



## AIR MONITORING REPORT UPDATE January 7, 2008

Superior Tube Company, Inc. ("STC") is providing this update as a public service regarding its voluntary emission reduction activities. These updates began with the February 15, 2007 *Collegetown Air Monitoring Report* and continued with the March 22, 2007; April 23, 2007; July 9, 2007; and October 19, 2007 *Air Monitoring Report Updates*. STC remains committed to reducing, and eventually eliminating, the use of TCE at its plant.

### Summary of 2007 Voluntary TCE Reduction Efforts

On February 15, 2007, STC publicly announced its voluntary TCE reduction goals. Specifically, STC planned to implement two projects that would reduce emissions by approximately 30% from current levels by the end of 2007. In addition, STC targeted an overall reduction of 60% from current levels in the years after 2007, based on projects to be developed in 2008 and beyond. These goals were based on the investigations into reducing TCE emissions that STC, and its United Kingdom affiliate, had made over the past four years.

**STC is pleased to confirm that it surpassed its 2007 TCE reduction goals in every respect.** Three projects were completed in 2007, and a fourth project was completed during the first week of 2008. **TCE emission levels have been reduced by more than 60%, well in excess of the original 2007 goal of a 30% reduction.** The development of the second round of voluntary TCE reduction projects began earlier than expected, enabling STC to achieve its longer-term TCE reduction goal much sooner than had been anticipated. Significantly, additional projects now in development have the potential to further reduce, if not eliminate, TCE from the facility.

### First Round of Voluntary TCE Reduction Projects

Initially, STC identified two projects that would be implemented before the end of 2007; projects which would result in an overall reduction in facility TCE emissions of approximately 30%. This first round of voluntary TCE reduction projects was expanded to three projects, and the actual facility TCE emission reduction from these projects exceeds 50%. This success is a direct result of the investigations into TCE reductions that STC initiated four years ago. The projects are described below:

#### **PROJECT 1: DEGREASING EQUIPMENT CONSOLIDATION**

**Summary:** This project involves the permanent removal of one large degreaser (the #1291 degreaser) from service, which had previously emitted 13.4 tons of TCE per year, and a 6.0 ton or less total increase in emissions from two smaller existing degreasers (Flush and Blow Booths). The combined result is at least an 8% decrease in overall TCE emissions.

On February 20, 2007, STC submitted a Plan Approval Application to the DEP to authorize consolidation of this equipment. DEP scheduled a public hearing on the Plan Approval Application for July 3, 2007. DEP subsequently rescheduled the public hearing for August 8, 2007. The required public comment period ran for 30 days after the public hearing. DEP could not issue the Plan Approval allowing STC to implement the emission reduction project until after it reviewed all comments submitted during the public hearing and public comment period. DEP ultimately approved the project on October 31, 2007. DEP had been delayed in issuing the

required approval due to the significant number of comments submitted during the required public comment period.

This project was completed the first week of 2008. The Flush and Blow Booths have been decoupled from the #1291 Degreaser. The #1291 Degreaser and its distillation unit have been removed from service, and all TCE has been removed from both units.

**Timetable:** STC has completed this project. The #1291 Degreaser is, and will remain, out of service. The project has resulted in at least an 8% reduction in TCE emissions.

#### **PROJECT 2: PRODUCTION MATERIAL REFORMULATION**

**Summary:** STC has implemented use of a family of reformulated production materials which is resulting in significantly lower TCE emissions. This project did not require regulatory approval from the DEP. This project was complete prior to STC's target date of June 30, 2007. STC submitted a request to the DEP to incorporate this project into STC air permit; the purpose of this request is to make the elimination of TCE from these sources permanent and legally enforceable by the DEP.

**Timetable:** The project is complete and STC has realized a reduction in overall TCE emissions significantly greater than the original 22% forecast.

#### **PROJECT 3: EQUIPMENT REMOVAL**

**Summary:** In late February, 2007, STC voluntarily removed its tubing Dip Tank, a piece of TCE-emitting production equipment, from the facility. STC has requested that DEP modify STC's air permit to delete this piece of equipment; the purpose of this request is to make the elimination of this source permanent and legally enforceable by the DEP. This project was not originally part of the first round of voluntary TCE reduction projects.

**Timetable:** The Dip Tank is, and will remain, out of service. The DEP is expected to process the request to modify the air permit in conjunction with the request for Project 2.

### **Second Round of Voluntary TCE Reduction Projects**

STC's development of TCE emission reducing projects continues. The second round of voluntary projects initially targeted an additional 30% reduction, with development of these projects to begin in 2008. However, the first project of the second round of voluntary projects has already been developed and implemented, as reported in October, 2007, and described below. STC has identified and is developing additional voluntary TCE reduction projects, some of which are aimed at completely eliminating TCE from the facility. STC will publicize these additional projects after they are developed, validated, and near implementation.

#### **PROJECT 4: EQUIPMENT REMOVAL**

**Summary:** The #1369 Degreaser was temporarily removed from service during the summer months of 2007, during which time a number of options for degreasing the materials previously processed in this machine were evaluated. Based on STC's evaluations, it has determined that the #1369 Degreaser could be permanently removed from service. In October, 2007, all TCE from the #1369 Degreaser and its distillation unit was removed and shipped to a solvent recycling operation.

**Timetable:** The #1369 Degreaser is, and will remain, out of service. This project has resulted in a 9% reduction in facility TCE emissions. In conjunction with the projects completed in the first round of voluntary TCE reduction projects, overall facility TCE emissions have been reduced more than 60%.