

ALLEGHENY COUNTY HEALTH DEPARTMENT
Air Quality Program

**SUMMARY OF PUBLIC COMMENTS AND DEPARTMENT RESPONSES
ON THE PROPOSED ISSUANCE OF SYNTHOMER JEFFERSON HILLS LLC
TITLE V OPERATING PERMIT NO. 0058-OP24**

[Notice of the opportunity for public comment appeared in the legal section of the Pittsburgh Post-Gazette on March 14, 2024. The public comment period ended on April 18, 2024]

1. **Comment:** Section I: Contact Information: commenter asked to change the physical address of the facility to 2200 State Route 837, Jefferson Hills, PA 15025, and change the address of the Responsible Official to PO Box 545, West Elizabeth, PA 15088-0545.

Response: The requested revision has been made to the final permit.

2. **Comment:** Section II: Facility Description, Table II-1; Emission Unit Identification: commenter asked to correct the volume of T-53 to 734,000 gallons. The capacity of this tank was increased under Installation Permit No. 0058-I021.

Response: The capacity was increased via a Request for Determination (RFD) dated March 7, 2024. The requested revision has been made to the final permit.

3. **Comment:** Section II: Facility Description, Table II-1; Emission Unit Identification: commenter asked to modify the equipment list for the WW Poly Unit. The project to install the East Preblend Tank, South Neutralizer, South Funda Filter, Solvent Wash Receiver, East Filtrate Receiver, and Lime/Filter Aid Bag Dump Station was permitted under Installation Permit No. 0058-I023, but this project was never executed. The Installation Permit has since expired.

Response: The requested revision has been made to the final permit and the equipment removed from the emission sources list.

4. **Comment:** Section II: Facility Description, Table II-1; Emission Unit Identification: commenter asked to remove tank T-382 from the table. Tank was permanently removed from service.

Response: The requested revision has been made to the final permit.

5. **Comment:** Section III: General Conditions, condition III.15.d.3): commenter asked to change the dates in this condition.

Response: The requested revision has been made to the final permit.

6. **Comment:** Section IV: Site Level Terms and Conditions, condition IV.27: commenter states that the facility is subject to the 40 CFR Part 63 Subpart ZZZZ and not a subject to the 40 CFR Part 61 Subpart M.

Response: The Department agrees that 40 CFR, Part 61, Subpart M is not applicable to the facility. However, the emergency generator meets the operational requirements of “emergency stationary

RICE” under §63.6640(f), therefore 63 Subpart ZZZZ does not apply. The revisions have been made to the final permit.

7. **Comment:** Section IV: Site Level Terms and Conditions, condition IV.27: commenter deleted requirement of 40 CFR Part 61 Subpart M – *National Emission Standard for Asbestos*.

Response: See response to Comment No. 6 above. The requested revision has been made to the final permit.

8. **Comment:** Section IV: Site Level Terms and Conditions, condition IV.27: commenter states that any required federal reporting for annual greenhouse gas emissions under 40 CFR Part 98 is not an applicable requirement under the Title V operating permit program. Therefore, this requirement has no place in this permit and must be deleted.

Response: While there are no Title V requirements for greenhouse gases, the Greenhouse Gas Reporting rule is a federal requirement under 40 CFR Part 98. If the facility exceeds 25,000 tons of actual greenhouse gas emissions in any 12-month period, it must submit reports. No changes were made to the permit.

9. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.A.6.a: commenter requests that the Department revise this condition to clarify that the baghouse may be replaced with a unit of equal or better efficiency for any reason including but not limited to preventing corrosion.

Response: The requested revision has been made to the final permit.

10. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.B: commenter deleted Condensers as a control device in Process Description.

Response: Condensers are the control devices for the Sparkler Filter in this process, so no changes were made to the permit.

11. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.B.1.1: commenter states that the PM/PM₁₀ limit for the Precoat Dump Station is listed as ≤ 0.0 TPY. This is not a practical limit and could be interpreted that no emissions can be emitted from this source. A very negligible amount of PM emissions is expected from the baghouse at 0.01 tpy or lower. Commenter requests that this emission limit be removed or that the emission limit be listed as 0.01 tpy.

Response: The requested revision has been made to the final permit – emissions changed to ≤ 0.01 tpy.

12. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.B.2.c: commenter states that the requirement to test the UHF filter was a one-time only requirement and was completed in 2012. Commenter therefore requests that this condition be removed.

Response: The Department agrees that the test in Installation Permit No. 0058-I011f was intended as a one-time test, which was completed in 2012. Given the low potential VOC emissions (0.14 tpy), the permit has been revised to remove the testing condition. Compliance with the limit will be demonstrated by continuously monitoring the pressure drop across the UHF filter.

13. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.B.3.b: commenter requests that the references to 40 CFR §63.995(c) and 40 CFR §63.996(d) be removed from this condition. The

carbon beds associated with the C5 polymerization process are not required by the MON regulations, and the references are inappropriate.

Response: The requested revision has been made to the final permit.

14. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.B.3.d: commenter requests that the Department remove the sentence “The differential pressure drops across the UHF Filter and baghouses shall be recorded at the time of inspection.” Synthomer monitors these units using electronic transmitters which automatically record and store data in the facility’s data archive which makes this language unnecessary.

Response: The requested revision has been made to the final permit.

15. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.B.4.a: commenter requests that the reference to 40 CFR §63.2525(b) be removed from this condition. This section of the MON refers to recordkeeping for operating scenarios and is not applicable.

Response: The requested revision has been made to the final permit.

16. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.B.6.a: commenter requests that the Department revise this condition to clarify that condensers and baghouses may be replaced with a unit of equal or better efficiency for any reason including but not limited to preventing corrosion.

Response: The requested revision has been made to the final permit.

17. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.C.3.b: commenter requests that the last sentence in this condition be removed. It duplicates the requirements in condition V.B.3.d.

Response: The requested revision has been made to the final permit.

18. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.C.6.d: commenter requests that the Department revise this condition to clarify that condensers and baghouses may be replaced with a unit of equal or better efficiency for any reason including but not limited to preventing corrosion.

Response: The requested revision has been made to the final permit.

19. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.D, Table: commenter requests to correct the volume of tank T-53 to 734,000 gallons. The capacity of this tank was increased under Installation Permit 0058-I021.

Response: See response to Comment No. 2 above. The requested revision has been made to the final permit.

20. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.D.1: commenter requests that a reference to condition V.D.5.b be included in order to clarify that changes in material stored in the subject tanks are permitted with a 10-day notice.

Response: The requested revision has been made to the final permit.

21. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.D.1.c, Table V-D-1: commenter requests that the VOC limit for T-52 be increased to 2.4 TPY, the VOC limit for T-53 be

increased to 0.75 TPY, and the limit for T-50 be increased to 0.33 TPY. These new limits were approved by the Department in Requests for Determination dated January 9, 2018, March 21, 2024, and March 7, 2024, respectively. Commenter also requests that all tanks in Table V-D-1 be regrouped so that tanks storing similar materials are grouped together.

Response: The Department approved these changes through the Request for Determination (RFD) process. In each case, the emissions increase was determined to be *de minimis* under §2103.14.e.4.E, which states:

“The Department may allow, as a condition of an Operating Permit, de minimis emission increases from a new or existing source up to the amounts authorized in this Subsection.

4. *[T]he maximum de minimis emission rate increases, as measured in tons/year, that may be authorized in the permit during the term of the permit are:*

E. *One ton of VOCs from an emissions unit during the term of the permit and 5 tons of VOCs at the source during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder, or this Article.”*

These sections of Article XXI are the basis for inclusion of changes made under an RFD into an operating permit. These conditions are included in the permit draft under General Conditions III.35 and III.36. The requested revision has been made to the final permit and TSD.

22. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.D.3.b: commenter requests that language in this condition be changed to clarify that only instrumentation actually used to measure tank throughput needs to be included in the Preventive Maintenance and Operation Plan.

Response: The requested revision has been made to the final permit.

23. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.D.3.g: commenter requests that this condition be removed from the permit. This language pertains only to closed vent systems regulated under MON, and there are no such systems associated with the tanks in this section.

Response: The requested revision has been made to the final permit.

24. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.D.4.a: commenter requests that the phrase, “or the most recent version” will insert following the reference to TANKS 4.09d. EPA released TANKS 5.0 for beta testing in April 2024.

Response: The requested revision has been made to the final permit.

25. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.D.4.a: commenter requests that the removal of the requirement to maintain vapor pressure as part of the AST log and the creation of a new recordkeeping requirement to take its place. The Antoine coefficients for all materials in the AST log are updated annually, and the temperature at which the vapor pressure is calculated fixed for each tank. The calculated vapor pressure of each material therefore remains fixed throughout the year and can be easily maintained as a record made available to the Department upon request.

Response: Regardless of how the facility maintains the Antoine coefficients and vapor pressures for each tank, the facility is still required to maintain those records. No changes were made to the permit.

26. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.D.5.a.1): commenter requests that the references to conditions V.D.4.a and V.D.4.b be removed from the reporting

requirements. These conditions refer to the AST log and the dimensions and capacities of T-52 and T-53. The requirements are not found in any of the underlying Installation Permits and would significantly increase the reporting burden on the facility with no corresponding environmental benefit.

Response: The requested revision has been made to the final permit.

27. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.D.5.b: commenter requests elimination of the word “Material” from the phrase “Material Safety Data Sheet”.

Response: The requested revision has been made to the final permit.

28. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.E.1.e: commenter requests that this condition refers to particulate emissions from the MP Poly baghouses. In order to avoid confusion, commenter requests that the word “gases” be struck from this condition and replaced with the phrase “filterable particulate matter”.

Response: The requested revision has been made to the final permit.

29. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.E.1.i: commenter requests that this condition is intended to apply to condensers E-203-4 and E-701-4. However, the condition references Installation Permit 0058-I026a, condition V.C.1.d, which only applies to condenser E-701-4. Synthomer therefore requests that the Department clarify the condition to apply explicitly to both condensers.

Response: The Department agrees that the RACT II permit (IP No. 0058-I026a) explicitly refers to condenser E-701-4. However, the Department does not feel that the actions described in response to a temperature exceedance (in condition V.E.1.i) are unreasonable for condenser E-203-4. The citations in conditions V.E.1.h and V.E.1.i have been revised to reflect applicability to both condensers.

30. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.E.3.a & 3.b: commenter requests the removal of the reference to 40 CFR §63.996 which is derived from the MON regulations. BF₃ is not a hazardous air pollutant, so the reference is inappropriate.

Response: The requested revision has been made to the final permit.

31. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.E.6.a: commenter requests that the Department revise this condition to clarify that condensers and baghouses may be replaced with a unit of equal or better efficiency for any reason including but not limited to preventing corrosion.

Response: The requested revision has been made to the final permit.

32. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.F.3.a: commenter requests that Department modify the language to allow material receipt records and level measurement changes to be used to determine the throughput of the subject storage tanks. This change would create uniform language at all units with tanks subject to the AST throughput monitoring requirements.

Response: The requested revision has been made to the final permit.

33. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.F.3.b: commenter requests that language in this condition be changed to clarify that only instrumentation actually used to measure tank throughput needs to be included in the Preventive Maintenance and Operation Plan.

Response: The requested revision has been made to the final permit.

34. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.F.4.a: commenter requests that the Department insert the phrase, “or the most recent version” following the reference to TANKS 4.09d. EPA released TANKS 5.0 for beta testing in April 2024.

Response: The requested revision has been made to the final permit.

35. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.F.4.a: commenter requests that the removal of the requirement to maintain vapor pressure as part of the AST log and the creation of a new recordkeeping requirement to take its place. The Antoine coefficients for all materials in the AST log are updated annually, and the temperature at which the vapor pressure is calculated fixed for each tank. The calculated vapor pressure of each material therefore remains fixed throughout the year and can be easily maintained as a record made available to the Department upon request.

Response: See response to Comment No. 25 above. No changes were made to the permit.

36. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.F.5.c: commenter requests elimination of the word “Material” from the phrase “Material Safety Data Sheet”. The documents formerly called Material Safety Data Sheets are now known as Safety Data Sheets and contain the information the Department requires.

Response: The requested revision has been made to the final permit.

37. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.G.1.b, Table V-G-1: commenter requests that this Table will be change based on the Table II-1. See Comment No. 3 above.

Response: The requested revision has been made to the final permit.

38. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.G.1.d: commenter requests removal of the reference to H-700-10. See Comment No. 3 above.

Response: The requested revision has been made to the final permit.

39. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.G.1.e: commenter requests removal of the references to E-701-7, E-903-3, and E-901-7. See Comment No. 3 above.

Response: The requested revision has been made to the final permit.

40. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.G.1.g: commenter requests removal of the references to S023, S027, and S295. See Comment No. 3 above.

Response: The requested revision has been made to the final permit.

41. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.G.3.a & 3.b: commenter requests that the removal of the reference to 40 CFR §63.996 which is derived from the MON regulations. BF₃ is not a hazardous air pollutant, so the reference is inappropriate.

Response: The requested revision has been made to the final permit.

42. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.G.3.e & 3.f: commenter requests removal of the references to E-701-7, E-903-3, and E-901-7. See Comment No. 3 above.

Response: The requested revision has been made to the final permit.

43. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.G.6.a: commenter requests that the Department revise this condition to clarify that condensers and baghouses may be replaced with a unit of equal or better efficiency for any reason including but not limited to preventing corrosion.

Response: The requested revision has been made to the final permit.

44. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.G.6.c: commenter requests removal of the reference to H-700-1. See Comment No. 3 above.

Response: The requested revision has been made to the final permit.

45. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.H.3.a: commenter requests that Department modify the language to allow material receipt records and level measurement changes to be used to determine the throughput of the subject storage tanks.

Response: The requested revision has been made to the final permit.

46. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.H.3.c: commenter requests language in this condition be changed to clarify that only instrumentation actually used to measure tank throughput needs to be included in the Preventive Maintenance and Operation Plan.

Response: The requested revision has been made to the final permit.

47. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.H.4.a: commenter requests that the first sentence of this condition be changed to specify the tanks to which this condition applies.

Response: The requested revision has been made to the final permit.

48. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.H.4.a: commenter requests that the removal of the requirement to maintain vapor pressure as part of the AST log and the creation of a new recordkeeping requirement to take its place. The Antoine coefficients for all materials in the AST log are updated annually, and the temperature at which the vapor pressure is calculated fixed for each tank. The calculated vapor pressure of each material therefore remains fixed throughout the year and can be easily maintained as a record made available to the Department upon request.

Response: See response to Comment No. 25 above. No changes were made to the permit.

49. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.H.5.c: commenter requests elimination of the word “Material” from the phrase “Material Safety Data Sheet”. The documents formerly called Material Safety Data Sheets are now known as Safety Data Sheets and contain the information the Department requires.

Response: The requested revision has been made to the final permit.

50. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.H.6.a: commenter requests that the Department revise this condition to clarify that condensers and baghouses may be replaced with a unit of equal or better efficiency for any reason including but not limited to preventing corrosion.

Response: The requested revision has been made to the final permit.

51. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.I.6.a: commenter requests that the Department revise this condition to clarify that condensers and baghouses may be replaced with a unit of equal or better efficiency for any reason including but not limited to preventing corrosion.

Response: The requested revision has been made to the final permit.

52. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.J.3.a: commenter requests that Department modify the language to allow material receipt records and level measurement changes to be used to determine the throughput of the subject storage tanks.

Response: The requested revision has been made to the final permit.

53. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.J.3.e: commenter requests that language in this condition be changed to clarify that only instrumentation actually used to measure tank throughput needs to be included in the Preventive Maintenance and Operation Plan.

Response: The requested revision has been made to the final permit.

54. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.J.4.a: commenter requests that the first sentence of this condition be changed to specify the tanks to which this condition applies.

Response: The requested revision has been made to the final permit.

55. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.J.4.a: commenter requests that the removal of the requirement to maintain vapor pressure as part of the AST log and the creation of a new recordkeeping requirement to take its place. The Antoine coefficients for all materials in the AST log are updated annually, and the temperature at which the vapor pressure is calculated fixed for each tank. The calculated vapor pressure of each material therefore remains fixed throughout the year and can be easily maintained as a record made available to the Department upon request.

Response: See response to Comment No. 25 above. No changes were made to the permit.

56. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.J.5.a: commenter requests the addition of the phrase “or polymerizate” after the word “solvent” in the first sentence in order to accurately reflect the contents of the Hydrogenation Unit storage tanks. Commenter also requests elimination of the word “Material” from the phrase “Material Safety Data Sheet”. The documents formerly called Material Safety Data Sheets are now known as Safety Data Sheets and contain the information the Department requires.

Response: The requested revision has been made to the final permit.

57. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.J.6.a: commenter requests that the Department revise this condition to clarify that condensers and baghouses may be replaced with a unit of equal or better efficiency for any reason including but not limited to preventing corrosion.

Response: The requested revision has been made to the final permit.

58. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.K.2.a: commenter requests that the reference to Site Level Condition IV.14 should be changed to condition IV.13.

Response: The requested revision has been made to the final permit.

59. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.K.4.b: commenter requests that the reference to 40 CFR §63.2525(b) be removed from this condition. This section of the MON refers to recordkeeping for operating scenarios and is not applicable to this condition.

Response: The requested revision has been made to the final permit.

60. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.K.6.a: commenter requests that the Department revise this condition to clarify that condensers and baghouses may be replaced with a unit of equal or better efficiency for any reason including but not limited to preventing corrosion.

Response: The requested revision has been made to the final permit.

61. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.L, section header: commenter requests removal of the reference to the scrubber. Installation Permit 0058-I012a removed the requirement to operate this scrubber.

Response: The requested revision has been made to the final permit.

62. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.L.1.a.1): commenter requests removal of the lower operating limit in this condition. Commenter indicated that readings below 1" w.c. occur whenever the bags are replaced and can last for weeks after replacement. An investigation by the facility showed that readings below 1" w.c. are solely the result of insufficient dust build-up on the bags and do not indicate that the baghouse is functioning improperly or that the process is generating excess emissions.

Response: The Department recognizes the commenter's concerns. However, a lower differential pressure in a baghouse is the standard method of detecting bag leaks in lieu of a bag leak detection system. As there is no bag leak detection system on this baghouse, the lower limit has been revised to 0.5" w.c.

63. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.L.1.e: commenter requests remove the phrase "Fume Scrubber (S085)" and replace it with "Dresinate dryer".

Response: The requested revision has been made to the final permit.

64. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.L.3.a: commenter requests removal of all references to the scrubber.

Response: The requested revision has been made to the final permit.

65. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.L.3.b: commenter requests that the last sentence of this condition be changed to eliminate references to the scrubber and further requests that the requirement to record the differential pressure drop across the baghouse simply be

“weekly” instead of “at the time of inspection”. Synthomer monitors the baghouse using an electronic transmitter which automatically records and stores data in the facility’s data archive and which makes this language unnecessary.

Response: The requested revision has been made to the final permit.

66. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.L.3.c: commenter requests remove the phrase “scrubbing unit and” from this condition.

Response: The requested revision has been made to the final permit.

67. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.L.6.c: commenter requests that the Department revise this condition to clarify that the baghouse may be replaced with a unit of equal or better efficiency for any reason including but not limited to preventing corrosion.

Response: The requested revision has been made to the final permit.

68. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.N.3.a: commenter requests that this condition be removed and replaced with a reference to proposed Section VII of the permit.

Response: Condition V.N.3.a is directly from Installation Permit #0058-I025. Furthermore, the commenter does not indicate where in Section VII the condition should be moved. No changes were made to the permit.

69. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.N.5.a: commenter requests that conditions 4) and 5) should be renumbered as 1) and 2).

Response: The requested revision has been made to the final permit.

70. **Comment:** Section VI: Miscellaneous, Condition VI.B, section header: commenter requests that the equipment numbers for Boilers #1 through #4 should be BU-1, BU-2, BU-3, and BU-4 respectively.

Response: The requested revision has been made to the final permit.

71. **Comment:** Section VI: Miscellaneous, Condition VI.C, section header: commenter requests that Boiler #5 should be designated “Boiler #5 (Trane Boiler)”.

Response: The requested revision has been made to the final permit.

72. **Comment:** Section VI: Miscellaneous, Condition V.D, section header: commenter requests that the maximum design rate of the emergency generator be corrected to 250 kW (335 hp).

Response: The requested revision has been made to the final permit.

73. **Comment:** Section VI: Miscellaneous, Section VI.E: commenter notes that the section for the LTC Heaters and the C-5 Hot Oil Furnace should be in their own section (VI.E) rather than VI.D.7 as in the draft. The commenter requests that the numbering in this section should be corrected.

Response: The requested revision has been made to the final permit.

74. **Comment:** Section VI: Miscellaneous, Condition VI.E.6.a: commenter requests that the reference to the C-6 Hot Oil Furnace should be corrected to the C-5 Hot Oil furnace.

Response: The requested revision has been made to the final permit.

75. **Comment:** Section VI: Miscellaneous, Condition VI.F table VI-F-1: commenter requests that omitted sources from application and table II-1 be added to the table in this section.

Response: The requested revision has been made to the final permit.

76. **Comment:** Section VI: Miscellaneous, Condition VI.G.1.a: commenter indicates that this condition defines the scope of the MON-required LDAR program at the facility and states that “The processes applicable to these regulations are: C5 Unit, LTC Unit, MP Poly Unit, WW Poly Unit, Hydrogenation Unit, and Emulsion Unit”. Commenter requests that this sentence be removed because it is inaccurate and will lead to confusion as to what components are covered by this section. Only portions of the C5, LTC, MP Poly, and WW Poly Units are covered by the MON-required LDAR program, and neither the Hydrogenation nor the Emulsion Units are covered by or subject to the MON-required LDAR requirements. In order to clarify this condition, commenter requests that the phrase “as defined in 40 CFR §63.2550” be inserted in the first sentence. This language guarantees that all MON-required LDAR components, and only those components, are included in the scope of this section.

Response: The language of this condition has been revised to reference 40 CFR §63.2550 and to remove reference to the Hydrogenation and Emulsion Units. However, the Department feels it is important to retain a reference to the applicable units. The phrase “...processes with equipment applicable to these regulations...” was added to indicate that not all of the equipment in these processes is applicable. Condition VI.G.1.b already requires that the facility identify all equipment subject to the LDAR requirements.

77. **Comment:** Due to the complexity of the MON regulations, commenter requests that all conditions referencing this regulation be removed from Section V, Emission Unit Level Terms and Conditions, and placed in a new Section VII of the permit to which the appropriate emissions units refer. Note that all startup, shutdown, and malfunction (SSM) provisions were removed from the MON regulations as of August 12, 2023.

Response: The Department agrees with this revision and has revised the permit to remove all MON regulations from Section V and created a new Section VII for the MON requirements.

78. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.A.1.b: commenter requests that the annual emission limits for the C5 Aluminum Chloride Handling Operation must reflect that source’s full potential to emit.

Response: The Aluminum Chloride Handling Operation consists of 4 different pieces of equipment – Silo, Receiver, Charging chamber, and Scrubber system. Potential emissions are the theoretical maximum emissions from operation at the equipment design rating: 180,000,000 lbs/yr for 8,760 hrs/yr. Note that not all of these processes are continuous, so the annual emissions will not necessarily correlate directly to the short-term limit. For batch processes, the short-term limits represent the maximum point of the batch. Annual emissions are based on the equipment design rating. See the technical support document (TSD) for calculations. No changes were made in the permit.

79. **Comment:** The permit does not incorporate testing, monitoring, or recordkeeping requirements that are sufficient to assure compliance with the hourly emission limits for the C5 Unit's polymerization process.

Response: Most of the process equipment for the C5 Unit Polymerization process are controlled by a thermal oxidizer. Temperature of the thermal oxidizer is continuously monitored, which is an accepted method of parametric monitoring of VOC and HAP emissions from a process controlled by a thermal oxidizer. Criteria pollutants from the thermal oxidizer are strictly from the combustion of VOC and supplemental natural gas. As the VOC is controlled and the other pollutants are a direct result of the control device, ACHD does not believe additional testing is justified. ACHD added a condition to Section V.B.4 to record natural gas use in the thermal oxidizer and to calculate emissions based on AP-42 factors monthly.

In the US EPA's petition decision for the United States Steel Clairton Works (Petition Nos. III-2023-5 and III-2023-6, page 9), they state "EPA has not indicated that in all cases testing and monitoring must exactly mirror the averaging times of associated emission limits." Given this statement, and the relatively low potential emissions, ACHD believes that monthly calculation of actual emissions (in addition to the other parametric monitoring) is sufficient to demonstrate continuous compliance.

C5 baghouses - The baghouses in question are associated with "dump stations" where dry materials are manually added into the process and exist primarily to provide localized exhaust ventilation for industrial hygiene purposes. These operations occur intermittently. A CEM for operations such as these is both inappropriate and technically infeasible. ACHD believes that weekly measurement of the pressure drop across the baghouse is sufficient to demonstrate continuous compliance.

C5 Pastillator belts - The permit requires continuous monitoring of the differential pressure of both the UHF filter and baghouse. The differential pressure range for the UHF Filter corresponding to proper operation was determined during testing. Like the C5 baghouses above, ACHD believes that weekly measurement of the pressure drop across the baghouse is sufficient to demonstrate continuous compliance.

80. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.B.2.c: commenter requests that the permit must specify how frequently the testing on the UHF filter is to occur.

Response: See response to Comment No. 12 above. This was intended to be a one-time test, which has already been performed.

81. **Comment:** Section V: Emission Unit Terms and Conditions, Condition V.C.1.e: commenter requests that the annual emission limits for the C5 Pastillation process must reflect that source's full potential to emit.

Response: Emission limits were established in Installation permit #0058-I018a for the maximum potential throughput. See the explanation in the TSD and response to Comment No. 78 above. No changes were made in the permit.

82. **Comment:** The permit does not incorporate testing, monitoring, or recordkeeping requirements that are sufficient to assure compliance with the hourly emission limits for the MP Poly Unit.

Response: MP Poly process is a batch process, so short-term limits based on lb/hr are not appropriate and the limits are based on lb/batch. The draft permit includes the requirement to monitor, record, and report all batch parameters. Additionally, the facility is required to calculate their actual emissions

monthly using equations from 40 CFR 63 Subpart GGG (Pharma MACT) as referenced by the MON. The facility has a continuous temperature monitoring requirements on the outlet vapor of all condensers and use this data to calculate VOC and HAPs emissions. Given these continuous monitoring requirements, ACHD believes that the current testing requirement is sufficient to demonstrate compliance. There are no short-term limits for PM emissions. There is a limit on production throughput, and the maximum PTE for PM is based on this throughput. ACHD believes that the current requirements are sufficient to demonstrate compliance.

83. **Comment:** The permit does not incorporate testing, monitoring, or recordkeeping requirements that are sufficient to assure compliance with the hourly emission limits for the WW Poly Unit.

Response: WW Poly process is a batch process, so short-term limits based on lb/hr are not appropriate and the limits are based on lb/batch. The draft permit includes the requirement to monitor, record, and report all batch parameters. Additionally, the facility is required to calculate their actual emissions monthly using equations from 40 CFR 63 Subpart GGG (Pharma MACT) as referenced by the MON. The facility has a continuous temperature monitoring requirements on the outlet vapor of all condensers and use this data to calculate VOCs, HAPs, and styrene emissions. Given these continuous monitoring requirements and the calculation of potential-to-emit, ACHD believes that the current requirements are sufficient to demonstrate compliance.

84. **Comment:** The permit does not incorporate testing, monitoring, or recordkeeping requirements that are sufficient to assure compliance with the hourly and per batch emission limits for the Hydro Unit.

Response: Hydro process is a batch process, so short-term limits based on lb/hr are not appropriate and the limits are based on lb/batch. The draft permit includes the requirement to monitor, record, and report all batch parameters. Additionally, the facility is required to calculate their actual emissions monthly using equations from 40 CFR 63 Subpart GGG (Pharma MACT) as referenced by the MON. The facility has a continuous temperature monitoring requirements on the outlet vapor of all condensers and use this data to calculate emissions. Given these continuous monitoring requirements and the calculation of potential-to-emit, ACHD believes that the current requirements are sufficient to demonstrate compliance.

85. **Comment:** The permit does not incorporate testing, monitoring, or recordkeeping requirements that are sufficient to assure compliance with the hourly emission limits for the LTC Unit.

Response: The facility has continuous temperature monitoring on the LTC process and resin kettles, continuous differential pressure and flow monitoring on the scrubbers, and continuous differential pressure monitoring on the baghouses. Testing has demonstrated that temperature is an acceptable method of demonstrating compliance with scrubber and condenser systems. The permit was revised to include the requirement to monitor VOC concentration at the outlet of the carbon beds weekly.

86. **Comment:** The Draft Permit's monitoring, testing, and reporting requirements are insufficient to assure compliance with emissions limits and ACHD must revise the permit to include monitoring, testing, and reporting requirements that assure continuous compliance with emission limits.

a. C5 Unit - AlCl₃ Handling Operation

The Draft Permit's monitoring requirements are insufficient to assure compliance with hourly or annual limits for Total Suspended Particles, PM₁₀, and hydrochloric acid from the C5 Unit - AlCl₃ Handling Operation. There are no monitoring requirements that would assure compliance with the limits contained at section V.A.1.b, which has hourly and annual limits of Total Suspended Particles, PM₁₀, and Hydrochloric Acid.

Response:

The facility is required to meet work practice standards for the controlling baghouses and scrubber for this process, including maintaining a scrubber recycle rate, maintaining and recording scrubber pH, and regular inspections. These are all generally acceptable methods for demonstrating compliance with baghouses and scrubbers.

b. C5 Unit - Polymerization Process

- i. ACHD must require CEMS for VOCs and NO_x from the Thermal Oxidizer to assure continuous compliance with the hourly and rolling annual emissions limits for VOCs and NO_x. To assure continuous compliance with hourly and rolling annual emissions limits, ACHD must require Continuous Emissions Monitoring Systems (“CEMS”) for, at a minimum, NO_x and VOC from the thermal oxidizer. All sources for which the Draft Permit establishes emissions limits must be able to demonstrate compliance, and, as stated, the frequency of testing needs to be sufficient to assure continuous compliance with short-term hourly and rolling annual emission limits.

Response:

See response to Comment No. 79 above.

- ii. The Draft Permit’s monitoring and testing provisions must be revised to assure continuous compliance with PM, PM₁₀, CO, Total HAPs, Ammonia, and Toluene limits from the Thermal Oxidizer. The Draft Permit’s monitoring requirements are insufficient to assure continuous compliance with hourly or annual limits for PM, PM₁₀, CO, Total HAPs, ammonia, or toluene from the Thermal Oxidizer. In addition to NO_x and VOCs, which were discussed in the preceding subsection as requiring CEMS, there are also no monitoring requirements that would assure compliance with the limits on these other pollutants contained at section V.B.1.

Response:

See response to Comment No. 79 above.

- iii. The Draft Permit’s monitoring and testing requirements must be revised to assure compliance with annual limits on PM/PM₁₀ from baghouses at the C5 Unit - Polymerization Process. The Draft Permit’s monitoring, testing, and recordkeeping requirements are insufficient to assure compliance with annual limits for PM/PM₁₀ from the baghouses at the C5 Unit - Polymerization Process contained at Table V-B-2 of Section V.B.1.i.

Response:

See response to Comment No. 79 above.

- iv. ACHD appears to have erroneously failed to require emissions testing for HAPs Paragraph V.B.2.b of the Draft Permit despite the fact such testing appears to have been intended because other requirements for HAPs testing are included in the subparagraphs. The Draft Permit appears to have erroneously failed to require emissions testing for HAPs from the Thermal Oxidizer.

Response:

The draft permit requirements for emission testing for NO_x in this section was a typographical error and should be a requirement to test for HAPs. The revision has been made to the final permit.

c. C5 Unit - Pastillation Process

The Draft Permit's monitoring requirements are insufficient to assure compliance with hourly or annual limits for PM (including PM₁₀ and PM_{2.5}), PM₁₀, PM_{2.5}, or VOCs from the C5 Unit - Pastillation Process.

Response:

See response to Comment No. 79 above. ACHD added a condition to V.C.4 to calculate monthly VOC emissions.

d. C5 Unit - Storage Tanks

The Draft Permit's monitoring requirements are insufficient to assure compliance with annual limits for VOCs or HAPs from the C5 Unit - Storage Tanks.

Response:

There are no generally accepted methods for testing fixed roof or internal floating roof tanks. Furthermore, as the commenter notes, the limits in the permit represent the total emissions from multiple tanks. Regular testing of these types of storage tanks is not typically conducted at similar facilities as it is not feasible. Compliance with emissions limits is based on standard equations in AP-42, Chapter 7 and those parameters in the table in condition V.D.4.a: vapor pressure of the material stored, tank material level, and throughput. The equations in AP-42 and vapor pressure of the material stored are fixed quantities and the permit requires monitoring and recording of each transfer in and out of the subject tanks. The permit also requires the facility to report the calculated rolling 12-month VOC and HAP emissions upon request. The permit has been revised to include a requirement to section V.D.4 to require that the facility keep monthly and rolling 12-month records of these VOC and HAP calculations. ACHD believes this is sufficient to demonstrate compliance with the hourly and annual limits.

e. MP Poly (Multi-Purpose Polymerization) Unit - Process

The Draft Permit's monitoring requirements are insufficient to assure compliance with annual emissions limit (tons/year ("tpy"), defined as any consecutive 12-month period) for PM or the short term batch limits (lb/batch, ("exclusive of auxiliary operations such as flushes, unit flushes, vessel cleaning, and dryer regenerations")) for VOCs, HAPs, and PM from the Multi- Purpose Polymerization ("MP Poly") Unit - Process source.

Response:

See response to Comment No. 82 above

f. MP Poly Unit – Storage Tanks

The Draft Permit's monitoring requirements are insufficient to assure compliance with annual emissions limit (tons/year ("tpy"), defined as any consecutive 12-month period) for VOCs or HAPs from the Multi-Purpose Polymerization ("MP Poly") Unit - Storage Tanks Source.

Response:

See response to Comment No. 86.d above.

g. WW Poly (Water White Polymerization) Unit

The Draft Permit's monitoring requirements are insufficient to assure compliance with annual emissions limit (tons/year ("tpy"), defined as any consecutive 12-month period) for

PM or the short-term batch limits (lb/batch, exclusive of auxiliary operations) for VOCs, HAPs, styrene, and PM from the Water White Polymerization (“WW Poly”) Unit source.

Response:

See response to Comment No. 83 above.

h. WW Poly (Water White Polymerization) - Storage Tanks

The Draft Permit’s monitoring requirements are insufficient to assure compliance with annual emissions limit (tons/year (“tpy”), defined as any consecutive 12-month period) for VOCs or HAPs from the Water White Polymerization (“WW Poly”) - Storage Tanks.

Response:

See response to Comment No. 86.d above

i. Hydrogenation (Hydro) Unit - Process

The Draft Permit’s monitoring requirements are insufficient to assure compliance with annual emissions limits (tons/year (“tpy”), defined as any consecutive 12-month period) or short-term emissions limits (lb/batch) for VOCs, HAPs, or PM from the Hydrogenation (Hydro) Unit – Process.

Response:

See response to Comment No. 84 above.

j. Hydrogenation (Hydro) Unit - Storage Tanks

The Draft Permit’s monitoring requirements are insufficient to assure compliance with annual emissions limits (tons/year (“tpy”), defined as any consecutive 12-month period) for VOCs or HAPs from the Hydrogenation (Hydro) Unit - Storage Tanks.

Response:

See response to Comment No. 86.d above.

k. LTC Operations - Process

The Draft Permit’s monitoring requirements are insufficient to assure compliance with hourly (lb/hr) or annual emissions limits (tons/year (“tpy”), defined as any consecutive 12-month period) for VOCs, PM/ PM₁₀/PM_{2.5}, total HAPs, or styrene from the LTC Operations – Process source.

Response:

See response to Comment No. 85 above.

l. Dresinate Unit

The Draft Permit’s monitoring requirements are insufficient to assure compliance with emissions limits HAPs, PM, or VOCs from the Dresinate Unit.

Response:

The permit requires continuous monitoring of the pressure drop across the baghouse. This is a generally acceptable method of demonstrating continuous compliance with PM emissions from a baghouse. VOC emission limits are based on testing conducted May-July 2007 on the dryer. The permit requires monitoring of hours of operation (monthly and 12-month) as well as material usage. Given the relationship between the PM and VOC emissions in the Dresinate process, ACHD believes the included recordkeeping is sufficient to demonstrate compliance.

m. Pilot Plant

The Draft Permit's monitoring requirements are insufficient to assure compliance with hourly (lb/hour) or annual emissions limits (tons/year ("tpy"), defined as any consecutive 12-month period) for VOCs or HAPs from the Pilot Plant.

Response:

The Pilot Plant operates very infrequently. The permit requires the facility to monitor condenser vapor outlet temperatures continuously and use this data to calculate monthly and 12-month emissions (VOC and HAPs) from each batch produced at the Pilot Plant. See response to Comment No. 79 above.

n. Wastewater Treatment Plant

ACHD must require monitoring and testing sufficient to assure compliance with permit limits for VOCs, HAPs, styrene, and toluene from the Wastewater Treatment Plant.

Response:

Emissions from the WWTP are through three principal sources – the 701 tanks, the Back Porch Sumps, and a variety of open-top tanks. The 701 Tanks and Back porch sumps are controlled by condensers and a series of carbon beds as required by the MON with the final control device being the carbon beds (to assure compliance with permit limits for VOCs, HAPs, styrene, and toluene). These beds are monitored as required by the MON. Instrumental monitoring of open-top tanks is technically infeasible. The facility demonstrates compliance based on material balance calculations derived from a WATER9 model. See responses to Comments No. 79 and No. 86.n above.

o. Miscellaneous - Cooling Towers

The Draft Permit's monitoring requirements are insufficient to assure compliance with hourly (lb/hour) or annual emissions limits (tons/year ("tpy"), defined as any consecutive 12-month period) for PM emissions from Miscellaneous - Cooling Towers source.

Response:

The permit requires the facility to use only municipal water and to keep records of recirculation rate of each cooling tower. Given the low variability of particulate in municipal water combined with the low potential emissions from each cooling tower, ACHD believes this is sufficient to demonstrate continuous compliance.

p. Miscellaneous - Boilers BU1, BU2, BU3, and BU4

The Draft Permit's monitoring requirements are insufficient to assure compliance with emissions limits for PM, NO_x, SO_x, VOCs, or CO from the Miscellaneous - Boilers BU1, BU2, BU3, and BU4.

Response:

The facility is required monitor natural gas usage. The permit was revised to include a limit on monthly and 12-month natural gas usage. This is an acceptable method for demonstrating compliance with emissions in natural gas combustion sources.

q. Miscellaneous - Boiler 5

The Draft Permit's monitoring requirements are insufficient to assure compliance with emissions limits for PM, NO_x, SO_x, VOCs, or CO from the Miscellaneous - Boilers 5 source.

Response:

See response to Comment No. 86.p above.

r. Miscellaneous - Emergency Generator

The Draft Permit's monitoring requirements are insufficient to assure compliance with emissions limits for PM, NO_x, SO_x, VOCs, or CO from the Miscellaneous – Emergency Generator source.

Response:

The emergency generator is, by definition, a unit that operates infrequently. Furthermore, at only 250 kW, the unit is a source of minor significance. As such, regular testing and monitoring is not feasible. The EPA has accepted for emergency generators, recordkeeping of hours of operation as a reasonable demonstration of continuous compliance (see "Calculating Potential to Emit for Emergency Generators", John S. Seitz, September 6, 1995). The permit includes a limit on operating hours as well as a requirement to record monthly and 12-month hours of operation. ACHD believes this is sufficient to demonstrate compliance.

s. Miscellaneous - #2 LTC and #4 LTC Heaters and C-5 Hot Oil Furnace

The Draft Permit's monitoring requirements are insufficient to assure compliance with emissions limits for PM, NO_x, SO_x, VOCs, CO, and HAPS from the Miscellaneous - #2 LTC and #4 LTC Heaters and C-5 Hot Oil Furnace source.

Response:

See response to Comment No. 86.p above

87. **Comment:** ACHD should require Synthomer to generate more reliable emissions factors based on site-specific data instead of continuing to use lower quality AP-42 emissions factors that are disfavored by EPA:

- a. PM₁₀ and CO emissions for the C-5 Polymerization Process Thermal Oxidizer, Source S044; and
- b. PM, SO₂, NO_x, VOC, and CO emissions for the C-5 Hot Oil Furnace and for the Nos. 2 and 4 LTC Process Heaters.

Response: Emissions from the three hot oil heaters and the combustion emissions from the thermal oxidizer are only minimal contributors to the overall site emissions of PM, CO, VOC, and NO_x. Emissions of SO₂ from the site are negligible. Developing site-specific factors for these sources would not improve the accuracy of the emissions inventory in any meaningful way. No changes were made to the permit.

88. **Comment:** ACHD needs to explain or remove inconsistent emission limit calculations for PM, PM₁₀, and PM_{2.5} for the C-5 Hot Oil Furnace, and source S056 in the Technical Support Document.

Response: Emission calculations for C5 Hot Oil Furnace were included in the Technical Support Document (TSD) on page 26 (C5 Polymerization Process) by mistake. The calculations for this source are with the combustion sources on page 55 of TSD. Emission limits for PM, PM₁₀, and PM_{2.5} are from amendment permit #0058-I011e. The revision has been made to the final TSD.

89. **Comment:** ACHD should explicitly state all Leak Detection and Repair ("LDAR") requirements in the permit rather than only incorporating them by reference.

Response: The conditions of 40 CFR Part 63, Subparts F, G, SS, and UU (as referenced by the MON

– 40 CFR Part 63, Subpart FFFF) are quite extensive and would not provide any clarity to the permit. Rather, including these conditions would only serve to complicate the permit. These sections are referenced in the permit and the facility is required meet them. No changes were made to the permit.

90. **Comment:** ACHD should require Synthomer to determine if and where it is possible to route multiple sources to a combined control mechanism to establish better controls and make sufficient monitoring more feasible.

Response: This has already been evaluated as part of the 2008 Ozone RACT (RACT II) and the 2015 Ozone RACT (RACT III). ACHD has determined that combining sources is either technically or economically infeasible. Furthermore, this is outside of the scope of the Title V permitting process, which is to combine all existing applicable requirements from existing permits.

91. **Comment:** ACHD should have better facilitated public participation in the April 18, 2024 public hearing by actively working to resolve reasonable confusion regarding the meeting’s location, holding the hearing in the host community of West Elizabeth Borough, and providing virtual participation options.
- a. ACHD should have taken additional steps to resolve reasonable confusion regarding the location of the April 18, 2024 public hearing.
 - b. ACHD should have held the public hearing in the host community of West Elizabeth Borough.
 - c. ACHD should have provided an option for the public to attend the April 18, 2024 public hearing and provide oral comments virtually because such an option removes barriers to participation, particularly for members of environmental justice communities.

Response: The notice of the public hearing is advertised in both a newspaper of general circulation (as required by Article XXI) and the Allegheny County website as well as sent to recipients of the Air Quality Program’s ‘Interested Parties’ list. Commenters do not have to be present at the public hearing to submit their comments. Comments timely received by e-mail or through the US Postal Service are considered and will receive a response.

The Department endeavors to locate the public hearing at a place that will maximize the participation of all county residents. The location of the April 18, 2024 hearing was advertised appropriately in all of the above-referenced sources. The last-minute change of room at said location was made by the hosting facility and was out of the control of the Department. Appropriate signage was placed to give notice of the new room.

92. **Comment:** Commenter notes that the Public Hearing for that permit was not properly noticed and asked to deny these unconstitutional permits.

Response: See the response to Comment No. 91 above. The ACHD Air Quality program and the Permitting section, as extensions of the federal Title V program, are charged with upholding current local, state, and federal air quality regulations and cannot levy penalties, including the stoppage of operations or denial of permitting, outside of the scope of what is currently provided within those regulations.

93. **Comment:** Commenter notes that facility must monitor VOC emissions. Also, ACHD has a bad website, and it was a bad location for the hearing.

Response: See responses to Comments No. 79, 82-86, and No. 91 above.

94. **Comment:** Commenters notes that the ACHD must strengthen Title V permit because: proposed permits monitoring and testing requirements are inadequate for ensuring that the facility complies with any of the emissions limits. Also, ACHD should require continuous emissions monitoring systems (CEMS) for at least NO_x and VOC from the thermal oxidizer, and for VOCs from the beds that control emissions from the wastewater treatment plant. The permit must include additional testing or monitoring for other emissions from the facility to adequately ensure compliance with emissions limits. ACHD should explore with Synthomer whether multiple emissions sources can be routed into combined control mechanisms through emissions controls in more easily established sufficient testing and monitoring to ensure compliance with emission limits.

Response: See responses to Comments No. 79, 82-86, and No. 90 above.

95. **Comment:** The commenter states that they are a lifelong resident of the Mon Valley, and have experienced the noxious fumes emanating from this unpermitted plant. For years this has permeated the Elizabeth Valley air with a density and longevity unlike other facilities. Also, the USX Clairton works is located down river, and between the two operations, a powder keg effect is enabled with air that is so dense with pollution and being unable to breathe, without covering your mouth and nose. People have the right to clean air and water. Enough is enough. They have damaged enough people and property values. Stand up for people and not profits. They should not be permitted to pollute. Time to reject and not grant a permit. They made their profits off of others health.

Response: The Department thanks the Commenter for his/her comment. However, the comment does not address specific issues related to the permit or its associated technical support document (TSD) and as such the Department is unable to respond to the comment.

96. **Comment:** Do not approve any permits that continue to threaten our health. The commenter states they have four neighbors now suffering from cancers that are easily prevented with healthy environmental practices. People before any profits. ACHD seems to put business profits first. Support the greening of our communities.

Response: The Department thanks the Commenter for his/her comment. However, the comment does not address specific issues related to the permit or its associated technical support document (TSD) and as such the Department is unable to respond to the comment.

97. **Comment:** The commenter has been a resident of West Elizabeth for 20 years. They are an active outdoor family. Often times what they do is determined by how West Elizabeth smells. Often times it is so potent that they have to hold their breath until I get to the car and back inside. If the air I breath is offensive to smell... what is it doing to our lungs? Would you want to take a walk or ride your bicycle in a place that smells so bad you want to hold your breath?

Response: The Department thanks the Commenter for his/her comment. However, the comment does not address specific issues related to the permit or its associated technical support document (TSD) and as such the Department is unable to respond to the comment.

98. **Comment/Response:** The Department updated the facility contact.

List of Commenters

| Name | Affiliation |
|--|--|
| Frederick T. Mullner Senior Environmental Coordinator | Synthomer Jefferson Hills LLC |
| John K. Baillie Senior Attorney | Group Against Smog & Pollution (GASP) |
| Patrick Campbell Executive Director | Group Against Smog & Pollution (GASP) |
| Alexander Bomstein Executive Director | Clean Air Council |
| Jay Ting Walker Outreach Coordinator | Clean Air Council |
| Lisa Hallowell Senior Attorney | Environmental Integrity Project |
| Lisa Graves-Marcucci PA Coordinator, Community Outreach | Environmental Integrity Project |
| Angela M. Kilbert Senior Attorney | PennFuture |
| Erin E. Doran Senior Staff Attorney | Food & Water Watch |
| Ana Hoffman Director of Air Quality Engagement | CREATE Lab Carnegie Mellon University |
| Matthew Mehalik Executive Director | Breathe Project |
| ACHD | |

| Citizen Commenters | | |
|--------------------|----------------------|-------------------|
| Benjamin Chiszar | Ryan Joyce | Emerson O'Donnell |
| Fred Bickerton | Frank Kirkwood | Sebastian Pleato |
| Jessica Bellas | Maya Lehman | Jeremy Richardson |
| Kenneth Bickel | Janet Lunde | James Stoner |
| Albert Ferrucci | MacKenzie MacFarland | Stephanie Ulmer |
| Emily Forney | Charles Manz | Cathy Welty |
| Constantina Hanse | Dennis McAndrew | Terri Yeager |

| Citizen Commenters | | |
|--------------------|----------------|--|
| Susan Hoppe | Don Naragon | |
| Nancy Ivan | Matthew Nemeth | |