



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: January 3, 2019

Effective Date: January 3, 2019

Expiration Date: ~~June 30, 2020~~

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 06-05040D

Federal Tax Id - Plant Code: 23-1315454-3

Owner Information

Name: EAST PENN MFG CO
Mailing Address: PO BOX 147
LYON STATION, PA 19536-0147

Plant Information

Plant: EAST PENN MFG CO INC/SMELTER PLT
Location: 06 Berks County 06953 Richmond Township
SIC Code: 3341 Manufacturing - Secondary Nonferrous Metals

Responsible Official

Name: RICHARD A LEIBY
Title: VP METALS DIVISION
Phone (610) 682 - 6361

Plan Approval Contact Person

Name: ERIC G PEFFEL
Title: SR ENG - AIR QUALITY
Phone: (610) 682 - 6361 Ext.2498

[Signature] William R. Weaver
WILLIAM R. WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER

**SECTION E. Source Group Plan Approval Restrictions.**

Group Name: SG07
Group Description: RACT 2 Sources
Sources included in this group

**RACT 2 SIP Provisions from PA 06-05040D
issued 01/03/19 (pages 17-18 of permit)**

ID	Name
101	BLAST FURNACE - BH #5
108	REVERBERATORY FURNACE & TAPPING - BH #5
115	MISCELLANEOUS CHEMICAL USE

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

**# 001 [25 Pa. Code §127.12b]
Plan approval terms and conditions.**

I. Sources 101/108

a. By no later than three years after issuance of Plan Approval No. 06-05040D, East Penn shall implement combustion system modifications to Sources 101/108 as proposed in its Alternative RACT and Compliance Proposal dated 10/24/16, and as clarified in its RACT Response Letter dated 1/5/18.

b. The current NO_x limits in Title V Operating Permit 06-05040, Source Group SG01, Conditions #002 and #005 shall remain in effect until the limits in c. below become effective.

c. For the combined exhaust of Sources 101 and 108, the permittee shall limit emissions to the following, once the modifications in a. have been completed:

1. 0.6 lb NO_x/mmBtu determined in accordance with Section E, Source Group 07, VII Additional Requirements, Condition #001(l)(h)

2. 71.42 tons of NO_x for any rolling consecutive 12-month period

**SECTION E. Source Group Plan Approval Restrictions.**

i. Rolling 12-month NO_x emissions are based on fuel input to reverberatory furnace and afterburner natural gas burners and most recent stack test results expressed as lb NO_x/mmBtu, or other methods approved by the department.

d. The permittee shall limit the emissions from the furnaces to the following:

1. Total Hydrocarbons - 20 ppmv measured as propane at 4% carbon dioxide in accordance with Condition #001(l)(h) (both furnaces)
2. Total Hydrocarbons - 360 ppmv measured as propane at 4% carbon dioxide in accordance with Condition #001(l)(h) (blast furnace only)
3. Total Hydrocarbons - 20 ppmv measured as propane at 4 % carbon dioxide in accordance with Condition #001(l)(h) (reverberatory furnace only)
4. Volatile Organic Compounds (VOC) - 28.61 tons in any consecutive 12-month period

e. The permittee shall pass the exhaust of both furnaces through the afterburner.

f. Source 101/108 shall not exceed 7,680 hours of operation during any consecutive 12-month period (rolling basis). The hours of operation shall be recorded.

g. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart X - National Emission Standards From Secondary Lead Smelting, with regard to total hydrocarbon emissions, controls, testing, monitoring, recordkeeping, reporting and work practices.

h. The permittee shall conduct an initial source test for NO_x and VOC on the combined exhaust of Sources 101/108 while both Source 101 and 108 are operating. A stack testing protocol shall be submitted to the PADEP Source Testing Group for approval within 60 days following the completion of the modifications described in Section E, Source Group 07, l(a) and the associated shakedown period. East Penn must conduct stack testing within 180 days of stack testing protocol approval.

i. After the initial source test in d. has been completed, source tests for NO_x and VOC shall be conducted once in each 5-year calendar period. Unless otherwise approved in writing by DEP, emission testing for VOC shall be conducted using EPA Methods 1-4, 18, and 25A, and the Method 25A results shall be corrected for non-VOC hydrocarbons using Method 18. Unless otherwise approved in writing by DEP, emission testing for NO_x shall also be conducted using EPA Methods 1 through 4 and 7E.

j. The permittee shall monthly calculate and record the total NO_x emissions from Sources 101/108 for the most recent 12-month period, based on stack test results or other methods approved by the Department.

k. The permittee shall employ good combustion practices when operating Source IDs 101 and 108 to limit NO_x and VOC emissions.

l. The permittee shall keep records to demonstrate compliance with 25 PA Code 129.96 through 129.100. In accordance with 25 PA Code 129.100(l), the records shall be retained by the permittee for 5 years and made available to the Department upon receipt of a written request from the Department.

II. Source 115

a. Source 115 includes but is not limited to VOC emissions from miscellaneous process related chemicals. The permittee shall meet RACT 2 requirements for Source 115 by complying with the following:

1. Engaging in good operating practices to limit VOC emissions. Good operating practices include methods such as proper employee training, standard operating procedures, periodic inspections, good housekeeping, monitoring, and recordkeeping, and where possible use products subject to 25 Pa Code 130 – Standards for Products.

2. VOC emissions from Source 115 shall not exceed 5 tons in any 12-month rolling period.

i. The permittee shall calculate and record rolling 12-month VOC emissions using mass-balance calculations, material usage records, and miscellaneous material VOC content from material data sheets (or equivalent sources) or other methods approved by the Department.