DAQ comments to response to comments for McWane’s March 29, 2022 AO-25 Public Information Session

- (1) Emissions
  - (1A) 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.

MDNJ continually strives to purchase and accept raw materials that are consistent with plant needs and regulatory requirements. See below as an example for receiving scrap metal. We have analyzed all raw materials for the subject cupola melting operation and have determined that there are no feasible and practical alternatives for substitution in order to reduce emissions while at the same time maintaining safe and compliant cupola operations.

  - (1A1) 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.

MDNJ has a formalized procedure on scrap specifications and incoming scrap inspection. This includes a rejection of partial or full loads as well as suspect loads. These inspection records are maintained and available for anyone to review.

  - (1B) Need analysis on whether emissions can possibly be offset by reducing emissions elsewhere at the facility.

MDNJ has determined it is not possible to offset the minor increases in the metals at the cupola baghouse emissions by reducing the PTE for metals in emission points elsewhere in the facility.

  - (1C) 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 offset this incremental risks. The EJ Law is requiring no additional impact to the overburdened area.

MDNJ. Regarding your comment “The EJ Law is requiring no additional impact to the overburdened area”, the risk assessment submitted by McWane demonstrated negligible impact from the facility metals emissions even with the slightly increased metal limits for the cupola emissions point. NJDEP Bureau of Evaluation and Planning (BEP) concurred with this assessment in its review memo dated December 22, 2021, that the risk associated with the facility HAP emissions is negligible. Negligible meets the “no additional impact” criteria. It is
also worth noting that the risk assessment perform was ultra conservative. As BEP pointed out in its memo, “Please note that McWane Ductile’s modeling analysis utilized a conservative approach. All emission units were modeled with an annual (TPY) emission rate based on 8,760 hours per year of operation. Unit 1 is permitted for 4,000 maximum operating hours per year, Unit 3 is permitted for 3,600 maximum operating hours per year, and unit 16 is permitted for 6,000 maximum operating hours per year. The emission rates in the permit are based on these maximum operating hours. The annual emission rates that were modeled based on 8,760 hours of operation reflect more operating hours than will actually happen at the facility, which makes the approach conservative.”

If we modeled our maximum permitted hours of operation and the conservative hours per year for all sources, the risk results would have been even lower and clearly even less than what is already considered negligible.

- (2) 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.

MDNJ is unaware of any control technologies that would improve upon what we are currently using. We are already using advanced state-of-the-art dust emission control systems. The facility has a scrap management plan including a specification provided to suppliers for incoming scrap metal and purchasing specifications for other raw materials.

- (3) Odor
  
  o The facility should identify measures to reduce odor and consider an odor management plan as part of the permit.

MDNJ has initiated discussions with NJDEP regarding development of an odor mitigation plan with milestones and a schedule for presentation to NJDEP. This will likely require retaining a consultant that is an expert in the field of odor and odor resolutions.

- (4) Dust
  
  o The facility should identify measures to reduce dust and consider a dust management plan as part of the permit.

MDNJ has implemented several measures over the last number of years to address on-site dust generation. This includes, to suppress roadway dust, using 1) a better road sweeper which is equipped with a water spray, and 2) water sprays along the back plant road to the main gate. In order to suppress dust generation at the bunker, we have installed 1) a monsoon mister used when loading trucks at the bunker, and 2) water sprays in the bunker, and added additional siding to the north and east walls of the bunker to bring those walls flush to the roof. Further, the facility has a BMP for dust control. These have effectively just about eliminated all offsite dust issues. MDNJ reviewed the last seven years of its records and has not had any confirmed dust complaints originating from the facility since 2015 and that was the only dust complaint in the
seven-year period. The last incident was on July 30, 2015 and originated from the recycled materials bunker. Corrective action was promptly taken, and no further incidents have occurred.

- (5) Air contaminant deposition
  - By properly addressed the above issues, this issue would also be resolved.

MDNJ - See above discussion regarding dust mitigation.

- (6) Noise
  - The facility should identify ways to reduce/mitigate/eliminate noise, which is a nuisance to the surrounding community.

MDNJ has reviewed our records for noise complaints over the past seven years and we have not received a noise complaint since March 2017. Prior to then, noise complaints were related to episodic events, like high winds causing tin metal to bang against a surface, a personnel issue like leaving a communication radio on high volume and mobile equipment to close to the property line. These were all promptly addressed and not repeated since 2017. We have investigated noise complaints in the past, including using a 3rd party contractor, and have always concluded that we are below the State and Municipal noise code and ordinance levels.