

**ALLEGHENY COUNTY HEALTH DEPARTMENT**  
**Air Quality Program**

**SUMMARY OF PUBLIC COMMENTS AND DEPARTMENT RESPONSES**  
**ON THE PROPOSED ISSUANCE OF NEVILLE ISLAND COMPANY,**  
**TITLE V OPERATING PERMIT NO. 0060-OP24**

*[Notice of the opportunity for public comment appeared in the legal section of the Pittsburgh Post-Gazette on February 1, 2024. The public comment period ended on March 12, 2024.]*

1. **Comment:** Section I: Contact Information: commenter states that facility Contact Information should be the same as the Responsible Official.

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

2. **Comment:** Section II: Facility Description, Table II-1: commenter states that Tanks 12, 13, and 14 have all been removed from the plant and should be removed from table.

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

3. **Comment:** Section III: General Conditions, condition III.12.b: commenter states that since is this not an initial permit, the requirement to submit an initial compliance certification should be removed.

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

4. **Comment:** Section IV: Site Level Terms and Conditions, condition IV.11: commenter states that this condition duplicate of Section IV.10 and should be deleted and the cross references updated.

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

5. **Comment:** Section IV: Site Level Terms and Conditions, condition IV.30.a: commenter states that line numbering starts with 3 instead of 1.

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

6. **Comment:** Section V: Emission Unit Level Terms and Conditions, condition V.E.1.e, Table V-E-1: commenter states that 2PC belt is listed instead of 3PC belt in both VOC and HAP rows.

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

7. **Comment:** Section V: Emission Unit Level Terms and Conditions, condition V.F.1.e, Table V-F-1: commenter states that 2PC belt is listed instead of 5PC belt in both VOC and HAP rows.

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

8. **Comment:** Section V: Emission Unit Level Terms and Conditions, condition V.J.3: commenter states that propane is not used at the facility and should be removed from the permit.

**Response:** The requested revision has been made to the final permit. Reference to propane was also removed from condition V.A.1.d.

9. **Comment:** Section V: Emission Unit Level Terms and Conditions, condition V.M.5.b: commenter states that reference to “MSDS” should be changed to “SDS”.

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

10. **Comment:** Section VI: Miscellaneous, condition VI.A.5.b: the outline numbering is incorrect.

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

11. **Comment:** Section V: Emission Unit Level Terms and Conditions, condition V.D: commenter states that the permit’s testing, monitoring, and recordkeeping requirements are not sufficient to assure compliance with continuous and hourly limits on emissions of PM from the No. 2, No.3, and No.5 Packaging Centers.

**Response:** The Department feels that the potential emissions of PM (No. 2 – 1.04 tpy, No. 3 – 1.13 tpy, and No. 5 – 1.13 tpy) are not high enough to warrant regular testing and that parametric monitoring of pressure drops across the baghouse is sufficient to demonstrate compliance. Maintaining a differential pressure drop range as specified in the baghouse manufacturer’s specifications, is an accepted method of parametric monitoring for the baghouse emissions since it ensures that the baghouse is functioning as designed and therefore providing the targeted emissions control required by the installation of the baghouse. ACHD added conditions to each packaging center (V.D.1.g, V.E.1.e, V.F.1.e) establishing a pressure drop range. ACHD also added conditions (V.D.2.b & c, V.E.2.c & d, V.F.2.b & c) to require a one-time test for PM to demonstrate compliance within that range, and conditions (V.D.4.a.5) & V.D.5.b.2), V.E.4.a.7) & V.E.5.b.2), V.F.4.a.5) & V.F.5.b.2)) to require recordkeeping and reporting of differential pressure.

12. **Comment:** To assure continuous compliance with hourly and rolling annual emissions limits, ACHD must require Continuous Emissions Monitoring Systems (“CEMS”) for NO<sub>x</sub> for Process P001, the #6 and #8 Boilers, the Still Process Heaters, and the Packaging Center Heaters; CEMs for VOCs from Process P001; and, at minimum, testing every two years of emissions of the other pollutants from those sources.

**Response:** The Heat Polymerization Process (P001, Stills #15, #16, #18, #19, and Unit 43) 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. NO<sub>x</sub> emissions (as well as other criteria pollutants) from the thermal oxidizer are strictly from the combustion of VOC and supplemental natural gas. Emissions of NO<sub>x</sub> are potentially less than 10 tpy. Requiring a CEM on a control device and on a process/pollutant where emissions are low is not feasible. As the VOC is controlled and the other pollutants are a direct result of the control device, ACHD does not believe additional testing is required. ACHD added a condition V.A.4.a.3) to recordkeeping of natural gas use and monthly calculations of NO<sub>x</sub> and CO emissions based on AP-42 factors.

For Boilers No. 6 (B013) and No. 8 (B012), the monthly records of fuel use are an acceptable parameter for demonstrating continuous compliance in a natural gas fired boiler. The EPA noted (*In the Matter of United States Steel Corporation, Clairton Coke Works Permit No. 0052-OP22*, Order on Petition Nos. III-2023-5 and III-2023-6) that: “EPA has not indicated that in all cases testing and monitoring must exactly mirror the averaging times of associated emission limits.” ACHD believes that monthly

fuel monitoring is sufficient for steady-state boilers. Additionally, an annual tune-up, including determining the NO<sub>x</sub> and CO emission rates, make annual or biennial testing unnecessary. The permit has been revised to include an annual tune-up requirement for Boiler No. 8. ACHD added conditions V.K.4.d and V.L.4.c to calculate NO<sub>x</sub> and CO emissions based on AP-42 factors monthly.

For the six Still Process Heaters (B001, B002, B003, B004, B015 & B006) and the three Packaging Center Heaters (B009, B010 & B011), all nine units are rated at less than 10 MMBtu/hr and combust only natural gas. Therefore, these heaters meet the exemption criteria of §2102.04.a.5.F. The requirement to install CEMS on these units (each of which has the potential NO<sub>x</sub> emissions of less than 4 tons/year) would be excessive and unnecessary. Monthly natural gas combustion is required to be monitored, recorded, and reported. As with Boiler #6 and Boiler #8, ACHD believes this is sufficient to demonstrate continuous compliance.

In all cases, the Department reserves the right to require additional compliance testing.

- 13. Comment:** ACHD must require VOC CEMs if feasible, and, if not, stack/emissions testing at least once every two years for VOCs, as well as stack testing at least every two years for HAPs, to assure compliance with per-product-change and rolling annual VOC and HAP emissions limits for Process P006, Unit #20/21 and Process P008, the No. 3 Continuous Still.

**Response:** For both of these processes, although they are “continuous”, emissions are only released when the respective product lines are initially filled following a product change. As such, conventional monitoring is not effective, therefore a CEMS is not feasible. In the case of the No. 3 Continuous Still, potential VOC emissions are less than 3 tons/year, so ACHD believes CEMS and additional testing to be unnecessary. For both of these processes, the facility is required to monitor and record all operating parameters. Additionally, in the draft permit, if production exceeds certain parameters, the facility is required to calculate their actual emissions to demonstrate compliance. ACHD removed the qualifying production parameters in conditions V.B.4.a.5) and V.C.4.a.5) to require calculation of monthly emissions regardless of production. While these processes are steady state, the emitting portion of the process is only during the initial fill of the product. The steady state portion of the process can last for hours or even days. Short-term limits based on lb/hr are not appropriate, so the limits are based on lb/product change. See also response to Comment No. 12 above. No changes have been made for testing requirements, but production threshold was removed from the Recordkeeping requirements in part of the calculating emissions.

- 14. Comment:** ACHD must require VOC CEMs if feasible, and, if not, stack/emissions testing at least every two years for VOCs, as well as stack testing at least every two years for HAPs and PM, to assure compliance with the hourly and rolling annual emission limits for Process P011, the No. 2 Packaging Center; Process P012, the No. 3 Packaging Center; and Process P013, the No. 5 Packaging Center.

**Response:** See response to Comment No. 13 above. For all three packaging centers there are between 4 and 8 different emissions points (fume hood and resin drain kettles) that would be required to have a CEMS, which is neither practical nor feasible. 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. Given these continuous monitoring requirements and the potential-to-emit, ACHD believes that the current testing requirement is sufficient to demonstrate compliance. See responses to Comments No. 12 and No. 13 above. No changes have been made.

- 15. Comment:** ACHD should use site-specific data rather than generic AP-42 emission factors to calculate VOC, NO<sub>x</sub>, SO<sub>2</sub>, CO, Total HAPs, and formaldehyde emissions for the Thermal Oxidizer (P001), the

Still Process Heaters (B001-B004, B006, & B015), the Packaging Center Heaters (B009-B011), and Boilers No. 6 & No. 8 (B013 & B012).

**Response:** The emission limits presented in the permit are directly from the issued installation permits. For combustion emissions, using EPA AP-42 emission factors is an accepted method for estimating potential emissions from combustion sources. The potential-to-emit (PTE) of VOC and HAP controlled by the thermal oxidizer are based on emission factors developed from stack test data and the efficiency of the thermal oxidizer. No changes have been made.

16. **Comment:** ACHD incorrectly applied an AP-42 emission factor for small boilers controlled by low-NO<sub>x</sub> instead of the applicable AP-42 emission factor specific to small boilers controlled by both a low-NO<sub>x</sub> burner and flue gas recirculation.

**Response:** The Department used emission factor for small boilers controlled by low-NO<sub>x</sub> burners as a worst-case scenario in the installation permit for the No. 8 Boiler. Those are the numbers used in the operating permit. No changes have been made.

17. **Comment:** If site-specific test data demonstrates that the sources for which ACHD applied the generic PM emission limits from ACHD Article XXI, §2104.02.a.1.A could instead achieve lower PM emissions, ACHD should lower the PM emissions limits accordingly.

**Response:** See responses to Comments No. 15 above and No. 18 below. No changes have been made.

18. **Comment:** ACHD should base emissions factors for sources P001, the Heat Polymerization Stills, and P011–P013, Packaging Centers No. 2, No. 3, and No. 5, on the most recent stack test data instead of on outdated stack tests from 1997–2007.

**Response:** Stack tests are required to demonstrate compliance with emission limits, and unless otherwise specified, are not intended to establish new emission factors (particularly with sources required to be tested regularly, such as those listed here). No changes have been made.

19. **Comment:** ACHD should require Neville Chemical to monitor components with the potential to leak at least twice per year, and the ongoing inspections for non-difficult/unsafe components should be conducted at least quarterly.

**Response:** A full Leak Detection and Repair (LDAR) evaluation on a facility the size of Neville Chemical would take approximately one month to conduct. The Department feels that requiring an LDAR evaluation more than once per year would be unnecessarily burdensome. As the commenter notes, the inspections required under Site Level Conditions IV.31 and IV.32 are “ongoing”. The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit.

20. **Comment:** commenter asked to deny the issue of both Title V permit and revision of the SIP for Neville Chemical Company, because with continued operation as is, and a new permit, the facility will still be producing as a major source of pollution in the community.

**Response:** 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.

**21. Comment:** In the new permit, Neville Chemical is permitted to emit more than 180 pounds of volatile organic compounds in addition to carbon monoxide, benzene, xylene, and other pollutants. Strict monitoring and testing should be required in this permit. However, that is not the case. How can the health department regulate Neville Chemical when several pollution sources listed in the permit have no emission testing requirements? How do you hold Neville Chemical accountable when some stacks are only required to be tested every five years. And how is an annual monitoring for leaks going to protect our communities for the rest of the year?

**Response:** The proposed Title V Operating permit reflects current regulatory and facility conditions, including emission standards and other safety measures. The restrictions within the permit reflect the current levels set by local, state, and federal regulations. ACHD and the Air Quality program are actively engaged in drafting and implementing regulatory and enforcement actions that support the work of the Permitting section and that address the health needs of impacted communities.

**22. Comment:** Please when considering drafting a Title V renewal permit for Neville Chemical remember pollution events that affected hundreds of residents in Allegheny County and build in protections to more quickly detect leaks and give yourselves the tools needed to hold the company accountable to standards that protect the health of neighboring residents. ACHD should require ongoing monitoring at least quarterly for components that are not difficult or unsafe to monitor and at least twice a year for components that are difficult or unsafe to monitor. Even though many emission sources must comply with hourly emission limits, several sources in this permit such as the still process heaters and the packaging center heaters, have no emission testing requirements. At most some sources are required to only have stack testing every five years, which is inadequate. Wherever possible ACHD must require Neville Chemical to install continuous emission monitoring systems.

**Response:** The Still Process and Packaging Center Heaters are considered sources of minor significance and would not otherwise be required to have a permit per Article XXI, §2102.04.a.5. See responses to Comments No. 19, and No. 21 above.

**23. Comment:** The Allegheny County Health Department should revise its draft Title V Operating Permit for Neville Chemical Company to incorporate required compliance certification, testing, monitoring, recording, and record keeping requirements sufficient to ensure compliance with the terms and conditions of the permit.

**Response:** See response to Comment No. 21 above.

**24. Comment:** The air quality in this area has seemingly gotten worse over the years and the distinctive chemical smell is very apparent on days with high emissions.

**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.

**25. Comment:** The Title V permit fails to provide monitoring and testing requirements sufficient to insure that Neville Chemical complies with its emissions limits. We need more reliable and up to date testing and better and more monitoring.

**Response:** See responses to Comments No. 12, No. 13, No. 14, and No. 19 above.

### List of Commenters

Name	Affiliation
Daniel D. Kokoski Vice President of Manufacturing	Neville Chemical Company
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
Sanghyun Lee 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
Matthew Mehalik Executive Director	Breathe Project
Ana Hoffman Director of Air Quality Engagement	CREATE Lab Carnegie Mellon University
ACHD	

Citizen Commenters		
Benjamin Chiszar	Karen Grzywinski	Thaddeus Popovich
Marisa Haney	Melanie Holcomb (Mayor, Ben Avon)	
Robert Maxin	Angelo Taranto	