

Community Meeting on McConway & Torley Draft Occupancy Permit  
Thursday November 16<sup>th</sup>, 2017  
6:30-8:30 p.m  
Attendance: 34 people

**Speakers and Moderators:** Dave Breingan (Lawrenceville United), Matt Galluzzo (Lawrenceville Corporation), Joann Truchan (Allegheny County Health Department), David Good (Allegheny County Health Department)

**Introduction from LU:** The meeting started at 6:35 PM with an introduction from Dave to go over the agenda, ground rules, and give background on McConway and Torley. McConway and Torley is one of Pittsburgh's oldest steel foundries. This draft permit matters because Pittsburgh ranks as the 8<sup>th</sup> most polluted city in America. Allegheny County received an F for particle pollution and high ozone days. There are many risk factors associated with air pollution. Dave B. explained the six criteria pollutants and their limits including those relevant to McConway and Torley. Dave shared information on the December 4<sup>th</sup> public hearing and where to send comments and concerns to the Health Department. Residents are also encouraged to get in touch with LU and provide feedback and input to guide LU's action.

**Presentation from ACHD:** JoAnn from the health department started her presentation at 6:48 PM. The Health department reviewed the McConway & Torley Permitting. The purpose of her presentation was to explain how the permit is evaluated and how an air permit helps to protect the citizens of Lawrenceville. All air permits consist of the same seven parts. The most important part is the emissions unit level terms and conditions which is broken up into more sections that discuss restrictions, testing, monitoring, record keeping, reporting and work practice standards. There is also a technical support document which is a supplement to the permit that explains how the emissions limits were developed. Finally, there is a comment and response document that responds directly to any public comments that are provided during the public comment period that are germane to the permit.

David Good then went into the details of the McConway and Torley Permit: this permit addresses all the unknowns we have had over the past 8 or 9 years. A steel foundry (which is what McConway and Torley is) is a factory that produces metal castings, the metals are cast into shapes by melting them into a liquid and then they are poured into a mold. M&T makes railroad castings through melting operations, then the mold and core operations then finally the finishing operations. Dave shared a diagram of the processes and a map of the facility. There is a metals monitor at the edge of the M&T parking lot.

EAF: Electric Arc Furnace heats charged material by means of an electric arc  
BH : Bag House is a pollution control device that is basically a large scale vacuum cleaner. There are three around M& T site

There are specific sources of pollution that are produced in each of the processes (melting, pouring, cooling, etc)

Current Pollution Control Devices:

Bag Houses

Two scrubbers that control odors for the core making operations

Total Building enclosure

The pollutants released are PM 10, PM 2.5, Nitrogen Oxide, Sulfur Oxides, Carbon Monoxide, Volatile Organic Compound, Benzene, Metal HAP, Chromium

(All of these are values that the ACHD was able to measure at the M&T facility)

There have been major changes that have occurred over the past three years that led to a new operating permit. The three major changes are facility wide emissions measurement, installation permit number 13 (replacing two bag houses), new sand reclaims units, increased air flow, lower particulate emissions, recycling of sand (uses less materials, waste and truck traffic). All of these new initiatives are decreasing pollution.

There is an EPA test method to verify total enclosure and M&T passed it, meaning that there aren't any fugitive emissions coming out of the building.

ACHD and M&T negotiated for a year to design a test protocol. Testing took place over two days in November 2016 for 8 hours to look at carbon monoxide, nitrogen oxides, volatile organic compounds and hazardous air pollutants. The results showed that M&T was not a major source of any pollutant and they were able to quantify the emissions (pounds of pollutant over ton of steel melted).

After quantifying these emissions there were changes to how ACHD arrives and calculates the emissions estimates. Big differences between 2015 and 2017 draft permits as a result.

Question from audience: How do these emissions come out in ground level concentrations that the community is exposed to?

- Answer: Metal monitor has been at the edge of M&T property line since 2011. The data being drawn from the metal monitor since 2011 shows a decreasing average in manganese. During this time new bag houses were installed and that's where you can see the decrease, especially when operating at total enclosure.

Sources of Toxicity: HAPS Air Toxics are pollutants that are known or suspected to cause cancer, serious health effects and adverse environmental effects.

ACHD put out new guidelines and policies two years ago. The EPA IRIS data base doesn't have updated data and exposure info for manganese, so used more updated ones. Chronic lifetime exposure for manganese that is acceptable is 300 ng /m<sup>3</sup>. The ACHD looked at the latest science and followed the EPA's lead to set these limits.

Next Steps JoAnn: Review the permit and make informed comments. The public comment period ends on December 4<sup>th</sup>. A public hearing will be held that evening at 6 p.m. at Arsenal Middle School's auditorium. You must sign up to speak by 4 p.m. on Friday December 1<sup>st</sup> by calling Karen Sagel at (412) 578-8115. Written comments are also accepted until December 4<sup>th</sup> by mailing to 301 39<sup>th</sup> Street, Pittsburgh, PA 15201 or emailing [aqpermits@alleghenycounty.us](mailto:aqpermits@alleghenycounty.us).

### Questions:

Q: Could you explain difference between minor source and major source and how a facility is categorized?

- A: Depends on potential to emit. A major source is a facility that has the ability to produce greater emissions (limits set by EPA). Major sources are subject to more stringent federal regulations. M&T is considered a synthetic minor, meaning they have voluntarily chosen to remain a minor source and set a cap on their production limits to remain so.

Q How is this monitored?

- A: They are required to keep records, they submit the records every 6 months.
- Q: So it is self-monitoring?
- A: Yes, an inspector does check their records and we know how much metal they can melt, we can ask for their businesses records.

Q: Do they operate at a constant rate? Or do they tweak operations based on what their orders are? If you're only monitoring 24 hours per every 72 hours, can't they easily game the system?

- A: I don't think that would be an advisable way to run a facility like this, you are essentially taking a cap on 1 out of every 3 operating days. It's been measured for such a long period, so it doesn't seem practical. We do full compliance inspections that are unannounced. We used to quantify their emissions because we would see some erratic behavior in the monitors to make sure it corresponds to the process change, but the monitor doesn't care if the metals are coming from the furnace or being kicked up from construction activity.

Q: You check these differences?

- A: Yes we did try to quantify whether different winds impact this, you get swirling wind next to a river, you can get the wind patterns and have looked into in the past. We try to cover as many bases as we can and have more than one way of demonstrating compliance. The one thing that over rides this discussion is that because the values are so low, we are barely above 10 percent of threshold. At this point it made more sense to do these evaluations, but it is so far below what is considered acceptable chronic life time exposure.

Q: Do they maintain production records? How many complaints have we seen in that time frame? I know we definitely felt the impact to our quality of life when they began producing more.

- A: It started going up in 2011 and then leveled off and then went downward. Not sure about the complaints, we don't have that info here tonight.

Q: The difference in the 2015 to 2017 they are well below the level? How did the other numbers in 2017 compare to the different types of pollution?

- A: The criteria pollutants are covered under standards for fine particulate matter, I would have to direct you towards the 2016 monitoring review, we haven't had any violations in Lawrenceville. The monitoring data is on the website you can look at the Lawrenceville monitor. The fact that there is a full building enclosing means the pollutants are going up and dissipating so ground level pollution is not as common.

Q: Enforcement isn't part of the 7 permit criteria, is there a part that defines the penalty for infractions?

• A: Our enforcement group goes out to do inspections and see how facility is meeting. If they are in violation they issue a notice of violation and then a statement of violation if not enforced and then they look at fines and legal action or a consent decree.

Q: How transparent are these actions?

- A: The inspections are available to the public with a right to know request, the reports are available as well. There may be some redacted business information.

Q: Does the December 4 hearing include the other three permits in public comment?

- A: Yes we expect M&T to have the most public comments, so we decided to host in Lawrenceville.

Q: The table of estimates I noticed that the two things that increased was nitrogen oxide measurements, why did that number increase?

- A: Previous to the 2015 draft permit we really only have nitrogen oxide measures from electric arc furnace bag permits, we had no reason to measure somewhere else. But when you test with total enclosure you know that the baghouses are capturing all the uncaptured processes. Even though we had these bag houses that didn't capture combustion processes they were capturing pollutants from inside the building.

Q: So their emission were always there, now we can quantify them and that's why the numbers look like this?

- A: Yes, previously we had no way to measure them. With total enclosure and two-day all-baghouses test gave us actual numbers.

Q: What happens to the stuff collected inside the BH?

- A: They are captured inside the BH with hundreds of bags in different compartments, collected and taken in trucks to a disposing site.

Q: This negative pressure is done through baghouse fans that require electricity. What happens if there is a power failure?

- A: If there is a power failure then they can't melt steel, it would just be a general outage, so they wouldn't be able to produce.

Q: It appears that the two-day emission testing that you did was really critical for establishing permit limits. How do you know that those two days are representative of what the operations are for the rest of the year or the lifetime of the permit?

- A: We wrestled with the testing protocol to make sure they were representative conditions. The testing was actually representative of maximum conditions, not just normal operating conditions. There are also records of how many molds and cores they were creating to make sure they weren't under creating or over creating so we represented as best as we could. Moving forward we want to make sure future tests are as close to the original test to break down pollution to ton of steels.

Q: Is the diesel emission from truck traffic considered in permitting? Lots of sand from trucks that gets kicked up on our streets, idling trucks.

- A: We only have the authority to regulate stationary sources of pollution. We don't have jurisdiction over transportation emissions. However, there are idling laws governing times and locations that we do have jurisdiction over, so that should be reported to us.

Q: I've tried to report idling operations, but because it wasn't between ACHD's 9-5 hours, no one could show up. Is there a better system to enforce an idling vehicle?

- A: We can direct this to the enforcement department. Some of this happens after hours, but make notes of when they occur and report to department during normal business hours.
- LU: For idling trucks and noise issues, please also refer them to us so that we can track and work directly with M&T or ACHD to address.

Q: Individuals can respond differently to criteria pollutants. When regulations are set, does the ACHD maintain health data near the facility and compare to other parts of country and state?

- A: Our epidemiology group keeps track of this data throughout the country, I don't know if they have specifics for Lawrenceville.

Q: Are there other facilities that contribute to this pollution?

- A: There are a couple facilities that could contribute, like Sunoco and smaller sources. Even Children's Hospital has boilers and generators.

Q: How many foundries are in the City of Pittsburgh?

- A: I don't know of any.

Q: Any in dense urban neighborhood?

- A: I know there is Union Electric Steel and US Steel facilities.

Q: You said M&T is required under this permit to run all the baghouses during all processes. Is there anything in the draft permit around maintenance on the bag houses. What happens when one goes offline?

- A: Good question. We never tested for when one goes down or is not running. With the new baghouse, air flow is going to increase the total airflow of the facility, so if one went down it wouldn't have such a big impact because that one is so significant. Additionally, if there was a breakdown, M&T is required to report it within 24 hours.

Dave Breingan: I understand your initial test took a long time to put together. When and how is testing repeated?

- A: Every five years or if there is a significant change in emission equipment.

Question: was the comprehensive bag house testing a "pop quiz?"

- A: No, these tests required a great deal of preparation. County wanted a long time scale & variation in testing procedure.

Q: Is the new bag house up and running?

- A: Yes, it was up and running earlier this year.

Phoebe Stern: Prior to this year and installation of new bag house, would they have been in compliance with the regulations?

- A: Yes.

Sara Innomarato: Are there public health effects for residents for LV and surrounding neighborhoods?

- A: County has run models assuming certain emission levels on manganese, they were not significant according to ASTDR levels.

-Sarah expressed concerns about health impacts & how data is (or is not) collected by the County.

-Joann indicated that this issue would be good for epidemiology division.

Matt Erb: Are the bag houses capable of filtering out PM10?

- A: Yes. The metals are included in that particulate matter as well. But the smaller the particle, the more difficult it is to capture and the less efficient the baghouse is.

Q: Do they currently have an operating permit?

- A: They are working on an installation permit currently.

Q: What's the difference between the current permit and the one two years ago?

- A: The big difference is that now we've verified total building enclosure, so there are better estimates on emissions based on test data. Rate limit in permit is 92,500 tons per year, when the one in 2015 was 21,250 tons per year. The facility is currently operating 40-60K currently.

Q: Any studies on migration of dust? Who does this?

- A: Air is going to disperse over large area. Valid concern about longitudinal accumulation in place.

Q: Can we bring out an epidemiologist?

- A: Yes, Joann will follow up.

Q: What is a synthetic minor threshold?

- A: By taking an enforceable limit on CO of 96.3 tons--under the 100 ton limit that would trigger a major source--they are considered a synthetic minor.

Q: Will the fence line monitor continue?

- A: That was on a three year term, which has passed. M&T has continued this by their own volition. There will be no requirement for the monitor moving forward.