

Virtual Public Meeting: TEMA R13-3414A (2024-06-05 18:05 GMT-4) - Transcript

Attendees

+1 304-***-24, Beverly D McKeone, Billie Garde, Brian D Carney, Christopher P Scanlan, Dennis O Stottlemeyer, Edward F Maguire, Hanna Ho, Hardy Mason, Jefferson County Foundation, Laura M Crowder, Lisa Payne, Iorenzo spagna, Lynn Delles, Mike Tony, Nicole D Ernest, Nicole D Ernest's Presentation, Patrick Ward, Terry A Fletcher

Transcript

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Terry A Fletcher: All right, so good evening everyone. My name is Terry Fletcher. I'm the chief Communications officer for the West Virginia Department of Environmental Protection. I want to welcome everyone to the division of air qualities public meeting regarding the permit modification for team in North America Permit application number are 13 - 3 4 1 4 8. With me tonight is staff from the depth division of air quality including division director Laura a Crowder new source review program manager Bev m permit engineer Brian Carney an environmental resource manager Nicole Ernst the purpose for this public meeting is to provide information answer questions and primarily give you the opportunity to share your comments or information about the application with the dep.

Terry A Fletcher: Please note that a decision on this application will not be made this all comments given this evening as well as any written comments submitted to the agency prior to the end of the comment period we'll be entered into the public record and considered by daq staff prior to the agency making its final determination. The agency will respond to comments and any questions that cannot answer this evening in a response to comments document which will be sent along with the agency's final determination. the official comment period ends at five o'clock on Friday, June 7th 2024 Comments can be emailed to at Brian dot d dot Carney at wv.gov with team of comments and the subject line.

Terry A Fletcher: And hard copy comments can be sent via regular mail to the attention of Brian Carney at the dep division of air quality. 601 57th Street Southeast, Charleston, West Virginia 2 5 304 that information is on the screen here. so all that contact information is right there available for you. To ensure that we successfully achieve the purpose of this meeting. We ask that you keep your microphone muted when not in use and to be respectful and consider each other by refraining from using foul language and name calling and interrupting others while they are speaking. We also ask that you keep your comments or questions on the topic of this application and air quality related issues so that our time together is used efficiently. We did ask that everyone register for the meeting tonight so that we have an accurate record of everyone in attendance. If you do not register, we ask that you please add your name and email address in the meeting chat.

Terry A Fletcher: And you can do that by clicking the text Bible icon in the bottom right corner of your screen. This will ensure that you also receive a copy of the agencies filed discrimination once it's made.

We'll begin the meeting with a brief presentation from Brian Carney, which we'll touch on the daq's permitting process and information included in the application. We will then open the floor for a question and answer segment before moving on to official comments. Again, any questions we can out answer during the Q&A portion? We will address those in our response to comment document. And also, please be aware that once we move to the official comments portion of the meeting. We will no longer be able to answer questions questions that you ask as part of your official comments will be addressed in the response to comment document.

Terry A Fletcher: Each commenter will be given five minutes to speak. And we ask that you please stay within this time frame to ensure everyone who wishes to participate has the opportunity to do so. And once again just a reminder written comments could be submitted to the agency at any point until five on Friday, June 7th 2024. All right. Thank you for bearing with me through those opening remarks and instructions at this point on I'll turn the floor over to permit engineer Brian Carney Brian.

Nicole D Ernest's Presentation: Hello everyone. I'm Brian Carney and I'll be presenting the modification permit for the Tema North America limited liability company.

Nicole D Ernest's Presentation: Whenever the agenda first we'll go over the currently permitted facility followed by the permitting process. And Emissions that are to be modified then some common comments.

Nicole D Ernest's Presentation: The current permitted operation has three plastic extruders all roads Materials Handling and building heaters. facilities located in the Burr Business Park along Route 9 South of carneysville

Nicole D Ernest's Presentation: What is plastic Extrusion is a manufacturing process for raw plastic, usually small pellets granules or powder is melted down and forced die to form a product. TMA produces materials such as damp proofing and drainings membranes for foundation's anti-condensation layers for roofing and uncoupling membrane for ceramic tiles. Approximately 80% of the materials is recycled. The operating temperature runs about 480 degrees Fahrenheit.

00:05:00

Nicole D Ernest's Presentation: Here's an example of an extruder that uses pellets. Plastic is first melted down and then pushed using a turning screw into shapes with a shaping die.

Nicole D Ernest's Presentation: This is not want to teemas extruders but it is an example of what one looks see. Te ma plans to add an to their existing three Extrusion lines. This line we use a polystyrene with an inert expansion gas hfc 152a for expansion and also use a heat or glue for lamination.

Nicole D Ernest's Presentation: Over the permit process and where we are currently the application was received by the division of air quality on January 16th. The applicant published the legal ad on February 21st and the Shepherdstown Chronicle. The division air quality uploaded the application onto the website.

Nicole D Ernest's Presentation: After review the application was deemed complete on April 3rd.

Nicole D Ernest's Presentation: During the evaluation of the application to the division of air quality review the inspections performed. The latest full inspection was completed by Chris Scanlan on March 21st. 2023. No violations were Checking back for compliance. The facility had no violations since the issuance of the original permit. After the division of air qualities preliminary determination illegal ad was

on April 24th in the spirit of Jefferson advocate the following rules apply to this modification 45 csr7 establishes particularly matter emission standards for the manufacturing processes and Associated operations Limits for a particular matter are based on the process weight which is set at 5,623 pounds per hour. Emissions from the extruders will be about 0.5 pounds per hour.

Nicole D Ernest's Presentation: 45 CSR is used for establishing limits for other pollutants and Reporting requirements. Rule 13 section 5.7 requires the permit be issued if all rules are met the modification will increase the maximum annual emissions of particular matter. By 5.81 tons per year carbon monoxide by 0.13 tons per year vocs by 1.93 tons per year and hazardous air pollutants by 0.11 tons per year.

Nicole D Ernest's Presentation: I'd like to give her some commonly received comments for this permit modification. The first one we received the applicant claims no fugitive emissions from truck unloading or storage. This is hard to accept because this includes cement delivered in bulk sack and placed in storage or blown into a silo and grinding of trimmings with transfer of grindings to a silo. These require the applicant to accurately estimate and control The Fugitive emissions associated with truck unloading and material storage. Ideally emissions should decrease not increase.

Nicole D Ernest's Presentation: In response to comment. Number one first off. This facility does not processes plastic. Also, the following permit requirements do deal with the ilities fugitive emissions. Under Section 4.1.1 of the draft permit the North America facility shall consist of only the pollutant emitting equipment and processes identified under Section 1.0 of this permit any other processes units defined as the Minimus per 45 CSR 13.

Nicole D Ernest's Presentation: In accordance with the information filed and permanent application r13 34 14a the equipment shall be installed maintained and operated so as to minimize any fugitive Escape of pollutants and the equipment processes child used to specified control devices. Also under section 4.1.11 of the draft mit. No person shall cause suffer allow or permit any manufacturing process or storage structure generating fugitive particular matter to operate that is not equipped with a system which may include but not limited to Process design control equipment design or operation and maintenance procedures to minimize the emissions of fugitive particulate matter.

Nicole D Ernest's Presentation: To minimized means such a system shall be installed maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable. On the number two for the back house X2 DC for The xbs Silo only other specified visual checks is marked under how is filter monitored for indications of deterioration. However, under the proposed monitoring and recordkeeping Reporting and testing section. The differential pressure is listed under Monitoring inner haircut keeping please ensure that the differential pressure is being monitored and that the alarms are required that indicate when the device is out of specification. Response to comment number two the following permit requirements deal with the facilities monitoring requirements.

00:10:00

Nicole D Ernest's Presentation: Section 4.2.2 of the draft permit the permittee shall operate and maintain all bag houses that filters in accordance with the manufacturers specification to ensure they remain in good operating conditions. Also under Section 4.4. There's lists of requirements for the permittee to Monitor and keep records of performed maintenance.

Nicole D Ernest's Presentation: Element number three the efficiency of bag house x2dc or XPS Silo is listed as a 100% with 95% control. This is apparently supported by the manufacturer's information.

However, the same is assumed for bag house x3dc for the future Silo, even though no manufacturer has been selected for that back house yet. What is the basis for this assumption?

Nicole D Ernest's Presentation: response to common number three The epa's published air emissions monitoring knowledge base says the following concerning bag houses in general fabric filters are capable of collecting efficiencies greater than 99%

Nicole D Ernest's Presentation: common number four bag house X3 DC has no monitoring or recording suggested. Please require stringent monitoring and recording for Backhouse DC. Response for common number four as follows. The emission point for Backhouse X3 DC is actually The particular matter limit for X3 CE under section 4.1.7 of the draft permit. Is 0.6 parts per hour and 0.22 tons per year? Also section 4 of the permit contains all the requirements for monitoring and recording for emission Point X3 CE.

Nicole D Ernest's Presentation: On the number five in the permit. There are only very general operating maintenance requirements for bag houses, but no certification of this or other types of monitoring these require visual checks and pressure differentials monitoring with alarms for both Bank houses. These also require monthly maintenance checks for the back houses with required documentation and Reporting. Response to comment number five is as follows under section 4.1.8 of the draft permit. No person shall cause or allow our permanent emission of smoke particulate matter into the open air from any processed Source operation, which is greater than 20% opacity. Except as noted on in subsections 3.2 through 3.7.

Nicole D Ernest's Presentation: Continue to response to common number five. the section 4.1.16 of the draft permit at the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the secretary thereafter appropriate test consisting of visual determinations or conventional instack measurements or such other tests the secretary shall be conducted to determine compliance.

Nicole D Ernest's Presentation: What's next? We'll review the public comments that continue to come in and we'll respond to the public comments. That will make a final decision to approve the modification to the permit.

Nicole D Ernest's Presentation: Division of equality will continue to accept comments until June 7th at 5 PM, please address them to Brian D Carney. At the division. We are qualities address 6157 Street Southeast Charleston to five 304.

Nicole D Ernest's Presentation: How much may also be received via email brian.dot Carney at wv.gov? And thank you all for listening.

Jefferson County Foundation: Yes, I am. Thank you. So my first question is and I appreciate you answering some of the commonly submitted comments. However, I still have the question how can daq and the facility insure compliance with state laws and permit requirements for particular matter emissions if there are no monitoring requirements for the new bag houses.

00:15:00

Jefferson County Foundation: It I have another question and so my next question is why didn't DEQ include inspection and maintenance requirements for the new bag houses or other equipment?

Jefferson County Foundation: Is it blinked in up? So why didn't daq include inspection and maintenance requirements for the new bag houses or other equipment in the permit of the applicant?

Brian D Carney: if inspections by us or by the operator

Jefferson County Foundation: applicant So what yeah the operator.

Beverly D McKeone: I think if you look at the requirements of the permit, it is required, but they are required to inspect and maintain the equipment. That's a standard requirement that comes directly out of state rule 7.

Jefferson County Foundation: Yeah, so I'm saying why weren't specific inspection and recording required. They're just required to follow the law not to do specific inspections.

Brian D Carney: Section 4 has monitoring requirements and...

Beverly D McKeone: section

Brian D Carney: recording requirements. of the permit

Beverly D McKeone: I mean are you asking why didn't we put in that you will inspect every month on the 15th of the month kind of thing.

Brian D Carney: that's

Beverly D McKeone: That is not...

Jefferson County Foundation: Yeah.

Beverly D McKeone: how we generally write conditions and they are required to maintain and inspect their equipment and keep records of that. And usually it's by the Specifications and different bank houses might have a different manufacturer and they have a different. inspection schedule, let's say so It doesn't help us to put it into permit when it might be.

Beverly D McKeone: Against what the manufacturers recommending so our standard language which comes out of the rule will say permit maintain and inspect your equipment permit manufacturer specifications.

Jefferson County Foundation: And then how when you inspect doing you ensure that that's occurring.

Beverly D McKeone: it are important inspectors obviously will go in and they will ask to see your records They will say when for a bank account. For example, they'll say I can see your maintenance records. When was the last time you changed What are your bags? That's all part of a routine inspection done by our compliance and enforcement section.

Jefferson County Foundation: And so your impliance and enforcement section maintains a list of what should be done with each bag house so that they can check. I mean that's what we're saying is we just think that that should be included in the permit so that when the inspector arrives on site that it's listed in the permit what they need to do and the perimeter of the inspector can compare what is existing on site with what is in the permit.

Beverly D McKeone: Again, they have the requirement to do. So to be extremely specific I think is what you're commenting on that says they have to do exactly this so that the enforcement person can check and see if they did exactly. This check we ends up making huge permits and...

Jefferson County Foundation: Yeah.

Beverly D McKeone: conditions and honestly could lead to a violation just by missing a step here or there. The importance here is to make sure that they maintain Their equipment and keep records showing that and our permit has the requirements.

Beverly D McKeone: Yeah, in 4.2.2, the permittee shall operate and maintain all bag house vent filters in accordance with the manufacturer specification to ensure they remain in good operating condition No, we do not say manufacturer of bag house one. Here's what they require which could be a 10 20 Page maintenance record or recommendations about what you do to inspect and check and put that in a permit. No, we do not also because that same manufacturer could turn around and next year change what they believe are the proper manufacturing maintenance and inspection report it so the rule says you have to properly maintain it but no we do not get extremely explicit as to what they have to do. in that manner

00:20:00

Jefferson County Foundation: So the owner is on the inspector to understand what is required for each back house when they go to inspect.

Beverly D McKeone: Yes, I mean it's understand. It's not that the inspector is going to check and see when you did your last inspection or changed your bags. Did you move to nozzle B to properly assign? they are not going to go into that bag house and check and see if the bags are properly installed for instance. That is not what we do. What he looking at is do you have those records? Do you know what your manufacturer specifications Can you tell us the last time you did that? When was the last time you changed your bags?

Beverly D McKeone: And are they working and honestly, the bag houses are Very simple straightforward equipment that is a pretty much designed the same way regardless of Manufacturers. You can have different, bags and bag types and what they're made of and that kind of thing but the key there is, it's working or not. If you can see an emission and that's the first thing the inspector would look for.

Jefferson County Foundation: Okay, so having a pressure differential gauge with an alarm. is not something that's what we would like to be required is that they have set inspection times. We're recording requirements and Reporting requirements and that instead of just visual inspections have a pressure differential with gauge with an alarm. but you're saying that's not

Beverly D McKeone: In this particular case with these types of bag houses and what the product is and what's being collected. Honestly a pressure drop would not be a good parametric monitor for this kind of equipment. if we put a pressure drop requirement in there that say is between one millimeter mercury and three and a half millimeters of mercury. If it reads three point six millimeters of mercury, then we could say they're out of compliance, but it doesn't mean that they are not actually still meeting the 99 percent because it's very similar in terms of pressure drop like your car with miles per gallon, we kind of give you an average but some cars get a little bit better and say make a model in a little bit less pressure drop is good for back houses to maybe if you see it fluctuate quickly to let you know maybe you had an issue with the bag and to check but that is not necessarily going to tell you that there's a violation or that

Beverly D McKeone: putting out more emissions or that they're having in a mission above limits.

Jefferson County Foundation: okay, because the answer to the comment that on the perimeter was the permanent reader was just discussing, when? He addressed the comment in the permit words as in the permit. There are only very general operating and I mean it's requirements for the back houses. and the commenter had requested that they use these pressure differentials and alarms and the answer is that in permanent condition for one eat. It says that no person shall calls or suffer allow.

Jefferson County Foundation: or permit emissions of smoke particular matter into the open air from any process Source operation, which is greater than 20% opacity. And so my question is I mean who is going to know if that is happening? without some sort of Measurement how is daq going to enforce that?

Jefferson County Foundation: If it's just simply a visual check by the actual. emitter

Beverly D McKeone:

Jefferson County Foundation: a

Beverly D McKeone: Yes,...

Beverly D McKeone: I mean it is a visual check. There's a federal. Test that we often call rule 22, which is literally can you look at it and see something and if you do then you go to Method 9, which is an actual reading of opacity over six minute period every 15 seconds taking a reading and all of our enforcement inspectors are certified twice a year to be able to take those measurements.

00:25:00

Jefferson County Foundation: And how often is an inspection of this facility done?

Beverly D McKeone: This particular one I think might be once every three years four years. I can't. Speak to that specifically.

Beverly D McKeone: this

Jefferson County Foundation: So on one day out of over a thousand days.

Beverly D McKeone: If you mean by the Western daq in terms of an on-site inspection, But the company is required to keep it at all times and...

Jefferson County Foundation: And that's the way it's checked. This is the visual.

Beverly D McKeone: very often companies have their own people who are certified to read.

Jefferson County Foundation: Yeah. m- Yeah, I put your vibration that'll really help us do that. So, I appreciate that and then my next question is polyethylene used at this facility.

Brian D Carney: Let me look. I don't.

Brian D Carney: I do not remember.

Jefferson County Foundation: It's our understanding that polyethylene is not used at this facility or not in this portion of the facility the new.

Brian D Carney: Just always styrene. I don't remember polyethylene.

Jefferson County Foundation: I agree with It's our understanding though from looking at the emission factors that are mission calculations that emission factors for polyethylene were used right for the particular matter, whether than The materials that are being used at the ability and...

Brian D Carney: What?

Jefferson County Foundation: so our question was why was that done?

Brian D Carney: Right b**** what she's talking about is what we use to determine the limits.

Jefferson County Foundation: Yeah.

Brian D Carney: I think in the application. That's what you're talking about. Correct?

Jefferson County Foundation: I'm not a TalkBack my notes.

Brian D Carney: Is it the Dow Chemical That the one you're talking about.

Jefferson County Foundation: So yeah, I'm interested.

Jefferson County Foundation: Okay.

Jefferson County Foundation: That was my last question. I appreciate you.

Terry A Fletcher: Thank you, Dr. Weimer. Is there anyone else that would have a question?

Terry A Fletcher: So you can use the race hand function. It's a little hand icon at the bottom of your screen.

Terry A Fletcher: Not seeing anyone. That has an additional question.

Terry A Fletcher: Brian were you able to track that down or you just get back to her later on that?

Terry A Fletcher: Give me a second really good. Okay, we have a question from Billy garde.

Terry A Fletcher: Billie's you have a question.

Terry A Fletcher: Okay, maybe that was a accident there at any rate. we don't have any more questions. We'll go ahead and move to official comments as I mentioned earlier. If you don't at this point, we're not going to answer any more questions. We're just gonna to listen to comments and record those and if you have any questions additional questions that you'd like to ask as part of your comments, we'll respond to those in our response to comments document. So again, I'm going to read off or name the folks that signed up to give a comment and then we can open the floor. So the first person have is Weimer again so drummer if you want to go with your questions get five minutes.

00:30:00

Jefferson County Foundation: Thank you.

Jefferson County Foundation: Sorry, I'm just trying to get back in my notes. There we go. Thank you for having us this evening the permit record must provide adequate information about bag house x3dc and its potential missions as we discussed before the federally enforceable West Virginia. Sip requires that quote no person shall calls suffer allow permit any manufacturing process or store it storage structure to operate that it's not equipped with system to minimize the missions of fugitive particular matter.

Jefferson County Foundation: Where that system must be installed maintained and operated to ensure the lowest fugitive particulate matter emission reasonably achievable team is permit application contains specific information regarding the dust collection system for the Recycled and outside silos, but not for In fact, it states that the dust collection system for the Virgin Silo is not yet selected. and we believe that they should.

Jefferson County Foundation: either not include that Silo in this permit or go ahead and select that Silo so that specific information regarding that Silo can be included in this permit the alternative they could remove that Silo from this permit and again modify the permit in the future to include that Silo when it is going to be built and when the information regarding the bag houses available. Permit must include additional monitoring and record keeping reporting requirements for the bag houses under West Virginia state law and the Sip the bag houses authorized by the proposed modification permit must be

Jefferson County Foundation: Installed maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable and cannot emit particular matter emissions in excess of 20% opacity as we just discussed their permit appears to address these requirements through specific particulate emission limits and general prohibitions. However, these Provisions alone are insufficient to ensure compliance with West Virginia law and the federally enforceable sip In order to ensure that the bag houses are operating properly and with minimal particulate matter emissions as required the permit must require. Tema to monitor the bag houses and record that information consistent with teama's own assertions in the application. The permit should require pressure drop gauges with audible alarms to monitor all three bag houses and require record keeping of that information.

Jefferson County Foundation: required the permit must address fugitive emissions from truck unloading as noted as we noted earlier state and federal law provides for Particular matter emissions from this Source must be minimized and cannot exe 20% opacity as explained in the fact sheet for this application and permit the new production lines authorized by the modification permit will be supplied by material delivered in bulk sacks Super Sacks and is refer to in the We understand fire trucks, which is unloaded by forklift and placed in storage or blown into a silo.

Jefferson County Foundation: While wvdep acknowledges Hall Road emissions as one of the five main categories of emissions from the facility. The department has done almost nothing in the proposed permit to address these emissions to comply with the requirements of state law on the West, Virginia. Zip wvdep should improve the provisions for Fusion dust in the permit to include specific parameters for when control steps must be taken to address dust from truck trucks delivering materials to the facility and include complying Provisions requiring Monitor and record monitoring and record keeping. Of Tina's compliance with them. the permit should also include of reporting of all required records

00:35:00

Jefferson County Foundation: Thank you for allowing us to make these comments.

Jefferson County Foundation: And I will also add I'm sorry just because we didn't get an answer to the question. I will add that. We believe that The emission factors used for this permit should be based on the materials used at this facility rather than polyethylene.

Terry A Fletcher: But thank you Dr. Weimer. All right. That was the only person we had that signed up to provide a comment at this point to open the floor to anyone else who would like to provide an official comment. If you'd like to do so hit the raise hand button.

Terry A Fletcher: Okay gonna give one last call or comments

Terry A Fletcher: All right, if there are no other commenters. This point we will close the meeting.

Terry A Fletcher: This will conclude the public meeting on the permit modification for team in North America. LLC. Permit application. Number are 13 - 3 4 1 4 8.

Jefferson County Foundation: Okay.

Terry A Fletcher: If you did not register again, please make sure your name and email address is in the meeting chat to ensure that you receive a copy of the agencies filed termination, or you can contact the agency. At the contact information on the screen and provide your contact information that way the comment period will end at five o'clock on Friday, June 7th, 2024 and again comments can be emailed or sent via regular mail at the information on the screen. I want to thank everyone for your interests and for taking the time to attend this meeting. Have a good

Jefferson County Foundation: Thank you.

Terry A Fletcher: Thank you.

Meeting ended after 00:37:45 🙌