

Doug Warden - Re: Heraeus Metal Processing

From: Doug Warden
To: Coulter, John
Date: Thursday, November 12, 2009 8:19 AM
Subject: Re: Heraeus Metal Processing

John,
 our responses to your comments follow in sequence.
 thanks,
 dew

>>> On Friday, November 06, 2009 at 1:52 PM, in message <20CF578F29504B868121350A724C82D2@CES>, "John Coulter" <coultereng@bellsouth.net> wrote:

Doug, we have several questions we would like your help with.

1. The Rotary Furnace, Permit No. 962395P, Condition 21(a) requires that they compile 30 days of pressure drop readings across the baghouse. They are approaching 30 days since startup but they have only operated the equipment for 2-3 days. Is that 30 consecutive days since start up or 30 operating days?

It should be 30 operating days; 2-3 days will tell us nothing. Yes-they may need an extension to collect enough data. (JWS)

2. In the rough draft under condition B8(b), it states that any malfunction that creates an imminent hazard to health must be reported within 24 hours. Heraeus wants to know what would constitute an imminent hazard to health. It is unlikely that a baghouse or oxidizer malfunction would actually create an imminent hazard to anyone's health. However, they want to know what TDEC/EPA would interpret that to mean.

This requirement is for situations where external assistance, such as the local fire department, must be summoned. This is **not** for routine equipment malfunctions, but for situations like a plant fire which could affect people beyond the plant boundaries. (JWS)

3. In the Draft Title V permit, on page 14 under the Fee Emissions Summary Table, ALLEF is listed several times. What does ALLEF stand for?

We'll complete the table before it goes to public notice. You'll have a chance to review (confirm the values) the permit once more before public notice. But FYI, **ALLEF** is the specified **ALLOWable Emissions for Fee** computation. For the pollutant under consideration this is the sum of the allowable emissions from each source listed in this permit subject to the 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(I). **If allowables for PM, SO₂, VOC, or NO_x were not specified in the past, should they be specified in this Title V permit? If so, maximum actual emissions should be calculated and used as the allowable emissions.**

4. Under Condition E4-4(a)(4) of the Draft Title V Permit, it requires that all monitoring equipment used by this source shall be installed, calibrated, maintained, and operated in compliance with the manufacturer's written specifications or recommendations, ... These specifications shall be made available to the Technical Secretary or his representative upon request. Heraeus is currently using a paddlewheel flow meter that can not be calibrated. When these paddlewheel flow meters develop problems or become suspect that are thrown away and replaced with a new meter. The alternative is to purchase and install an electronic / doppler flow meter. This would require the purchase of at least two flow meters so that we

could have sustained operations in case of a failure or for removing the flowmeter for calibrations. The factory representative has stated that Heraeus can periodically send the flow meters to their calibration lab and they would perform an ID and certifiable flow rate tests but it would not be considered a classic calibration traceable to National Institute of Standards and Technology (NIST) standards. Heraeus would like to continue using the simpler paddle wheel meters with TDEC's approval.

I have no problem with specifying the type of meter that they use with a periodic manufacturers accuracy check and a note that they promptly replace it, if there is problem noted. (JWS)