

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: July 13, 2016

Effective Date: May 1, 2019

Revision Date: May 1, 2019

Expiration Date: [REDACTED]

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

TITLE V Permit No: 24-00012

Federal Tax Id - Plant Code: 04-3583868-2

Owner Information

Name: GRAFTECH USALLC
Mailing Address: 800 THERESIA ST
SAINT MARYS, PA 15857-1831

Plant Information

Plant: GRAFTECH USALLC/ST MARYS
Location: 24 Elk County 24814 Saint Marys City
SIC Code: 3624 Manufacturing - Carbon And Graphite Products

Responsible Official

Name: WILLIAM A. MCFADDEN
Title: GENERAL MGR
Phone (814) 781 - 2408

Permit Contact Person

Name: LEE CUNNINGHAM
Title: HSEP MGR
Phone: (814) 781 2479

[Signature]


ERIC A. GUSTAFSON, NORTHWEST REGION AIR PROGRAM MANAGER

Pages 2-44 and 53-112 are redacted entirely.

SECTION 1: Source/Load Requirements

Source ID: 186

Source Name: CARBOTTOMS (16)

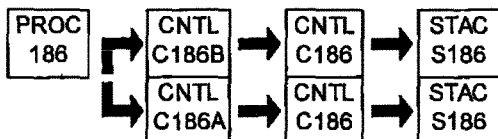
Source Capacity/Throughput

50.000 Tons/HR

10.000 MMCF/HR

Natural Gas

Conditions for this source occur in the following groups: 5



I. RESTRICTIONS.

Emission Restriction(s).

001

Plan approval terms and conditions.

(a) The permittee shall not exceed 1.49 lbs of VOC per ton of carbon baked in the furnace or 89.6 tpy based on a consecutive 12-month period from Source 186, Source 1001, Source 1002, Source 1003, Source 1004, Source 1005, & Source 1006.

[Fulfills the alternative RACT requirement of 129.99(c)]

II. TESTING REQUIREMENTS.

002

Compliance demonstration and recordkeeping requirements.

a) Within twelve (12) to eighteen (18) months prior to the expiration of the facility's current operating permit (non-reoccurring).

a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The stack test shall be performed while the aforementioned source is operating at its maximum achievable production rate. The stack test shall determine the overall VOC control efficiency (using EPA Method 25A as appropriate) at the outlet of the RTO.

b) One paper copy plus one electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager.

Paper copies shall be sent using the following mailing addresses:

CENTRAL OFFICE:

Pennsylvania Department of Environmental Protection
Attn: PSIMS Administrator
P.O. Box 8468
Harrisburg, PA 17105-8468

NORTHWEST REGIONAL OFFICE:

Pennsylvania Department of Environmental Protection
Attn: Air Quality Program Manager
230 Chestnut St
Meadville, PA 16335

Electronic copies shall be sent to the following e-mail addresses:

CENTRAL OFFICE:

RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE:

RA-EPNWstacktesting@pa.gov

c) At least 90 days prior to performing a stack test, a protocol shall be submitted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. Submit the protocol via the instructions in b). The protocol shall contain, at a minimum, location of sampling ports, planned production rates, and any other information applicable to the stack testing. Performing a stack test prior to Department approval of the protocol may invalidate the results.

d) At least 2 weeks prior to the test, the Department shall be informed, in writing, of the date and time of the test.

e) Within 60 days after completion of the test, the complete test report, including, but not limited to, production rates during testing, calculation methods and results, and any other applicable testing information that will allow for a complete review of the test and results, shall be submitted to the Department for approval. Submit the report via the instructions in b).

f) Actions Related to Noncompliance Demonstrated by a Stack Test

(1) When the results of a stack test performed in conformance with this Condition exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to the Department, within thirty (30) days of receipt of the test results. 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 thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to the Department within thirty (30) days of receipt of the notice of deficiency. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(2) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to the Department that retesting in one hundred and twenty (120) days is not practicable, the Department may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

[RACT II Review]

SECTION 3. Supplemental Requirements

III. MONITORING REQUIREMENTS.

003

Plan approval terms and conditions.

[Plan Approval 24-012G]

(a) The permittee shall maintain a continuous recording of the thermal oxidizer's inlet and outlet gas temperature and retain these records for at least five years.

[Fulfills the RACT II requirements of 129.100]

004

Operating permit terms and conditions.

The permittee shall maintain a continuous recording of the incinerator's inlet and outlet gas temperature and retain these records for at least five years.

[Authority for this condition is also derived from PSD Permit 79-PA-26, Conditions No. 2A and 2B.]

[Fulfills the RACT II requirements of 129.100]

IV. RECORDKEEPING REQUIREMENTS.

005

Monitoring and related recordkeeping and reporting requirements.

(a) The permittee shall maintain a record of all preventive maintenance inspections of the control device. These records shall, at a minimum, contain the dates of the inspections, any problems or defects, the actions taken to correct the problem or defects, any routine maintenance performed and the pressure drop across the control device.

(b) The permittee shall calculate from material balance the amount of carbon monoxide generated from this source in terms of pounds per hour.

(c) The permittee shall maintain a record of pounds of VOC emitted per tons of carbon baked in the furnace.

[Fulfills the RACT II requirements of 129.100]

006

Compliance demonstration and recordkeeping requirements.

The permittee shall calculate the twelve-month rolling total of actual VOC emissions from the source. The total calculated shall be maintained in a log and updated monthly.

[RACT II Review]

VI. WORK PRACTICE REQUIREMENTS.

007

Monitoring and related recordkeeping and reporting requirements.

- (a) The permittee shall perform a weekly preventive maintenance inspection of control device.
- (b) The permittee shall monitor and keep a record of the exhaust temperature of the thermal oxidizer.
- (c) The permittee shall operate the control device at all times that this source is in operation.
- (d) The permittee shall maintain and operate this source and the control devices in accordance with the manufacturer's specifications and good air pollution control practice.
- (e) the permittee shall install, operate, and maintain the low NOx burners (for car bottom kilns 491, 492, 493, 494, 495, and 496) in accordance with the manufacturer's specifications and good air pollution control practices

[Condition (e) is from Plan Approval 24-012G]

[Fulfills the RACT II requirements of 129.100]

Source ID: 187

Source Name: LONGITUDINAL GRAPHITIZERS (20) BLDG 800

Source Capacity/Throughput

5.000 Tons/HR

PROC
187STAC
S187

This source occurs in alternate operation SIMULTANEOUS USE OF TWO RECTIFYING TRANS

I. RESTRICTIONS.

Emission Restriction(s).



SECTION 1. SOURCE INFORMATION

008

Alternative RACT proposal and petition for alternative compliance schedule.

- (a) VOC emissions from Source 187 shall not exceed 94 tons in any 12 consecutive month period.
- (b) The permittee shall calculate the twelve-month rolling total of actual VOC emissions from the source. The total calculated shall be maintained in a log and updated monthly.

[RACT II Review]

II. TESTING REQUIREMENTS.

011

Compliance demonstration and recordkeeping requirements.

(a) Within twelve (12) to eighteen (18) months prior to the expiration of the facility's current operating permit (non-reoccurring), a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The stack test shall be performed while the aforementioned source is operating at its maximum achievable production rate. The stack test shall determine the VOC emission rate per ton of carbon graphitized (using EPA Method 25A as appropriate).

(b) One paper copy plus one electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager.

Paper copies shall be sent using the following mailing addresses:

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NORTHWEST REGIONAL OFFICE:

Pennsylvania Department of Environmental Protection
Attn: Air Quality Program Manager
230 Chestnut St.
Meadville, PA 16335

Electronic copies shall be sent to the following e-mail addresses:

RA-EPstacktesting@pa.gov

RA-EPNWstactesting@pa.gov

- (c) At least 90 days prior to performing a stack test, a protocol shall be submitted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. Submit the protocol in accordance with the instructions in (b). The protocol shall contain, at a minimum, location of sampling ports, planned production rates, and any other information applicable to the stack testing. Performing a stack test prior to Department approval of the protocol may invalidate the results.
- (d) At least 2 weeks prior to the test, the Department shall be informed, in writing, of the date and time of the test.
- (e) Within 60 days after completion of the test, the complete test report, including, but not limited to, production rates during testing, calculation methods and results, and any other applicable testing information that will allow for a complete review of the test and results, shall be submitted to the Department for approval. Submit the report in accordance with the instructions in (b).
- (f) **Actions Related to Noncompliance Demonstrated by a Stack Test:**
- (1) When the results of a stack test performed in conformance with this Condition exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to the Department, within thirty (30) days of receipt of the test results. 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 thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to the Department within thirty (30) days of receipt of the notice of deficiency. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (2) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to the Department that retesting in one hundred and twenty (120) days is not practicable, the Department may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

[IRACT II Review]

IV. RECORDKEEPING REQUIREMENTS.

[RACT II Review]

[RACT II Review]