RESPONSE TO COMMENTS
on the Draft Title V Permit to Operate Renewal
for Pimalco, Inc. (GR-ROP 04-02)

October 23, 2006

I. Response to Comments Raised During the Public Comment Period

This section contains all comments submitted to EPA during the public comment period with regard to the draft title V permit renewal for Pimalco, Inc. in Chandler, AZ, along with EPA's responses. The public comment period ran from August 18, 2006 through September 18, 2006. EPA received comments from Pimalco; no other comments were received.

Comment 1 – Section I.B

Correct the nomenclature of the following emission units:

- *PSI #5 – Identify as Despatch Vertical Heat Treat Furnace (add "Despatch" and "Furnace")*
- *Modify volume of the Cold Dip Tank to 10,676 gallons from 4,787.20 gallons*

EPA Response:
EPA has modified the description for PSI #5 and the Cold Dip Tank as requested in Section 1.f, Table 1 of the Statement of Basis and in Section I.B of the permit.

Comment 2 – Section I.B

Add the emissions unit for Safety Clean Solvent Parts Washers. The facility has solvent parts washers that were identified in the Title V permit application as having VOC PTE of 5.5 tpy.

EPA Response:
EPA has added the "Safety Clean Solvent Parts Washers" to the table of emission-generating units and activities in Section I.B of the permit and Section 1.f of the Statement of Basis as emission unit ID number Misc #2. Please note, however, that the maximum VOC PTE, as documented in Pimalco's application, is 6.2 tons per year.

With the assistance of Pimalco, EPA has also identified four other units that should be added to the table of emission-generating units and activities. These are discussed below, in Section II.B of this document.

Comment 3 – Section II.A

Section II.A.3 states, "Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test. No adjustments are to be made within two (2) hours of the start of the tests. Any operating adjustments made during a source test, that are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid." Pimalco understands that testing must be representative of normal operating conditions, but we believe that EPA lacks the authority to specify who may operate processes during a compliance test or when adjustments might be made.

Adjustments may be necessary as a matter of routine operation. Pimalco agrees that adjustments made during a test to improve test results that might not otherwise be made would render the source test invalid. We suggest that Section II.A.3 be revised to include only the final requirement:

> 3. *Any operating adjustments made during a source test, that are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.*

Section II.A.4 establishes additional testing requirements that are unnecessary and potentially problematic. It requires that certain data be collected for two hours prior to the test and for two hours after completion of the test. The processes that we are most likely to test are batch processes that would be tested over the duration of the batch cycle, Data generated from the previous cycle or the cycle that follows would have little bearing on the cycle that is tested.

EPA Response:
The permit conditions referred to in this comment contain standard language that is used in many of the Part 71 permits issued by EPA, Region 9. EPA is revising permit conditions II.A.3 and II.A.4 per Pimalco's comment on the basis that the originally proposed language is unnecessary given Pimalco's current operating practices. EPA understands that Pimalco's furnace controls cannot be adjusted in any manner that would affect source test results. EPA has deleted the prohibition against adjusting operations within 2 hours of the source tests in Condition II.A.3 and has deleted the requirement in Condition II.A.4 to record process data for 2 hours prior to and 2 hours after each test run.

If Pimalco modifies operations in the future such that process adjustments can be made that may alter source test results (for instance, if Pimalco were to install an air pollution control device) then the language for these two permit conditions should be revisited.

Comment 4 – Section III

Emission standards, usage tracking requirements and recordkeeping requirements are expressed as 12-month rolling "averages". They would be more accurately identified as 12-month rolling "totals". The effected sections include: III.A.5.a-d, III.C.6.b and c, and III.D.4.b.

EPA Response:
EPA agrees with Pimalco's suggested revision and the permit conditions in question have been modified.

Comment 5 – Section III.A.4

Modify the language under III.A.4 to more accurately reflect the requirements at 40 CFR 63.1505(k)(5). We believe that the language should more appropriately read as:

> 4. *The owner or operator may demonstrate compliance with the emission limits of 40 CFR § 63.1505(k)(3) by demonstrating that each emission unit is in compliance with the emission limits at 40 CFR § 63.1505(i)(3) and Condition III.A.1*
>
> *[40 CFR § 63.1505(k)(5)]*

EPA Response:
EPA is modifying Permit Condition III.A.4 per Pimalco's suggestion, as we agree that Pimalco's proposed language better reflects the language of 40 CFR § 63.1505(k)(5).

However, we are retaining the requirement that Pimalco must first apply for and receive a permit modification prior to using the option allowed under 40 CFR § 63.1505(k)(5). Pimalco's renewal application did not identify this option as an applicable operating scenario. Furthermore, during the process of drafting the proposed title V permit renewal for Pimalco, EPA consulted with Pimalco on this issue, offering the option for Pimalco to apply for an alternative operating scenario per 40 CFR § 71.6(a)(9). Pimalco stated that the option provided under 40 CFR § 63.1505(k)(5) is currently not being used at their Gila River plant, and that it is not expected to be used in the near future. Because Pimalco's application did not identify this option as an applicable operating scenario, and because Pimalco did not apply for an alternative operating scenario, the permit does not contain requirements from MACT Subpart RRR related to this option. If Pimalco wishes to use this option in the future, the title V permit would need to be revised in order to incorporate all applicable requirements from the MACT. As indicated previously, Pimalco may apply to have both options included in the title V permit per the alternative operating scenario provisions of 40 CFR § 71.6(a)(9).

Comment 6 – Section III.B.1

We are suggesting that Section III.B.1 provide permit language flexibility to allow for Pimalco to conduct emissions tests using reactive flux to serve as the basis for a permit modification. To this end, we are suggesting the following additional language for Section III.B.1:

The owner or operator shall maintain the total reactive chlorine flux injection rate of each of the group 1 furnaces (IBC #3, IBC #4, IBC #5, and IBC #6) for each operating cycle or time period used in the performance test at or below the average rate established during the performance test. The appropriate total reactive chlorine flux injection rate shall be identified in the facility's OM&M Plan.

EPA Response:
EPA is not revising the permit in response to this comment. The permit excludes several provisions from MACT Subpart RRR on the basis that Pimalco does not conduct reactive fluxing in its furnaces. As with the issue addressed in Comment 5, above, Pimalco's renewal application did not identify reactive fluxing as a potential operating scenario and Pimalco did not identify any of MACT Subpart RRR's provisions related to reactive fluxing as applicable requirements. Further, EPA consulted with Pimalco during the process of drafting the proposed title V permit renewal and informed Pimalco of the option to apply for an alternative operating scenario per 40 CFR § 71.6(a)(9). At the time, Pimalco did not anticipate the need for the permit to include reactive flux requirements. Because Pimalco's application did not identify reactive fluxing as a potential operating scenario and because Pimalco did not apply for an alternative operating scenario, the permit does not contain requirements from MACT Subpart RRR that would apply if Pimalco were to use reactive flux in their furnaces (such as the requirements for weight measuring devices per 40 CFR § 63.1510(e)). If Pimalco wishes to conduct reactive fluxing in the future, the title V permit would need to be revised in order to incorporate all applicable requirements from the MACT.

Comment 7 – Section III.B.2.d

The furnace labels should reflect the applicable emission limits and means of compliance, including the flux addition rate, based on the most recent performance test. The acceptable amount of salt flux added to a charge is subject to change during the life of this permit based on the design and results of performance testing. We are suggesting the following modification:

> *2. The owner or operator must provide and maintain an easily visible label posted at each group 1 furnace (IBC #3, IBC #4, IBC #5, and IBC #6) that identifies:*
>
> > *d. The acceptable flux addition rate; and*

EPA Response:
EPA is not revising the permit in response to this comment. The permit currently prohibits the use of reactive flux in Pimalco's group 1 furnaces. If Pimalco applies for a permit modification to allow reactive fluxing in the group 1 furnaces in the future, Pimalco may, at that time, request a revision to this permit condition. It is important that the label clearly identify currently applicable operational requirements to prevent operation inconsistent with the permit and/or the MACT standard.

Comment 8 – Section III.B.3

Pimalco is also suggesting that this section be revised to identify specific requirements of the OM&M Plan rather than the parametric limits identified in the current version of the Plan. We are suggesting the following modification:

> *3. The owner or operator must operate each group 1 furnace (IBC #3, IBC #4, IBC #5, and IBC #6) in accordance with the work practice/pollution prevention measures documented in the OM&M plan required by 40 CFR § 63.1510(b) and within the parameter values or ranges established in the OM&M plan. Such measures shall address, at a minimum;*
>
> > *a. The maximum weight of internally generated (boring) chips per charge.*
> >
> > *b. A description of acceptable charge material*
> >
> > *c. A specification for purchased scrap and a procedure for ensuring that purchased scrap is properly inspected.*
> >
> > *d. The maximum total reactive flux injection rate*

As currently written, if Pimalco would wish to conduct a performance test using salt flux or with a greater amount of scrap (or chips), we would first have to apply for a permit modification, then conduct the performance test and revise the OM&M Plan

Based on this, Pimalco is requesting that permit language be inserted to allow the facility to conduct emissions testing to allow for changes in scrap or chip quantities without requiring a permit modification.

With respect to salt fluxing, Pimalco would like to propose to EPA to provide for an alternate operating scenario to allow for salt flux additions in a future permit modification.

EPA Response:
EPA is not revising the permit in response to this comment. In drafting the proposed title V renewal permit, EPA reviewed the OM&M plan and identified the critical parameters for ensuring ongoing compliance with the dioxin/furan limits of MACT Subpart RRR. Any changes to the parameters specified in Condition III.B.3, with the exception of Condition III.B.3.d (which requires training in scrap inspection procedures), would require Pimalco to conduct a new source test to demonstrate that the dioxin/furan limits will not be exceeded. Any change significant enough to require a new source test should undergo review by EPA to ensure that we agree with the protocol and to ensure that we agree that any resultant changes to operating parameters will continue, necessarily, to ensure compliance with the MACT standard. Changes to the OM&M plan do not require EPA approval, thus the only means EPA has to ensure that Pimalco will continue to operate in a manner that will achieve compliance with the MACT standard is by including the specific operating parameters identified in Condition III.B.3.

Comment 9 – Section III.B.5.a-c

Pimalco is requesting that this section be deleted in its entirety. The specific emissions limits that were derived from these usages is based on stoichiometric calculations – by definition, the most conservative means of estimating. Specific emissions limits are specified at Section III.A.5.a, b, c and d.

Because it is possible to test a specific emissions source to ascertain the true emission factor, it is likely that an emissions test will conclude that actual HAP emissions are less than stoichiometric calculations. In this case, more ABF/AFB/Cl2 could be used and Pimalco would still remain within the emissions limits specified at Section III.A.5.a, b, c and d.

EPA Response:
EPA agrees that the useage limits for ABF, AFB, and Cl2 contained in Condition III.B.5 are redundant and unnecessary given the separate limits on HAP contained in Condition III.A.5. The sole purpose of the limits on ABF, AFB, and Cl2 was to ensure that Pimalco remain an area source for purposes of the MACT; the limits on HAP in Condition III.A.5 accomplish the same. The permit will continue to require that Pimalco track useage of AFB, ABF, and Cl2 to demonstrate compliance with the HAP limits of Condition III.A.5.

Comment 10 – Section III.C.1.e

Delete reference to "title V". If Pimalco weren't a major source, a permit modification would still be required.

EPA Response:
EPA is not revising the permit in response to this comment. The purpose of Condition III.C.1.e is to ensure that the permit and the OM&M plan do not contain contradictory requirements. Because the permit in question is a title V permit (the only air permit currently issued to Pimalco) this concern and condition only apply to the [title V] permit currently being issued by EPA.

Comment 11 – Section III.E.6

The notification of compliance status report has already been submitted (circa May 2003).

EPA Response:
EPA agrees that the required information was submitted as part of the initial compliance report, on May 12, 2003. Therefore, EPA has deleted Condition III.E.6 and has added an explanation to the table in Appendix A of the Statement of Basis as to why no permit condition is needed.

II. Summary of Permit Changes

A. Changes Made to Permit in Response to Public Comment

1. Modified description for PSI #5

   [Section I.B]

2. Modified volume of the Cold Dip Tank, DTM #10

   [Section I.B]

3. Added Safety Kleen Solvent Parts Washers to the table of emission-generating units and activities.

   [Section I.B]

4. Deleted portions of Conditions II.A.3 and II.A.4.

   [Sections II.A.3 and II.A.4]

5. Changed "rolling average" to "rolling total"

   [See Section III.A.5.a-d; III.C.6.b and c; and III.D.4.b]

6. Modified the wording of Condition III.A.4 to more accurately reflect the language of 40 CFR § 63.1505(k)(5).

   [See Section III.A.4]

7. Deleted redundant limits on ABF, AFB, and Cl2 useage.

   [See Section III.B.5]

8. Deleted Condition III.E.6 requiring Pimalco to submit certain information as part of the notification of compliance status report, as this information has already been submitted.

   [See Section III.E.6]

B. Other Changes to Permit

1. Changed "Pimalco" to "Pimalco, Inc." on page 1 of permit in response to informal request from Pimalco.

   [See Permit Cover Page]

2. Added the following emission units to the table of emission-generating units and activities: DTM #5 (East Age/Anneal Oven), DTM #6 (West Age/Anneal Oven), Aerospace #1 (Despatch Vertical Heat Treat Furnace), and Aerospace #13 (Westinghouse Electric Heat Treat Furnace). These units were inadvertently left off of the table in the proposed permit.

   [See Section I.B]

3. Added requirement to Condition IV.A.4 to require that copies of checks and fee calculation worksheets be mailed to EPA, Region 9.

   [See Condition IV.A.4, page X]