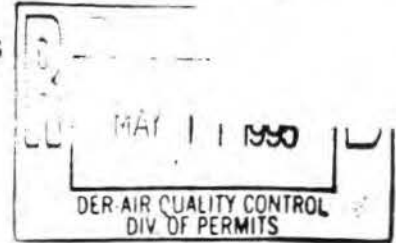


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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
SOUTHCENTRAL REGION
AIR QUALITY CONTROL PROGRAM

PLAN APPROVAL



APPROVAL NO. 06-1026 Source & Teflon Crumb Making
Owner/Operator: NAFCO Air Operation
Address: P. O. Box 704 Cleaning Refrigerated Condenser
Leesport, PA 19533 Device (Niagara)
Attention: Mr. George E. Bingham
Vice President Location Leesport Plant
Ontelaunee Township
Berks County

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and with Chapter 127 of the rules and regulations of the Department of Environmental Resources, the Department on April 19, 1995 approved plans for the modification of the above indicated air contamination source(s).

RECEIVED
Ozone & Mobile Sources
Section (3AT13)

This PLAN APPROVAL expires May 31, 1996.

Plan approved is subject to the following conditions:

JUN 9 1995

- (1) The sources are to be modified in accordance with the plans submitted with the application (as approved herein).

EPA, REGION III

(SEE THE ATTACHED ADDITIONAL CONDITIONS)

Notify the person noted below when the installation is completed so that the source(s) can be inspected for issuance of an OPERATING PERMIT.

NOTE:

Roger A. Fitterling
Air Quality Control Program
1005 Cross Roads Boulevard
Reading, PA 19605
(610) 916-0100

LEIF ERICSON
Air Quality Program Manager

cc Permits
Southcentral Regional Office
Lancaster District Office
Reading District Office

Plan Approval
Approval No. 06-1026
North American Fluoropolymers Co.

- (3) The Teflon crumb making operation consists of the Crummer (Fitzpatrick Midwestern), Crumb Trays (Grieve Corp.), and Oven (Grieve Corp.). The Crummer and Oven are controlled by a Refrigerated Condenser.
 - (4) This Plan Approval constitutes a RACT determination for this facility per 25 PA Code §129.91(e).
 - (5) This Plan Approval authorizes temporary operation of the source(s) covered by this Plan Approval provided the following conditions are met:
 - (a) The Department must receive written notice from the Owner/Operator of the completion of construction and the Operator's intent to commence operation at least five (5) working days prior to the completion of construction. The notice shall state when construction will be completed and when the Operator expects to commence operation.
 - (b) Operation is authorized only to facilitate the start up and shake-down of sources and air cleaning devices, to permit operations pending the issuance of an Operating Permit or to permit the evaluation of the source(s) for compliance with all applicable regulations and requirements.
 - (c) This condition authorizes temporary operation of the source(s) for a period of one hundred eighty (180) days from the date of commencement of operation, provided the Department receives notice from the Owner/Operator pursuant to Subpart (a), above.
 - (d) The Owner/Operator may request an extension if compliance with all applicable regulations and Plan Approval requirements has not been established. The extension request shall be submitted in writing at least fifteen (15) days prior to the end of this period of temporary operation and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established.
 - (e) The notice submitted by the Owner/Operator pursuant to Subpart (a), above, prior to the expiration of this Plan Approval, shall modify the Plan Approval expiration date. The new Plan Approval expiration date shall be one hundred eighty (180) days from the date of the written notice.
 - (6) The company shall notify the person noted on the Plan Approval when the source is operating as designed so that the source can be inspected while in operation for the issuance of an Operating Permit.
 - (7) The company shall monitor the operating temperature of the condenser coolant. This temperature shall be recorded daily.
- 2

Plan Approval
Approval No. 06-1026
North American Fluoropolymers Co.
~~Page 2~~

- (8) The company shall maintain on hand copies of the temperature monitoring records for a period of five (5) years and shall make these records available to the Department upon request.
- (9) The company shall maintain records, such as invoices or purchase orders, of all solvents purchased. In addition, a monthly inventory of all solvent stored in the facility shall be conducted and recorded.
- (10) The solvent recovered from the condenser shall be recorded daily in inches and converted to pounds by the following equation.

inches measured x 1.4 gal/inch* x solvent density (lb/gal)

- * Based on currently used container. A new conversion factor shall be determined and reported to the Department when a different collection container is used.
- (11) VOC emissions shall be calculated and recorded on a monthly basis based on the following equation.

VOC emissions = beginning solvent inventory - ending solvent inventory + solvent purchased - solvent recovered
- (12) Monthly solvent usage, monthly VOC emissions, and yearly VOC emissions shall be submitted to the Lancaster District Supervisor no later than March 1 of the following year authorized by the Operating Permit or its renewal. The report shall contain, but not be limited to:
 - a) solvent identification
 - b) pounds per month of solvent purchased
 - c) pounds per month solvent recovered
 - d) monthly beginning and ending solvent inventories
 - e) pounds per month of VOC emissions
 - f) pounds per year of VOC emissions
 - g) percentage solvent recovery
- (13) Records required under this Plan Approval shall be kept for a period of five (5) years and shall be made available to the Department upon its request.
- (14) The VOC emissions shall be broken down between perchloroethylene, trichloroethylene and total.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHCENTRAL REGION
AIR QUALITY PROGRAM
PLAN APPROVAL
Attended March 19, 1997

APPROVAL NO	<u>06-1026</u>	Source	<u>Teflon Crumb Making Operation</u>
Owner/Operator	<u>NAFCO</u>	Air	<u></u>
Address	<u>PO Box 704</u>	Cleaning	<u>Refrigerated Condenser</u>
	<u>Leesport, PA 19633</u>	Device	<u></u>
Attention:	<u>Mr. George E. Bingham</u>	Location	<u>Leesport Plant</u>
	<u>Vice President</u>		<u>Ontelaunee Township</u>
			<u>Berks County</u>

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L.2119, as amended, and with Chapter 127 of the Rules and Regulations of the Department of Environmental Protection, the Department on April 19, 1996 approved plans for the modification of the above indicated air contamination source(s).

This PLAN APPROVAL expires March 31, 1997

The plan approved is subject to the following conditions:

- (1) The source is to be modified in accordance with the plans submitted with the application.

(SEE THE ATTACHED ADDITIONAL CONDITIONS)

Notify the person noted below when the installation is completed so that the source(s) can be inspected for issuance of an OPERATING PERMIT.

NOTE:

Roger A. Fitterling
Air Quality Program
1006 Cross Roads Boulevard
Reading, PA 19605
Telephone: 810-916-0100

LEIF ERICSON
Program Manager

cc: Permits
Southcentral Regional Office
Reading District Office

Plan Approval
Approval No. 08-1026
NAFCO

Conditions (continued):

- (2) The Teflon crumb making operation consists of the Crummer (Fitzpatrick Midwestern), Crumb Trays (Grieve Corp.), and Oven (Grieve, Corp.). The Crummer and Oven are controlled by the Refrigerated Condenser.
- (3) This Plan Approval constitutes a RACT determination for this facility per 25 PA Code §129.91(e).
- (4) RACT is the following:
 - a) The exhausting of the crumbroom to a refrigerated condenser during the mixing of material and the operation of the crummer.
 - b) The undried crumb shall be stored in sealed containers, until the drying operation.
 - c) The exhausting of the crumb drying oven to a refrigerated condenser during operation.
 - d) The overall reduction in emissions shall be a minimum of 40% by the refrigerated condenser.
- (5) This Plan Approval authorizes temporary operation of the source(s) covered by this Plan Approval provided the following conditions are met:
 - (a) The Department must receive written notice from the owner/operator of the completion of construction and the Operator's intent to commence operation at least five (5) working days prior to the completion of construction. The notice shall state when construction will be completed and when the Operator expects to commence operation.
 - (b) Operation is authorized only to facilitate the start-up and shakedown of sources and air cleaning devices, to permit operations pending the issuance of an Operating Permit or to permit the evaluation of the source(s) for compliance with all applicable regulations and requirements.
 - (c) This condition authorizes temporary operation of the source(s) for a period of One hundred eighty (180) days from the date of commencement of operation, provided the Department receives notice from the owner/operator pursuant to Subpart (a), above.
 - (d) The owner/operator may request an extension if compliance with all applicable regulations and Plan Approval requirements has not been established. The extension request shall be submitted in writing at least fifteen (15) days prior to the end of this period of temporary operation and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance and the reasons compliance has not been established.

Plan Approval
Approval No. 08-1028
NAFCO

Conditions (continued):

- (e) The notice submitted by the owner/operator pursuant to Subpart (a), above, prior to the expiration of this Plan Approval, shall modify the Plan Approval expiration date. The new Plan Approval expiration date shall be one hundred eighty (180) days from the date of commencement of operation.
- (6) The owner/operator shall notify the person noted on the Plan Approval when the source is operating as designed so that the source can be inspected while in operation for the issuance of an Operating Permit.
- (7) The owner/operator shall monitor the operating temperature of the condenser coolant. This temperature shall be recorded daily.
- (8) The owner/operator shall maintain on hand, copies of the temperature monitoring records for a period of five (5) years and shall make these records available to the Department upon request.
- (9) The owner/operator shall maintain records, such as invoices or purchase orders, of all solvents purchased. In addition, a monthly inventory of all solvent stored in the facility shall be conducted and recorded.
- (10) The owner/operator shall calculate and record the VOC and/or perchloroethylene emissions on a monthly basis based on the following equation:
- $$\text{VOC/perchloroethylene} = \text{beginning VOC/perchloroethylene inventory} - \text{ending VOC/perchloroethylene} + \text{VOC/perchloroethylene purchased} - \text{VOC/perchloroethylene recovered}.$$
- Perchloroethylene shall not be included in the VOC emissions, but shall be counted as a HAP.
- (11) The solvent recovered from the condenser shall be recorded daily in inches and converted to pounds by the following equation:
- $$\text{inches measured} \times 1.4 \text{ gal/inch}^3 \times \text{solvent density (lb/gal)}$$
- *Based on currently used container. A new conversion factor shall be determined and reported to the Department when a different collection container is used.
- (12) The owner/operator shall maintain a monthly report with the following items:
- solvent identification
 - pounds per month of solvent purchased
 - pounds per month of solvent recovered
 - monthly beginning and ending solvent inventories
 - pounds per month of VOC emissions
 - pounds per year of VOC emissions
 - percentage of solvent recovered

Plan Approval
Approval No. 06-1026
NAFCO

Conditions (continued)

- (13) The total VOC emissions from this facility, including cleanup VOC, shall not exceed 50 TPY.
- (14) Records required under this Plan Approval shall be kept for a period of five (5) years and shall be made available to the Department upon its request.
- (15) The VOC emissions shall be broken between perchloroethylene, trichloroethylene and total.
- (16) The collection container for the condensed solvent from the condenser shall be covered at all times. The company shall maintain a hose or equivalent method to convey the condensate between condenser and container. At no time shall this be free fall. The condensate shall be removed in a timely manner and placed in sealed containers.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
SOUTHCENTRAL REGION
AIR QUALITY CONTROL PROGRAM

COMPLIANCE PERMIT

accordance with 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.	<u>CP-06-1026</u>	Source &	<u>Teflon Crumb Making</u>
Owner/Operator:	<u>NAFCO</u>	Air	<u>Operation</u>
Address:	<u>P. O. Box 704</u>	Cleaning	<u>Refrigerated Condenser</u>
	<u>Leesport, PA 19533</u>	Device	<u>(Niagara)</u>
Attention:	<u>Mr. George E. Bingham</u>		
	<u>Vice President</u>	Location	<u>Leesport Plant</u>
			<u>Ontelaunee Township</u>
			<u>Berks County</u>

is 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.

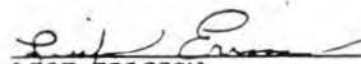
(SEE THE ATTACHED ADDITIONAL CONDITIONS)

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 June 1, 1995

Expires May 31, 1996

cc: Permits ✓
Southcentral Regional Office
Lancaster District Office
Reading District Office


LEIF ERICSON
Air Quality Program Manager

Compliance Permit
Permit No. CP-06-1026
NAFCO

- (3) The permittee shall complete implementation of RACT according to the following schedule.
 - a) Crumbraker
 - 1) Installation of duct work to the condenser by March 31, 1996.
 - 2) Final compliance by May 31, 1996
 - b) All other sources except the crumbraker shall comply as per the RACT Plan by May 31, 1995.
- (4) This permit is issued solely for the purpose of authorizing operation of the sources between May 31, 1995 [but not earlier than authorized by the relevant Plan Approval] and the date by which implementation and operation of RACT shall be completed under paragraph 3, above.
- (5) This permit does not authorize the construction or modification of any source. Construction or modification of a source is subject to the Plan Approval requirements of 25 Pa. Code, Chapter 127, Subchapter B. Except as provided below, this permit does not modify in any way the terms and conditions of any existing or subsequent plan approvals or operating permits issued for the sources that are the subject of this permit.
- (6) In the event that the permittee is prevented from complying in a timely manner with any interim time limit imposed in this permit solely because of a strike, fire, flood, act of God, or other circumstance entirely beyond the permittee's control and which the permittee, by the exercise of all reasonable diligence, is unable to prevent, or mitigate, then the permittee may request an extension of time from the Department.

The permittee shall only be entitled to the benefits of this paragraph if it notifies the Department within five (5) days by telephone and within ten (10) days in writing of the date it becomes aware or reasonably should have become aware of the event impeding performance. The written submission shall include all related documentation, as well as a notarized affidavit from a responsible corporate official specifying the reasons for the delay, the expected duration of the delay, and the efforts which have been made and are being made by the permittee to minimize the length of the delay. The permittee's failure to comply with the requirements of these paragraphs specifically and in a timely fashion shall render these paragraphs null and of no effect as to the particular incident involved.
- (7) If the permittee fails to achieve compliance by the final compliance date described in paragraph 3 above, this permit shall terminate.

