

Electronic Submission

Mr. Joshua Cook, P.E.
Regional Air Pollution Control Engineer
Region 6, Division of Air Resources
New York State Department of Environmental Conservation
317 Washington Street
Watertown, NY 13601

**RE: Revere Copper Products, Inc. – Additional Information for Copper and Copper Oxide Air Dispersion Modeling, DEC ID 6-3013-00091
FILE: 1087689/1940103004**

Dear Mr. Cook:

On behalf of Revere Copper Products, Inc. (Revere), Ramboll Americas Engineering Solutions, Inc. (Ramboll) is providing the attached addendum to the revised application to renew and modify the Air State Facility (ASF) Permit for Revere's facility located in Rome, New York submitted to New York State Department of Environmental Conservation (NYSDEC) on July 21, 2023.

July 28, 2023

In the revised application, air toxics modeling was performed for copper and copper oxide and, in accordance with NYSDEC's request sent on July 20, 2023, emissions of these two contaminants were modeled together and compared to the guideline concentrations for copper. The revised application showed that the modeled predicted impact of the combined emissions of copper and copper oxide exceeded the annual guideline concentration (AGC), while remaining below the short-term guideline concentration (SGC). Given the limited amount of time between NYSDEC's request to model these two contaminants together and the due date of the revised permit application, there was limited time to identify remedies to this exceedance. An initial review of the modeling indicated that the exceedance area only occurred on Revere's parking lot and, therefore, restricting public access to this part of the parking lot would reduce the off-site impact to below the AGC. The application indicated that details as to the extent of the restriction as well as to the methods of restricting this area would be provided the week of July 24, 2023.

Ramboll
94 New Karner Road
Suite 106
Albany, NY 12203
USA

T 518-724-7272
F 315-463-7554
<https://Ramboll.com>

Revere is proposing to restrict public access to the portion of the northeastern parking lot that is closest to the plant. As stated in the NYSDEC DAR-10 guidance document *"Note that, for modeling purposes, the Department interprets the term "ambient air" as outdoor air in all locations except where public access is precluded by means of a fence or other physical barrier. [...] At the same time, however, the Department acknowledges that in certain limited circumstances, this interpretation may be overly restrictive or there may be measures other than physical barriers that are effective in precluding public access."* Revere is proposing to install large visible signage along the existing light poles in the parking lot to preclude public access to the portion of the parking lot closest to

the plant. The entire parking lot is Revere’s private property and is neither available for public parking, nor is it used by members of the public or the surrounding neighborhood for parking or for any other purpose (e.g., walking), even though it is not fenced. Additionally, the parking lot is monitored by cameras which allow Revere security personnel to monitor activity in the parking lot. Given that no members of the public currently use the parking lot, Revere believes this additional signage will be sufficient to preclude the public from accessing the portion of the parking lot that would result in impacts exceeding the AGC.

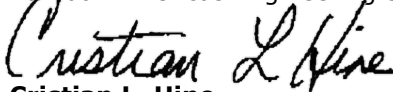
The current facility plant boundary, based on the existing fence line and exterior building walls, is provided in **Figure 1**. The proposed plant boundary, extended by the proposed signage within the parking lot, is provided in **Figure 2**. Air dispersion modeling was performed for both of these scenarios and the results are provided in **Table 1**. Note that the results of the modeling performed with the existing fence line (i.e., as shown in Figure 1) is the information that was submitted with the revised permit application on July 21, 2023. The results show that with public access precluded by signage along the existing light poles in the parking lot, the off-site impact of the combined copper and copper oxide emissions is below the SGC and AGC.

Ramboll has submitted the modeling files for this additional run to the NYSDEC Impact Assessment and Meteorology Group along with this letter. The modeling was performed in accordance with the approved modeling protocol and was run outside of the Lakes modeling software Multi-Chem utility.

Should you have questions about this information, please contact Dave Ozog of Revere at (315) 338-2160 or at DOzog@reverecopper.com, or Cris Hine of Ramboll at (518) 424-8768 or at Cris.Hine@Ramboll.com.

Yours sincerely,

Ramboll Americas Engineering Solutions, Inc.



Cristian L. Hine

Project Manager

D 518-724-7259

M 518-424-8768

Cris.Hine@Ramboll.com



Matthew Traister, P.E.

Vice President

D 513-697-2021

M 315-569-7882

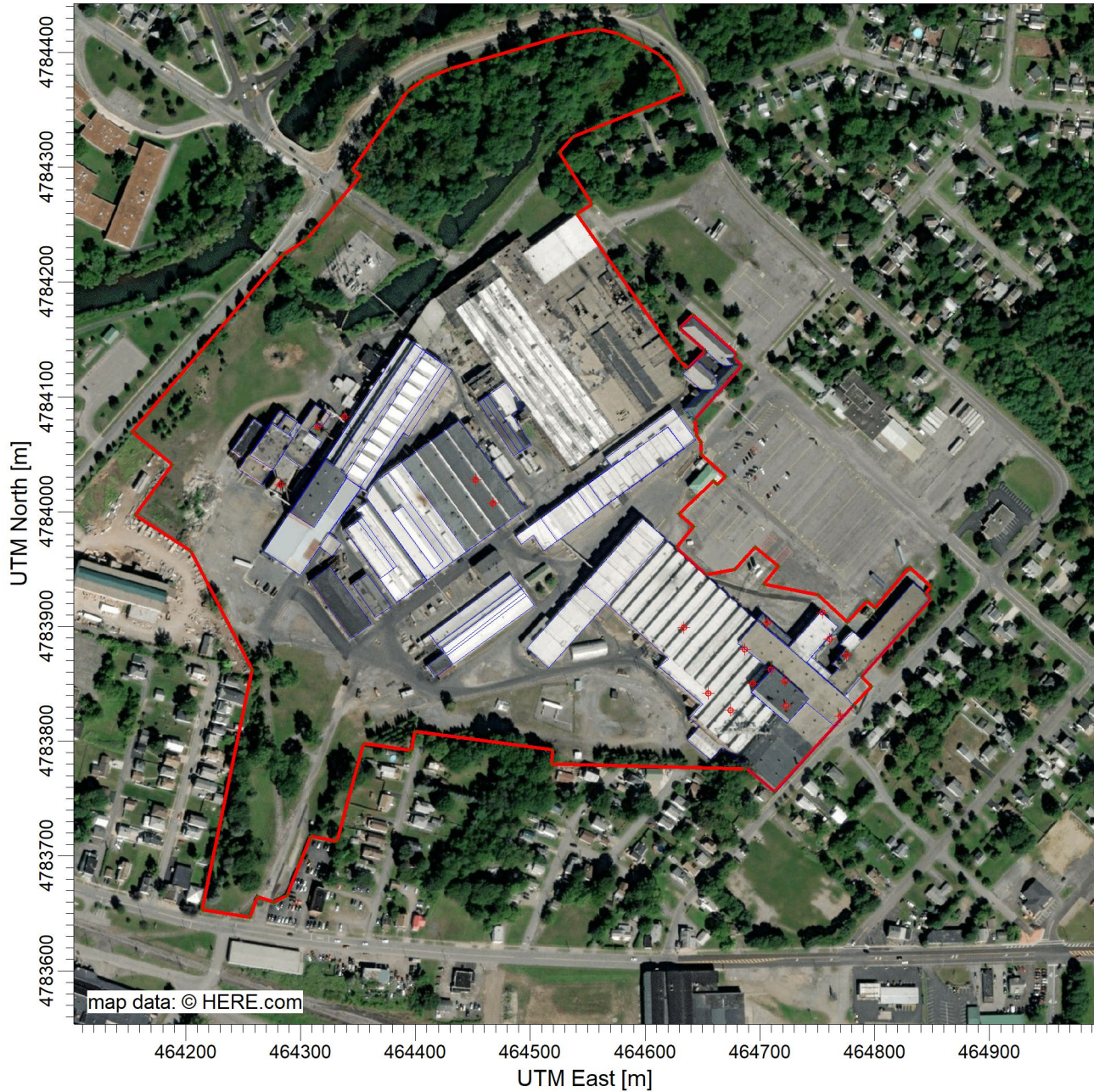
matt.traister@ramboll.com

Attachments: Figure 1 – Current Plant Boundary
Figure 2 – Proposed Plant Boundary
Table 1 – Permit Application Copper and Copper Oxide Modeling Results Comparison
Between Plant Boundaries

cc: Craig Weill (NYSDEC)
Impact Assessment and Meteorology Group (NYSDEC)
Dave Ozog (Revere)
Steven Miraglia (Ramboll)

PROJECT TITLE:

Figure 1 - Current Plant Boundary



COMMENTS:

SOURCES:

18

COMPANY NAME:

Revere Copper Products, Inc.

RECEPTORS:

10568

MODELER:

Steven Miraglia

SCALE:

1:5,592

0

0.2 km

RAMBOLL

DATE:

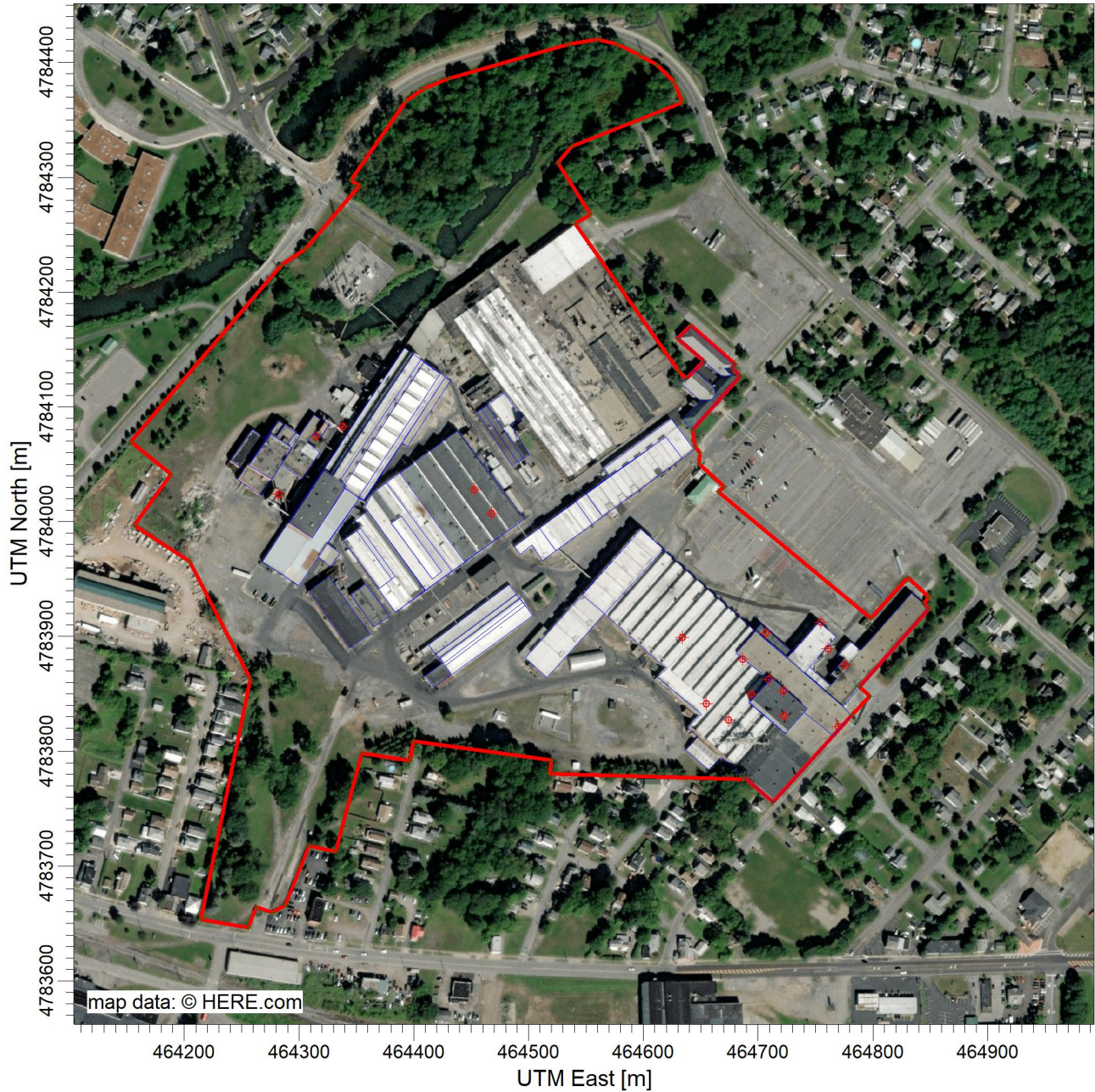
7/28/2023

PROJECT NO.:

1940103004

PROJECT TITLE:

Figure 2 - Proposed Plant Boundary



COMMENTS:

SOURCES:

18

COMPANY NAME:

Revere Copper Products, Inc.

RECEPTORS:

10552

MODELER:

Steven Miraglia

SCALE:

1:5,592

0

0.2 km

RAMBOLL

DATE:

7/28/2023

PROJECT NO.:

1940103004

Table 1
Permit Application Copper and Copper Oxide Modeling Results Comparison Between Plant Boundaries
Revere Copper Products, Inc
Rome, NY

Pollutants	CAS Number	Averaging Period	Permit Application Results			Results with Proposed Plant Boundary		
			Predicted Concentration ($\mu\text{g}/\text{m}^3$)	SGC/AGC ^(a) ($\mu\text{g}/\text{m}^3$)	Percent of SGC/AGC (%)	Predicted Concentration ($\mu\text{g}/\text{m}^3$)	SGC/AGC ^(a) ($\mu\text{g}/\text{m}^3$)	Percent of SGC/AGC (%)
Copper and Copper oxide, combined ^(b)	07440-50-8/01317-38-0	1-Hour	18.1	100	18	13.7	100	14
		Annual	0.762	0.48	159	0.448	0.48	93

Notes:

- (a) Annual and short-term guideline concentrations (AGCs and SGCs, respectively) are based on NYSDEC's DAR-1, Guidelines for the Evaluation and Control of Ambient Air Contaminants Under Part 212 issued February 12, 2021.
- (b) As requested by NYSDEC on July 20, 2023, emissions of copper and copper oxide are modeled together and compared to the SGC/AGC for copper. Revere is proposing to restrict public access to the portion of the parking lot as needed to demonstrate acceptable combined impacts of copper and copper oxide.

