

# Kristin Bidegain

Additional comments:

The PTE values for NO<sub>x</sub> of 93.7 tpy and VOC 93.3 tpy which sit just below the 100 tpy (PSD major thresholds) are notable. To prevent post-construction creep into PSD, I respectfully request enforceable throughput/operating limits (and monitoring) that keep annual emissions below major thresholds with margin. Please monitor for Nitrogen Dioxide (oxides).

The ADEQ presentation slides from 7/28/25 list an "AEDQ Acute Ambient Air Concentration" for HCl of 16 mg/m<sup>3</sup> and an "EPA Health Guideline" of 2.7 mg/m<sup>3</sup> (AEGL-1 of approx. 1.8 ppm). ADEQ's own tables confirm 16 mg/m<sup>3</sup> as the state acute comparison level, but it's far less protective than widely used health values. I respectfully request that ADEQ correct the "benchmark" framing and show how permit limits/alerts align with the most health-protective science. I also respectfully request that alert/shutdown thresholds not exceed 2.1 mg/m<sup>3</sup> and that early-action triggers be set lower (maybe 1.0 mg/m<sup>3</sup>) to protect sensitive groups.

Hydrogen Chloride monitors and met station are good, but I respectfully request that the permit specify method(s), Method Detection Limits (MDLs), siting at/near modeled maxima and sensitive receptors, continuous data reporting, and a Quality Assurance Project Plan (QAPP).

I respectfully request more transparency on your modeling. Please provide the AERMOD protocol, meteorology years, receptor grids, ambient air boundary determination, and proof of temporarily varying background per EPA's 2024 Background Concentration Guidance. Please re-run the model if needed.

The slides also show a potential for Hazardous Air Pollutants (HAP) greater than 100.7 tpy and HCl of 92.3 tpy (potentially exceeding the 10/25 tpy major source thresholds: Who Has to Obtain a Title V Permit? | US EPA). That would make the source major for HAP and triggers the Maximum Achievable Control Technology MACT (Subpart RRR) for relevant units such as scrap dryers/decoaters, group 1 furnaces, in-line fluxers, etc. Please include the specific RRR emission limits (e.g., HCl kg/Mg feed for decorators and furnaces) and all required monitoring/recordkeeping (bag -leak detectors, operating parameter limits, etc.) directly in the permit.

Please add this statement to my original comment submission. Thank you.