



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

**TITLE V/STATE OPERATING PERMIT**

Issue Date: April 12, 2021

Effective Date: April 12, 2021

Expiration Date: [REDACTED]

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: 20-00194**

Federal Tax Id - Plant Code: 25-0626921-3

**Owner Information**

Name: LORD CORP  
Mailing Address: 601 SOUTH ST  
SAEGERTOWN, PA 16433-5050

**Plant Information**

Plant: LORD CORP/SAEGERTOWN  
Location: 20 Crawford County 20931 Saegertown Borough  
SIC Code: 2899 Manufacturing - Chemical Preparations, Nec

**Responsible Official**

Name: JOHN ESSMAN  
Title: PLANT MGR  
Phone: (814) 763 - 2345 Ext.444

**Permit Contact Person**

Name: SHARON LEVKUS  
Title: EHS MANAGER -SAEG OPR  
Phone: (814) 763 - 2345 Ext.426

[Signature] \_\_\_\_\_  
ERIC A. GUSTAFSON, NORTHWEST REGION AIR PROGRAM MANAGER

Pages 2-22, 24-30, 32-34, 36-124, 126-129, 132-208, 210-211, 213-268, and 271-315 are redacted entirely.

**SECTION C. Site Level Requirements**

# 006 [REDACTED]

**Operating permit terms and conditions.**

The VOC emissions, from all sources at this facility combined, shall not exceed 160 tons during any consecutive twelve (12) month period.

[Authority for this condition is also derived from 25 Pa Code 129.91.]

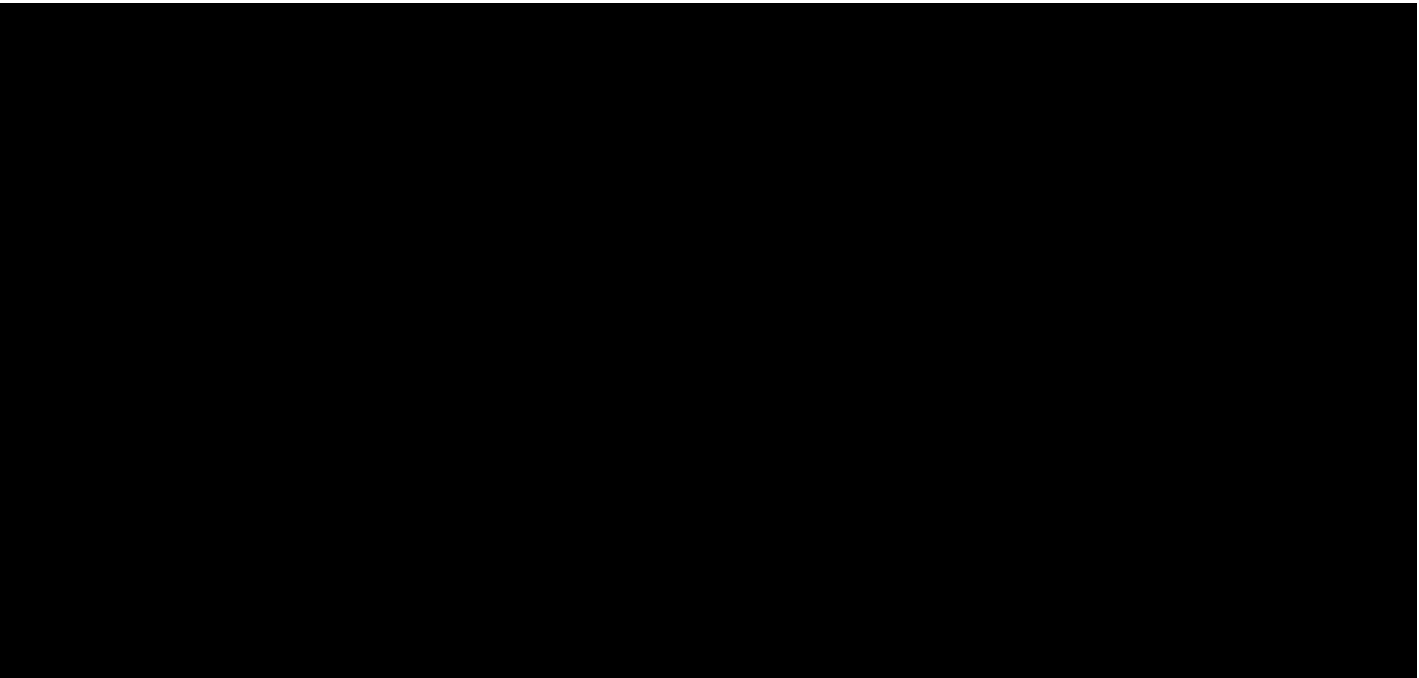
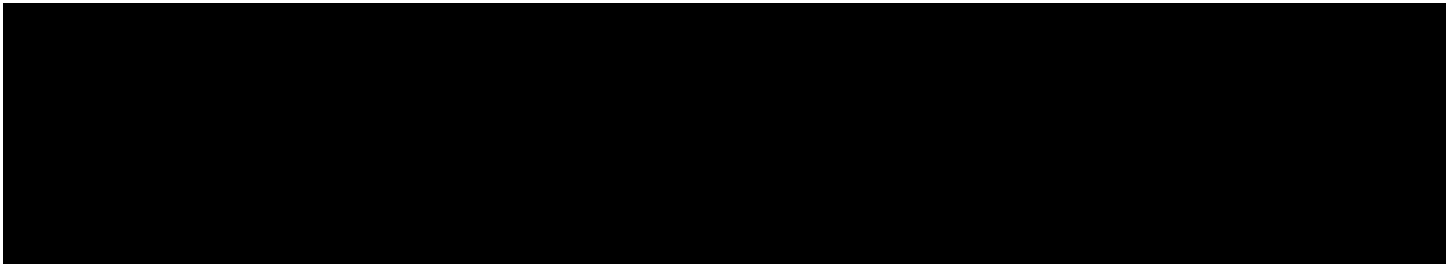
**II. TESTING REQUIREMENTS.**

# 007 [REDACTED]

**Operating permit terms and conditions.**

The Department reserves the right to require exhaust stack testing of any source(s) as necessary to verify emissions for purposes including determining the correct emission fee, malfunctions, or determining compliance with any applicable requirement.

[Authority for this condition is also derived from 25 Pa Code 129.91.]

**SECTION C. Site Level Requirements****III. MONITORING REQUIREMENTS.**

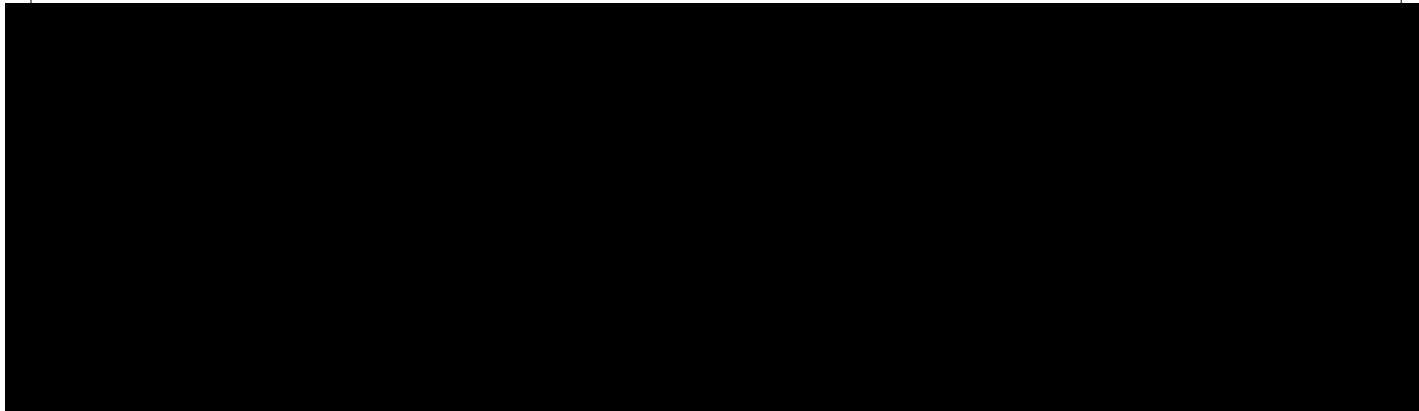
# 010

**Operating permit terms and conditions.**

The permittee shall calculate the annual VOC emissions from this facility by way of a computerized emissions tracking model. This model shall use actual production data to calculate the VOC emissions.

This calculated annual VOC emissions number shall be used to determine a VOC emission factor (pounds of VOC emissions per pound of VOC-containing product produced) for the facility. This VOC emission factor and monthly production records shall be used to estimate the monthly VOC emissions from this facility.

[Authority for this condition is also derived from 25 Pa Code 129.91.]



**SECTION C. Site Level Requirements****IV. RECORDKEEPING REQUIREMENTS.**

# 013

**Operating permit terms and conditions.**

- a) The permittee shall maintain production records for all processes at this facility. These records shall contain sufficient data and calculations to clearly demonstrate compliance with the VOC emission limitation for the facility.
- b) All production records and results of the emission tracking model shall be maintained by the permittee for a period of at least five (5) years and shall be made available to the Department upon request.

[Authority for this condition is also derived from 25 Pa Code 129.91.]

**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: URETHANE MANUFACTURING

Source Capacity/Throughput:

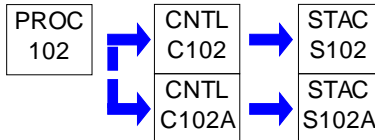
N/A

Conditions for this source occur in the following groups: 123.13

P000 COMPLIANCE

RACT II CASE-BY-CASE

RACT II PRESUMPTIVE

**VI. WORK PRACTICE REQUIREMENTS.**

# 001

**Operating permit terms and conditions.**

For the following Source 102 sources (Urethane Pigment Tank 1, Hockmeyer Room 1, Urethane Hockmeyer Room 3, Urethane Kady Mill Room 3, & Urethane Kady Mill Room 2) RACT Controls are as follows:

(a) Equipment or Process Modifications (Tank Lids & Equipment Cleaning);

(b) Improved Operating Practices (Use of covers during tank operation; Splash/Spill Prevention; Recycling Techniques; & Employee Awareness).

[Authority for this condition is also derived from 25 Pa Code 129.91.]

**SECTION D. Source Level Requirements**

Source ID: 105

Source Name: BLDG 1 MIX TANKS (CHEMLOK)

Source Capacity/Throughput:

N/A

Conditions for this source occur in the following groups: 123.13

ALL PROCESS VESSELS

COVERS - HHHHH

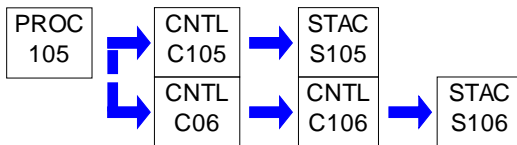
P000 COMPLIANCE

PROCESS VESSELS CONTROLLED BY RTO

RACT II CASE-BY-CASE

RACT II PRESUMPTIVE

SOURCES CONTROLLED BY RTO

**VI. WORK PRACTICE REQUIREMENTS.**

# 001

**Operating permit terms and conditions.**

For the following Source 105 sources (CH 500-Gallon Mix Tank 2) RACT Controls are as follows:

(a) Equipment or Process Modifications (Tank Lids &amp; Equipment Cleaning);

(b) Improved Operating Practices (Use of covers during tank operation; Splash/Spill Prevention; Recycling Techniques; &amp; Employee Awareness).



## SECTION D. Source Level Requirements

[Authority for this condition is also derived from 25 Pa Code 129.91.]



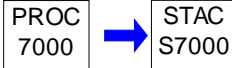
**SECTION D. Source Level Requirements**

Source ID: 7000

Source Name: MISC SMALL EMISSION UNITS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 123.13  
M O C PROCESS  
RACT II CASE-BY-CASE  
RACT II PRESUMPTIVE

**VI. WORK PRACTICE REQUIREMENTS.**

# 001

**Operating permit terms and conditions.**

For the following Source 7000 sources (RG-3, RS-4, RG-9, RS-12, & RS-19) RACT Controls are as follows:

- (a) Chilled Condenser;
- (b) Equipment or Process Modifications (Tank Lids & Equipment Cleaning);
- (c) Improved Operating Practices (Use of covers during tank operation; Splash/Spill Prevention; Recycling Techniques; & Employee Awareness).

[Authority for this condition is also derived from 25 Pa Code 129.91.]

**SECTION D. Source Level Requirements**

Source ID: 7000C

Source Name: PORTABLE PROCESS VESSELS REQUIRING COVERS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 123.13

M O C PROCESS

RACT II CASE-BY-CASE

RACT II PRESUMPTIVE

**VI. WORK PRACTICE REQUIREMENTS.**

# 001

**Operating permit terms and conditions.**

For the following Source 7000C sources (Grind Tanks) RACT Controls are as follows:

- (a) Equipment or Process Modifications (Tank Lids & Equipment Cleaning);
- (b) Improved Operating Practices (Use of covers during tank operation; Splash/Spill Prevention; Recycling Techniques; & Employee Awareness).

[Authority for this condition is also derived from 25 Pa Code 129.91.]

## SECTION E. Source Group Restrictions.

Group Name: RACT II CASE-BY-CASE

Group Description: Alternative RACT conditions under 129.99

Sources included in this group

ID	Name
102	URETHANE MANUFACTURING
105	BLDG 1 MIX TANKS (CHEMLOK)
105A	PROCESS VESSEL ID #7004
7000	MISC SMALL EMISSION UNITS
7000A	MISCELLANEOUS PROCESS VESSELS
7000C	PORTABLE PROCESS VESSELS REQUIRING COVERS
7000F	MISC. BATCH PROCESS VENTS SUBJECT TO SUBPART FFFF
7110	REACTOR RG-3, PACKAGING
7405	BLDG 5, RS-4 & RS-4TT
7490	URETHANE ROOM 2 (4 MIX TANKS)
7500	URETHANE ROOMS 2 & 3 (7 MIXERS)
7980	REACTOR RG-9
8130	REACTOR RS-12

### I. RESTRICTIONS.

#### Emission Restriction(s).

# 001

**Alternative RACT proposal and petition for alternative compliance schedule.**

The VOC emissions shall not exceed the following:

RG-3 (building 1): 4.85 tpy & 0.41 tons/calendar month  
 RS-4 (building 5): 10.92 tpy & 0.91 tons/calendar month  
 RG-9 (building 8): 5.66 tpy & 0.48 tons/calendar month  
 RS-12 (building 8B): 4.83 tpy & 0.41 tons/calendar month  
 RS-19 (building 16C): 15.97 tpy & 1.33 tons/calendar month  
 Grind Tanks (portable): 11.9 tpy & 1.0 tons/calendar month  
 Urethane Pigment 1 Tank (building 5): 11.1 tpy & 0.93 tons/calendar month  
 CH 500-Gallon Mix Tank 2 (building 1): 17.76 tpy & 1.48 tons/calendar month  
 Hockmeyer Room 1 (building 5): 36.5 tpy & 3.05 tons/calendar month  
 Urethane Hockmeyer Room 3 (building 5): 51.8 tpy & 4.32 tons/calendar month  
 Urethane Kady Mill Room 3 (building 5): 28.2 tpy & 2.35 tons/calendar month  
 Urethane Kady Mill Room 2 (building 5): 20.4 tpy & 1.70 tons/calendar month

### II. TESTING REQUIREMENTS.

# 002

**Compliance demonstration and recordkeeping requirements.**

In accordance with 129.99(d)(6), the facility shall include methods of demonstrating compliance and recordkeeping and reporting requirements in accordance with 129.100 (relating to compliance demonstration and recordkeeping requirements) for each contamination source included in the RACT proposal. Compliance demonstration with the VOC emission limits for each source will be shown through the use of "Mitchell Scientific - Emission Master Software" or another Department approved model/software on a monthly basis by inputting the total number of batches and ensuring that the process information is up to date.

**SECTION E. Source Group Restrictions.****IV. RECORDKEEPING REQUIREMENTS.**

# 003 [REDACTED]

**Compliance demonstration and recordkeeping requirements.**

In accordance with 25 Pa. Code §129.100(d), 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:

- The records must include sufficient data and calculations to demonstrate that the requirements of 25 PA Code 129.96 – 129.99 are met.
- Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.

# 004 [REDACTED]

**Compliance demonstration and recordkeeping requirements.**

In accordance with 25 Pa. Code §129.100(i), 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.

[REDACTED]

**VII. ADDITIONAL REQUIREMENTS.**

# 005 [REDACTED]

**Alternative RACT proposal and petition for alternative compliance schedule.**

In accordance with §129.99(g), the emission limit and requirements specified in the plan approval or operating permit issued by the Department or appropriate approved local air pollution control agency under subsection (f) supersede the emission limit and requirements in the existing plan approval or operating permit issued to the owner or operator of the source prior to April 23, 2016, on the date specified in the plan approval or operating permit issued by the Department or appropriate approved local air pollution control agency under subsection (f), except to the extent the existing plan approval or operating permit contains more stringent requirements.

[REDACTED]