



### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

## STATE ONLY OPERATING PERMIT

Issue Date:	January 12, 2016	Effective Date:	September 28, 2017
Revision Date:	September 28, 2017	Expiration Date:	<del>January 12, 2021</del>
Revision Type:	Modification		

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 operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit 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 permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

<u>State Only Permit No: 26-00545</u> Synthetic Minor Federal Tax Id - Plant Code: 20-3489593-1

Owner Information

Name: HEARTLAND FABRICATION LLC Mailing Address: 1800 PAUL THOMAS BLVD BROWNSVILLE, PA 15417-1555

#### Plant Information

Plant: HEARTLAND FABRICATION LLC

Location: 26 Fayette County

26907 Brownsville Township

SIC Code: 3731 Manufacturing - Ship Building And Repairing

Responsible Official

Name: TED M. STILGENBAUER Title: VICE PRESIDENT OPERATIONS

Phone (724) 785 - 2575

Permit Contact Person

Name: ROBERT THISTLETHWAITE Title: SAFETY MGR Phone: (724) 785 - 2575 Ext.149

[Signature]

MARK R. GOROG, P.E., ENVIRONMENTAL PROGRAM MANAGER, SOUTHWEST REGION





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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	PAINT BUILDING		
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<del>103</del>	UNPAVED ROADWAYS		
<del>104</del>	SUBMERGED ARC AND WELDING ACTIVITIES		
C01	PAINT BUILDING FILTER		
<del>C02</del>	DUST COLLECTOR (20,000 SCFM)		
<del>S01</del>	BUILDING STACK		
<del>\$02</del>	STACK		

PERMIT MAPS		
$\begin{array}{c} PROC \\ 101 \end{array} \longrightarrow \begin{array}{c} CNTL \\ C01 \end{array} \longrightarrow \begin{array}{c} STAC \\ S01 \end{array}$		
$\begin{array}{c} PROC \\ 102 \end{array} \rightarrow \begin{array}{c} CNTL \\ C02 \end{array} \rightarrow \begin{array}{c} STAC \\ S02 \end{array}$		





# #001 [25 Pa. Code § 121.1] Definitions. Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1. #002 [25 Pa. Code § 127.446] **Operating Permit Duration.** (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. #003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)] Permit Renewal. (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit. (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official. (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c). (1) Three hundred dollars for applications filed during the 2000-2004 calendar years. (2) Three hundred seventy five dollars for applications filed for the calendar years beginning in 2005. (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(i). (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application. #004 [25 Pa. Code § 127.703] Operating Permit Fees under Subchapter I. (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b): (1) Three hundred dollars for applications filed during the 2000-2004 calendar years. (2) Three hundred seventy five dollars for applications filed for the calendar years beginning in 2005. This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,



SECTION B. General State Only Requirements			
modification, revision, renewal, and re-issuance of each operating permit or part thereof.			
(b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established i 25 Pa. Code § 127.703(c).			
(1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.			
(2) Three hundred dollars for applications filed during the 2000-2004 calendar years.			
(3) Three hundred seventy five dollars for applications filed during the years beginning in 2005.			
(c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund".			
#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]			
Transfer of Operating Permits.			
(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.			
(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.			
(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.			
#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]			
Inspection and Entry.			
(a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:			
(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;			
(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;			
(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;			
(4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.			
(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.			
(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.			
#007 [25 Pa. Code §§ 127.441 & 127.444]			
Compliance Requirements.			
(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes			





a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

## #008 [25 Pa. Code § 127.441]

## Need to Halt or Reduce Activity Not a Defense.

It shall not be a defense for the permittee in an enforcement action that it was necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

## #009 [25 Pa. Code §§ 127.442(a) & 127.461]

### Duty to Provide Information.

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

## #010 [25 Pa. Code § 127.461]

#### Revising an Operating Permit for Cause.

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

(1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.

(2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.

(4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

## #011 [25 Pa. Code §§ 127.450 & 127.462]

## Operating Permit Modifications

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and





significant operating permit modifications, under this permit, as outlined below:

(b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

## #012 [25 Pa. Code § 127.441]

Severability Clause.

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#### #013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

(b) The Department may disapprove or condition de minimis emission increases at any time.

(c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.

(3) One and six tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:





(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

## #014 [25 Pa. Code § 127.3]

**Operational Flexibility.** 

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

(1) Section 127.14 (relating to exemptions)

(2) Section 127.447 (relating to alternative operating scenarios)

(3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)

(4) Section 127.449 (relating to de minimis emission increases)

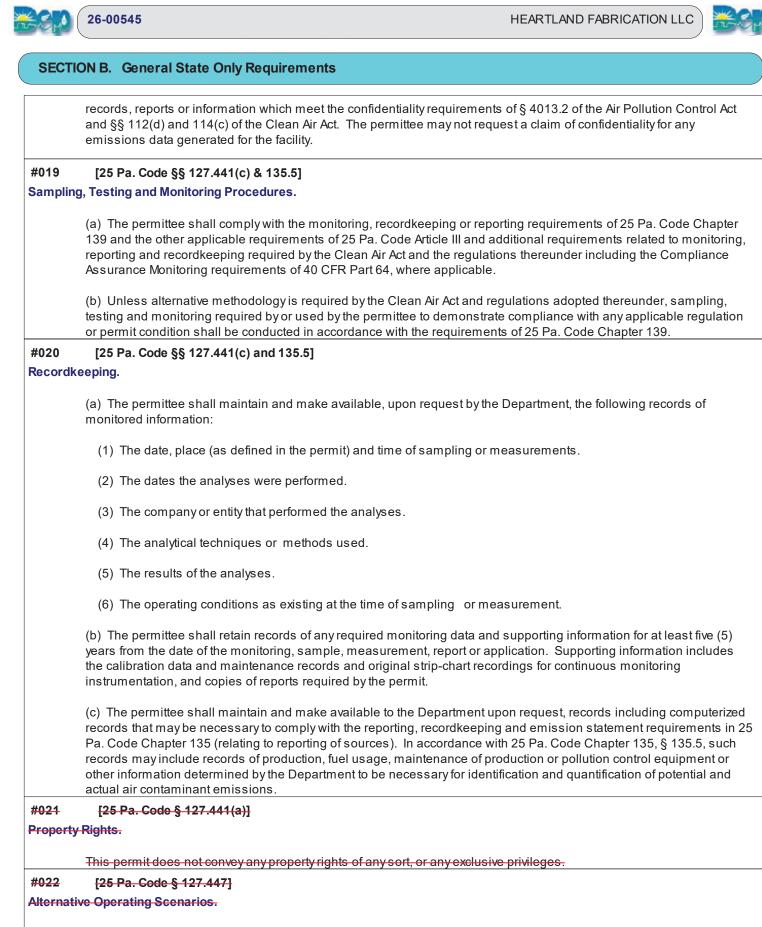
(5) Section 127.450 (relating to administrative operating permit amendments)





	(6) Section 127.462 (relating to minor operating permit modifications)
	(7) Subchapter H (relating to general plan approvals and general operating permits)
<del>#015</del>	[ <del>25 Pa. Code § 127.11]</del>
Reactiv	ation
	(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
	(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).
<del>#016</del>	[25 Pa. Code § 127.36]
Health F	Risk-based Emission Standards and Operating Practice Requirements.
	(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
	(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.
<del>#017</del>	[25 Pa. Code § 121.9]
	vention.
	No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors
#018	[25 Pa. Code §§ 127.402(d) & 127.442]
Reporti	ng Requirements.
	(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
	(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
	(c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:
	Regional Air Program Manager PA Department of Environmental Protection (At the address given in the permit transmittal letter, or otherwise notified)
	(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
	(e) Any records, reports or information submitted to the Department shall be available to the public except for such

(e) Any records, reports or information submitted to the Department shall be available to the public except for such



The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.



## I. RESTRICTIONS.

## Emission Restriction(s).

## # 001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the act.

## # 002 [25 Pa. Code §123.1]

### **Prohibition of certain fugitive emissions**

(a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations.

(7) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.

(8) Coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in § § 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations).

(9) Sources and classes of sources other than those identified in paragraphs (1) (8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(i) the emissions are of minor significance with respect to causing air pollution; and

(ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

(b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) A person responsible for any source specified in subsections (a)(1) – (7) or (9) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.



(3) Paving and maintenance of roadways.

(4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

(d) The requirements contained in subsection (a) and 123.2 do not apply to fugitive emissions arising from the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

## # 003 [25 Pa. Code §123.2]

## Fugitive particulate matter

Permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, Condition #002 (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

## # 004 [25 Pa. Code §123.31] Limitations

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

#### # 005 [25 Pa. Code §123.41] Limitations

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

(1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.

(2) Equal to or greater than 60% at any time.

# # 006 [25 Pa. Code §123.42]

#### Exceptions

The limitations of 123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:

(1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.

(2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.



## # 007 [25 Pa. Code §127.444]

#### Compliance requirements.

A person may not cause or permit the operation of a source subject to this article unless the source and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the application and conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

#### # 008 [25 Pa. Code §129.14]

#### **Open burning operations**

(a) No person may permit the open burning of material in an air basin

(b) N/A

(c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from: (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.

(2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(3) A fire set for the prevention and control of disease or pests, when approved by the Department.

(4) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

(5) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of such structure.

(6) A fire set solely for recreational or ceremonial purposes.

(7) A fire set solely for cooking food.

(d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:

(1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor — A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained. Clearing and grubbing wastes — Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

(2) Subsection (a) notwithstanding, clearing and grubbing wastes may be burned in a basin subject to the following requirements:

(i) Air curtain destructors shall be used when burning clearing and grubbing wastes.

(ii) Each proposed use of air curtain destructors shall be reviewed and approved by the Department in writing with respect to equipment arrangement, design and existing environmental conditions prior to commencement of burning. Proposals approved under this subparagraph need not obtain plan approval or operating permits under Chapter 127 (relating to construction modification, reactivation and operation of sources).

(iii) Approval for use of an air curtain destructor at one site may be granted for a specified period not to exceed 3 months, but may be extended for additional limited periods upon further approval by the Department.

(iv) The Department reserves the right to rescind approval granted if a determination by the Department indicates that an air pollution problem exists.

(3) N/A

(4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

#### II. TESTING REQUIREMENTS.

## # 009 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Measurement, calculation, sampling and testing methodologies. The following measurement, calculation, sampling and testing methodologies shall be used to determine the amount of VOC emissions from Ship Building and Ship Repair Surface Coating operations:

(1) Measurements of the volatile fraction of coatings shall be performed according to the following, as applicable:





(i) EPA Reference Method 24.

(ii) Appendix A of 40 CFR Part 63, Subpart II (relating to National emission standards for hazardous air pollutants for Shipbuilding and Ship Repair Surface Coating .

(iii) Manufacturer's formulation data.

(2) Calculations of the VOC emissions and rates shall be performed according to the following, as applicable:

(i) A Guideline for Surface Coating Calculations, EPA-340/1-86-016, including updates and revisions.

(ii) Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings, EPA-450/3-84-019, including updates and revisions.

(3) Sampling and testing shall be performed according to the procedures and test methods specified in Chapter 139 (relating to sampling and testing).

(4) Another method or procedure that has been approved in writing by the Department and the EPA.

## III. MONITORING REQUIREMENTS.

## # 010 [25 Pa. Code §123.43]

#### **Measuring techniques**

Visible emissions may be measured using either of the following:

(1) A device approved by the Department and maintained to provide accurate opacity measurements.

(2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

#### #011 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

(a)The permittee shall conduct weekly inspections of this facility, when the source is in operation, to determine the presence of fugitive emissions and malodorous air emissions detectable beyond the boundaries of the facility, and determine compliance with 25 PA Code Sections 123.1, 123.2 and 123.31.

(b) If any fugitive emissions or malodors are apparent, the permittee shall take immediate corrective action to eliminate them.

## IV. RECORDKEEPING REQUIREMENTS.

## # 012 [25 Pa. Code §127.441]

## **Operating permit terms and conditions.**

The permittee shall keep and maintain a record of all malodor and fugitive emissions surveys performed. The records shall include the date, time, name, and title of the observer, whether fugitive emissions and/or malodors were observed, and any corrective actions taken. Records shall be kept on site for a minimum of five years, and made available to the Department upon request.

## # 013 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) Compliance monitoring and recordkeeping. An owner or operator subject to this section shall maintain records sufficient to demonstrate compliance with the applicable as applied VOC limits for marine coatings :

(1) The owner or operator shall maintain daily records of the following parameters for each coating, thinner, component or cleaning material as supplied:

(i) The name and identification number.

(ii) The volume used.

(iii) The mix ratio.



- (iv) The density or specific gravity.
- (v) The weight percent of total volatiles, water, solids
- and exempt solvents.
- (vi) The volume percent of solids for each EDP coating.
- (vii) The VOC content.
- (2) The owner or operator shall maintain a daily record of the VOC content of each as applied coating or cleaning material.(3) The owner or operator shall:
- (i) Maintain the records onsite for 5 years, unless a longer period is required under Chapter 127 (relating to construction, modification, reactivation and operation of
- sources) or a plan approval, operating permit or order issued by the Department.
- (ii) Submit the records to the Department in an acceptable format upon receipt of a written request from the Department.
- (4) The owner or operator subject to subsection (e) shall maintain the written work practice plan specified in subsection
- (e)(2) onsite and make it available to the Department upon request.

## V. REPORTING REQUIREMENTS.

## # 014 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

The owner or operator of each stationary source emitting oxides of nitrogen or VOC's shall provide the Department with a statement, in a form as the Department may prescribe, for classes or categories of sources, showing the actual emissions of oxides of nitrogen and VOCs from that source for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based. The statement shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.

Annual emission statements are due by March 1 for the preceding calendar year beginning with March 1, 1993, for calendar year 1992 and shall provide data consistent with requirements and guidance developed by the EPA. The guidance document is available from: United States Environmental Protection Agency, 401 M. Street, S.W., Washington, D.C. 20460. The Department may require more frequent submittals if the Department determines that one or more of the following applies:

(1) A more frequent submission is required by the EPA.

(2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the act.

## # 015 [25 Pa. Code §127.441]

## **Operating permit terms and conditions.**

The owner or operator shall submit by March 1 of each year, a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.

The source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

## #016 [25 Pa. Code §127.442]

## Reporting requirements.

(a) The owner or operator shall report each malfunction that occurs at this facility that poses an imminent and substantial danger to the public health and safety or the environment or which it should reasonably believe may result in citizen complaints to the Department. For purpose of this condition a malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or source to operate in a normal or usual manner that may result in an increase in the emission of air contaminants. Examples of malfunctions that may result in citizen complaints include but are not limited to: large dust plumes, heavy smoke, a spill or release that results in a malodor that is detectable outside the property of the person on whose land the source is being operated.

(b) When the malfunction poses an imminent and substantial danger to the public health and safety or the environment, the





notification shall be submitted to the Department no later than one hour after the incident. All other malfunctions that must be reported under subsection (a) shall be reported to the Department no later than the next business day.

(c) The report shall describe the:

(i) name and location of the facility;
(ii) nature and cause of the malfunction or breakdown;
(iii) time when the malfunction or breakdown was first observed;
(iv) expected duration of excess emissions; and
(v) estimated rate of emissions.

(d) The owner or operator shall notify the Department immediately when corrective measures have been accomplished.

(e) Subsequent to the malfunction, the owner/operator shall submit a full written report to the Department including the items identified in (c) and corrective measures taken on the malfunction within 15 days, if requested.

(f) The owner/operator shall submit reports on the operation and maintenance of the source to the Regional Air Program Manager at such intervals and in such form and detail as may be required by the Department. Information required in the reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and maintenance schedules.

(g) Malfunctions shall be reported to the Department at the following address:

PADEP Office of Air Quality 400 Waterfront Drive Pittsburgh, PA 15222-4745 412-442-4000

#### VI. WORK PRACTICE REQUIREMENTS.

#### #017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For any source specified in Section C, Condition #003, the permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads or the clearing of land.

(2) Application of asphalt, oil, or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(3) Paving and maintenance of roadways.

(4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

## # 018 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall make every effort to perform final coating of barge components indoors; if the physical size of a barge requires barge sections to be welded together outdoors, surface coating of the barge's weld seams shall be performed using a manual rolling application technique.

## # 019 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) Work practice requirements. The owner and operator shall comply with the following work practices for:

(1) Coating-related activities. An owner and operator shall:

(i) Store all VOC-containing coatings, thinners and coating-related waste materials in closed containers.



r (( iii) () () () () () () () () () () () () ()	<ul> <li>(ii) Ensure that mixing and storage containers used for VOC-containing coatings, thinners and coating-related waste materials are kept closed at all times except when depositing or removing these materials.</li> <li>(iii) Minimize spills of VOC-containing coatings, thinners and coating-related waste materials and clean up spills mmediately.</li> <li>(iv) Convey VOC-containing coatings, thinners and coating-related waste materials from one location to another in closed containers or pipes.</li> <li>(v) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.</li> <li>(2) Cleaning materials. An owner and operator shall develop and implement a written work practice plan to minimize VOC emissions from cleaning of equipment associated with all coating operations for which emission limits are required. The written plan must specify practices and procedures to ensure that VOC emissions from the following operations are minimized:</li> <li>(i) Ship body wiping.</li> <li>(ii) Coating line purging.</li> <li>(iii) Flushing of coating systems.</li> <li>(v) Cleaning of spray booth grates.</li> <li>(v) Cleaning of spray booth areas.</li> <li>(vii) Cleaning external spray booth areas.</li> <li>(viii) Other housekeeping measures, including:</li> </ul>
(	<ul> <li>A) Storing all VOC-containing cleaning materials and used shop towels in closed containers.</li> <li>B) Ensuring that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times</li> </ul>
	except when depositing or removing these materials.
	C) Minimizing spills of VOC-containing cleaning materials and cleaning up spills immediately.
	D) Conveying VOC-containing cleaning materials from one location to another in closed containers or pipes. E) Minimizing VOC emissions from cleaning of storage, mixing and conveying equipment.
VII.	ADDITIONAL REQUIREMENTS.
	# 020 [25 Pa. Code §127.441]
	Operating permit terms and conditions.
ר	The applicant shall meet the following applicable requirements as applied:
_	
	TABLE 1.—VOC LIMITS FOR MARINE COATINGS

Coating Category

VOC limits (a b)

(·····································			Grams/liter solids
General use	340	t = 4.5°C 571	t < 4.5°Cd 728
Specialty:			
Air flask	340	571	728
Antenna	530	1,439	
Antifoulant	400	765	971
Heat resistant	420	84	1 1,069
High-glos	420	841	1,069





High-temperature	500	1,237 1,597
Inorganic zinc high-build	340	571 728
Military exterior	340	571 728
Mist	610	2,235
. Navigational aids	550	1,597
Nonskid	340	571 728
Nuclear	420	841 1,069
Organic zinc	360	630 802
Pretreatment wash prime	780	11,095
Repair and maint. of thern	noplastics 550	1,597
Rubber camouflage	340	571 728
Sealant for thermal spray	aluminum 610	2,235
	490	1,178
Speciality interior	340	571 728
Tack coat	610	2,235
Undersea weapons syste	ms 340	571 728
Weld-through precon. prin	ner 650	2,885

a: The limits are expressed in two sets of equivalent units. Either set of limits may be used to demonstrate compliance. b: To convert from g/L to lb/gal, multiply by (3,785 L/gal)(1/453.6 lb/g) or 1/120. For compliance purposes, metric units define the standards.

c: VOC limits expressed in units of mass of VOC per volume of solids were derived from the VOC limits expressed in units of mass of VOC per volume of coating assuming the coatings contain no water or exempt compounds and that the volumes of all components within a coating are additive.

d: These limits apply during cold-weather time periods (i.e., temperatures below 4.5°C). Cold-weather allowances are not given to coatings in categories that permit less than 40 percent solids (nonvolatiles) content by volume. Such coatings are subject to the same limits regardless of weather conditions.

Appendix A. Procedure to Determine VOC content of the Coatings to Which Thinning Solvent Will Be Added.

For a coating to which thinning solvent is routinely or sometimes added, the owner or operator shall determine the VOC content as follows:

(1) Prior to the first application of each batch, designate a single thinner for the coating and calculate the maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Table 1 for each batch as follows:

R= (Vs)(VOClimit) - mVOC/ Dth Eqn. 1



## Where:

R = Maximum allowable thinning ratio for a given batch (L thinner/L coating as supplied); Vs = Volume fraction of solids in the batch as supplied (L solids/L coating as supplied); VOC limit = Maximum allowable asapplied VOC content of the coating (g VOC/L solids); mVOC = VOC content of the batch as supplied (g VOC/L coating as supplied); Dth = Density of the thinner (g/L). If Vs is not supplied directly by the coating manufacturer, the owner or operator shall determine Vs as follows:

Vs = 1- m volatiles/Davg Eqn. 2

Where:

mvolatiles = Total volatiles in the batch, including VOC, water, and exempt compounds (g/L coating); and Davg = Average density of volatiles in the batch (g/L).

In addition, the owner or operator may choose to construct nomographs, based on Equation 1, similar or identical to the one provided in Appendix C (Figure 1) as a means of easily estimating the maximum allowable thinning ratio. The VOC Data Sheet included as Appendix D also provides useful information in determining compliance with the applicable VOC coating limit.

(2) Prior to the first application of each batch, notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch of the coating by affixing a label to each container of coating or through another means approved by the Department.

(3) By the 15th day of each calendar month, determine the volume of each batch of the coating used, as supplied, during the previous month.

(4) By the 15th day of each calendar month, determine the total allowable volume of thinner for the coating used during the previous month as follows:

[See 40 CFR 63.785 for Equation 3]

where:

Vth = Total allowable volume of thinner for the previous month (L thinner);

Vb = Volume of each batch, as supplied and before being thinned, used during non-cold-weather days of the previous month (L coating as supplied);

Rcold = Maximum allowable thinning ratio for each batch used during cold-weather days (L thinner/L coating as supplied);

Vb-cold = Volume of each batch, as supplied and before being thinned, used during cold-weather days of the previous month (L coating as supplied);

i = Each batch of coating; and

n = Total number of batches of the coating.

(5) By the 15th day of each calendar month, determine the volume of thinner actually used with the coating during the previous month.

(6) If the volume of thinner actually used with the coating [paragraph (5) of this section] is less than or equal to the total allowable volume of thinner for the coating [paragraph (4) of this section], then compliance is demonstrated for the coating for the previous month, unless a violation is revealed using Method 24 of appendix A to 40 CFR part 60.





# #021 [25 Pa. Code §127.441] Operating permit terms and conditions. Terms used in the Control Techniques Guidelines (CTG) for Ship Building and Ship Repair Operations (Surface Coating) as published in the Federal Register on August 27, 1996 are as follows: Add-on control system means an air pollution control device such as a carbon absorber or incinerator that reduces pollution in an air stream by destruction or removal prior to discharge to the atmosphere. Affected source means any shipbuilding or ship repair facility having surface coating operations with a minimum 1,000 liters (L) (264 gallons (gal)) annual marine coating usage. Air flask specialty coating means any special composition coating applied to interior surfaces of high pressure breathing air flasks to provide corrosion resistance and that is certified safe for use with breathing air supplies. Antenna specialty coating means any coating applied to equipment through which electromagnetic signals must pass for reception or transmission. Antifoulant specialty coating means any coating that is applied to the underwater portion of a vessel to prevent or reduce the attachment of biological organisms and that is registered with the EPA as a pesticide under the Federal Insecticide, Fungicide, and Rodenticide Act. As applied means the condition of a coating at the time of application to the substrate, including any thinning solvent. As supplied means the condition of a coating before any thinning, as sold and delivered by the coating manufacturer to the user. Batch means the product of an individual production run of a coating manufacturer's process. A batch may vary in composition from other batches of the same product. Bitumens mean black or brown materials that are soluble in carbon disulfide, which consist mainly of hydrocarbons. Bituminous resin coating means any coating that incorporates bitumens as a principal component and is formulated primarily to be applied to a substrate or surface to resist ultraviolet radiation and/or water. Certify means, in reference to the VOC content of a coating, to attest to the VOC content as determined through analysis by Method 24 of Appendix A to Part 60 of Title 40 of the Code of Federal Regulations (CFR) or to attest to the VOC content as determined through an EPA-approved test method. In the case of conflicting results, the EPA Method 24 shall take precedence. Coating means any material that can be applied as a thin layer to a substrate and which cures to form a continuous solid film. Cold-weather time period means any time during which the ambient temperature is below 4.5°C (40°F) and coating is to be applied. Container of coating means the container from which the coating is applied, including but not limited to a bucket or pot. Cure volatiles means reaction products which are emitted during the chemical reaction which takes place in some coating films at the cure temperature. These emissions are other than those from the solvents in the coating and may, in some cases, comprise a significant portion of total VOC and/or VOHAP emissions.





Epoxy means any thermoset coating formed by reaction of an epoxy resin (i.e., a resin containing a reactive epoxide with a curing agent).

Exempt compounds means specified organic compounds that are not considered VOC due to negligible photochemical reactivity. Exempt compounds are specified in 40 CFR § 51.100(s).

Facility means all contiguous or adjoining property that is under common ownership or control, including properties that are separated only by a road or other public right-of-way.

General use coating means any coating that is not a specialty coating.

Heat resistant specialty coating means any coating that during normal use must withstand a temperature of at least 204°C (400°F).

High-gloss specialty coating means any coating that achieves at least 85 percent reflectance on a 60 degree meter when tested by the American Society for Testing and Materials (ASTM) Method D–523.

High-temperature specialty coating means any coating that during normal use must withstand a temperature of at least 426°C (800°F).

Inorganic zinc (high-build) specialty coating means a coating that contains 960 grams per liter (eight pounds per gallon) or more elemental zinc incorporated into an inorganic silicate binder that is applied to steel to provide galvanic corrosion resistance. (These coatings are typically applied at more than two mil dry film thickness.)

Maximum allowable thinning ratio means the maximum volume of thinner that can be added per volume of coating without violating the applicable VOC limit (see Table 1).

Military exterior specialty coating or Chemical Agent Resistant Coatings means any exterior topcoat applied to military or U.S. Coast Guard vessels that are subject to specific chemical, biological, and radiological washdown requirements.

Mist specialty coating means any low viscosity, thin film, epoxy coating applied to an inorganic zinc primer that penetrates the porous zinc primer and allows the occluded air to escape through the paint film prior to curing.

Navigational aids specialty coating means any coating applied to Coast Guard buoys or other Coast Guard waterway markers when they are recoated aboard ship at their usage site and immediately returned to the water.

Nonskid specialty coating means any coating applied to the horizontal surfaces of a marine vessel for the specific purpose of providing slip resistance for personnel, vehicles, or aircraft.

Nonvolatiles (or volume solids) means substances that do not evaporate readily. This term refers to the filmforming material of a coating.

Normally closed means a container or piping system is closed unless an operator is actively engaged in adding or removing material.

Nuclear specialty coating means any protective coating used to seal porous surfaces such as steel (or concrete) that otherwise would be subject to intrusion by radioactive materials. These coatings must be resistant to long-term (service life) cumulative radiation exposure (ASTM D4082–83), relatively easy to decontaminate (ASTM D4256–83), and resistant to various chemicals to which the coatings are likely to be exposed (ASTM 3912–80). (For nuclear coatings, see the general protective requirements outlined by the U.S. Atomic Energy Commission in a report entitled "U.S. Atomic Energy Commission Regulatory Guide 1.54" dated June 1973, available through the Government Printing Office at (202) 512–2249 as document number A74062–00001.)

Operating parameter value means a minimum or maximum value established for a control device or process parameter that, if achieved by itself or in combination with one or more other operating parameter values, determines that an owner or operator has complied with an applicable emission limitation or standard.





Organic zinc specialty coating means any coating derived from zinc dust incorporated into an organic binder that contains more than 960 grams of elemental zinc per liter (eight pounds per gallon) of coating, as applied, and that is used for the expressed purpose of corrosion protection.

Pleasure craft means any marine or fresh-water vessel used by individuals for noncommercial, nonmilitary, and recreational purposes that is less than 20 meters in length. A vessel rented exclusively to, or chartered for, individuals for such purposes shall be considered a pleasure craft.

Pretreatment wash primer specialty coating means any coating that contains a minimum of 0.5 percent acid, by mass, and is applied only to bare metal to etch the surface and enhance adhesion of subsequent coatings.

Repair and maintenance of thermoplastic coating of commercial vessels (specialty coating) means any vinyl, chlorinated rubber, or bituminous resin coating that is applied over the same type of existing coating to perform the partial recoating of any in-use commercial vessel. (This definition does not include coal tar epoxy coatings, which are considered "general use" coatings.)

Rubber camouflage specialty coating means any specially formulated epoxy coating used as a camouflage topcoat for exterior submarine hulls and sonar domes.

Sealant for thermal spray aluminum means any epoxy coating applied to thermal spray aluminum surfaces at a maximum thickness of one dry mil.

Ship means any marine or fresh-water vessel used for military or commercial operations, including self-propelled vessels, those propelled by other craft (barges), and navigational aids (buoys). This definition includes, but is not limited to, all military and Coast Guard vessels, commercial cargo and passenger (cruise) ships, ferries, barges, tankers, container ships, patrol and pilot boats, and dredges. Pleasure craft and offshore oil and gas drilling platforms are not considered ships.

Shipbuilding and ship repair operations means any building, repair, repainting, converting, or alteration of ships.

Special marking specialty coating means any coating that is used for safety or identification applications, such as ship numbers and markings on flight decks.

Specialty coating means any coating that is manufactured and used for one of the specialized applications described within this list of definitions.

Specialty interior coating means any coating used on interior surfaces aboard U.S. military vessels pursuant to a coating specification that requires the coating to meet specified fire retardant and low toxicity requirements, in addition to the other applicable military physical and performance requirements.

Tack specialty coating means any thin film epoxy coating applied at a maximum thickness of two dry mils to prepare an epoxy coating that has dried beyond the time limit specified by the manufacturer for the application of the next coat.

Thinner means a liquid that is used to reduce the viscosity of a coating and that evaporates before or during the cure of a film.

Thinning ratio means the volumetric ratio of thinner to coating, as supplied. Thinning solvent: see Thinner.

Undersea weapons systems specialty coating means any coating applied to any component of a weapons system intended to be launched or fired from under the sea.

Volatile organic compounds (VOC) means any organic compound that participates in atmospheric photochemical reactions; that is, any organic compound other than those that the Administrator designates as having negligible photochemical reactivity. The VOC is measured by a reference method, an equivalent method, an alternative method, or by procedures specified under any rule. A reference method, an equivalent method, or an alternative method, however, may also measure nonreactive organic compounds. In such cases, any owner or operator may exclude the nonreactive organic



compounds when determining compliance with a standard. For a list of compounds that the Administrator has designated as having negligible photochemical reactivity, refer to 40 CFR § 51.00.

Volatile organic hazardous air pollutant (VOHAP) means any compound listed in or pursuant to Section 112(b) of the CAA that contains carbon, excluding metallic carbides and carbonates. This definition includes VOC listed as hazardous air pollutant (HAP) and exempt compounds listed as HAP.

Weld-through preconstruction primer (specialty coating) means a coating that provides corrosion protection for steel during inventory, is typically applied at less than one mil dry film thickness, does not require removal prior to welding, is temperature resistant (burn back from a weld is less than 1.25 centimeters (0.5 inches)), and does not normally require removal before applying film-building coatings, including inorganic zinc high-build coatings. When constructing new vessels, there may be a need to remove areas of weld-through preconstruction primer due to surface damage or contamination prior to application of film-building coatings.

#### VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to State Only General Requirements).

## IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.





## SECTION D. Source Level Requirements

Source ID: 101

Source Name: PAINT BUILDING

Source Capacity/Throughput:



## I. RESTRICTIONS.

## **Emission Restriction(s).**

## # 001 [25 Pa. Code §123.13] **Processes** The permittee may not permit the emission into the outdoor atmosphere of particulate matter in excess of 0.04 grain per dry standard cubic feet when the effluent gas volume is less than 150,000 dry standard cubic feet per minute. # 002 [25 Pa. Code §127.441] Operating permit terms and conditions. Total emissions from this facility during any consecutive 12 months period shall be limited as follows: Pollutant Tons VOC 49.5 < 25 - Total HAP HAP < 10 - Individual HAP # 003 [25 Pa. Code §127.441] Operating permit terms and conditions. The permittee shall control particulate emissions from the paint building source using four (4) Model 3366 dry filter systems, arranged in parallel, and manufactured by JBI,Inc (or equivalent). The 95 % particulate matter capture efficiency

systems, arranged in parallel, and manufactured by JBI,Inc (or equivalent). The 95 % particulate matter capture efficiency guaranteed for the filter systems requires the pressure drop across the filters to not exceed 2 inches of water. Total air flow through the four (4) filter systems is 117, 200 standard cubic feet per minute at the specified pressure drop.

## # 004 [25 Pa. Code §129.52]

## Surface coating processes

(a) This section applies to a surface coating process category, regardless of the size of the facility, which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year since January 1, 1987.

(b) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from a surface coating process category listed in Table I, unless one of the following limitations is met:

(1) The VOC content of each as applied coating is equal to or less than the standard specified in Table I.

(i) The VOC content of the as applied coating, expressed in units of weight of VOC per volume of coating solids, shall be calculated as follows:

VOC = (Wo)(Dc)/Vn

Where:

VOC = VOC content in lb VOC/gal of coating solids



## SECTION D. Source Level Requirements

Wo = Weight percent of VOC (Wv-Ww-Wex)

Wv = Weight percent of total volatiles (100%-weight percent solids)

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

- Dc = Density of coating, lb/gal, at 25°C
- Vn = Volume percent of solids of the as applied coating
- (c) Included in Recordkeeping Section

(d) The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this section and § 129.67 (relating to graphic arts systems). A surface coating process which seeks to comply with this section through the use of an exempt solvent may not be included in any alternative standards.

- (e) Not Applicable
- (f) Not Applicable
- (g) Included in Recordkeeping Section

(h) The VOC standards in Table I do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

(1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.

(2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

Table I (Only the Emission Limit of VOCs in Surface Coatings applicable to the permittee is listed)

Emission Limits of VOCs in Surface Coatings by Process Category

Weight of VOC per Volume of Coating Solids

Surface Coating Process Category

10. Miscellaneous metal parts & products

(f) extreme performance coatings- 6.67 lbs. VOC per gallon of coating solids

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



## III. MONITORING REQUIREMENTS.

## # 005 [25 Pa. Code §127.441]

## **Operating permit terms and conditions.**

The permittee shall visually monitor the appearance of exhaust emissions from the paint building stacks at least once weekly during coating operations to confirm proper operation of the four particulate emissions control systems. If the appearance of the stack exhaust is observed to be darker than usual for the process, for a period of 20 minutes, the permittee shall take appropriate corrective action.

#### # 006 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

A stack exhaust appearance problem that persists longer than 24 hours shall be visually observed by an opacity reader certified to Title 40, Code of Federal Regulations, Part 60, Appendix A, Method 9, for compliance with the opacity limits specified for the source

## # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall monitor the pressure drop across the dry filter systems at least once per week during surface coating operations in the paint building. If the pressure drop deviates from normal, the permittee shall take appropriate corrective action.

#### IV. RECORDKEEPING REQUIREMENTS.

## # 008 [25 Pa. Code §129.52]

## Surface coating processes

(c) A facility, regardless of the facility's annual emission rate, which contains surface coating processes shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:

(1) The following parameters for each coating, thinner and other component as supplied:

- (i) The coating, thinner or component name and identification number.
- (ii) The volume used.
- (iii) The mix ratio.
- (iv) The density or specific gravity.
- (v) The weight percent of total volatiles, water, solids and exempt solvents.
- (vi) The volume percent of solids for Table I surface coating process categories 1-10.
- (2) The VOC content of each coating, thinner and other component as supplied.
- (3) The VOC content of each as applied coating.

## # 009 [25 Pa. Code §129.52]

## Surface coating processes

The records shall be be maintained for a period of 5 years and shall be submitted to the Department upon request.

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





# VI. WORK PRACTICE REQUIREMENTS.

# # 010 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The permittee shall develop, implement and comply with a written Work Practice Implementation Plan (WPIP) consisting of the following:

a. Operator Training Program - New and existing personnel, including contract personnel, who are involved in coating, cleaning or wash-off operations shall complete an operator training program. Existing personnel shall be trained prior to the issuance of a State Only Operating Permit. New personnel shall be trained upon hiring. Training may be performed in-house, or by an outside vendor.

A copy of the written operator training program shall be maintained as part of the WPIP and shall include the following: 1. A list of all current personnel that require training, by name and job description.

2. An outline of the subjects to be covered in the initial and annual refresher training sessions for each position or group of personnel.

3. Lesson plans for courses to be given at the initial and annual refresher training shall, at a minimum, include appropriate application techniques, appropriate cleaning procedures, appropriate equipment setup and adjustment to minimize coating usage and overspray, appropriate management of cleanup wastes and review of all appropriate operating permit conditions.

4. A description of the methods to be used at the completion of initial or annual refresher training sessions to demonstrate successful completion.

5. A record of the date each employee is trained.

b. Leak Inspection and Maintenance Plan.- The permittee shall prepare and maintain as part of the WPIP a written leak inspection and maintenance plan which shall include the following:

1. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, primers, or solvents.

2. An inspection schedule.

3. The methods for documenting the date and results of each inspection and any repairs that were made.

4. The time frame between identifying a leak and making a repair.

c. Cleaning Solvent Accounting System- A solvent accounting form shall be developed to account for solvents used in cleaning operations. The information recorded shall include:

1. The name and total quantity of each solvent used each month.

2. The name and total quantity of each solvent evaporated to the atmosphere each month.

d. Storage Requirements- The permittee shall use normally closed containers for storing coating and cleaning materials.

e. Line Cleaning, Equipment, and Spray Gun Cleaning- The solvent used for cleaning shall be collected in normally closed containers.

f. Quality Control Program- The permittee shall develop, implement, and follow a written QCP which includes routine measurement of both wet and dry film thickness, monitoring of coating VOC using EPA Reference Method 24 or equivalent.

## # 011 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) The permittee shall use air-assisted airless application technology for surface coatings or primers which contain VOCs, and which require a fluid atomization pressure less than 2000 psig. For surface coatings or primers which contain VOC, and which require a fluid atomization pressure of 2000 psig, or greater, the airless application technology shall be used to apply the coatings.

(b) Application of surface coatings to weld seams that must be performed outdoors due to the physical size of the barge sections shall be performed using a manual rolling technique.

# # 012 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

As part of a preventative maintenance program, the permittee shall inspect the paint building filter system once per month to



assure the system is in good working order.

## # 013 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall recover solvents used in the surface coating processes to the maximum extent possible. A Model SW-30, continuous feed, solvent recycling still supplied by Solvent Waste Management, Inc. (or equivalent) shall be installed at the facility and be fully operational within two months from the date of issue of the State Only Operating Permit.

## VII. ADDITIONAL REQUIREMENTS.

## # 014 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The permittee may use engineering analysis to demonstrate compliance with the particulate matter emissions restriction specified for the source.

# 015 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Compliance with the VOC and HAP restrictions for this facility may be satisfied using purchase records, manufacturers' analyses, and other material balance calculations.





Source ID: 102

Source Name: SHOT BLAST UNITS (2)

Source Capacity/Throughput:

PROC	CNTL	STAC
102	C02	S02

### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





Source ID: 103

Source Name: UNPAVED ROADWAYS

Source Capacity/Throughput:

#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





Source ID: 104

#### Source Name: SUBMERGED ARC AND WELDING ACTIVITIES

Source Capacity/Throughput:

#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





SECTION E. Source Group Restrictions.





# SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





# SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.





## SECTION H. Miscellaneous.

Sources of minor significance at the facility include the following:

\*Koike Aronson G-1, G-2, G-3 (3 plasma cutters)

\* Welding Machines

\* Hand held metal cutting Torches

\*Hand held equipment for buffing, polishing, drilling, sawing, grinding & machining of metal

\* Pangborn Rotoblaster with a Farr Tenkay dust collector venting indoors

\* Surface Coating of Barge weld seams using manual roller application technique

\*Various electric heaters

\*Various torpedoheaters, paint shopheaters and plate shot blast area heater (all natural gas fired)

\*Liquid CO2 and oxygen storage tanks

\*2 (500- gallon diesel storage tanks





# \*\*\*\*\*\* End of Report \*\*\*\*\*\*



# **APPENDIX C**

# Support for a Negative Declaration for EPA's Large Petroleum Dry Cleaners CTG

Bureau of Air Quality Department of Environmental Protection [This page intentionally left blank.]

# APPENDIX C

# Support for a Negative Declaration for EPA's Large Petroleum Dry Cleaners CTG

### Applicability

The Department has included a negative declaration as part of this revision to the Commonwealth's SIP that there are no dry-cleaning facilities in Pennsylvania to which the EPA's Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009, September 1982 (Large Petroleum Dry Cleaners CTG) would apply. This negative declaration by the Department and the identification and assessment of potentially affected facilities applies to the Commonwealth of Pennsylvania, except for Philadelphia and Allegheny counties, which have their own local air pollution control agencies. Both counties will be submitting their own CTG RACT certifications to the EPA for the 2008 ozone NAAQS.

The Large Petroleum Dry Cleaners CTG does not define the term "Large" used in the title of the CTG. However, Appendix E of the Large Petroleum Dry Cleaners CTG contains a model regulation that contains the following applicability: "This Regulation applies to all petroleum solvent dry-cleaning facilities described in § XX.010(A) that consume 123,000 liters (32,493 gallons) or more of petroleum solvent annually." The Department interprets "consume" to mean the petroleum solvent is used. A petroleum dry-cleaning operation that consumes 123,000 liters (32,493 gallons) of petroleum solvent would emit between 97.5 and 130.0 tons VOC, based on a solvent density range of 6 to 8 pounds per gallon.

### Permitting Program Background

The Department administers the comprehensive plan approval and operating permit programs contained in 25 Pa. Code Chapter 127. The provisions of 25 Pa. Code Chapter 127 have been codified in the Commonwealth's SIP at 40 C.F.R. § 52.2020(c)(1) at various times since May 31, 1972, and therefore, are all federally enforceable.

All facilities that exceed the major source threshold are required to apply for Title V operating permits. The major source threshold for VOC emissions is 50 tons VOC, except in the 5-county Philadelphia area, where it is 25 tons VOC. Because the 123,000-liter (32,493 gallons) solvent consumption threshold provided in the CTG model regulation equates to a VOC emissions range of 97.5 to 130.0 tons, the Department concludes that the Large Petroleum Dry Cleaners CTG would only apply to a facility with potential VOC emissions greater than the major source threshold.

Synthetic Minor facilities are those whose potential to emit, without taking limitations and/or restrictions, exceed the Title V applicability threshold. Synthetic Minor facilities take a restriction in the hours of operation, an emission limitation, or any other approved method to become a minor facility. It is important to note that in order for a facility to become a Synthetic Minor, the limitations and/or restrictions taken must be federally enforceable.

Natural Minor facilities are facilities whose potential to emit is lower than the major source threshold. Therefore, the Large Petroleum Dry Cleaners CTG would not apply to Natural Minor facilities.

The Department has issued General Plan Approvals and General Operating Permits (GP) for specific categories of sources that are similar in design and operation and can be adequately regulated with standardized specifications and conditions. The Department developed GP-6 for Petroleum Dry Cleaners. To be eligible for GP-6, a petroleum dry-cleaning facility must be a minor source. Therefore, the Large Petroleum Dry Cleaners CTG would not apply to any petroleum dry-cleaning facility that has been issued a GP-6 authorization.

# Pennsylvania Facilities Considered

The Department conducted a search of the Air Information Management System (AIMS), the Department's database of air quality facilities, and the Environmental Facility Application Compliance Tracking System (eFACTS), to identify facilities in the dry-cleaning sector using NAICS 8123XX and SIC 7216. This search identified 577 facilities. Of these, one facility, Roeberg Enterprises/Yorgeys Clnrs, is a Synthetic Minor facility. All other facilities are Natural Minor facilities, to which the Large Petroleum Dry Cleaners CTG would not apply.

Roeberg Enterprises/Yorgeys Clnrs is a Synthetic Minor facility with a state-only operating permit. Because this facility has federally enforceable limits to restrict potential emissions to below the major source threshold, the Large Petroleum Dry Cleaners CTG would not apply. However, as the only Synthetic Minor facility identified, the Department evaluated the facility in more detail. An evaluation of the permit, inspection records, and discussion with the Department District Office responsible for the facility provided the following information:

- Source 101, dry cleaning operation was installed 12/31/1989 and is subject to 40 C.F.R. Part 60, Subpart JJJ Standards of Performance for Petroleum Dry Cleaners.
- The facility has one solvent washer and two solvent dryers with condensers.
- The permit requires use of a dryer equipped with integral solvent condenser.
- The rated capacity of the dry-cleaning operation is 45 pounds of solvent per hour.
- The table below contains the facility's VOC emissions and hours of operation. The table also provides the facility's annual solvent use, based on the facility's solvent purchase records, for the years that information is available.

Year	2011	2012	2013	2014	2015	2016	2017
VOC (Tons)	6.306	8.717	6.21	5.852	6.12	3.820	3.638
Hours	1925	1925	1820	1950	1900	3640	4056
Solvent Used (Gallons)				1815		1155	1100

The 1,815 gallons of petroleum solvent used in 2014 used by Roeberg Enterprises/Yorgeys Clnrs is only 6% of the 123,000-liter threshold in the CTG model regulation. Based on the facility's Synthetic Minor status and the solvent consumption applicability threshold provided in the CTG model regulation, the Department concludes that the Large Petroleum Dry Cleaners CTG does not apply to this facility.

Nine facilities were identified that have GP-6 authorizations. To be eligible for GP-6, a petroleum dry-cleaning facility must be a minor source. Therefore, the Department concludes that the Large Petroleum Dry Cleaners CTG does not apply to petroleum dry-cleaners that have been issued a GP-6 permit authorization.

### **Conclusion**

The Department has determined that there are no dry-cleaning facilities in Pennsylvania to which the EPA's Large Petroleum Dry Cleaners CTG would apply based on its review of the existing facilities. Accordingly, the Department has included a negative declaration as part of its revision to the Commonwealth's SIP for certification of the CTG RACT under the 2008 ozone NAAQS.



# **APPENDIX D**

Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry

> Bureau of Air Quality Department of Environmental Protection

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# **APPENDIX D**

# Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry

The Department is requesting that EPA incorporates 25 Pa. Code Chapter 122 into the Commonwealth's SIP as part of this SIP revision. Through incorporation of this regulation, the federal NSPS regulations address the EPA's RACT recommendations for facilities covered by the EPA's CTG "Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry, EPA-450/4-91-031, August 1993" (Reactor and Distillation Processes SOCMI CTG). The Reactor and Distillation Processes SOCMI CTG provides that federal NSPS regulations (Subparts NNN and RRR) meet recommended RACT. This recommendation is made by EPA in the Reactor and Distillation Processes SOCMI CTG. In Section 1.0 of the Reactor and Distillation Processes SOCMI CTG EPA states, "[T]here are different regulations that can apply to the same SOCMI facility, process unit, or process vent. For example, a given SOCMI facility could potentially be subject to all three NSPS (air oxidation, distillation, reactor process), to the HON (for process vents), and to regulations developed in accordance with this CTG. The required control efficiency for a combustion control device is the same in all these various regulations. Thus, any process vent that is controlled with a combustion device to meet the requirements of the HON, NSPS, or regulations in accordance with the air oxidation CTG would meet recommended RACT in this CTG, and it is unnecessary to test for applicability for VOC regulation developed in accordance with this CTG. Section 7.3 presents the appropriate rules and regulations to which a SOCMI facility may be subject."<sup>1</sup> Other than the five facilities listed below, Pennsylvania has no other facilities subject to the Reactor and Distillation Processes SOCMI CTG. The five facilities identified are covered by the federal NSPS regulations, Subparts NNN or RRR. PADEP has included a demonstration below showing that five facilities in the Commonwealth are subject to NSPS, Subparts NNN and RRR, and therefore, no additional RACT analysis is required based on EPA's CTG.

### New Source Performance Standards Reviewed

- Subpart NNN—STANDARDS OF PERFORMANCE FOR VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS FROM SYNTHETIC ORGANIC CHEMICAL MANUFACTURING INDUSTRY (SOCMI) DISTILLATION OPERATIONS
- Subpart RRR—STANDARDS OF PERFORMANCE FOR VOLATILE ORGANIC COMPOUND EMISSIONS FROM SYNTHETIC ORGANIC CHEMICAL MANUFACTURING INDUSTRY (SOCMI) REACTOR PROCESSES

<sup>&</sup>lt;sup>1</sup> Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry, EPA-450/4-91-031, August 1993 (SOCMI CTG); pp. 1-2 and 1-3, available at:

https://www3.epa.gov/airquality/ctg\_act/199308\_voc\_epa450\_4-91-031\_reactor\_distillation\_socmi.pdf

The Department reviewed and compared the NSPS in 40 C.F.R. Part 60, Subparts NNN and RRR to the referenced requirements for NSPS referred to in Section 1.0, of the Reactor and Distillation Processes SOCMI CTG. Based upon the sections in the Reactor and Distillation Processes SOCMI CTG listed below, the Department has concluded that the requirements in the NSPS for Subparts NNN and RRR continue to be as stringent as the CTG. Therefore, these facilities are subject to RACT levels of control as indicated in the Reactor and Distillation Processes SOCMI CTG.

**The CTG's section 7.3.3 "Distillation Process New Source Performance Standard"** provides that NSPS for "Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry Distillation Operations," (55 FR 26931, June 29, 1990; 40 C.F.R. 60, Subpart NNN) was promulgated on June 29, 1990. This NSPS covers SOCMI distillation operations constructed, reconstructed, or modified after December 30, 1983, that produce any of the affected chemicals listed in Table 7-1 as a product, co-product, or intermediate.

**The CTG's section 7.3.4 "Reactor Process New Source Performance Standard Standards of performance for SOCMI reactor process operations**" were proposed in the *Federal Resister* on June 29, 1990 (55 FR 26953). The proposed standards applied to reactor processes operating as part of a process unit that produces any of the affected chemicals listed in Table 7-1 of the Reactor and Distillation Processes SOCMI CTG, as a product, by-product, co-product, or intermediate. The NSPS rulemaking was finalized on August 31, 1993 (58 FR 45962).

The Reactor and Distillation Processes SOCMI CTG recommends on page 7-11 that other facilities consider exempting reactor or distillation processes in plants with very low capacities from the CTG RACT requirements. Most research and development facilities or laboratory-scale facilities are not designed to produce more than 1 gigagram (2.2 x 106 pounds) of chemicals per year. These facilities generally operate on an intermittent basis.

For informational purposes, PADEP notes that EPA previously approved Subparts NNN and RRR as RACT for Philadelphia Air Management Services Regulation V, Section XVI relating to Distillation Operations and Reactor Processes on October 17, 2016 for the 1997 ozone NAAQS (81 FR 69687). The Department has adopted Subparts NNN and RRR by reference in 25 Pa. Code Chapter 122 as part of this SIP revision for incorporation into the Commonwealth's SIP.

DEP identified 5 facilities potentially subject to the new source performance standards requirements.

Primary Facility	PF ID	Region	NNN	RRR
ALPONT LLC/ERIE	809682	NW	Yes	Yes
BARD BIODIESEL/FAIRLESS HILLS	701363	SE	Yes	Yes
LAKE ERIE BIOFUELS LLC/ERIE	676832	NW	Yes	Yes
MATHESON TRI GAS/UPPER HANOVER	758579	SE	Yes*	Yes*
SHELL CHEM				
APPALACHIA/PETROCHEMICALS COMPLEX	775836	SW	Yes	Yes

### Table D -1: Facilities Subject to NSPS Exceptions and Exemptions

\* Record Keeping Only

Four facilities listed in Table D-1 above are subject to the NSPS requirements in 40 C.F.R. Part 60, Subparts NNN and RRR and already meet recommended RACT in the Reactor and Distillation Processes SOCMI CTG. Therefore, "it is unnecessary to test for applicability for VOC regulation developed in accordance with this CTG."<sup>2</sup>

# Matheson Tri Gas/Upper Hanover, Permit No. 46-00281

One facility is subject to the record keeping requirements of 40 C.F.R. Part 60, Subparts NNN and RRR. If the production levels of the facility increase in the future, it is required to notify the Department and will become subject to 40 C.F.R. Part 60, Subparts NNN and RRR.

Condition no. 1 in section D for permit no. 46-00281 indicates that the VOC process systems are exempted from all but the recordkeeping and reporting requirements of 40 C.F.R. Part 60, Subparts NNN and RRR, due to the total design capacity being less than 1 gigagram per year. This exemption level is taken directly from Subparts NNN [40 C.F.R. § 660(c)(5)] and RRR [40 C.F.R. § 700(c)(3)].

As indicated previously, the exemption recommendations are made in the applicability section, on pages 7-11 and 7-12 (pages 145 and 146) of the Reactor and Distillation Processes SOCMI CTG. "Other facilities to consider exempting from RACT requirements include reactor or distillation processes in plants with very low capacities. Most research and development facilities or laboratory-scale facilities are not designed to produce more than 1 gigagram (2.2 x 106 pounds) of chemicals per year. These facilities generally operate on an intermittent basis making control techniques that apply to industry-scale production facilities inappropriate for these operations."

Additionally, the comment response document included in the Reactor and Distillation Processes SOCMI CTG as Appendix F notes on page F-17 (page 264) that facilities with capacities of less than 1 gigagram of chemicals per year were exempted from the recommended RACT requirements.

<sup>&</sup>lt;sup>2</sup> Id. at pp. 1-2 and 1-3.



# **APPENDIX E**

# Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry

Bureau of Air Quality Department of Environmental Protection [This page intentionally left blank.]

# **Appendix E**

# Incorporation of Permit Requirements Meeting the Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry

The Department has included redacted permit no. 39-00024 as part of this SIP revision for incorporation into the Commonwealth's SIP.

### Background

### GEO Specialty Chemicals, Inc. TRIMET Products Group (Geo Specialty Chem Trimet)

The Department found and reviewed one facility that was listed in the original Air Oxidation Processes SOCMI CTG. The facility was previously identified as International Minerals & Chemical, but now goes by the name of Geo Specialty Chem Trimet in permit no. 39-00024. The facility's formaldehyde process and catalytic incinerator where installed prior to December 1984, the date of the Air Oxidation Processes SOCMI CTG, and neither has been modified since the installation date of July 1, 1980.

Page 4-1 of the Air Oxidation Processes SOCMI CTG referenced above, states "It is recommended that air oxidation facilities for which an existing combustion device is employed to control process VOC emissions should not be required to meet the 98 percent emissions limit until the combustion device is replaced for other reasons. In other words, no facility would be required to upgrade or replace an existing combustion device."<sup>1</sup>

Geo Specialty Chem Trimet has not modified its formaldehyde process and catalytic incinerator at its facility located in South Whitehall Township, Lehigh County, Pennsylvania. Only if a modification were to occur, would the facility become subject to the process and control provisions at the higher destruction efficiency of 98% as recommended in the Air Oxidation Processes SOCMI CTG. Until a modification is made to the formaldehyde process, it is not subject to the 98 percent emissions limit recommended in the Air Oxidation Processes SOCMI CTG.

The Department has reviewed all facilities in its Air Information Management System (AIMS) and has not found any other applicable facilities in Pennsylvania covered by the Air Oxidation Processes SOCMI CTG or the federal NSPS in 40 C.F.R. Part 60, Subpart III (relating to standards of performance for volatile organic compound emissions from the synthetic organic chemical manufacturing industry air oxidation unit processes). Affected facilities under NSPS, Subpart III include those for which construction, modification, or reconstruction commenced after October 21, 1983.

<sup>&</sup>lt;sup>1</sup> Control of Volatile Organic Compound Emissions from Air Oxidation Processes in the Synthetic Organic Chemical Manufacturing Industry, EPA, 450/3-84-015, December 1984, Page 4-1, available at: https://www3.epa.gov/airquality/ctg\_act/198412\_voc\_epa450\_3-84-015\_air\_oxidation\_processes.pdf

For informational purposes, PADEP notes that EPA previously approved Subpart III as RACT for Philadelphia Air Management Services Regulation V, Section XVI relating to Air Oxidation Unit Processes on October 17, 2016 for the 1997 ozone NAAQS (81 FR 69687). The Department has adopted Subpart III by reference in 25 Pa. Code Chapter 122 as part of this SIP revision for incorporation into the Commonwealth's SIP.

### **Conclusion**

Along with its SIP Certification, the Department is incorporating the attached redacted permit, document E1, as part of this SIP revision. The unredacted requirements and provisions remaining in the permit for the air oxidation processes at the Geo Specialty Chem Trimet facility are being incorporated into the Commonwealth's SIP as part of this SIP revision to address the CTG RACT requirements under Sections 172(c)(1), 182(b)(2), and 184(b)(1)(B) of the CAA for the 2008 ozone NAAQS.

• E1 - Permit No. 39-00024 Geo Specialty Chem Trimet, incorporated into the SIP as redacted.

Geo Specialty Chem Trimet's permit no. 39-00024 covers the air oxidation processes at the facility. The redacted permit submitted as part of this SIP revision includes permit conditions that require a 95% control efficiency, existing control levels which remain as RACT based on the recommendations of the Air Oxidation Processes SOCMI CTG.



# **Document E1**

# Permit No. 39-00024 Geo Specialty Chem Trimet Div as Redacted

Bureau of Air Quality Department of Environmental Protection [This page intentionally left blank.]





#### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

#### STATE ONLY OPERATING PERMIT

Issue Date:	March 21, 2017	Effective Date:	March 21, 2017
Expiration Date:	March 20, 2022		

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 operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit 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 permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

#### State Only Permit No: 39-00024

#### Federal Tax ld - Plant Code: 34-1708689-1

Owner Information	
Name: GEO SPECIALTY CHEM TRIMET DIV	
Mailing Address: 2409 N CEDAR CREST BLVD	
ALLENTOWN, PA 18104-9733	
Diant information	
Plant Information	
Plant: GEO SPECIALTY CHEM/TRIMET PROD GROUP	
Location: 39 Lehigh County 39919 South Whitehall	Township
SIC Code: 2869 Manufacturing - Industrial Organic Chemicals, Nec	
Responsible Official	
Name: TODD HOFFMAN	
Title: PLANT MANAGER	
Phone (610) 782 - 2614	
Permit Contact Person	
Name: MARIE C REINER	
Title: ENVIRONMENTAL MANAGER	
Phone: (610) 782 - 2621	
[Signature]	
MARK J. WEJKSZNER, NORTHEAST REGION AIR PROGRAM MANAGER	





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#### Note: These same sub-sections are repeated for each source!

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Section H. Miscellaneous





# SECTION A. Site Inventory List

GU601     CLEAKER BROOKS BOILER 1 W/LOW NOX     29.900     MMBTU/HR       BURNER     GU602     CLEAKER BROOKS BOILER 2 W/LOW NOX     29.900     MMBTU/HR       GU605     CLEAKER BROOKS BOILER 5 W/LOW NOX     30.600     MMBTU/HR       BURNER     GU605     CLEAKER BROOKS BOILER 5 W/LOW NOX     30.600     MMBTU/HR       104     DIESELFIRED EMERGENCY ENGINES (4)     20     100     100       201     TME PRIMARY REACTOR     20     100     100       202     TME CAFORMATE SEPARATION PROCESSES     203     N & S PURE TME CRYSTALLIZER TANKS & TANK C-       203     N & S PURE TME CRYSTALLIZER TANKS & TANK C-     12       204     TME EAFLORAGE SILO     207       205     LIME STORAGE SILO     207       206     LIME SURRY TANK     200       209     #1 GRAINER DRYER     200       210     #2 GRAINER DRYER     200       211     #3 GRAINER DRYER     201       212     #4 GRAINER DRYER     201       213     PORCUPINE DRYER     201       214     #3 GRAINER DRYER     201       215     #4 GRAINER DRYER     201       216     TME PROCESS TANKS     301       301     DMPA PRIMARY AND SECONDARY REACTION       302     DMPA OXIDATION REACTORS (	
CU602     CLEAVER BROCKS BOILER 2 W/LOW NOX BURNER     20.900     MMBTU/HR       CU605     CLEAVER BROCKS BOILER 5 W/LOW NOX BURNER     30.600     MMBTU/HR       101     DIESEL FIRED EMERGENCY ENGINES (4)     1       201     TME PRIMARY REACTOR     1       202     TME CAFORMATE SEPARATION PROCESSES     1       203     N & S PURE TME CRYSTALLIZER TANKS & TANK C- 42     1       204     TME EAST / WEST BLEND TANK     1       205     LIME SLURRY TANK     1       206     LIME STORAGE SILO     1       207     TME SWENSON EVAPORATOR CONDENSER     1       208     TME BUFLOVAK EVAPORATOR CONDENSER     1       209     #1 GRAINER DRYER     1       210     #2 GRAINER DRYER     1       211     #3 GRAINER DRYER     1       212     #4 GRAINER DRYER     1       213     PORCUPINE DRYER     1       214     #3 GRAINER DRYER     1       215     DMPA CRYSTALLIZER TANKS     1       216     TME PACKAGING     1       217     TME PACKAGING     1       218     PORCUPINE DRYER     1       219     #2 GRAINER DRYER     1       210     #2 GRAINER DRYER     1       211     #3 GRAINER DRYER	
BURNER101DIESEL FIRED EMERGENCY ENGINES (4)201TME PRIMARY REACTOR202TME-CAFORMATE SEPARATION PROCESSES203N&S PURE TME CRYSTALLIZER TANKS & TANK C- 12204TME EAST / WEST BLEND TANK205LIME SLURRY TANK206LIME STORAGE SILO207TME SWENSON EVAPORATOR CONDENSER208TME BUFLOVAK EVAPORATOR CONDENSER209#1 GRAINER DRYER210#2 GRAINER DRYER211#3 GRAINER DRYER222TME PORCENSTAKS233PORCUPINE DRYER244TME PROCESS TANKS304DMPAPRIMARY AND SECONDARY REACTION PROCESS305DMPACRYSTALLIZATION304DMPAPRIMARY AND SECONDARY REACTION PROCESS305DMPACRYSTALLIZATION304GALCIUMFORMATE DRYER305DMPASCREENING & PACKAGING404GALCIUMFORMATE DRYER	
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202       TME-CAFORMATE-SEPARATION PROCESSES         203       N & S PURE TME-CRYSTALLIZER TANKS & TANK C- 12         204       TME-EAST/WEST BLEND TANK         205       LIME SLURRY TANK         206       LIME-STORAGE SILO         207       TME-SWENSON-EVAPORATOR CONDENSER         208       TME-BUFLOVAK EVAPORATOR CONDENSER         209       #1 GRAINER DRYER         210       #2 GRAINER DRYER         211       #3 GRAINER DRYER         212       #4 GRAINER DRYER         213       PORCUPINE DRYER         220       TME-PACKAGING         250       TME-PACKAGING         260       TME-PACKAGING         211       DMPA-ORIDARY AND-SECONDARY REACTION PROCESS         301       DMPA-ORIDARY AND-SECONDARY REACTION PROCESS         302       DMPA-ORIDARY EACTORS (2)         303       DMPA-CRYSTALLIZATION         304       DMPA-DRYER         305       DMPA-SCREENING & PACKAGING         404       CALCIUM-FORMATE DRYER	
203N & S PURE TME CRYSTALLIZER TANKS & TANK C- 12204TME EAST / WEST BLEND TANK205LIME SLURRY TANK206LIME STORAGE SILO207TME SWENSON EVAPORATOR CONDENSER208TME BUFLOVAK EVAPORATOR CONDENSER209#1 GRAINER DRYER210#2 GRAINER DRYER211#3 GRAINER DRYER212#4 GRAINER DRYER213PORCUPINE DRYER220TME PACKAGING250TME PROCESS TANKS301DMPA PRIMARY AND SECONDARY REACTION PROCESS302DMPA OXIDATION REACTORS (2)303DMPA CRYSTALLIZATION304DMPA ASCREENING & PACKAGING401GALCIUM FORMATE DRYER	
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206LIME STORAGE SILO207TME SWENSON EVAPORATOR CONDENSER208TME BUFLOVAK EVAPORATOR CONDENSER209#1 GRAINER DRYER210#2 GRAINER DRYER211#3 GRAINER DRYER212#4 GRAINER DRYER213PORCUPINE DRYER220TME-PACKAGING250TME-PROCESS TANKS301DMPA PRIMARY AND SECONDARY REACTION PROCESS302DMPA OXIDATION REACTORS (2)303DMPA CRYSTALLIZATION304DMPA DRYER305DMPA SCREENING & PACKAGING401CALCIUM FORMATE DRYER	
207TME SWENSON EVAPORATOR CONDENSER208TME BUFLOVAK EVAPORATOR CONDENSER209#1 GRAINER DRYER210#2 GRAINER DRYER211#3 GRAINER DRYER212#4 GRAINER DRYER213PORCUPINE DRYER220TME PACKAGING250TME PROCESS TANKS301DMPA PRIMARY AND SECONDARY REACTION PROCESS302DMPA CRYSTALLIZATION303DMPA CRYSTALLIZATION304DMPA SCREENING & PACKAGING401CALCIUM FORMATE DRYER	
208TME BUFLOVAK EVAPORATOR CONDENSER209#1-GRAINER DRYER210#2 GRAINER DRYER211#3 GRAINER DRYER212#4 GRAINER DRYER213PORCUPINE DRYER220TME PACKAGING250TME PROCESS TANKS301DMPA PRIMARY AND SECONDARY REACTION PROCESS302DMPA OXIDATION REACTORS (2)303DMPA CRYSTALLIZATION304DMPA SCREENING & PACKAGING401GALCIUM FORMATE DRYER	
209#1 GRAINER DRYER210#2 GRAINER DRYER211#3 GRAINER DRYER212#4 GRAINER DRYER213PORCUPINE DRYER220TME PACKAGING250TME PROCESS TANKS301DMPA PRIMARY AND SECONDARY REACTION PROCESS302DMPA OXIDATION REACTORS (2)303DMPA CRYSTALLIZATION304DMPA DRYER305DMPA SCREENING & PACKAGING401CALCIUM FORMATE DRYER	
210#2-GRAINER-DRYER211#3-GRAINER-DRYER212#4-GRAINER-DRYER213PORCUPINE DRYER220TME-PACKAGING220TME-PACKAGING250TME-PROCESS TANKS301DMPA PRIMARY AND SECONDARY REACTION PROCESS302DMPA OXIDATION REACTORS (2)303DMPA CRYSTALLIZATION304DMPA DRYER305DMPA SCREENING & PACKAGING401CALCIUM FORMATE DRYER	
211#3 GRAINER DRYER212#4 GRAINER DRYER213PORCUPINE DRYER220TME PACKAGING250TME PROCESS TANKS301DMPA PRIMARY AND SECONDARY REACTION PROCESS302DMPA OXIDATION REACTORS (2)303DMPA CRYSTALLIZATION304DMPA DRYER305DMPA SCREENING & PACKAGING401CALCIUM FORMATE DRYER	
211       #4 GRAINER DRYER         213       PORCUPINE DRYER         220       TME PACKAGING         250       TME PROCESS TANKS         301       DMPA PRIMARY AND SECONDARY REACTION PROCESS         302       DMPA OXIDATION REACTORS (2)         303       DMPA CRYSTALLIZATION         304       DMPA SCREENING & PACKAGING         401       CALCIUM FORMATE DRYER	
213PORCUPINE DRYER220TME PACKAGING250TME PROCESS TANKS301DMPA PRIMARY AND SECONDARY REACTION PROCESS302DMPA OXIDATION REACTORS (2)303DMPA CRYSTALLIZATION304DMPA DRYER305DMPA SCREENING & PACKAGING401CALCIUM FORMATE DRYER	
220TME PACKAGING250TME PROCESS TANKS301DMPA PRIMARY AND SECONDARY REACTION PROCESS302DMPA OXIDATION REACTORS (2)303DMPA CRYSTALLIZATION304DMPA DRYER305DMPA SCREENING & PACKAGING401CALCIUM FORMATE DRYER	
250       TME PROCESS TANKS         301       DMPA PRIMARY AND SECONDARY REACTION PROCESS         302       DMPA OXIDATION REACTORS (2)         303       DMPA CRYSTALLIZATION         304       DMPA DRYER         305       DMPA SCREENING & PACKAGING         401       CALCIUM FORMATE DRYER	
301DMPA PRIMARY AND SECONDARY REACTION PROCESS302DMPA OXIDATION REACTORS (2)303DMPA CRYSTALLIZATION304DMPA DRYER305DMPA SCREENING & PACKAGING401CALCIUM FORMATE DRYER	
PROCESS         302       DMPA OXIDATION REACTORS (2)         303       DMPA CRYSTALLIZATION         304       DMPA DRYER         305       DMPA SCREENING & PACKAGING         401       CALCIUM FORMATE DRYER	
303     DMPA CRYSTALLIZATION       304     DMPA DRYER       305     DMPA SCREENING & PACKAGING       401     CALCIUM FORMATE DRYER	
304     DMPA DRYER       305     DMPA SCREENING & PACKAGING       401     CALCIUM FORMATE DRYER	
305     DMPA SCREENING & PACKAGING       401     CALCIUM FORMATE DRYER	
401 CALCIUM FORMATE-DRYER	
402 CALCIUM FORMATE SCREENING AND PACKAGING	
501 FORMALDEHYDE PLANT & AUXILIARY SOURCES	
502 METHANOL STORAGE & PIPING	
701 PROPRIONALDEHYDE STORAGE & PIPING	
C201 TME REACTOR SCRUBBER	
C202 TME CAFORMATE CENTRIFUGE & MAGMA TANKS SCRUBBER	
C203 TME CRYSTALLIZER / C-12 SCRUBBER	
C204 TME EAST / WEST BLEND TANKS SCRUBBER	
C205 LIME SLURRY TANK SCRUBBER	
C206 LIME SILO BAGHOUSE	
C207 TME SWENSON CONDENSER VACUUM PUMP	
C208 TME BUFLOVAK CONDENSER VACUUM PUMP	
C209 #1 GRAINER DRYER CONDENSER & VACUUM	





SECTION A. Site Inventory List

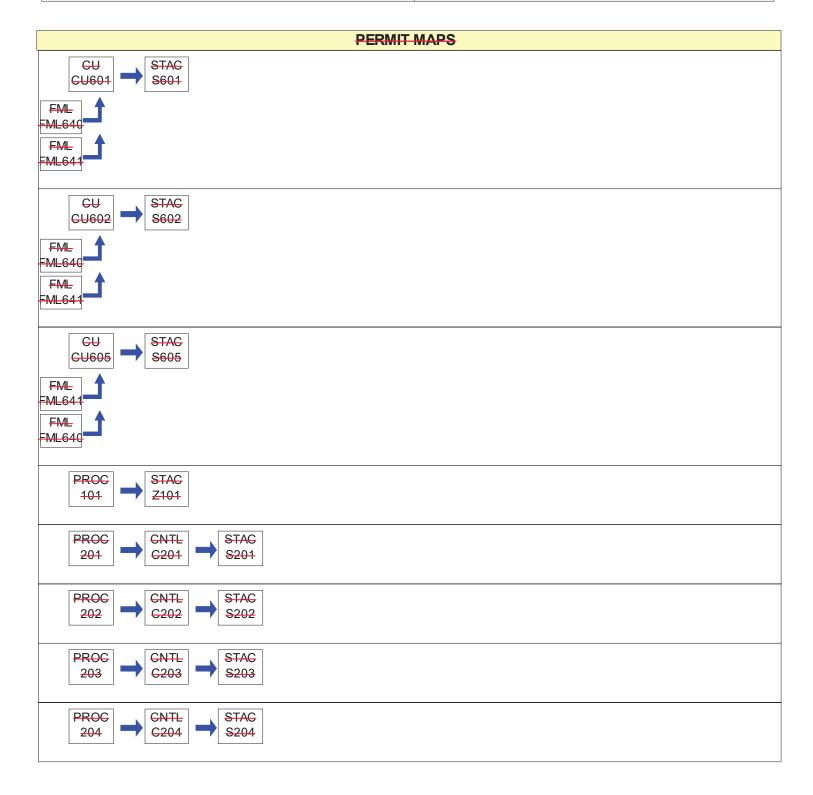
Source ID	Source Name	Capacity/Throughput	Fuel/Material
	PUMP		
	#2 GRAINER DRYER CONDENSER & VACUUM PUMP		
	#3 GRAINER DRYER CONDENSER & VACUUM PUMP		
	#4 GRAINER DRYER CONDENSER & VACUUM PUMP		
	PORCUPINE DRYER CONDENSER & VACUUM PUMP		
<del>C301</del>	DMPA MONROE SCRUBBER		
<del>C302</del>	DMPA OXIDATION SCRUBBER		
<del>C303</del>	DMPA COMPOSITE SCRUBBER		
<del>C304</del>	DMPA DRYER CYCLONE		
C304A	DMPADRYER DUST COLLECTOR		
<del>C305</del>	DMPA SCREENING & PACKAGING SCRUBBER		
C401	CALCIUM FORMATE DRYER BAGHOUSE		
	CAFORMATE SCREENING/PACKAGING DUST COLLECTOR		
C501	FORMALDEHYDE PLANT CATALYTIC OXIDIZER		
C502	METHANOL VAPOR RECOVERY SYSTEM		
<del>C701</del>	PROPIONALDEHYDE VAPOR RECOVERY SYSTEM		
FML541	NATURAL GAS UTILITY METER FOR INCINERATOR		
FML640	#2 FUEL OIL STORAGE		
FML641	NATURAL GAS UTILITY METER FOR BOILERS		
<del>S201</del>	TME REACTOR SCRUBBER STACK		
<del>\$202</del>	TME CAFORMATE CENTRIFUGE SCRUBBER STACK		
<del>\$203</del>	TME CRYSTALLIZER / C-12 SCRUBBER STACK		
<del>S204</del>	TME E & W BLEND TANK SCRUBBER STACK		
<del>\$205</del>	LIME SLURRY SCRUBBER STACK		
<del>S206</del>	LIME SILO BAGHOUSE STACK		
<del>\$207</del>	TME SWENSON VACUUM PUMP STACK		
<del>S208</del>	TME BUFLOVAK VACUUM PUMP STACK		
<del>S209</del>	TME DRYER STACK		
<del>\$220</del>	TME PACKAGING STACK		
<del>\$302</del>	DMPA OXIDATION STACK		
<del>\$303</del>	DMPA COMPOSITE SCRUBBER STACK		
	DMPA DRYER CYCLONE AND DUST COLLECTOR STACK		
<del>\$305</del>	DMPA SCREENING AND PACKAGING STACK		
<del>\$401</del>	CALCIUM FORMATE DRYER BAGHOUSE STACK		
	CAFORMATE SCREEN / PACK DUST COLLECTOR STACK		
	FORMALDEHYDE INCINERATOR STACK		
<del>S601</del>	BOILER #1 STACK		
<del>\$602</del>	BOILER #2 STACK		

**39-00024** 



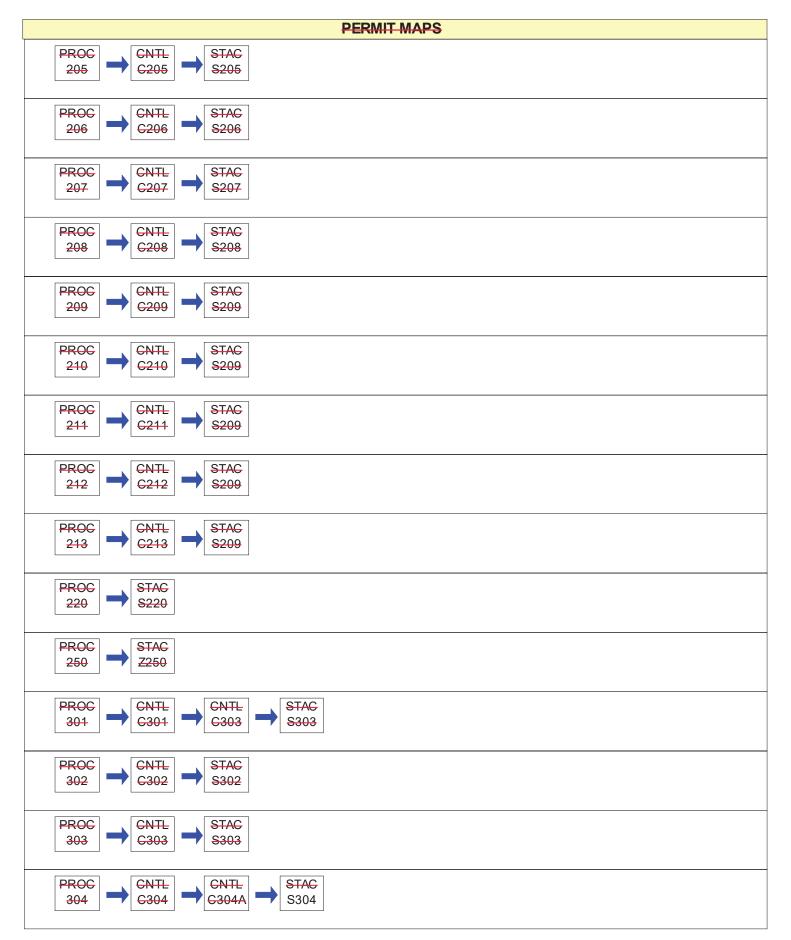
SECTION A. Site Inventory List

Source IE	Source Name	Capacity/Throughput	Fuel/Material
<del>\$605</del>	BOILER #5 STACK		
<del>Z101</del>	EMERGENCY ENGINES FUGITIVE EMISSIONS		
<del>Z250</del>	TME PROCESS TANKS FUGITIVE EMISSION POINTS		
<del>Z550</del>	METHANOL FUGITIVE EMISSIONS POINTS		
<del>Z750</del>	PROPIONALDEHYDE FUGITIVE EMISSION POINTS		



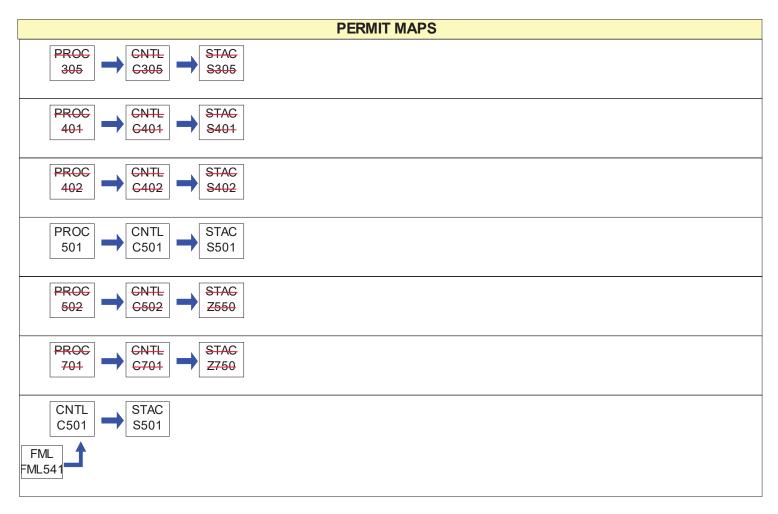










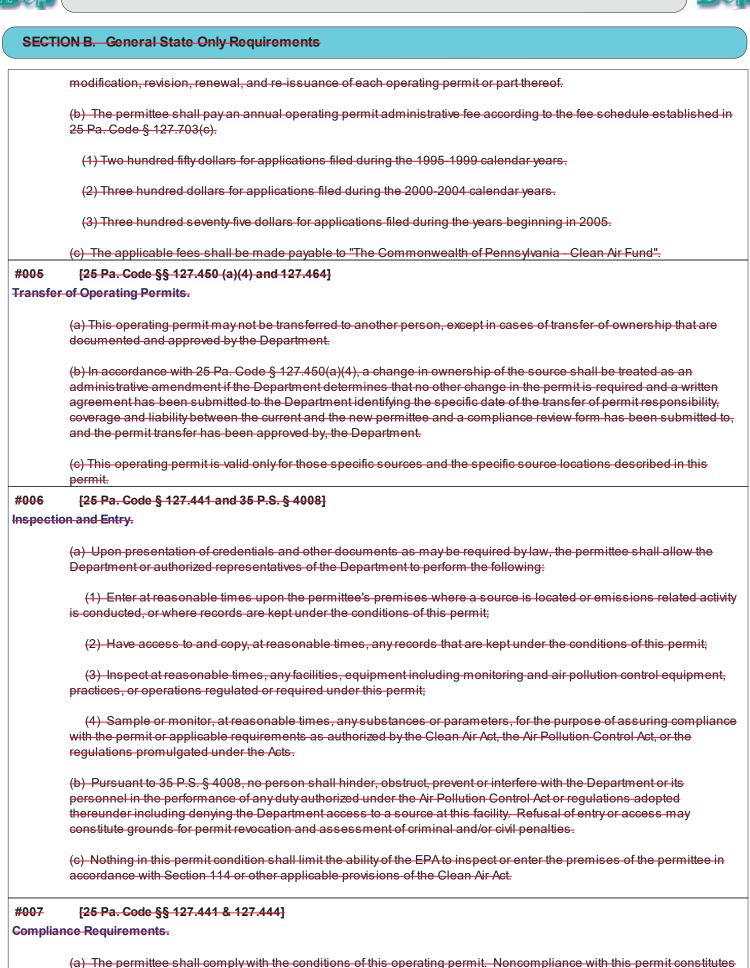






#### SECTION B. General State Only Requirements

# #001 [25 Pa. Code § 121.1] Definitions. Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1. #002 [25 Pa. Code § 127.446] **Operating Permit Duration.** (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. **#003** [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)] Permit Renewal. (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit. (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official. (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c). (1) Three hundred dollars for applications filed during the 2000-2004 calendar years. (2) Three hundred seventy five dollars for applications filed for the calendar years beginning in 2005. (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(i). (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application. #004 [25 Pa. Code § 127.703] Operating Permit Fees under Subchapter I. (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b): (1) Three hundred dollars for applications filed during the 2000-2004 calendar years. (2) Three hundred seventy five dollars for applications filed for the calendar years beginning in 2005. This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,



39-00024





	<del>39-0002</del> 4	GEO SPECIALTY CHEMTRIMET PROD GROUP
SECT	FION B. General State Only R	equirements
	a violation of the Clean Air Act	and the Air Pollution Control Act and is grounds for one or more of the following:
	(1) Enforcement action	
	(2) Permit termination, rev	ocation and reissuance or modification
	(3) Denial of a permit rene	wal application
	source(s) and air cleaning dev approval issued for the source the conditions in the plan appr	or permit the operation of a source which is subject to 25 Pa. Code Article III unless the vices identified in the application for the plan approval and operating permit and the plan is operated and maintained in accordance with specifications in the applications and oval and operating permit issued by the Department. A person may not cause or permit ination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good
	operating permits are the physe are essential for the permittee sub-condition shall be constru	lition (b) of this permit condition, the specifications in applications for plan approvals and sical configurations and engineering design details which the Department determines 's compliance with the applicable requirements in this State-Only permit. Nothing in this red to create an independent affirmative duty upon the permittee to obtain a partment for physical configuration or engineering design detail changes made by the
<del>#008</del>	[25 Pa. Code § 127.441]	
Need to	Halt or Reduce Activity Not a De	vfense.
		e permittee in an enforcement action that it was necessary to halt or reduce the permitted npliance with the conditions of this permit.
<del>#009</del>	[25 Pa. Code §§ 127.442(a)	& <u>127.461]</u>
Duty to	Provide Information.	
		t reports to the Department containing information the Department may prescribe relative nce of each source at the facility.
	(b) The permittee shall furnish	to the Department, in writing, information that the Department may request to determine

epartment may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#### **#010** [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

(1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.

(2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.

(4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#### **#011** [25 Pa. Code §§ 127.450 & 127.462]

#### **Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and





#### SECTION B. General State Only Requirements

significant operating permit modifications, under this permit, as outlined below:

(b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#### #012 [25 Pa. Code § 127.441]

Severability Clause.

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#### #013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

(b) The Department may disapprove or condition de minimis emission increases at any time.

(c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.

(3) One and six tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:





#### SECTION B. General State Only Requirements

(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#### #014 [25 Pa. Code § 127.3]

**Operational Flexibility.** 

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

(1) Section 127.14 (relating to exemptions)

(2) Section 127.447 (relating to alternative operating scenarios)

(3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)

(4) Section 127.449 (relating to de minimis emission increases)

(5) Section 127.450 (relating to administrative operating permit amendments)





SECT	ION B. General State Only Requirements
	(6) Section 127.462 (relating to minor operating permit modifications)
	(7) Subchapter H (relating to general plan approvals and general operating permits)
<del>#015</del>	[25 Pa. Code § 127.11]
Reactive	ation
	(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
	(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).
<del>#016</del>	[25 Pa. Code § 127.36]
Health F	Risk-based Emission Standards and Operating Practice Requirements.
	(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
	(b) Aperson challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.
<del>#017</del>	[25 Pa. Code § 121.9]
Circum\	vention.
	No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors
#018	[25 Pa. Code §§ 127.402(d) & 127.442]
Reportir	ng Requirements.
	(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
	(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
	(c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:
	Regional Air Program Manager PA Department of Environmental Protection (At the address given in the permit transmittal letter, or otherwise notified)
	(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
	(e) Any records, reports or information submitted to the Department shall be available to the public except for such





	records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.
#019 Samplin	[25 Pa. Code §§ 127.441(c) & 135.5] g, Testing and Monitoring Procedures.
	(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
	(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.
<del>#020</del>	[25 Pa. Code §§ 127.441(c) and 135.5]
Recordk	eeping.
	(a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
	(1) The date, place (as defined in the permit) and time of sampling or measurements.
	(2) The dates the analyses were performed.
	(3) The company or entity that performed the analyses.
	(4) The analytical techniques or methods used.
	(5) The results of the analyses.
	(6) The operating conditions as existing at the time of sampling or measurement.
	(b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
	(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.
<del>#021</del>	[25 Pa. Code § 127.441(a)]
Property	r Rights.
	This permit does not convey any property rights of any sort, or any exclusive privileges.
<del>#022</del>	[25 Pa. Code § 127.447]
Alternat	ve Operating Scenarios.
	The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.





#### I. RESTRICTIONS.

#### **Emission Restriction(s)**.

# # 001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

(a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations.

(7) Sources and classes of sources other than those identified in paragraphs (1) (6), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(i) the emissions are of minor significance with respect to causing air pollution; and

(ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

#### # 002 [25 Pa. Code §123.2]

#### **Fugitive particulate matter**

Aperson may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Site Level Condition #001 (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

#### # 003 [25 Pa. Code §123.31]

#### **Limitations**

The permittee shall not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

# # 004 [25 Pa. Code §123.41]

Limitations

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

(1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.

(2) Equal to or greater than 60% at any time.

#### # 005 [25 Pa. Code §123.42]

#### Exceptions

The limitations of Site Level Condition #004 shall not apply to a visible emission in any of the following instances:

(1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.

(2) When the emission results from the operation of equipment used solely to train and test persons in observing the





#### opacity of visible emissions.

(3) When the emission results from sources specified in Site Level Condition #001 (relating to prohibition of certain fugitive emissions).

#### # 006 [25 Pa. Code §127.441]

**Operating permit terms and conditions.** 

The facility site level emission limit for Volatile Organic Compounds (VOCs) shall be less than 50 tons per year based on a 12 month rolling sum.

#### # 007 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

The facility site level emission limit for Hazardous Air Pollutants (HAPs) shall be:

a) less than 10 tpy on a 12 month rolling sum for individual pollutants,

b) less than 25 tpy on a 12 month rolling sum for combined pollutants.

#### II. TESTING REQUIREMENTS.

#### # 008 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

a) If at any time the Department has cause to believe that air contaminant emissions from the source(s) at the facility 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 Protection, the company shall be required to conduct to 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 the Department of Environmental Protection, the DEP Source Testing Manual and Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The testing shall be performed in accordance with any restriction or limitation established by the Department, within the time frame specified by the Department.

b) The company shall not impose conditions upon or otherwise restrict the Department's access to the aformentioned source(s) and /or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.

c) The company shall, within 1 hour of discovery, notify the Department of any malfunction of, or damage to, these air cleaning devices which result in, or may possible result in, the emissions of air pollution in excess of the limitations specified in the Operating Permit or any applicable Department Rule or Regulation.

#### III. MONITORING REQUIREMENTS.

#### # 009 [25 Pa. Code §123.43]

**Measuring techniques** 

Visible emissions may be measured using either of the following:

(1) A device approved by the Department and maintained to provide accurate opacity measurements.

(2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

#### #010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Visible emissions may be measured according to the methods specified in Section C, Condition #009, or alternatively, plant personnel who observe any visible emissions will report the incident of visible emissions to the Department within four hours of each incident and make arrangements for a certified observer to verify the opacity of the visible emissions.





#### #011 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

A visual inspection of the facility shall be performed on a daily basis to determine if visible, fugitive, or malodor emissions are detectable outside the facility.

#### IV. RECORDKEEPING REQUIREMENTS.

#### #012 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

The facility shall maintain monthly records to demonstrate compliance with Site Level Requirement #006 and #007 for HAPs and VOCs. These records shall be kept for a five (5) year period and be made available to the Department upon request.

#### # 013 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

All instances of exceedances of visible or fugitive emission limitations, Site Level Condition #001, #002, and #004, shall be recorded in a daily log book. Such records shall be maintained in accordance with General Condition #020, Section B, and shall be made available to the Department upon written or verbal request in a reasonable time.

#### # 014 [25 Pa. Code §127.441]

**Operating permit terms and conditions.** 

The facility is subject to the following record keeping requirements: (1) the permittee shall keep a logbook of daily facility inspections for fugitive visible emissions, visible emissions and malodor emissions.

#### # 015 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain files (hard copy or electronic versions) containing all records and other data that are required to be collected pursuant to the various provisions of this operating permit. The file shall include, but not be limited to all air pollution control systems performance evaluations, records of calibration checks, adjustments to sources and control devices, and maintenance performed on all equipment, which is subject to this operating permit. All measurements, records and other data required to be maintained by the company shall be retained for at least five (5) years following the date on which such measurements, records or data are recorded.

#### # 016 [25 Pa. Code §135.5]

#### Recordkeeping

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with § 135.3 (relating to reporting). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct records eping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#### V. REPORTING REQUIREMENTS.

#### # 017 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

The company, within 1 hour of discovery, shall notify the Department, at 610-861-2070, of any malfunction, recordkeeping and reporting errors, or other possible non-compliance issues, which result 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 regulations contained in Article III of the Rules and Regulations of the Department of Environmental Protection. A written report shall be submitted to the Department within five working days following the incident describing the malfunction, recordkeeping and reporting error or other non-compliance issue and the corrective actions being taken. The Department may take enforcement action for any violations of the applicable standards.

#### # 018 [25 Pa. Code §135.3]

#### Reporting

(a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the





proceeding calendar year and sources modified during the same period which were not previously reported.

(b) A person who receives initial notification by the Department that a source report is necessary shall submit an initial source report within 60 days after receiving the notification or by March 1 of the year following the year for which the report is required, whichever is later.

(c) A source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

### # 019 [25 Pa. Code §135.4]

#### Report format

Source reports shall contain sufficient information to enable the Department to complete its emission inventory. Source reports shall be made by the source owner or operator in a format specified by the Department.

#### VI. WORK PRACTICE REQUIREMENTS.

# 020 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee shall shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(3) Paving and maintenance of roadways.

(4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

#### # 021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall prevent fugitive particulate matter by the application of water on the roadways and sweeping of roads.

#### # 022 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

Equipment shall be maintained and operated in accordance with the accepted industry practices to optimize efficiency and to comply with Site Level Condition #004.

#### VII. ADDITIONAL REQUIREMENTS.

#### # 023 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the act.

#### # 024 [25 Pa. Code §129.14]

#### **Open burning operations**

(a) Air basins. No person may permit the open burning of material in an air basin.

(b) Outside of air basins. No person may permit the open burning of material in an area outside of air basins in a manner that:

(1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.

(2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.





## SECTION C. Site Level Requirements

(3) The emissions interfere with the reasonable enjoyment of life or property.

(4) The emissions cause damage to vegetation or property.

(5) The emissions are or may be deleterious to human or animal health.

(c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:

(1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.

(2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(3) A fire set for the prevention and control of disease or pests, when approved by the Department.

(4) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

(5) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of such structure.

(6) A fire set solely for recreational or ceremonial purposes.

(7) A fire set solely for cooking food.

(d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:

(1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

(2) Subsection (a) notwithstanding, clearing and grubbing wastes may be burned in a basin subject to the following requirements:

(i) Air curtain destructors shall be used when burning clearing and grubbing wastes.

(ii) Each proposed use of air curtain destructors shall be reviewed and approved by the Department in writing with respect to equipment arrangement, design and existing environmental conditions prior to commencement of burning. Proposals approved under this subparagraph need not obtain plan approval or operating permits under Chapter 127 (relating to construction modification, reactivation and operation of sources).

(iii) Approval for use of an air curtain destructor at one site may be granted for a specified period not to exceed 3 months, but may be extended for additional limited periods upon further approval by the Department.

(iv) The Department reserves the right to rescind approval granted if a determination by the Department indicates that an air pollution problem exists.

(3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:

(i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.





## SECTION C. Site Level Requirements

(ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.

(4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

#### VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to State Only General Requirements).

## IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

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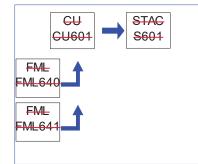
Source ID: CU601

Source Name: CLEAVER BROOKS BOILER 1 W/ LOW NOX BURNER

Source Capacity/Throughput:

29.900 MMBTU/HR

## Conditions for this source occur in the following groups: 02



## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.

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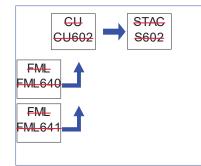
Source ID: CU602

Source Name: CLEAVER BROOKS BOILER 2 W/ LOW NOX BURNER

Source Capacity/Throughput:

29.900 MMBTU/HR

## Conditions for this source occur in the following groups: 02



## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.

<b>39-00024</b>		GEO	SPECIALTY CHEM/TRIMET PROD G
SECTION D. Source L	evel Requirements		
Source ID: CU605	Source Name: CLEAVER BROOM		W/LOW NOX BURNER
	Source Capacity/Throughput:	<del>30.600</del>	MMBTU/HR

Conditions for this source occur in the following groups: 01



## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

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## SECTION D. Source Level Requirements

Source ID: 101

#### Source Name: DIESEL-FIRED EMERGENCY ENGINES (4)

Source Capacity/Throughput:

PROC 101 = STAC Z101	

#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### VII. ADDITIONAL REQUIREMENTS.

# 001 Operatinę	[25 Pa. Code §127.441] g permit terms and conditions.
Source ID	0 101 consists of four CI emergency engines:
(2) 449 H	HP Detroit Model #81634705 engine, installed 1993, Wastewater Treatment Plant P Caterpillar Model #3406 engine, installed 2002, Boiler House
	P Caterpillar Model #3306 engine, installed 2009, Wells P Clarke Model #JDFP-06WA engine, installed 2000, reconstructed 2011, Fire Pump
# 002 Operatinę	[25 Pa. Code §127.441] g permit terms and conditions.
Source ID	0 101 engines shall comply with all applicable requirements of 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart

7777.





Source ID: 201

Source Name: THE PRIMARY REACTOR

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

	PROC 201		CNTL C201		STAC S201	
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 202

Source Name: THE CAFORMATE SEPARATION PROCESSES

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

$\frac{202}{202} \longrightarrow \frac{C202}{202} \longrightarrow \frac{S202}{202}$
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 203

Source Name: N & S PURE THE CRYSTALLIZER TANKS & TANK C-12

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

<del>203</del> <del>C203</del> <del>S203</del>	200 / 0200 / 0200
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 204

Source Name: THE EAST / WEST BLEND TANK

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

	PROC 204		CNTL C204		STAC S204	
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





#### Source ID: 205

Source Name: LIME SLURRY TANK

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

205 C205 S205	200 / 0200 / 0200	PROC 205		CNTL C205	$\rightarrow$	STAC S205	
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





#### Source ID: 206

Source Name: LIME STORAGE SILO

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

PROC 206	$\rightarrow$	CNTL C206	$\rightarrow$	STAC S206	

## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 207

Source Name: THE SWENSON EVAPORATOR CONDENSER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

<del>207</del> <del>C207</del> <del>S207</del>
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 208

Source Name: THE BUFLOVAK EVAPORATOR CONDENSER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

208 C208 S208	
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





#### Source ID: 209

Source Name: #1 GRAINER DRYER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

	PROC 209	-	CNTL C209	-	STAC S209	
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





#### Source ID: 210

Source Name: #2 GRAINER DRYER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

PROC 210	$\rightarrow$	CNTL C210	$\rightarrow$	STAC S209	

## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 211

Source Name: #3 GRAINER DRYER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

	PROC 211	-	CNTL C211	$\rightarrow$	STAC S209	
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





#### Source ID: 212

Source Name: #4 GRAINER DRYER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

PROC 212	$\rightarrow$	CNTL C212	 STAC S209	

## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 213

Source Name: PORCUPINE DRYER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

$\frac{213}{7}$ $\frac{7}{213}$ $\frac{213}{7}$ $\frac{5209}{5209}$
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.

GEO SPECIALTY CHEMTRIMET PROD GROUP

## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.

	<del>39-00024</del>
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Source ID: 250

Source Name: TME PROCESS TANKS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03



## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 301

Source Name: DMPA PRIMARY AND SECONDARY REACTION PROCESS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03



## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 302

Source Name: DMPA OXIDATION REACTORS (2)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

302 C302 S302	<del>302</del> <del>C302</del> <del>S302</del>		PROC 302	-	CNTL C302	-	STAC S302
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 303

Source Name: DMPA CRYSTALLIZATION

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

	PROC 303	-	CNTL C303	$\rightarrow$	STAC S303	
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





#### Source ID: 304

Source Name: DMPA DRYER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03



## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 305

Source Name: DMPA SCREENING & PACKAGING

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

305 C305 S305
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 401

Source Name: CALCIUM FORMATE DRYER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

401 6401 8401	PROC 401	-	CNTL C401	-	STAC S401	
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 402

Source Name: CALCIUM FORMATE SCREENING AND PACKAGING

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

	PROC 402	$\rightarrow$	CNTL C402	$\rightarrow$	STAC S402	
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.

39-00024

GEO SPECIALTY CHEM/TRIMET PROD GROUF



## SECTION D. Source Level Requirements

Source ID: 501

Source Name: FORMALDEHYDE PLANT & AUXILIARY SOURCES

04

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

 $\begin{array}{c} \mathsf{PROC} \\ \mathsf{501} \end{array} \xrightarrow{\mathsf{CNTL}} \begin{array}{c} \mathsf{STAC} \\ \mathsf{C501} \end{array} \xrightarrow{\mathsf{STAC}} \\ \mathsf{S501} \end{array}$ 

## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 502

Source Name: METHANOL STORAGE & PIPING

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

$\begin{array}{c} 1 \\ \hline 502 \\ \hline 502 \\ \hline \end{array} \rightarrow \begin{array}{c} 1 \\ \hline 0502 \\ \hline 0502 \\ \hline \end{array} \rightarrow \begin{array}{c} 1 \\ \hline 0502 \\ \hline 0502 \\ \hline 0502 \\ \hline \end{array} \rightarrow \begin{array}{c} 1 \\ \hline 0510 \\ \hline 0502 \\ \hline 0$
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## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





Source ID: 701

Source Name: PROPRIONALDEHYDE STORAGE & PIPING

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 03

|--|

## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.





## Group Name: 01

Group Description: RACT

Sources included in this group-

ID Name

CU605CLEAVER BROOKS BOILER 5 W/ LOW NOX BURNER

## I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### IV. RECORDKEEPING REQUIREMENTS.

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.** 

[Authority for this condition is also derived from 25 Pa. Code, Section 129.95.]

The permittee shall record each adjustment conducted under the procedures in Section 129.93(b)(2) in a permanently bound log book or other method approved by the Department. This log shall contain, at a minimum, the following information:

(1) The date of the last adjustment and/or tune up on combustion process.

(2) The name of the service company and technicians.

(3) The final operation rate or load.

(4) The final carbon monoxide (CO) and nitrogen oxides (NOx) emission rate.

(5) The final excess oxygen rate.

(6) The other information required by the applicable requirement, such as fuel certification for distillate oil #2, for residual oils, minimum recordkeeping includes a certification from fuel supplier of nitrogen, sulfur, and ash content of the fuel, and identification of the sampling method and sample protocol.

Measurements, records, and other data shall be maintained in accordance with General State Only Requirement Condition #020, Section B.

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## VI. WORK PRACTICE REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

[Authority for this condition is also derived from 25 Pa. Code, Section 129.93.]

NOx emission for these sources shall be regulated under the presumptive RACT emission limitations as described under 25 Pa. Code, Section 129.93(b)(2). An annual adjustment or tune up of the sources in accordance with the "Combustion Efficiency Optimization Manual for Operators of Oil and gas fired boilers" (EPA 340/1-83-023) or The Department approved equivalent procedures. These adjustments shall consist of, at a minimum, the following:





(1) Inspection, adjustment, cleaning or replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.

(2) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emission of NOx, and to the extent practicable minimize emissions of CO.

(3) Inspection of the air to fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





## Group Name: 02

Group Description: Combustion Units

Sources included in this group

нÐ	Name
CU601	CLEAVER BROOKS BOILER 1 W/ LOW NOX BURNER
	CLEAVER BROOKS BOILER 2 W/ LOW NOX BURNER
CU605	CLEAVER BROOKS BOILER 5 W/ LOW NOX BURNER

#### I. RESTRICTIONS.

## **Emission Restriction(s)**.

## # 001 [25 Pa. Code §123.11]

#### **Combustion units**

A person may not permit the emission into the outdoor atmosphere of particulate matter, expressed as PM, from a source in excess of the rate of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of Btus per hour is greater than 2.5 but less than 50.

## # 002 [25 Pa. Code §123.22]

#### Combustion units

(c) Allentown, Bethlehem, Easton; Reading; Upper Beaver Valley; and Johnstown air basins. Combustion units in these subject air basins must conform with the following:

(1) General provision. A person may not permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit in excess of the rate of 3 pounds per million Btu of heat input over a 1-hour period.

(2) Commercial fuel oil.

(i) Except as specified in subparagraphs (ii) and (iii), a person may not offer for sale, deliver for use, exchange in trade or permit the use of commercial fuel oil in the subject air basins if the commercial fuel oil contains sulfur in excess of the applicable maximum allowable sulfur content set forth as follows:

Maximum Allowable Sulfur Content Beginning July 1, 2016, Expressed as Parts per Million (ppm) by Weight or Percentage by Weight (Consistent with ASTM D396)

No. 2 and lighter oil - 500 ppm (0.05%)

## # 003 [25 Pa. Code §127.441]

## **Operating permit terms and conditions.**

Source ID CU601 and CU602 shall not exceed the following nitrogen oxides (NOx) and carbon monoxide (CO) emission limits:

i. 30 ppmdv NOx at 3% O2 when firing gas;

ii. 90 ppmdv NOx at 3% O2 when firing No. 2 fuel oil; and

## iii. 300 ppmdv CO at 3% O2.

## Fuel Restriction(s).

## # 004 [25 Pa. Code §127.441]

**Operating permit terms and conditions.** 

(a) These sources shall combust only natural gas or #2 fuel oil.

(b) To be exempt from 40 CFR 63 Subpart JJJJJJ, the boilers shall only be fired on fuel oil during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours, per boiler, during any





calendar year. If the 48 hour limit is exceeded for any of the boilers, all boilers shall immediately be subject to the provisions of Subpart JJJJJJ.

#### II. TESTING REQUIREMENTS.

## # 005 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

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 Protection, the company 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 revisions of Chapter 139 of the Rules and Regulations Environmental Protection, 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.

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### IV. RECORDKEEPING REQUIREMENTS.

#### # 006 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

1. The company shall comply with the recordkeeping and certification requirements in accordance with 40 CFR §§60.46c(e), 60.42c(h) and 60.48c(f)(1). Reports shall be submitted on a quarterly basis unless no excess emissions occurred. If there are no excess emissions, the company shall semi-annually report that no excess emissions occurred during the semi-annual reporting period.

2. The company shall maintain daily records indicating the fuel type, average hourly firing rate, and total quantity used in accordance with 40 CFR §60.48c(g). Records shall be kept for the fuel firing rates of the combustion units on a monthly basis in order to determine sulfur dioxide (SO2) emissions in accordance with 40 CFR §60.48c(d).

#### # 007 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

1) The permittee shall keep records of emission calculations used to verify compliance with the emission limitation of Condition #001.

2) The permittee shall keep records of fuel supplier certifications to verify compliance with the emissions limitation of Condition #002.

3) These records shall be kept for the five (5) year permit term and be made available to the Department upon request.

#### V. REPORTING REQUIREMENTS.

## # 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

1. Any changes in the location of the aforementioned source, or any changes in the process or control equipment would be considered a modification and would require the submittal of an amended application for plan approval in accordance with the provisions of 25 Pa. Code 127.11 and 127.12.

2. These sources are subject to Subpart Dc 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 Protection Division US EPA, Region III 1650 Arch Street Philadelphia, PA 19103

3. Any notification as a result of any condition herein should be directed to:

Mark J. Wejkszner Air Quality Program Manager Department of Environmental Protection 2 Public Square Wilkes-Barre, PA 18711-0790

#### VI. WORK PRACTICE REQUIREMENTS.

## # 009 [25 Pa. Code §127.441]

## **Operating permit terms and conditions.**

1. The aforementioned source(s) may only be operated as long as the associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.

2. The company shall perform an annual adjustment and/or tune-up on the combustion process as per manufacturer specifications.

3. The company shall maintain and operate the boilers in accordance with the manufacturer specifications and with good engineering practice.

## VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





Group Name: 03

Group Description: Processes

Sources included in this group

ID	Name
<del>201</del>	TME PRIMARY REACTOR
202	TME CAFORMATE SEPARATION PROCESSES
<del>203</del>	N & S PURE TME CRYSTALLIZER TANKS & TANK C-12
<del>204</del>	TME-EAST/WEST BLEND TANK
<del>205</del>	LIME SLURRY TANK
<del>206</del>	LIME STORAGE SILO
<del>207</del>	TME-SWENSON EVAPORATOR CONDENSER
<del>208</del>	TME-BUFLOVAK EVAPORATOR CONDENSER
<del>209</del>	#1 GRAINER DRYER
<del>210</del>	#2 GRAINER DRYER
<del>211</del>	#3 GRAINER DRYER
212	#4 GRAINER DRYER
<del>213</del>	PORCUPINE DRYER
<del>220</del>	TME PACKAGING
<del>250</del>	TME PROCESS TANKS
<del>301</del>	DMPA PRIMARY AND SECONDARY REACTION PROCESS
<del>302</del>	DMPA OXIDATION REACTORS (2)
<del>303</del>	DMPA CRYSTALLIZATION
<del>304</del>	DMPADRYER
<del>305</del>	DMPA SCREENING & PACKAGING
<del>401</del>	CALCIUM FORMATE DRYER
<del>402</del>	CALCIUM FORMATE SCREENING AND PACKAGING
501	FORMALDEHYDE PLANT & AUXILIARY SOURCES
<del>502</del>	METHANOL STORAGE & PIPING
<del>701</del>	PROPRIONALDEHYDE STORAGE & PIPING

## I. RESTRICTIONS.

## Emission Restriction(s).

## # 001 [25 Pa. Code §123.13]

## Processes

(c)(1) Prohibited emissions. No person may permit the emission into the outdoor atmosphere of particulate matter from a process in a manner that the concentration of particulate matter in the effluent gas exceeds the following:

(i) .04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

## # 002 [25 Pa. Code §123.41]

## **Limitations**

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

(1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.

(2) Equal to or greater than 60% at any time.





## # 003 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

1. Pursuant to the Best Available Technology provision of 25 Pa. Code, Chapter 127, the process baghouse(s) are subject to the following air contaminant emission limitations:

a. Total Particulate (including PM10) - 0.02 grains per dscf from the processes.

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

#### III. MONITORING REQUIREMENTS.

## # 004 [25 Pa. Code §127.441]

## **Operating permit terms and conditions.**

The permittee shall ensure that the Composite scrubber is equipped with instrumentation to continuously monitor the pressure drop across the scrubber and the water flow rate to the scrubber.

#### # 005 [25 Pa. Code §127.441]

**Operating permit terms and conditions.** 

The Monroe scrubber shall be equipped with a low-water flow alarm and a high-water level alarm.

#### # 006 [25 Pa. Code §127.441]

**Operating permit terms and conditions.** 

1. Mechanical gauges shall be installed and maintained to indicate, in inches of water column, the static pressure differential across the baghouse(s).

2. The company shall ensure that the control devices shall be equipped with the applicable monitoring equipment and the monitoring equipment shall be installed, calibrated, operated, and maintained according to the vendor's specifications at all times the control device is in use.

#### IV. RECORDKEEPING REQUIREMENTS.

## # 007 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

1. The permittee shall record the pressure drop across the baghouse(s). At a minimum these recordings shall be taken once per week, while the source and baghouse(s) are in operation. The recordings shall be maintained in a logbook and made available to the Department upon request.

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

## VI. WORK PRACTICE REQUIREMENTS.

## # 008 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

1. The storage and handling of the material collected in the air cleaning device(s) associated with the aforementioned source(s) shall not at any time result in the emission of fugitive air contaminants in excess of the limitations specified in Section 123.1 of Chapter 123 of the Rules and Regulations of the Department of Environmental Protection.

2. Dust collected in the baghouse filters shall be discharged into closed containers only.

3. The aforementioned source(s) may only be operated as long as the associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth in this operating permit.

4. The permittee shall keep on hand a sufficient quantity of spare baghouse bags/filters for the baghouse(s) associated





with the aforementioned source(s) in order to be able to immediately replace any bags/filters requiring replacement due to deterioration resulting from routine operation of the source(s) and baghouse(s).

5. The company shall maintain and operate the air pollution control equipment and sources in accordance with good engineering practice.

#### VII. ADDITIONAL REQUIREMENTS.

#### # 009 [25 Pa. Code §127.441]

**Operating permit terms and conditions.** 

The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.

# 010 [25 Pa. Code §127.441]

**Operating permit terms and conditions.** 

1. Any changes in the location of the aforementioned source, or any changes in the process or control equipment would be considered a modification and would require the submittal of an amended application for plan approval in accordance with the provisions of 25 Pa. Code 127.11 and 127.12.

2. Any notification as a result of any condition herein should be directed to:

Mark J. Wejkszner Air Quality Program Manager Department of Environmental Protection 2 Public Square Wilkes Barre, PA 18711-0790





## Group Name: 04

Group Description: Formaldehyde Plant

Sources included in this group

## ID Name

501 FORMALDEHYDE PLANT & AUXILIARY SOURCES

## I. RESTRICTIONS.

## **Emission Restriction(s).**

## # 001 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

A minimum operating temperature of 575 degrees F shall be maintained at the catalyst inlet as the compliance temperature in accordance with Condition #015 of Section E, Source Group 04 restrictions in Plan Approval Permit #39-399-059.

## Control Device Efficiency Restriction(s).

## # 002 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The VOC destruction efficiency (DE) of the catalytic incinerator shall be at least 95%.

## II. TESTING REQUIREMENTS.

## # 003 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Upon request of the Department, the permittee shall perform VOC performance stack tests on the catalytic incinerator before the catalyst bed is to be replaced with new or refreshed catalysts and prior to the end of the 730-day operating cycle of the catalyst bed:

1. Testing shall be performed to determine the incinerator outlet emissions of methanol by using EPA Method 308, formaldehyde by using EPA Method 316 and carbon monoxide by using EPA Method 10.

2. VOC destruction tests shall be performed on the catalytic incinerator by using EPA Method 25 to demonstrate compliance with the VOC DE of at least 95%.

After the requested stack tests have been performed prior to the end of the next 730-day operating cycle of the catalyst bed, the Department will make a decision if further stack testing will be required for the next catalyst bed.

## # 004 [25 Pa. Code §127.441]

## **Operating permit terms and conditions.**

All performance tests shall be conducted in accordance with the Department's source testing procedures described in the latest Source Testing Manual referenced in 25 Pa. Code Section 139.4(5).

## # 005 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

At least 60 days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

## # 006 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

At least two weeks prior to the test, the Regional Air Quality Program Manager shall be informed of the date and time of the test.

## # 007 [25 Pa. Code §127.441]

## **Operating permit terms and conditions.**

Within 60 days after the 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.





## III. MONITORING REQUIREMENTS.

## # 008 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The permittee shall install temperature sensing and recording devices to continuously monitor and record the inlet and outlet temperatures of the catalyst bed.

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall obtain a core sample of each used catalyst bed, after every cycle of 730 operating days to determine, by outside lab analysis, the VOC destruction effectiveness.

## IV. RECORDKEEPING REQUIREMENTS.

## # 010 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The permittee shall maintain the temperature records of the catalytic incinerator for a period of five (5) years. These records shall demonstrate compliance with Group Level Condition #002.

## V. REPORTING REQUIREMENTS.

# 011 [25 Pa. Code §127.441]

**Operating permit terms and conditions.** 

Any notification as a result of any condition therein should be directed to:

Air Quality Program Manager Department of Environmental Protection 2 Public Square Wilkes-Barre, PA 18711-0790

## VI. WORK PRACTICE REQUIREMENTS.

## # 012 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The permittee shall replace the catalyst bed with new or refreshed catalyst on intervals not to exceed 730 days of operating use.

# 013 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The inlet temperature to the catalytic incinerator shall be maintained at a temperature of not less than 575 degrees F, or at least the temperature at which compliance with the VOC DE of at least 95% was demonstrated during the compliance testing. The inlet temperature to the catalytic incinerator shall not fluctuate more than 25 degrees F below the demonstrated compliance temperature during production activities. Demonstration of compliance with the compliance temperature shall be based on 3-hour rolling averaged values of the catalyst inlet temperatures taken on 1-minute intervals or less.

## # 014 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The operation of the formaldehyde plant may commence and continue, but only if the catalyst inlet temperature remains at, or is greater than, the compliance temperature determined by the most recent stack test to achieve a VOC DE of at least 95%.

## # 015 [25 Pa. Code §127.441]

## **Operating permit terms and conditions.**

The permittee shall maintain and operate the formaldehyde plant sources and the associated catalytic incinerator in accordance with good engineering practice.

## VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





## SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.





## SECTION H. Miscellaneous.

a) The operating permit application for the facility was received by the Department on 06/28/2016. The annual operating permit administrative fee per 25 Pa. Code, Chapter 127, Section 127.703(c)(3) for this Natural Minor permit shall be \$375.00. The fee is due 30 days prior to the anniversary date of the issuance of the permit.

b) The facility operated under SM 39-00024 before issuance of this renewal operating permit.

- c) This is a State Only Operating Permit facility.
- d) Requests for Determination (RFD's) include: 39-0636 issued on 4/22/09 39-0637 issued on 5/4/09 39-0760 issued on 5/14/13 39-0763 issued on 5/28/13 39-0770 issued on 6/20/13 39-0771 issued on 6/20/13 39-0772 issued on 6/20/13 39-0773 issued on 6/20/13 39-0861 issued on 7/22/16





# \*\*\*\*\*\* End of Report \*\*\*\*\*\*