

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF AIR QUALITY CONTROL

Page 1 of 5

MAY 30 1995

OPERATING PERMIT

According to provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Resources, the Department hereby issues this permit for the operation of the air contamination source(s) described below.

Permit No.	48-0003	Source &	Cement Kilns (2), Boilers (7)
Owner	Keystone Cement Company	Air	and Solvent Storage Tanks (4)
Address	P.O. Box A	Cleaning	
	Bath, PA 18014-0058	Device	
Attention:	Mr. Michael J. Luybli	Location	East Allen Township
	Vice-President		Northampton County
	Environmental Affairs		

This permit is subject to the following conditions:

- (1) That the source(s) and any associated air cleaning devices are to be:
 - (a) operated in such a manner as not to cause air pollution;
 - (b) in compliance with the specifications and conditions of the plan approval issued under the same number;
 - (c) operated and maintained in a manner consistent with good operating and maintenance practices.
- (2) This permit is valid only for the specific equipment, location and owner named above.

(SEE ATTACHED)

Failure to comply with the conditions placed on this permit is a violation of Section 127.25. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Resources will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued MAY 25 1995
March 31, 2000

Thomas A. DiLazaro
THOMAS A. DILAZARO
Regional Air Quality Program Manager

Central Office
Wilkes-Barre Regional Office
Bethlehem District Office

- (3) This Operating Permit includes Reasonably Available Control Technology (RACT) determinations as required by the Title I provisions of the Clean Air Act Amendments.
- (4) Boilers (Nos. 1 through 7)
- (a) NO_x RACT for the seven boilers (Nos. 1 through 7) shall be the installation, maintenance and operation of the sources according to manufacturers specifications in accordance with the presumptive RACT emission limitations as found in 25 PA Code Section 129.93(c)(1).
 - (b) The Permittee shall maintain records in accordance with the recordkeeping requirements of 25 PA Code Section 129.95 and shall include as a minimum the following:
 - 1. Data which clearly demonstrates that the heat input for each boiler never exceeds its rated capacity.
 - 2. All records shall be maintained for at least two years and shall be made available to the Department upon request.
- (5) The following allowable emission limits are established for the operation of the No. 1 cement kiln:
- (a) Nitrogen oxide emissions shall never exceed 153.6 lbs/hr (30-day rolling average).
- (6) The following allowable emission limits are established for the operation of the No. 2 cement kiln:
- (a) Nitrogen oxide emissions shall never exceed 529.0 lbs/hr (30-day rolling average).
- ~~(7) The final NO_x RACT emission limits (30-day rolling average and 24-hour maximum) shall be based on CEM data and will be incorporated in the RACT operating permit.~~

(8) Continuous monitoring requirements are as follows:

- (a) Continuous emission monitors for nitrogen oxides shall be installed, operated and maintained in accordance with the Department's latest Continuous Source Monitoring Manual (Manual) for the Nos. 1 and 2 cement kilns.
- (b) Continuous monitoring shall be conducted in accordance with 25 PA Code Chapter 139 and be approved by the Department.
- (c) Monitoring and recording of exhaust gas flow rate shall be conducted in accordance with the applicant's procedure submitted to and approved by the Department.
- (d) The Permittee shall submit quarterly reports for nitrogen oxides as specified in the Manual. The reports shall include information listed in the "Recordkeeping and Reporting" section of the Manual.

(9) Testing requirements are as follows:

- (a) Source tests for NO_x for the Nos. 1 and 2 cement kilns shall be conducted in accordance with 25 PA Code Chapter 139 as per the Department's source testing procedures described in the latest Source Testing Manual or source testing procedures approved by the Department prior to testing.
- (b) At least sixty (60) days prior to the tests, test procedures and sketches with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples shall be submitted to the Department for approval.
- (c) At least two weeks prior to the tests, the Regional Air Quality Program Manager shall be informed of the date and time of the tests.
- (d) Within sixty (60) days after completion of the tests, two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Program Manager for approval.

(10) The Department reserves the right to require the Permittee to conduct source tests, as described in Condition (9)(a), in the future, if warranted.

(11) Solvent Storage Tanks (Nos. 1A, 1B, 2 and 3)

- (a) Each tank shall be equipped with the following:
1. Conservation Vent
 2. Explosion Vent
 3. Carbon Canister Adsorbers (2)
 4. Pressure Relief Vent
- (b) The Permittee shall monitor weekly the exhaust from each waste solvent storage tank for emissions of volatile organic compounds using a HNu photoionization detector or Department approved equivalent. The weekly monitoring shall be conducted whenever possible while the tank is being loaded. At no time shall the monitoring be conducted while the tank is being unloaded. The Permittee shall maintain a log of the date, time and results of the monitoring.
- (c) The Permittee shall maintain on-site sufficient spare carbon canisters to be able to make four (4) replacements per tank.
- (d) The carbon canisters shall be replaced when a concentration of 20 ppmv is detected by the HNu photoionization detector or Department approved equivalent.
- (e) The Permittee shall not operate the sources unless the control devices are fully operational and properly employed.
- (f) Records required under this Operating Permit shall be kept for a period of two (2) years and shall be made available to the Department upon its request.
- (g) Tank Nos. 1A, 1B, 2 and 3 are subject to Subpart Kb of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 40 CFR §60.4 requires submission of copies of all requests, reports, applications, submittals and other communications to both EPA and the Department. The EPA copies shall be forwarded to:
- Director
Air, Toxics, and Radiation Division
US EPA, Region III
841 Chestnut Street
Philadelphia, PA 19107
- (h) The emissions from these sources shall not at any time cause or create a malodor condition.

- (11) If at any time it is determined that the operation of the aforementioned source(s) is causing the emission of air contaminants in excess of that allowed under Article III of the Rules and Regulations of the Department of Environmental Resources, or is causing the emission of these contaminants or any other type of air contaminant in excess of the limitations specified in, or established pursuant to, any other applicable rule or regulation contained in Article III, the Permittee shall take immediate steps, including the installation of additional air cleaning device(s), if necessary, to reduce the air contaminant emissions to within the applicable limitations.
- (12) If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Resources, the Permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Resources, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.
- (13) The Permittee, within one hour of occurrence, shall notify the Department, at (610) 861-2070, of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Resources. A written report shall be submitted to the Department within two working days following the incident describing the malfunctions and corrective actions taken.
- (14) This Operating Permit supersedes and consolidates all Plan Approvals, Temporary Operating Permits and Operating Permits bearing the Nos. 48-312-001 and 48-312-001A.
- (15) The expiration date shown on the Operating Permit is for State purposes. For Federal Enforcement purposes, the Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the US Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by the US EPA upon its approval of the above as a revision to the SIP.
- (16) This Operating Permit is valid for a limited period of time and may be renewed before its expiration date. Requests for an Operating Permit Renewal must be in writing and must be accompanied by a permit fee in the amount of (five hundred dollars) \$500.00 (\$250.00 application processing fee and \$250.00 annual administration fee). The request should be made on an Interim Application for Renewal of a Permit to Operate form and must be received by the Department along with a completed Compliance History form no later than February 28, 2000.

An annual Operating Permit administration fee of two hundred fifty dollars (\$250.00) is also due no later than the anniversary date of this Operating Permit. The administration fee is to be submitted with one of the transmittal forms (attached).

