• Emissions
  o The facility should analyze whether the increase in emissions can be avoided by better selection of raw material or other emission mitigation measures. The facility used the FWRA determination of negligible risk to justify increases, but this does not explain necessity of increases to begin with, i.e., compared to improving control devices or scrap selection process.
    ▪ Formalize a standard operating procedure for screening raw material that is on record and can be accessed and followed by all employees at the facility as an effort to keep emissions lower.
  o Need analysis on whether emissions can possibly be offset by reducing emissions elsewhere at the facility.
  o For carcinogens, the health benchmark is the ambient air concentration that would result in a facility-wide risk of greater than 10 in a million of getting cancer if a person inhaled that concentration over a whole lifetime. For non-carcinogens, the health benchmark is the ambient air concentration that would result in a hazard quotient of greater than 1. The facility demonstrated that these facility-wide risks will be negligible even with proposed increases in HAP emissions. However, the incremental risks resulting solely from the HAP emission increases were not determined, and no proposals were made to off-set this incremental risks. The EJ Law is requiring no additional impact to the overburdened area.
• Controls
  o The facility should provide an analysis of what control measures would be possible for any of the processes at the facility that would reduce emissions or offset the requested increase of emissions.
• Odor
  o The facility should identify measures to reduce odor and consider an odor management plan as part of the permit.
• Dust
  o The facility should identify measures to reduce dust and consider a dust management plan as part of the permit.
• Air contaminant deposition
  o By properly addressed the above issues, this issue would also be resolved.
• Noise
  o The facility should identify ways to reduce/mitigate/eliminate noise, which is a nuisance to the surrounding community.