



10/4/2017

VIA Electronic Mail (paul.braun@epa.ohio.gov)

Paul Braun
Ohio Environmental Protection Agency, DAPC
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: Draft Rule Comment – Startup, Shutdown or Malfunction Scheduled Maintenance Rules

Dear Mr. Braun,

The Ohio Manufacturers' Association (OMA) is dedicated to protecting and growing manufacturing in Ohio. The OMA represents over 1,400 manufacturers in every industry across Ohio. For more than 100 years, the OMA has supported reasonable, necessary, and transparent environmental regulations that promote the health and well-being of Ohio's citizens.

OMA welcomes the opportunity to provide additional comments to the draft amended rules related to changes to Ohio's startup, shutdown or malfunction and scheduled maintenance rules as they pertain to air pollution control equipment. After reviewing the latest changes provided by Ohio EPA the OMA still has concerns outlined below.

First, OMA appreciates Ohio EPA's agreement to allow up to 25 days of maintenance at non-recovery coke battery operations based on its review of maintenance requests. However, this maintenance period is reduced to 14 days in a rolling 24-month period for byproduct recovery coke plants, which does not allow for all components to be properly inspected and repaired. Neither OMA nor Ohio EPA wants to compromise the reliability and availability of desulfurization plants or other air quality equipment at coke plants.

OMA believes that a further records review would demonstrate that byproduct recovery coke plants have needed between 21 – 25 days for annual outages of desulfurization plants, along with shorter periods of time to maintain other equipment, as has been previously pre-approved annually by Ohio EPA. These activities have occurred for decades, and are necessary to properly maintain the equipment, ensure optimal SO₂ reduction, and avoid potential malfunctions that could be catastrophic in nature. Thus, regulatory scheduled outages provide both environmental and health and safety benefits.

Provided below is a summary of the time necessary to safely and properly shut down a desulfurization plant at a byproduct recovery coke facility. First, the system must be properly isolated and purged prior to conducting maintenance activities. There are three major processes in the Desulfurization Plant that undergo maintenance activities during the outage. Approximately 9 days are needed to purge each of the systems as shown below:

- 1) Sulfiban Process – 3 days to purge
- 2) HCN Process – Approximately 10 days to purge. The reactor takes a longer time to reach safe purge conditions.
- 3) Claus Plant – 6 days to purge

Maintenance activities start as soon as the third day. The duration depends on the extent of the work needed. Inspection and maintenance of the major areas in the Desulfurization Plant includes but is not limited to the following areas: process reclaimer; cooling tower; site boilers used for steam generation; cooling tower; inlet separator; contactor; rich tanks; catalytic reactors; and burner and heat recovery.

After maintenance activities have been completed, the system processes can be brought back on line. Bringing the system on line must be done in a systematic way and each process area will take time to properly heat up. The start-up takes approximately 10 days. Each reactor takes three days to warm up.

Ohio EPA has historical records that support the need for annual outages of byproduct recovery coke plants for approximately 21 – 25 days per year for desulfurization plants. Because of these real-world operational constraints, the OMA strongly suggests that paragraph (F) of the rule be revised to allow a coke oven battery 25 days per year to conduct routine maintenance activities, as set forth in the proposed startup, shutdown and malfunction (SSM) rules . The proposed revised language is as follows:

(F) During routine maintenance of pollution control equipment, an owner or operator of a coke oven battery or non-recovery coke oven battery shall be exempt from specified provisions related to any individual source affected by the routine maintenance contained in any permit-to-install or permit-to-install and operate issued under Chapter 3745-31 of the Administrative Code or any permit-to-operate issued under Chapter 3745-77 of the Administrative Code if all of the following occur:

- (1) Routine maintenance of individual (or each) pollution control equipment does not exceed twenty-five days per year.
- (2) Routine maintenance is conducted in a manner consistent with good engineering practices for minimizing emissions.
- (3) A report is submitted to the director ten days prior to the start of the routine maintenance containing an explanation of the schedule of the maintenance

and specifying the provisions that the source will be exempt from, including identification of permit number and term.

As Ohio EPA continues to develop these rules please include the OMA in these developments, and OMA environmental counsel Frank L. Merrill at Bricker & Eckler. We look forward to working with Ohio EPA on this issue and appreciate the opportunity to participate in this process.

Regards,



Rob Brundrett
Director, Public Policy Services

cc: Frank L. Merrill, Esq.
Julianne Kurdila, Committee Chair