITORING OF THE DIFFERENTIAL PRESSURE DROP ACROSS THE BAGHOUSE AND CYCLONE IS NOT SUFFICIENT TO ENSURE COMPLIANCE WITH PARAMETERS FOR PRESSURE DROP THAT APPLY CONTINUOUSLY

Emissions from the Facility’s Twenty-One Material Transfer Points are controlled by a baghouse.⁸ Emissions from the Facility’s Rotary Kiln Dryer are controlled by that same baghouse and by a cyclone.⁹ The Permit imposes continuous limits on the differential pressure drop across the baghouse¹⁰ and cyclone,¹¹ but only requires that the Facility monitor its compliance with those limits once each week.¹²

(requiring the Facility to record material throughput on a daily basis); § V.E.4.a.3 (requiring the Facility to record material throughput on a daily basis).

⁷ 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”).

⁸ *See* § V.D.1.b.

⁹ *See* § V.E.1.d.

¹⁰ *See* §§ V.D.1.d and V.E.1.e.

¹¹ *See* § V.E.1.f.

¹² *See* §§ V.D.3.b; V.E.3.c; and V.E.3.d.

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.”¹³ The monitoring requirements of a Title V Operating Permit that are not sufficient to assure compliance must be supplemented so that they do assure compliance.¹⁴ Weekly monitoring is not sufficient to ensure compliance with operating limits that apply continuously. The Permit must be revised to require the Facility to monitor differential pressure drop across the baghouse and cyclone continuously.

IV. THE ROTARY KILN DRYER’S CONSUMPTION OF COKE OVEN GAS MUST BE MONITORED ON AN HOURLY BASIS TO ASSURE COMPLIANCE WITH HOURLY LIMITS ON HEAT INPUT AND EMISSIONS

The Permit imposes an hourly limit on heat input to the Rotary Kiln Dryer and hourly limits on emissions from the dryer.¹⁵ The Facility’s compliance with those limits depends in at least some part on how much coke oven gas the Rotary Kiln Dryer combusts each hour. The Permit does not, however, require that the Facility monitor, record, or report how much coke oven gas is combusted by the Rotary Kiln Dryer on an hourly basis.¹⁶

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.”¹⁷ The monitoring requirements of a Title V Operating Permit that are not sufficient to

¹³ 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”).

¹⁴ *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.

¹⁵ *See* §§ V.E.1.a and V.E.1.h.

¹⁶ *See* § V.E.3.a (requiring the Facility to “monitor the amount of coke oven gas combusted in the dryer” without specifying how frequently such monitoring is to occur).

¹⁷ 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”).

assure compliance must be supplemented so that they do assure compliance.¹⁸ The Permit's monitoring requirements do not assure compliance with the hourly heat input limit and the hourly emission limits for the Rotary Kiln Dryer because they do not require the Facility to monitor and record the amount of coke oven gas the Rotary Kiln Dryer combusts each hour. The Permit must be revised to require the Facility to undertake such monitoring and recordkeeping.

V. THE PERMIT MUST REQUIRE MONITORING OF THE CONCENTRATION OF SULFUR COMPOUNDS IN THE COKE OVEN GAS COMBUSTED BY THE ROTARY KILN DRYER TO ENSURE COMPLIANCE WITH THE PERMIT'S LIMIT ON SUCH CONCENTRATIONS

The Permit imposes a limit on the concentration of sulfur compounds in the coke oven gas combusted by the Rotary Kiln Dryer.¹⁹ However, the Permit does not require the Facility to monitor the concentration of sulfur compounds in such coke oven gas.²⁰

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.”²¹ The monitoring requirements of a Title V Operating Permit that are not sufficient to assure compliance must be supplemented to assure compliance.²² Compliance with the Permit's limit on the concentration of sulfur compounds in the coke oven gas combusted by the Rotary Kiln Dryers cannot be assured because the Permit does not require such concentrations to be monitored. Accordingly, the Permit must be revised to require the Facility to monitor the

¹⁸ 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.

¹⁹ See § V.E.1.c.

²⁰ See §V.E.3.

²¹ 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”).

²² 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.

concentration of sulfur compounds in the coke oven gas that is combusted by the Rotary Kiln Dryer.