



## Division of Air Pollution Control (DAPC) Response to Comments

**Project: Brush Wellman – Beryllium Pebble Plant; Draft Air permit- to-install (PTI)  
Ohio EPA ID #: PTI# 03-17418**

### **Agency Contacts for this Project**

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Ohio EPA held a public hearing on July 24, 2008, regarding draft air pollution permit #03-17418 for Brush Wellman. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on July 31, 2008.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

Comments from Gene Novak and Fred Conley

**Comment 1:** Both commenters request that the Ohio EPA consider requiring the installation of an air quality monitor in or around the village of Oak Harbor to monitor and report air quality, as has been done in the village of Elmore. Oak Harbor is located approximately four miles downwind from the Brush Wellman facility.

**Response 1:** The air quality monitor located near Elmore, Ohio is part of a monitoring network to demonstrate compliance with a federal standard [National Emissions Standard for Hazardous Air Pollutants, 40 CFR 61.32 (b)] which requires that the ambient concentration of beryllium (Be) in the vicinity of the facility shall not exceed 0.01 micrograms (ug)/cubic meter, averaged over a 30-day period. The current monitoring network consists of nine ambient monitoring stations located around the vicinity of the facility. The monitoring locations were determined in accordance with established criteria for selecting monitoring sites. The sites vary in distance from one-third of a mile to more than three miles from the facility. It should be noted that one of the monitors in the network is located approximately two miles southwest of Oak Harbor, which is closer in proximity to any monitor located near Elmore. The closest monitor in the network to Elmore is approximately two and one-half miles northeast of the village. At this time, Ohio EPA feels the current monitoring network meets the requirements for measuring compliance with federal beryllium air quality standards.

Comments from Bernadette Eriksen

**Comment 2:** The commenter states she hopes that the Ohio EPA would take into consideration that there is another logical site for the expansion of this plant, which is in Utah. The plant location in Utah is not on a major waterway; it is not in a residential area. It makes more sense to have the facility built where it would reduce the population that could be exposed to plant emissions.

**Response 2:** The permit was developed in accordance with environmental rules and regulations which are designed to protect public health and apply to the proposed location. Environmental rules and regulations do not include a "comparison" approach for determining for if a proposed location is acceptable.

Comments from Brush Wellman

**Comment 3:**           **The company states that they would like to have the ability to burn propane in their two boilers as emergency back-up fuel.**

Response 3:           The use of propane will not change or affect the emissions as presented in the draft permit. As such language for both boiler emission units will be revised to include propane as an emergency back-up fuel.

**Comment 4:**           **The company plans to install a gas meter on each boiler.**

Response 4:           The installation of a gas meter at each boiler will meet the requirements of the PTI.

**Comment 5:**           **The company states that the permit establishes a zero percent opacity limit for the following sources: P113 – P120. They further state that the quantifying of zero percent opacity is subjective and that all of the above emission units vent through the main exhaust stack for the Pebble plant. The company requests that the visible particulate emission limit be changed to five percent opacity.**

Response 5:           Ohio EPA agrees that measuring the main stack at the Pebble plant can cause issues, in addition to background opacities, and the possible interference of measuring opacities for other permitted sources. Ohio EPA will raise the opacity limit to five percent as a six-minute average for the above-referenced sources.

**Comment 6:**           **The company requests that the permit establish group limits for sources that are controlled by the wet electrostatic precipitator which involves emission units P113 – P118. The group limits will also assist with stack testing requirements.**

**Response 6:**           Ohio EPA will amend the PTI to include group limits of the summation of permitted allowables for the following emission units P113 – P117 and the concentrated fluoride operations of P118, which includes pollutants PM10, beryllium, fluoride compounds and hydrogen cyanide.

**Comment 7:**           **Several typographical errors**

**Response 7:**           **The following table addresses each typographical error as**

**specified in the commenter's letter. It is noted whether or not the Agency will modify the permit and justification for such action.**

Emission Unit	Description	Response
Cover Letter of the PTI	NSPS Applicability	Company states Subpart Dc should be added to the summary table for NSPS. Will modify as stated.
P113	Emission unit description	Changed as specified by the company to refer to the Decomposition Furnace No. 1. as emissions unit P122. P113 was previously assigned to the 40 ton straightening press.
P113, P114, and P115.	HCN emission controls	Company states that the HCN are controlled by the acid gas scrubber and not by the Wet Electrostatic Precipitator (WESP). The references to the 95 percent control of HCN by the WESP will be removed.
P113 – P118	WESP monitoring language	Company states the references to the thermal oxidizer language in the monitoring section should be removed. Will modify as stated.
P113 – P115	PM-10 control efficiency	Changed as specified by the company to lower the control efficiency for PM-10 to 80 percent.
P116 and P117	Testing requirements	Remove the first paragraph in the testing section for both emission units.

**Comment 8: The company stated that the beryllium emissions from the Wet Plant Concentrated Fluoride Operations should be 0.000035 lbs/day from the Salt Dryer and the IBC Dump Station.**

**Response 8:** Ohio EPA will revise the contribution from the Wet Plant Concentrated Fluoride Operations to 0.0000015 lbs/hr and 0.0000064 ton/year and add this number toward the Be group limit.

**Comment 9: Due to the difficulty of measuring the visible emissions from sources P118 and P120, which have baghouse controlled emissions, the company is requesting parametric monitoring of the baghouse in lieu of visible emission checks.**

- Response 9:** Ohio EPA will remove the visible emission requirements and replace the term with the daily baghouse pressure drop monitoring.
- Comment 10:** **The company stated that the potential to emit from emissions unit P119 for fluoride compounds should be 0.0024 ton/year.**
- Response 10:** Ohio EPA will revise the fluoride compound emissions to reflect the application, and will add these emissions toward the fluoride compound emissions group limit.

**End of Response to Comments**