

Revere Copper Products, Inc.



MEMORANDUM:

Re: Air toxic exceedances

Revere submitted a revised application to renew and modify our ASF permit on July 21, 2023. Model-predicted concentrations of three air contaminants were indicated as exceeding the initial conservative interim annual guideline concentrations (AGC) which were provided by the DEC Air Toxics Section:

- Poly(oxy-1,2-ethanediyl), α -(carboxymethyl)- ω -[(9Z)-9-octadecen-1-yloxy]- (CAS# 57635-48-0)
- Fatty acids, C18-unsaturated phosphates (CAS# Trade Secret #5)
- Trade Secret (CAS# Trade Secret #8)

On August 25, 2023, the DEC Air Toxics Section provided notification that it was modifying the initial interim AGCs for the above three contaminants to be consistent with the low to moderate toxicity (Low/Mod Tox) de minimus value of 0.1 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

As shown in the following table, the model-predicted maximum offsite concentrations for the three contaminants are below DEC's revised AGC threshold.

Contaminant	averaging period	predicted concentration ($\mu\text{g}/\text{m}^3$)	AGC ($\mu\text{g}/\text{m}^3$)	percent of AGC (%)
poly(oxy-1,2-ethanediyl), α -(carboxymethyl)- ω -[(9Z)-9-octadecen-1-yloxy]	1 Hour	0.8	-	-
	Annual	0.042	0.1	42
fatty acids, C18-unsaturated phosphates (trade secret #5)	1 Hour	0.49	-	-
	Annual	0.025	0.1	25
trade secret #8	1 Hour	1.62	-	-
	Annual	0.08	0.1	85