



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

[47]

**PLAN APPROVAL**

Issue Date: December 19, 2017

Effective Date: December 19, 2017

Expiration Date:

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

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

Plan Approval No. 06-05036C

Federal Tax Id - Plant Code: 47-3389998-6

**Owner Information**

Name: NOVIPAX LLC  
Mailing Address: 4275 READING CREST AVE  
READING, PA 19605-1130

**Plant Information**

Plant: NOVIPAX LLC/READING  
Location: 06 Berks County 06946 Muhlenberg Township  
SIC Code: 3086 Manufacturing - Plastics, Foam Products

**Responsible Official**

Name: TOM MORSE  
Title: PLT MGR  
Phone (610) 926 - 7539

**Plan Approval Contact Person**

Name: KAREN M BOLIN  
Title: ENVCOMP/QC - SPEC  
Phone: (610) 926 - 7593

[Signature]

WILLIAM R. WEAVER, SOUTH CENTRAL REGION AIR PROGRAM MANAGER



## Plan Approval Description

[48]

This plan approval is for the approval of a Reasonably Available Control Technology (RACT II) plan in accordance with the requirements of 25 Pa. Code Sections 129.96 through 129.100. The plan approval also incorporates the approved alternative compliance schedule approved in accordance with 25 Pa Code §129.97(k).

Pages 3 through 23 fully redacted

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

Group Name: SG05

Group Description: §§129.96 - 129.100 - RACT II Requirements

Sources included in this group

**RACT 2 SIP Provisions from PA 06-05036C  
issued 12/19/17 (pages 24-26 of permit)**

ID	Name
102	EXTRUSION
103	OUTSIDE STORAGE
104	THERMOFORM
105	PRODUCT STORAGE/SHIPPING
106	SCRAP&SPOILAGE GRIND/CONVEYING
106B	SPOILAGE GRINDING-CONV.
106C	TRIM GRINDING-CONVEYING
107	RECLAIM EXTRUSION
108	FLUFF STORAGE-CONVEYING

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall not allow the maximum pentane blowing agent to exceed the following:

(a) Interim Limits for extruders: 217, 222, 230, 260: (1/1/17 – 1/1/18)

(1) Foam (>8.0 g/60 in<sup>2</sup>) - 4.1% by weight

(b) Limits Starting 1/1/18 for extruders: 217, 222, 230, 260, & 290:

(1) Foam (>8.0 g/60 sq. in) - 4.0% by weight

(2) Foam (<8.0 g/60 sq. in) - 4.5% by weight

(c) Limits Starting upon EPA's approval of the provisions of SG05 as part of the SIP for extruder 270:

(1) Foam (>8.0 g/60 sq. in) - 4.0% by weight

(2) Foam (<8.0 g/60 sq. in) - 4.5% by weight

(d) Extruder 250 (starting 57 weeks from the issuance date of Plan Approval No. 06-05036C)

(1) Foam (>8.0 g/60 sq. in) - 4.0% by weight

(2) Foam (<8.0 g/60 sq. in) - 4.5% by weight

(e) All percentages are based on 24-hour averages.

**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The total combined volatile organic compound (VOC) emissions, including fugitive emissions, from the facility shall not exceed 650.0 tons in any 12-consecutive month period.

**# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The volatile organic compound (VOC) emissions from the No. 270 & 290 extruders shall not exceed the following per extruder:

(a) 5 pounds per hour (24 hour average),

(b) 110 pounds per day (7 day running average), or

(c) 14.5 tons during any consecutive 12-month period.

**SECTION E Source Group Plan Approval Restrictions.****II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.****# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) Except as provided in § 129.100(c), the owner and operator of an air contamination source subject to a NOx requirement or RACT emission limitation or VOC requirement or RACT emission limitation, or both, listed in § 129.97 (relating to presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule) shall demonstrate compliance with the applicable RACT requirement or RACT emission limitation by performing the following monitoring or testing procedures:

(1) The permittee shall monitor and record the following:

- (i) The amount of pentane used - daily,
- (ii) The amount and type of expanded polystyrene (EPS) foam produced on each extruder - daily,
- (iii) The pentane content of each EPS foam product on each extruder - daily,
- (iv) The amount of trays shipped offsite, by type - daily,
- (v) The monthly pentane content sampling as conducted pursuant to (a)(2)(iii)(A), below,
- (vi) Monthly VOC totals,
- (vii) 12-month rolling VOC totals.

(2) The permittee shall maintain a VOC emission tracking system that shall, at a minimum, include the following:

- (i) Monthly VOC emissions shall be calculated using the following equation:

VOC Emissions (lb/month) = pentane used (lb/month) - SUMMATION[tray i shipped offsite (lb/month)\*tray i pentane content (%)]

Where: i = the tray type consisting of one of the following: meat tray, non-processor tray, processor tray, or barrier tray

- (ii) Pentane use shall be measured by the Veedor Root monitoring system (or equivalent) and pentane delivery receipts.
- (iii) The pentane content for each tray type shall be determined by one of the following methods:

(A) Each tray type shall be sampled monthly to determine the average monthly pentane content. A minimum of three (3) samples of each type shall be taken; or

(B) The following pentane contents shall be used:

- (I) Meat tray - 1.48%
- (II) Non-processor tray - 1.62%
- (III) Processor tray - 1.44%
- (IV) Barrier tray - 0.58%

(b) The owner and operator of an air contamination source subject to this section and § § 129.96—129.99 shall keep records to demonstrate compliance with § § 129.96—129.99 in the following manner:

(1) The records must include sufficient data and calculations to demonstrate that the requirements of § § 129.96—129.99 are met.

(2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.

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

(c) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.

[Additional authority for this permit condition is derived from 25 Pa Code § 129.100(a), (d) & (i)]

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

**# 005 [25 Pa. Code §127.12b]**

**Plan approval terms and conditions.**

Upon approval of the SG05 conditions in this plan approval as a SIP revision, the SG05 conditions in this plan approval shall supersede the following conditions in Title V Operating Permit No. 06-05036 issued on 6/3/14 and amended on 6/3/15:

- (1) SG01 002
- (2) SG01 003
- (3) SG01 005