



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building

P.O. Box 2063

Harrisburg, PA 17105-2063

April 12, 2007

Secretary

The Honorable John C. Rafferty, Jr.
Senate of Pennsylvania
Senate Post Office Box 203044
Harrisburg, PA 17120-3044

Dear Senator Rafferty:

This is in follow-up to your questions raised during my testimony at the confirmation hearing concerning our efforts to work with Collegeville area companies to reduce Trichloroethylene (TCE) emissions. Although the agreement to reduce emissions is voluntary, the controls placed on the various TCE sources will have Department of Environmental Protection (DEP) enforceable permit conditions.

As you know, both Superior Tube and Accellent, the two largest sources of TCE in the area, are in compliance with current regulatory requirements. However, in response to our investigative sampling and risk assessment, both facilities have committed to make substantial, voluntary reductions in their TCE emissions within the year. While we do not have written agreements with the facilities regarding these reductions, we will be revising their Operating Permits to reflect the changes they make, including the removal of equipment, the installation of controls, and the associated emission reductions. This will make the changes enforceable.

The Environmental Protection Agency (EPA) has proposed more stringent standards for solvent degreasing that will apply to both Superior Tube and Accellent. The proposal places a facility-wide cap on regulated degreaser emissions but does not specify any particular method for achieving it. Existing sources will be given two years to comply.

We have been in touch with the EPA regarding the proposed regulation and have provided them with our sampling data and risk assessment to aid them in their decision-making. We encouraged the EPA to stand firm on their proposed changes because we believe our data supports their conclusion that the current regulations do not protect the public with an adequate margin of safety. The EPA expects the regulation to be final sometime in April.

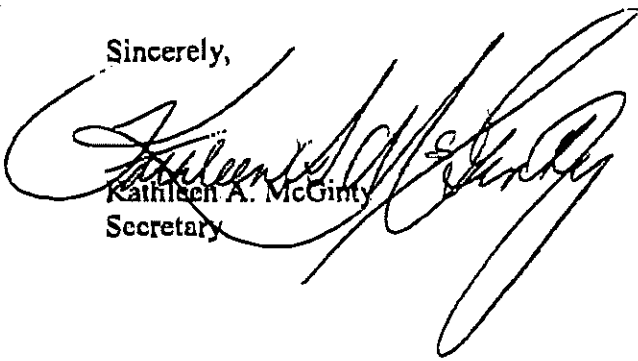
Given the uncertainty of its final form, we cannot guarantee that the emission reduction plans of Accellent and Superior Tube will ensure compliance with the new regulation. Based on our discussions with Accellent, Accellent is proposing to install carbon absorbers on its two large vapor degreasers. The manufacturer is guaranteeing a 30 percent overall emission reduction, but we believe that this is a very conservative estimate. We typically see a 90 percent or better emission reduction with carbon adsorption on similar types of sources. If this holds true for



Accellent, it would allow them to comply with the more stringent of the two proposed caps. Superior Tube will need to reduce TCE emissions by approximately 30-35 tons/year from its regulated degreasers to comply. This is approximately a 50 percent reduction from the total facility TCE emissions. Superior Tube is committing to make a 30 percent reduction in overall TCE emissions within the next year and a 60 percent reduction within the next several years. This may or may not allow them to comply with the proposed regulation depending on where the emission reductions come from. The emission caps proposed by the EPA only apply to a facility's regulated degreasers, and not all of the TCE sources at Superior Tube are subject to the requirements. Rest assured that if the proposed emission reduction plans do not ensure compliance with the EPA's final rule, the facilities will be required to revise their plans accordingly.

We are committed to achieving reductions of TCE emissions in the Collegeville area as expeditiously as possible. We will continue to keep you advised of our progress.

Sincerely,



Kathleen A. McGinty
Secretary

cc: