

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

**TITLE V/STATE OPERATING PERMIT**

Issue Date: June 9, 2015  
Revision Date: March 26, 2019  
Revision Type: Modification

Effective Date: March 26, 2019  
Expiration Date: ~~March 26, 2019~~

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 applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

**TITLE V Permit No: 43-00182**

Federal Tax Id - Plant Code: 23-1327437-1

**Owner Information**

Name: JOHN MANEELY CO DBA WHEATLAND TUBE CO  
Mailing Address: PO BOX 608  
WHEATLAND, PA 16161-0608

**Plant Information**

Plant: WHEATLAND TUBE CO DIWHEATLAND TUBE DIV  
Location: 43 Mercer County 43945 Wheatland Borough  
SIC Code: 3317 Manufacturing - Steel Pipe And Tubes

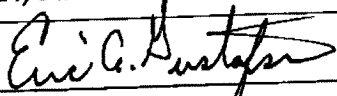
**Responsible Official**

Name: TIM FEENEY  
Title: GENERAL MGR  
Phone (724) 342 - 6851

**Permit Contact Person**

Name: JOSEPH SERVICK  
Title: ENV MGR  
Phone: (724) 342 - 6851 Ext.1267

[Signature]



ERIC A. GUSTAFSON, NORTHWEST REGION AIR PROGRAM MANAGER

## SECTION 1 SOURCE GROUP INFORMATION

Group Name: 10 SOURCE 102 ALT RACT II REQUIREMENTS

Group Description: Source 102 (#1 Galvanizing Kettle) Alternate RACT II requirements amended from plan approval

Sources included in this group

102 #1 GALVANIZING KETTLE

## I. RESTRICTIONS.

### Emission Restriction(s).

# 001

Plan approval terms and conditions.

Emissions of NOx from Source 102 shall not exceed:

- 1) 3.97 lb/hr
- 2) 17.41 tpy (in any 12 consecutive month period).

[Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

## II. TESTING REQUIREMENTS.

# 002

Plan approval terms and conditions.

- a) Within 180 days after the date of the 2019 operating permit modification issuance (non-reoccurring), the permittee shall conduct EPA reference method stack testing for NOx.
- b) The stack testing shall be performed while the aforementioned source is operating at a thermally steady state achieving the maximum operating temperature.
- c) At least ninety (90) calendar days prior to commencing an emission testing program to demonstrate compliance required by the 2019 permit modification, a Test Protocol shall be submitted to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office for review and approval. The Test Protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual. The emissions testing shall not commence prior to receipt of a protocol acceptance letter from the Department.
- d) At least fifteen (15) calendar days prior to commencing an emission testing program to demonstrate compliance required by this modification, written notification of the date and time of testing shall be provided to the Department's appropriate Regional Office. Notification, in writing, shall also be sent to the Department's Bureau of Air Quality, Division of Source Testing and Monitoring, so that an observer may be present. The Department is under no obligation to accept the results of any testing performed without adequate advance written notice to the Department of such testing.
- e) Within fifteen (15) calendar days after completion of the on-site testing portion of an emission test program to demonstrate compliance required by this modification, if a complete test report has not yet been submitted, an electronic notification shall be sent to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office indicating the completion date of the on-site testing.
- f) A complete test report shall be submitted to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office no later than sixty (60) calendar days after completion of the on-site testing portion of an emission test program required by this permit.
- g) The complete test report shall include a summary of the emission results at the beginning of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:
  - i. A statement that the Permittee has reviewed the report from the emissions testing body and agrees with the findings.
  - ii. Permit number(s) and conditions(s) which are the basis for the evaluation.
  - iii. Summary of results with respect to each applicable permit condition.

## SECTION 7. Source Control Requirements.

## iv. Statement of compliance or non-compliance with each applicable permit condition.

h) All submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

i) All testing shall be performed in accordance with any applicable federal regulations (such as New Source Performance Standards), 25 Pa. Code, Chapter 139, and the current revision of the Department's Source Testing Manual or an alternative test method as approved by the Department. The Permittee of the facility shall use the following federal reference methods or alternative test methods approved, in writing, by the Department to demonstrate compliance:

1) 40 CFR Part 60, Appendix A, Method 7E or 40 CFR Part 63, Appendix A, Method 320 shall be used to determine the nitrogen oxide (NOx) emissions.

j) Reports, protocols and test completion notification with exception of periodic monitoring data shall be submitted through PSims \*Online available through <https://www.depgreenport.state.pa.us/ecommm/Login.jsp>. If the internet submittal is not feasible, copies of the submittal shall be sent to the appropriate Pennsylvania Department of Environmental Protection Regional Office (Air Quality Program, 230 Chestnut Street, Meadville, PA 16335) and to the attention of the Department's Bureau of Air Quality, Division of Source Testing and Monitoring (400 Market Street, 12th Floor, Rachel Carson State Office Building, Harrisburg, PA 17105-8468), with deadlines verified through document postmarks.

k) The Permittee shall ensure that all applicable federal reporting requirements are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between federal and state laws and regulation, the Permittee shall comply with the most stringent provision, term, condition, method or rule.

## l) Actions Related to Noncompliance Demonstrated by a Stack Test:

1) If the results of a stack test, performed as required by this approval exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. Within 30 days of the Permittee receiving the stack test results, a written description of the corrective action shall be submitted to the Department. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within 30 days, if the corrective actions taken are deficient. Within 30 days of receipt of the notice of deficiency, the Permittee shall submit a description of additional corrective actions to the Department. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

2) If the results of the required stack test exceed any limit defined in this permit, the test was not performed in accordance with the stack test protocol or the source and/or air cleaning device was not operated in accordance with the permit, then another stack test shall be performed to determine compliance. Within 120 days of the Permittee receiving the original stack test results, a retest shall be performed. The Department may extend the retesting deadline if the Permittee demonstrates, to the Department's satisfaction, that retesting within 120 days is not practicable. Failure of the second test to demonstrate compliance with the limits in the plan approval, not performing the test in accordance with the stack test protocol or not operating the source and/or air cleaning device in accordance with the plan approval may be grounds for immediate revocation of the plan approval to operate the affected source.

[Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

## IV. RECORDKEEPING REQUIREMENTS.

# 003

## Plan approval terms and conditions.

a) All maintenance (i.e., routing and/or preventative maintenance, repairs, adjustments, parts replacements, calibrations, etc.) and inspections performed shall be recorded in a log. These records shall contain, at a minimum, the following:

1) The date of the maintenance/inspection.

## SECTION ONE Source Control Restrictions

- 2) The type of maintenance/inspection performed.
- 3) A detailed description of the maintenance/inspection.
- 4) Name, title, and initials of the individual performing the maintenance/inspection.

b) The owner or operator of the facility shall keep records which clearly verify compliance with this source's emission restrictions. The owner or operator shall perform monthly calculations to demonstrate compliance with the emission restrictions of this source. These calculations shall include the twelve (12) month rolling total emissions of NOx (tpy).

[Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

## VI. WORK PRACTICE REQUIREMENTS.

# 004

## Plan approval terms and conditions.

a) The owner or operator shall perform an annual source inspection and a burner tune up (occurring at a minimum of once in any consecutive 12 month period).

b) All burners shall undergo maintenance as needed to ensure proper tuning and air-fuel ratios. The burners shall be inspected monthly at a minimum.

[Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

## SECTION 11 SOURCE 103 ALT RACT II REQUIREMENTS

Group Name: 11 SOURCE 103 ALT RACT II REQUIREMENTS

Group Description: Source 103 (#2 Galvanizing Kettle) Alternate RACT II requirements amended from plan approval

Sources included in this group

ID: 103 #2 GALVANIZING KETTLE

I. RESTRICTIONS.

Emission Restriction(s).

# 001

Plan approval terms and conditions.

Emissions of NOx from Source 102 shall not exceed:

- a) 6.01 pounds per hour.
- b) 26.32 tons per year (in any 12 consecutive month period).

[Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

II. TESTING REQUIREMENTS.

# 002

Plan approval terms and conditions.

- a) Within 180 days after the date of the 2019 operating permit modification issuance (non-reoccurring), the permittee shall conduct EPA reference method stack testing for NOx.
- b) The stack testing shall be performed while the aforementioned source is operating at a thermally steady state achieving the maximum operating temperature.
- c) At least ninety (90) calendar days prior to commencing an emission testing program to demonstrate compliance required by the 2019 permit modification, a Test Protocol shall be submitted to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office for review and approval. The Test Protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual. The emissions testing shall not commence prior to receipt of a protocol acceptance letter from the Department.
- d) At least fifteen (15) calendar days prior to commencing an emission testing program to demonstrate compliance required by this modification, written notification of the date and time of testing shall be provided to the Department's appropriate Regional Office. Notification, in writing, shall also be sent to the Department's Bureau of Air Quality, Division of Source Testing and Monitoring, so that an observer may be present. The Department is under no obligation to accept the results of any testing performed without adequate advance written notice to the Department of such testing.
- e) Within fifteen (15) calendar days after completion of the on-site testing portion of an emission test program to demonstrate compliance required by this modification, if a complete test report has not yet been submitted, an electronic notification shall be sent to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office indicating the completion date of the on-site testing.
- f) A complete test report shall be submitted to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office no later than sixty (60) calendar days after completion of the on-site testing portion of an emission test program required by this permit.
- g) The complete test report shall include a summary of the emission results at the beginning of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:
  - i. A statement that the Permittee has reviewed the report from the emissions testing body and agrees with the findings.
  - ii. Permit number(s) and conditions(s) which are the basis for the evaluation.
  - iii. Summary of results with respect to each applicable permit condition.
  - iv. Statement of compliance or non-compliance with each applicable permit condition.

## SECTION E Source Control Requirements

- h) All submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- i) All testing shall be performed in accordance with any applicable federal regulations (such as New Source Performance Standards), 25 Pa. Code, Chapter 139, and the current revision of the Department's Source Testing Manual or an alternative test method as approved by the Department. The Permittee of the facility shall use the following federal reference methods or alternative test methods approved, in writing, by the Department to demonstrate compliance:
- 1) 40 CFR Part 60, Appendix A, Method 7E or 40 CFR Part 63, Appendix A, Method 320 shall be used to determine the nitrogen oxide (NOx) emissions.
- j) Reports, protocols and test completion notification with exception of periodic monitoring data shall be submitted through PSims \*Online available through <https://www.depgreenport.state.pa.us/ecommm/Login.jsp>. If the internet submittal is not feasible, copies of the submittal shall be sent to the appropriate Pennsylvania Department of Environmental Protection Regional Office (Air Quality Program, 230 Chestnut Street, Meadville, PA 16335) and to the attention of the Department's Bureau of Air Quality, Division of Source Testing and Monitoring (400 Market Street, 12th Floor, Rachel Carson State Office Building, Harrisburg, PA 17105-8468), with deadlines verified through document postmarks.
- k) The Permittee shall ensure that all applicable federal reporting requirements are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between federal and state laws and regulation, the Permittee shall comply with the most stringent provision, term, condition, method or rule.
- l) Actions Related to Noncompliance Demonstrated by a Stack Test:
- 1) If the results of a stack test, performed as required by this approval exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. Within 30 days of the Permittee receiving the stack test results, a written description of the corrective action shall be submitted to the Department. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within 30 days, if the corrective actions taken are deficient. Within 30 days of receipt of the notice of deficiency, the Permittee shall submit a description of additional corrective actions to the Department. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.
  - 2) If the results of the required stack test exceed any limit defined in this permit, the test was not performed in accordance with the stack test protocol or the source and/or air cleaning device was not operated in accordance with the permit, then another stack test shall be performed to determine compliance. Within 120 days of the Permittee receiving the original stack test results, a retest shall be performed. The Department may extend the retesting deadline if the Permittee demonstrates, to the Department's satisfaction, that retesting within 120 days is not practicable. Failure of the second test to demonstrate compliance with the limits in the plan approval, not performing the test in accordance with the stack test protocol or not operating the source and/or air cleaning device in accordance with the plan approval may be grounds for immediate revocation of the plan approval to operate the affected source.
- [Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

## IV. RECORDKEEPING REQUIREMENTS.

# 003

Plan approval terms and conditions.

- a) All maintenance (i.e., routing and/or preventative maintenance, repairs, adjustments, parts replacements, calibrations, etc.) and inspections performed shall be recorded in a log. These records shall contain, at a minimum, the following:

## SECTION 1 Source Compliance

- 1) The date of the maintenance/inspection.
- 2) The type of maintenance/inspection performed.
- 3) A detailed description of the maintenance/inspection.
- 4) Name, title, and initials of the individual performing the maintenance/inspection.

b) The owner or operator of the facility shall keep records which clearly verify compliance with this source's emission restrictions. The owner or operator shall perform monthly calculations to demonstrate compliance with the emission restrictions of this source. These calculations shall include the twelve (12) month rolling total emissions of NOx (tpy).

[Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

## VI. WORK PRACTICE REQUIREMENTS.

# 004

Plan approval terms and conditions.

- a) The owner or operator shall perform an annual source inspection and a burner tune up (occurring at a minimum of once in any consecutive 12 month period).
- b) All burners shall undergo maintenance as needed to ensure proper tuning and air-fuel ratios. The burners shall be inspected monthly at a minimum.

[Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

## SECTION 1 Source Group Restrictions

Group Name: 9 SOURCE 101 ALT RACT II REQUIREMENTS

Group Description: Source 101 Alternate RACT II requirements amended from plan approval.

Sources included in this group

Source Name

101 CONTINUOUS WELD FURNACE

#### I. RESTRICTIONS.

##### Emission Restriction(s).

# 001

Plan approval terms and conditions.

Emissions of NOx from Source 101 shall not exceed 47.18 tons in any 12 consecutive month period.

[Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

#### IV. RECORDKEEPING REQUIREMENTS.

# 002

Plan approval terms and conditions.

a) All maintenance (i.e., routine and/or preventative maintenance, repairs, adjustments, parts replacement, calibrations, etc.) and inspections performed shall be recorded in a log. These records shall contain, at a minimum, the following:

- 1) The date of the maintenance/inspection.
- 2) The type of maintenance/inspection performed.
- 3) A detailed description of the maintenance/inspection.
- 4) Name, title, and initials of the individual performing the maintenance/inspection.

b) The owner or operator of the facility shall keep records which clearly verify compliance with this source's emission restrictions. The owner or operator shall perform monthly calculations to demonstrate compliance with emission restrictions of this source. These calculations shall include the twelve (12) month rolling total emissions of NOx (tpy).

[Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

#### VI. WORK PRACTICE REQUIREMENTS.

# 003

Plan approval terms and conditions.

a) The permittee shall perform an extended annual shutdown of the Continuous Weld Furnace (Source 101) for major overhaul and maintenance (occurring at a minimum of once in any consecutive 12 month period) which shall include the following at a minimum:

- 1) Burner adjustment/tuning.
- 2) refractory repair/replacement, and



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## 3) refractory re-alignment.

- b) The independent oxygen supply used by the furnace shall be continuously maintained to ensure optimum combustion efficiency. The oxygen supply shall be inspected daily at a minimum.
- c) All burners shall undergo maintenance as needed to ensure proper tuning and air-fuel ratios. The burners shall be inspected monthly at a minimum.

[Additional authorization for this requirement is based on 25 Pa. Code Section 129.99]

Any page numbers not included in this document shall be considered to be redacted in full.