

Notes from the Community Meeting Regarding Air Quality in Lawrenceville
Question and Answer Session
January 21, 2016 , 6:30 pm
Goodwill, 118 52nd Street

Meeting Objective: Lawrenceville United invited representatives from the Allegheny County Health Department Air Quality Program to present an overview of their role in monitoring and permitting, as well as to present issues relative to air quality and answer questions on current permitting and monitoring issues. The full presentation is available on LU's website at www.lunited.org, and notes from the Q and A portion are below.

Presentation by: David Good and Sandra Etzel of the Allegheny County Public Health Department Air Quality Program

Please note that we tried to capture a summary of questions and answers from the meeting. We have taken the liberty of summarizing and paraphrasing, but representatives from the Allegheny County Health Department's Air Quality Program can be reached for additional information of further clarification:

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Sandra Etzel, Air Pollution Manager, setzel@achd.net, 412-578-8115*

Q: The problem with the McConway Torley monitor is it is upwind of the plant.

A: The Allegheny County Health Department would have to have a different site to move it to, if it were to be moved to a new locaton. While it is upwind, the meteorological data collected from the roofs shows that while it is upwind the wind changes so drastically all day that it has little effect. The monitor still records some very high readings even when there is no air movement. ACHD has talked before about putting a second monitor in the area. Step one would be finding a site to place it.

Q: What would the requirements for this site be?

A: Access to the property once every three days, a steady electrical source, and more funding from ACHD to pay for the analysis. Currently, ACHD collects the samples and ships them to a third party laboratory, but McConway Torley pays for the analysis.

Q: Could a resident allow ACHD to put it on their roof?

A: Possibly yes.

Comment: I (a resident) would allow a monitor on my roof.

A: Send an email to Sandra or David, or fill out a slip and indicate what you would be willing to do or host.

Q: What is the current status of the McConway Torley permit?

A: The production level in that permit was based upon the assumption that there was no building control at the facility. It also incorporated McConway Torley's desire to be a synthetic minor producer of air pollution. (Synthetic minor polluters create far less pollution than they otherwise could.) They did not want to create more than 100 tons of PM10, 50 tons of VOC, or 25 tons of total HAP – keeping them a minor source. McConway Torley was able to prove that with all of their baghouses running, they were able to capture all of those particulates – so they are operating with 100% building enclosure and negative air pressure. This means ACHD can now measure pollutants directly instead of estimating them. The results of the upcoming testing will determine what their operating levels will be at in the future.

Q: Is there a range or estimate of what those levels might be?

A: ACHD does not know because they have not been able to measure carbon monoxide or HAP levels during pouring and cooling operations before. That will likely determine their production levels to remain a synthetic minor source.

Q: What does HAP mean?

A: Hazardous air pollutant.

Q: What happens to the pollutants collected from the baghouses?

A: The new baghouse McConway Torley wants to install will have 7 compartments. Six will be online removing pollutants from the air. While those 6 are online, the air in the 7th is drawn in the opposite direction and knocks the particles down into a hopper. After several cycles, the hopper will be filled. Its contents are emptied into a truck which will transport them to an appropriate dumping site.

Q: Are the trucks in the building while they are being filled?

A: The baghouses are located outside of the building. The trucks are designed to not let the pollutants spill out.

Q: What happened in Feb 2015? Did you just become aware that they were running this negative air system or were they running it all the time?

A: ACHD changed their procedure for estimating fugitive emissions within a building. Previously, they worked with the assumption that emissions within a building would be captured and settled out by approximately 50%. That assumption had not been examined critically. An evaluation determined there was no technical justification for it, so they notified all pollution sources in January that they would not accept controls based on this assumption. The sources had to prove that they had some kind of control happening. McConway Torley was the only facility that conducted an EPA standard testing method to prove that they had negative air pressure within the building. As long as the baghouses are all operating, air is directed toward them and not out into the community. They started to run the baghouses at full capacity in February. Often facilities don't run them at full capacity all of the time because they are expensive to run. McConway Torley is willing to run their baghouses full time.

Q: How does the elevation of the monitor affect its readings?

A: The monitor had always been at ground level. McConway Torley requested if they could put it on a platform to prevent it from picking up dirt and dust kicked up by vehicles in the parking lot where it is located. It is currently eight feet above the ground.

Q: Does that change the results?

A: The results had been dropping for six to seven months previously to moving the monitor, so it is unclear what effect this may have had. ACHD currently cannot co-locate a monitor to corroborate the readings. ACHD has not performed an official Health Risk Assessment, but the emissions have always been well below EPA standards and it is trending downward.

Q: What has the ACHD done to solve the issue of dirty trucks dropping some of the waste material over the community?

A: ACHD does not have jurisdiction over the vehicles that come from the facility. McCowany Torley believes the truck traffic will be lessened when they get the permit that will allow them to generate less waste from the sand in the molding process.

Comment: It is not just sand. It sand mixed with fine metal that gets all over the area.

A: ACHD will note that as a major concern, but they do not have jurisdiction over the trucks.

Q: Is there something that a resident could bring to ACHD to bring the problem into a clearer light? The sidewalks are thick with the residue and it seems as if McConway Torley is not concerned with it.

A: Contact ACHD and they will investigate it, but they cannot say they can do anything specifically regarding the trucks.

Q: Who would the community contact to get the problem addressed?

A: They may need a permit from the Department for Environmental Protection or it might be a fugitive dust issue for ACHD to address. You can contact ACHD with your concerns. They brought pamphlets for their complaint line. If you leave your name and phone number they will get back to you. Residents can call Sandra or David if they have a concern or question.

Q: Are the trucks a relevant issue for the sand reclamation permit?

A: The permit could result in less truck traffic. One of the reasons McConway Torley sought the permit was so they could use their sand through more cycles so they would not have to truck in as much sand or truck out as much of it. The sand is going to be blackened and show signs of combustion due to having molten steel poured into it.

Q: Are there special conditions that can be placed on the facility?

A: If you were to make leave a comment to that effect, it can be addressed in writing. It is possible that something could be done. They could require a tarp on the truck or something similar.

Q: While the manganese emissions have been trending downward, it will still spike above acceptable standards. If the building control efficiencies are so good, how are these spikes still occurring? What additional analysis is being done by ACHD or McConway Torley to reduce these spikes?

A: ACHD cannot say for sure without a full analysis of the entire area. There are lots of ways that the monitors could show higher readings without necessarily higher emissions from the facility. For example, there could be re-suspension of particulates that have already resettled to the ground. A vehicle could kick up a dust of material that goes directly into the monitor causing it to spike. Also, the wind could just happen to point some exhaust from the baghouses directly toward the monitor. However, those are only some examples of how a spike could happen. It is possible McConway Torley had a condition where they temporarily did not have total building capture of polluted air. They cannot say for sure without, for example, a 24 hour tracer study to track path of the air to the monitor. The standards are for lifetime annual averages as opposed to

spikes. Studies are currently being done to determine the health effects of these spikes, but the standards do not exist yet.

Q: With air pollutants being blown into the area from up to 50 miles away, how can you determine the source of any pollutants picked up by the monitor and whether they originated from the plant?

A: The monitor at McConway Torley only measures manganese, lead, and chromium particulates that are small enough to breathe. There is also a monitor at the health department that measures both fine and coarse particles, so it measures all manganese, not just the breathable portion. Generally, the results at the health department station are much lower even though it collects a much larger range of particles. While it is true that some pollutants, like mercury, can travel very long distances, it is unlikely that large quantities of manganese or chromium would travel a long distance and all settle in the same area. Usually interstate transport of pollutants is more applicable to things like sulfur dioxide.

Q: It is very important to get a second monitor in the area, because it is clear that only one station is inadequate.

If compliance relies on all of the baghouses working, and the baghouses are so expensive to operate, what is McConway Torley's incentive to keep them running at full capacity all the time? How does ACHD ensure that the baghouses are always operating at an adequate level?

A: The operation of the baghouses is currently entirely voluntary on the part of McConway and Torley. They are not actually a site required to have total air enclosure, but they are very interested in becoming one. The next draft of the operating permit requires that they always have their baghouses running to prove that the building is always under negative air pressure, because that is the only way ACHD will be able to use the new emission standards instead of using the old estimates.

ACHD will look into and take citizen comments on the installation of a second monitor.

Q: What is an example of the enforcement process and when that might come into play?

A: It would start with a citizen complaint to the health department. They would send an inspector out to corroborate the complaint. Unfortunately, things like odors are very difficult to confirm because they are very fleeting. Other violations can occur during records inspections or on-site inspections. For example, an interruption to the electricity operating the fans would indicate a change in how much air flow was being pulled into the baghouses. Enforcement can be a long process, and ACHD often relies on citizens to point them in the right direction.

Synthetic minor sources, like McConway Torley is seeking to become, are also subject to a full compliance investigation every 3 years. During the inspection, an enforcement officer goes

through every step of the permit and ensures that the site is in full compliance with everything in the permit, including monitoring, record keeping, and reporting requirements. Every 1, 2 or 5 years companies must undergo stack testing. During the test, an enforcement agent is on-site to ensure that the testing meets all EPA requirements.

Q: What is the determining factor as far as a source's location near a school or high rise building?

A: ACHD does not have any jurisdiction over the zoning of sources. If a new source was to come online, they would be subject to the air toxics review and examined for how they would potentially impact human health in the area.

Q: What do they melt in the furnaces?

A: Electric arc furnaces are subject to a National Emission Standard for Hazardous Air Pollutants, or NESHAP. It determines the quality of the scrap metal that they use. It forbids them from using things like mercury switches into the furnace. While melting is occurring, there are hoods over the furnaces that draw air into the baghouse to control particulates and metals in the air.

Q: What does the scrap consist of?

A: Mostly automotive parts. The NESHAP forbids the use of any plastics in the furnace.

Q: What is the process for submitting a citizen comment on the McConway Torley installation permit?

A: To provide comments on the permit, provide Sandra with your name and email address. She will provide you with a copy of the permit to review. If you have any question or comments you can submit them back to ACHD via Sandra's email or via aqpermit@achd.net. The public notice for comments is on the ACHD website, achd.net.

The last day for public comment on the Installation Permit is January 25th 2016. McConway Torley will have to apply for a longer term Operating Permit after this one expires, which the public will have an opportunity to voice any comments or concern over as well.