



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 12, 2004

Mr. Steve Hill
Manager, Engineering Division
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

RE: EPA Review of Proposed Title V Permit Modification for Pechiney Plastic Packaging, Inc. (#A0273)

Dear Mr. Hill:

Thank you for the opportunity to comment on the proposed Title V permit modification for Pechiney Plastic Packaging, Inc. We have reviewed the permit revision and are concerned about the changes made to the source testing requirements for catalytic oxidizers A-2 and A-3 and the effect these changes may have on the enforceability of the permit's BACT and synthetic minor limits. Please find our comments enclosed.

We appreciate your willingness to work with us to resolve these issues. If you have any questions concerning this letter, please contact me at (415) 972-3974 or contact Katie Stewart of my staff at (415) 947-4119.

Sincerely,

Gerardo C. Rios
Chief, Air Permits Office

Enclosure

cc: Mike Tollstrup, CARB
Dick Edgeworth, Pechiney Plastic Packaging, Inc.

**EPA Comments on the Proposed
Title V Permit Modification for Pechiney Plastic Packaging, Inc.**

1. Screening Tests for Catalytic Oxidizers A-2 and A-3

Condition #14373, parts 14 and 15, currently requires an annual source test for oxidizers A-2 and A-3 to show compliance with the BACT limit under Condition 14373, Part 2¹. We understand that the facility uses two catalytic oxidizers in parallel to either emit less than 10 ppm of Non-Methane Hydrocarbon (NMHC) or meet a tiered BACT limit. We also understand that BAAQMD is now proposing to allow for an annual screening test on the combined outlet of the two catalytic oxidizers, in place of the annual source test, as a result of an appeal by Pechiney. If the results show a combined outlet concentration exceeding 10ppm, Pechiney would have 30 days to screen the oxidizers individually. For any oxidizer with an outlet concentration that still exceeds 10 ppm after the second screening test, Pechiney would then have an additional 30 days to determine the inlet and outlet concentration at that oxidizer, and to determine whether an appropriate destruction efficiency is being achieved.

We are concerned that the facility will have three attempts to show compliance with their BACT limit, and that the raw material inputs may change dramatically over each 30-day period. Because Pechiney is permitted to use both complying and noncomplying materials (defined per BAAQMD Regulation 8-20-302), the inlet concentration of NMHC and HAP at the oxidizers could vary significantly.

We recommend that the District not approve Pechiney's request to modify the annual source test requirement. However, if the District does approve the screening approach, the permit could allow the source to initially screen each individual outlet, and then conduct any necessary source test within 30 days; we believe that the facility should only conduct a second screening test in lieu of source testing as a second step if it is unclear whether one of the oxidizers is over 10 ppm (i.e., if the average concentration of both oxidizers at the combined stack outlet is between 5 and 10 ppm it would be unclear whether one of the outlets is over 10 ppm). As noted below, we also believe that a minimum source testing frequency is required for the facility to use a control efficiency to show compliance with their synthetic minor HAP limit.

We understand that Pechiney may have relied on EPA's Draft Technical Support Document for Title V Permitting of Printing Facilities in making their case to the Hearing Board that annual source testing of catalytic oxidizers is unnecessary. We would like to point out that the guidelines are draft and should not be relied upon as final agency opinion. In addition,

¹ Please note that permit condition #14373, Part 2 appears to be mis-worded. Rather than requiring that the oxidizers meet their BACT limit, the permit reads that the source shall not operate the oxidizers unless they meet their BACT limit. We would recommend clarifying the intent of the permit condition. Please also see page 8 of the permit.

general guidelines suggesting one potential approach to verify that a control device is operating properly does not necessarily provide information on whether a unit will meet a case-by-case BACT limit, as applies in this situation. However, because the document was brought to our attention, we would like to address the document's recommendations for catalytic oxidizers.

Appendix C of EPA's TSD lists the following parameters as presumptively acceptable protocols for monitoring the performance of a catalytic oxidizer:

- Performance testing once every five years
- Annual sampling and testing of the catalyst activity
- Verification of the operating condition of the bypass valve and interlock
- Periodic monitoring of the catalyst bed inlet temperature
- Periodic inspection of the oxidizer, including burner assembly

The testing protocol proposed in the Title V permit revision does not appear to satisfy the first two of these parameters. EPA's draft guidance suggests performance testing at least once every five years along with annual catalyst sampling and testing. The Title V permit for Pechiney does not set any requirement to perform a periodic source test, unless the oxidizers fail both screening tests. While we agree that, at a minimum, annual screening testing is necessary for BACT purposes, we believe that catalyst activity testing would help verify proper catalyst operation.

Again, the guidance document mentioned above is draft. We would like to stress that the District should continue to address the appropriateness of any testing and monitoring conditions on a case-by-case basis. While we would recommend that the District deny Pechiney's request, at a minimum, we strongly recommend that the District require that any necessary source test be conducted within 30 days following the initial screening test, rather than waiting for a second screening test. We also recommend that the District require the facility to show in a source test protocol or notification to the District that they will test at their maximum emission rate, or under conditions that the District finds are representative of their maximum emission rate.

2. Calculating HAP Emissions Under Condition #20229

Pursuant to Condition #20229, Pechiney is subject to a synthetic minor limit on HAP emissions. Without this limit, Pechiney would be subject to the Printing and Publishing MACT (40 CFR, Part 63 subpart KK). In calculating HAP emissions, Part 2 of Condition #20229 allows the source to take into account the control efficiency for abated operations, provided that the most recent source test for the abatement device meets the permits destruction efficiency requirements. If the District does not deny Pechiney's request to implement a screening test in place of a source test, Condition #20229 must require a minimum source testing frequency and explain how HAP destruction efficiency would be calculated in the absence of a recent source test showing the destruction efficiency of the oxidizers.

Part 2 of Condition #20229 also allows Pechiney to use MSDS information to calculate

HAP emissions. Since MSDS are intended to identify hazardous compounds and associated safety-related information rather than to determine air pollution emissions, we do not believe that they are appropriate for air permit compliance purposes. Please replace approval to use MSDS with a requirement to use Certified Product Data Sheets, or if necessary data from the on-site determination of HAP content of the materials as applied.

