

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

### TITLE V/STATE OPERATING PERMIT

Issue Date:September 5, 2018Effective Date:November 15, 2018Revision Date:November 15, 2018Expiration Date:September 4, 2023

Revision Type: Modification, Significant

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: 39-00040

Federal Tax Id - Plant Code: 54-0499731-1

Owner Information

Name: CARPENTER CO
Mailing Address: PO BOX 519

57A OLIN WAY

FOGELSVILLE, PA 18051-0519

Plant Information

Plant: CARPENTER CO/UPPER MACUNGIE

Location: 39 Lehigh County 39920 Upper Macungie Township

SIC Code: 3086 Manufacturing - Plastics, Foam Products

Responsible Official

Name: PAT NAIDU Title: DIVISION MGR Phone: (610) 366 - 8349

### **Permit Contact Person**

Name: BRIAN GEREN

Title: ENVIRONMENTAL COORDINATOR

Phone: (610) 366 - 8349

[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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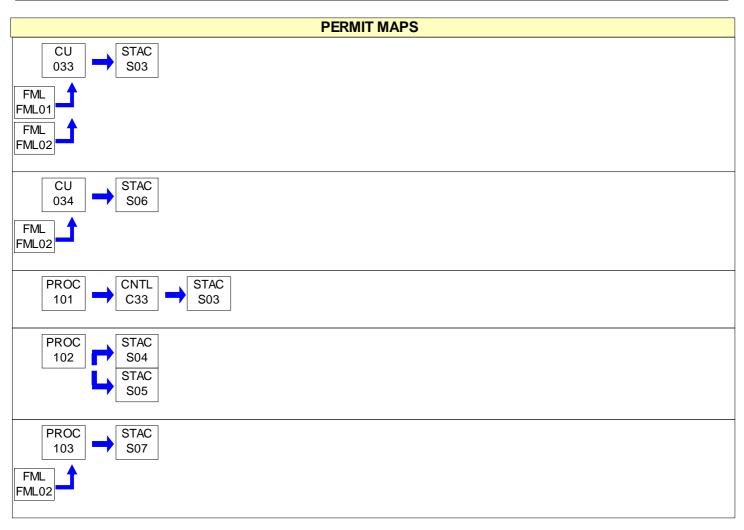
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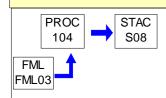
## SECTION A. Site Inventory List

Source I	D Source Name	Capacity/T	hroughput	Fuel/Material
033	BOILER - EPS BUILDING	16.329	MMBTU/HR	
034	MISC. NATURAL GAS USAGE			
101	EPS MANUFACTURING	4,000.000	Lbs/HR	PENTANE
102	POLYURETHANE FOAM MFG			
103	FIBER OVEN			
104	DIESEL FIRE PUMP			
C33	BOILER - EPS BUILDING			
FML01	PENTANE FROM PROCESS			
FML02	NATURAL GAS			
FML03	DIESEL FUEL			
S03	STACK - SOURCE ID 033			
S04	POUR LINE STACK			
S05	CUT OFF SAW EXHAUST			
S06	MISC. NATURAL GAS USAGE STACK			
S07	FIBER OVEN STACK			
S08	DIESEL FIRE PUMP STACK			





## PERMIT MAPS







#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 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 121.7]

**Prohibition of Air Pollution** 

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

#003 [25 Pa. Code § 127.512(c)(4)]

**Property Rights** 

This permit does not convey property rights of any sort, or any exclusive privileges.

#004 [25 Pa. Code § 127.446(a) and (c)]

### **Permit Expiration**

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. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V 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. 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.

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]

### **Permit Renewal**

- (a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.
- (b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.
- (c) 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. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).
- (d) 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 during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]

### **Transfer of Ownership or Operational Control**

- (a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:
  - (1) The Department determines that no other change in the permit is necessary;
- (2) 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,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.



(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

### #007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

### **Inspection and Entry**

- (a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a Title V 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 or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, 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, 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.
- (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.

### #008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

### **Compliance Requirements**

- (a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) 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 to the source are 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 Title V permit.

### #009 [25 Pa. Code § 127.512(c)(2)]

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

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

### #010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

### **Duty to Provide Information**

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or







to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

### #011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

### Reopening and Revising the Title V Permit for Cause

- (a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.
- (b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:
- (1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.
- (2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.
- (3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- (4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.
- (d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

### #012 [25 Pa. Code § 127.543]

### Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

### #013 [25 Pa. Code § 127.522(a)]

### **Operating Permit Application Review by the EPA**

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

### #014 [25 Pa. Code § 127.541]

### **Significant Operating Permit Modifications**

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with



25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

### #015 [25 Pa. Code §§ 121.1 & 127.462]

### **Minor Operating Permit Modifications**

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

### #016 [25 Pa. Code § 127.450]

### **Administrative Operating Permit Amendments**

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

### #017 [25 Pa. Code § 127.512(b)]

### **Severability Clause**

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

### #018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

### **Fee Payment**

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).



CARPENTER CO/UPPER MACUNGIE

### **SECTION B.** General Title V Requirements

- (e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.
- (f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

### #019 [25 Pa. Code §§ 127.14(b) & 127.449]

### **Authorization for De Minimis Emission Increases**

- (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. 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.

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

- (b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit 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 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 or 25 Pa. Code Article III.
- (c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:
- (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, liquefied petroleum gas 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.
- (d) 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 (b)(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 the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.
- (e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).
- (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 allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical 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.

### #020 [25 Pa. Code §§ 127.11a & 127.215]

### **Reactivation of Sources**

- (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.
- (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).

### #021 [25 Pa. Code §§ 121.9 & 127.216]

### Circumvention

- (a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) 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 this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department,







the device or technique may be used for control of malodors.

### #022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]

### **Submissions**

(a) 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 on the permit transmittal letter, or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Office of Air Enforcement and Compliance Assistance (3AP20)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

### #023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

### Sampling, Testing and Monitoring Procedures

- (a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

### #024 [25 Pa. Code §§ 127.511 & Chapter 135]

### **Recordkeeping Requirements**

- (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:
  - (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 the 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. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

### #025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

### **Reporting Requirements**

- (a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.
- (c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.
- (d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

### #026 [25 Pa. Code § 127.513]

### **Compliance Certification**

- (a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:
  - (1) The identification of each term or condition of the permit that is the basis of the certification.
  - (2) The compliance status.
  - (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
  - (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department and EPA in accordance with the submission requirements specified in condition #022 of this section.

### #027 [25 Pa. Code § 127.3]

### **Operational Flexibility**

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

(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 amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

### #028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

### **Risk Management**

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:
  - (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
  - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
  - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
  - (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.





(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #26 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

### #029 [25 Pa. Code § 127.512(e)]

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### **Approved Economic Incentives and Emission Trading Programs**

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

### #030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

### **Permit Shield**

- (a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:
  - (1) The applicable requirements are included and are specifically identified in this permit.
- (2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.
- (b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.
  - (2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.
  - (4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.
- (c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.







### **SECTION C.** Site Level Requirements

### 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) 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.

### # 002 [25 Pa. Code §123.2]

### Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, 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 emissions 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.







### **SECTION C.** Site Level Requirements

### # 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 Section C, 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 Section C, Condition #001 (relating to prohibition of certain fugitive emissions).

### # 006 [25 Pa. Code §127.512]

### Operating permit terms and conditions.

The annual actual volatile organic compound (VOC) emission rate from this site shall never exceed 108.8 tons per year based on a 12-month rolling average, as calculated by the company and approved by the Department..

### # 007 [25 Pa. Code §129.14]

### Open burning operations

- (a) 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.
  - (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.
  - (b) Exceptions: The requirements of subsection (a) does 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



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### CARPENTER CO/UPPER MACUNGIE



### **SECTION C.** Site Level Requirements

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.

### II. TESTING REQUIREMENTS.

### # 008 [25 Pa. Code §127.511]

### Monitoring and related recordkeeping and reporting requirements.

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 most current publication of 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.

### # 009 [25 Pa. Code §127.511]

### Monitoring and related recordkeeping and reporting requirements.

All sampling, testing, and analyses performed in compliance with the requirements of any section of this Title V Operating Permit shall be done in accordance with Section B, Condition #023.

### # 010 [25 Pa. Code §139.1]

### Sampling facilities.

Upon the request of the Department, the person responsible for a source shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on the source. The Department will set forth, in the request, the time period within which the facilities shall be provided, as well as the specifications for the facilities.

### # 011 [25 Pa. Code §139.11]

### General requirements.

The following provisions are applicable to source tests for determining emissions from stationary sources:

- (1) Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.
- (2) The Department will consider test results for approval where sufficient information is provided to verify the source conditions existing at the time of the test and where adequate data is available to show the manner in which the test was conducted. Information submitted to the Department shall include, as a minimum, all of the following:
  - (i) A thorough source description, including a description of air cleaning devices and the flue.
- (ii) Process conditions, for example, the charging rate of raw material or rate of production of final product, boiler pressure, oven temperature and other conditions which may affect emissions from the process.
  - (iii) The location of the sampling ports.
- (iv) Effluent characteristics, including velocity, temperature, moisture content, gas density (percentage of CO, CO2, O2 and N2), static and barometric pressures.
- (v) Sample collection techniques employed, including procedures used, equipment descriptions and data to verify that isokinetic sampling for particulate matter collection occurred and that acceptable test conditions were met.
  - (vi) Laboratory procedures and results.
  - (vii) Calculated results.

### III. MONITORING REQUIREMENTS.

### # 012 [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.





### **SECTION C.** Site Level Requirements

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

### # 013 [25 Pa. Code §127.511]

### Monitoring and related recordkeeping and reporting requirements.

- (a) The permittee shall conduct daily inspections of the facility perimeter, during daylight hours when the plant is in operation, to detect visible, fugitive, and malodor emissions as follows:
- (1) Visible emissions in excess of the limits stated in SECTION C, Site Level Requirement, Condition #004.
- (2) Visible emissions may be measured according to the methods specified in SECTION C, Site Level Requirement, Condition #012, or alternatively, plant personnel who observe any visible emissions (i.e. emissions in excess of 0% opacity) will report the incident of visible emissions to the Department within four (4) hours of each incident and make arrangements for a certified observer to verify the opacity of the emissions.
- (3) The presence of fugitive emissions visible beyond the boundaries of the facility, as stated in SECTION C, Site Level Requirement, Condition #002.
- (4) The presence of malodor emissions beyond the boundaries of the facility, as stated in SECTION C, Site Level Requirement, Condition #003.

### IV. RECORDKEEPING REQUIREMENTS.

### # 014 [25 Pa. Code §127.511]

### Monitoring and related recordkeeping and reporting requirements.

- (a) The permittee shall keep a logbook of daily facility inspections performed. The logbook shall include the name of the company representative performing the inspection, the date and time of inspections, any instances of exceedances of visible emissions limitations, visible fugitive emissions limitations and malodorous air emissions limitations, and the name of the manager informed if a potential exceedance is observed. The permittee shall also record any and all corrective action(s) taken to abate each recorded deviation to prevent future occurrences.
- (b) These records shall be kept for a five (5) year period and shall be made available to the Department upon request.

### # 015 [25 Pa. Code §127.511]

### Monitoring and related recordkeeping and reporting requirements.

All records shall be maintained for (5) years in accordance with Section B, Condition #024 and shall be made available to the Department upon written or verbal request.

### # 016 [25 Pa. Code §127.511]

### Monitoring and related recordkeeping and reporting requirements.

The facility shall record all VOC materials used at the facility as well as calculations on the entire facility all emissions updated monthly and maintained on a 12-month rolling sum, all air pollution control systems performance evaluations and records of calibration checks, and adjustments and maintenance performed on all equipment which is subject to this Title V Operating Permit.

### V. REPORTING REQUIREMENTS.

### # 017 [25 Pa. Code §127.442]

### Reporting requirements.

The facility shall, within one hour of occurrence, notify the Department, at (610) 861-2070, of any malfunction of the source(s) or associated air cleaning device(s) which results 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 malfunctions and corrective action taken. The Department may take enforcement action for any violations of the applicable standards.



### **SECTION C.** Site Level Requirements

### # 018 [25 Pa. Code §127.511]

### Monitoring and related recordkeeping and reporting requirements.

The permittee shall submit the following reports:

(a) An annual certification of compliance, due by March 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under Condition #026 of Section B of this permit. The annual certification of compliance shall be submitted to the Department in paper form and to the EPA Region III in electronic form at the following email address below. Any required semi-annual reports can also be sent to this email address:

### R3\_APD\_Permits@epa.gov

- (b) A semi-annual deviation report, due by September 1st, of each year, for the period covering January 1 through June 30 of the same year. (Note: The annual certification of compliance fulfills the second deviation reporting period (July 1 through December 31).
- (c) Notifications to EPA, pursuant to 25 PA Code §127.462(c), copies of requests for administrative permit amendments to EPA, pursuant to 25 PA Code §127.450(c)(1), and copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), if required, may be submitted to the following EPA e-mail box:

### R3\_Air\_ Apps\_&\_Notices@epa.gov

in lieu of the mailing address listed in Condition #022(b), of Section B, of this permit. For any electronic submission, please place the following in the subject line: TV 39-00040, Carpenter Co.

### # 019 [25 Pa. Code §127.513]

### Compliance certification.

The reporting period for the certificate of compliance required by Section B, Condition #026, shall be for the previous calendar year, and it shall be submitted within 60 days after the specified period but no later than March 1st.

### # 020 [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.

### VI. WORK PRACTICE REQUIREMENTS.

### # 021 [25 Pa. Code §123.1]

### Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne as stated in Section C, Condition #001. 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.



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#### SECTION C. **Site Level Requirements**

- (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.

### [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The source and any associated air cleaning devices shall be:

- (1) Operated in such a manner as not to cause air pollution.
- (2) Operated and maintained in a manner consistent with good operating and maintenance practices.
- (3) Operated and maintained in accordance with manufacturer's specifications.

#### # 023 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The facility shall ensure that the capture system and control device are operated at all times when the manufacturing process is in operation.

#### VII. ADDITIONAL REQUIREMENTS.

#### # 024 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

#### # 025 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The company shall not impose conditions upon or otherwise restrict the Department's access to the sources and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to the sources 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.

### COMPLIANCE CERTIFICATION.

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

### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

### \*\*\* Permit Shield In Effect \*\*\*



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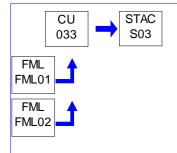


#### SECTION D. **Source Level Requirements**

Source ID: 033 Source Name: BOILER - EPS BUILDING

> Source Capacity/Throughput: 16.329 MMBTU/HR

Conditions for this source occur in the following groups: 1



### 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 from a combustion unit in excess 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**

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

#### # 003 [25 Pa. Code §127.512]

Operating permit terms and conditions.

Pursuant to the Best Available Technology (BAT) provisions of 25 PA Code Section 127.12(a)(5), NOx emissions from the boiler shall never exceed 30 ppmdv at 3% O2.

### **TESTING REQUIREMENTS.**

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

#### III. MONITORING REQUIREMENTS.

#### # 004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The facility shall ensure that the boiler is equipped with the applicable monitoring equipment and the monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with good manufacturing practices at all times the boiler is in use.

#### # 005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Authority for this condition is also derived from 40 CFR Part 64, regarding Compliance Assurance Monitoring (CAM)]

Monitoring Requirements:

Pursuant to the compliance assurance monitoring requirements of 40 CFR Sections 64.4 and 64.6, this source shall be equipped with instrumentation that measures the steam pressure (CAM parameters). The operating range of the boiler is







#### SECTION D. **Source Level Requirements**

15-270 psi of steam pressure as per boiler manual. The permittee shall monitor the steam pressure once a day during normal operating hours whenever source 101 is in operation (excludes weekends and holidays). If the boiler fails, pentane will still be collected by Process 101 until the concentration reaches 50% of the LEL, at which point the pentane is released and emitted. When the boiler is operating properly and pentane concentration in Process 101 reaches 85% of the LEL. then pentane is released and emitted. This would constitute a failure of the control device.

### IV. RECORDKEEPING REQUIREMENTS.

#### # 006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Recordkeeping Requirements:

(Additional authority for permit conditions (a)-(d) is also derived from 40 CFR §64.9)

- (a) The permittee shall record the steam pressure once a day during normal operating hours whenever source 101 is in operation (excludes weekends and holidays).
- (b) The permittee shall record all excursions and corrective actions taken in response to an excursion and the time elapsed until the corrective actions have been taken.
- (c) The permittee shall record all inspections, repair and maintenance performed on the monitoring equipment.
- (d) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, possible causes and corrective actions taken for the incidents.

# 007 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.48c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units Reporting and recordkeeping requirements.

Pursuant to 40 CFR 60.48c(i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

Pursuant to 40 CFR 60.48c(j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

### REPORTING REQUIREMENTS.

#### # 008 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Pursuant to 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:

US EPA, Region III

Associate Director, Office of Air Enforcement and Compliance (3AP20)

1650 Arch Street

Philadelphia, PA 19103-2029

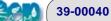
### VI. WORK PRACTICE REQUIREMENTS.

### [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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





### **SECTION D.** Source Level Requirements

### VII. ADDITIONAL REQUIREMENTS.

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

\*\*\* Permit Shield in Effect. \*\*\*



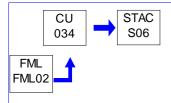


### SECTION D. Source Level Requirements

Source ID: 034 Source Name: MISC. NATURAL GAS USAGE

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 1



### I. RESTRICTIONS.

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

# 001 [25 Pa. Code §123.11]

**Combustion units** 

Source ID 034 shall not emit particulate matter in excess of the rate of 0.40 pounds per million Btu of heat input.

# 002 [25 Pa. Code §123.22]

**Combustion units** 

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from the exhaust of Source ID 034 in excess of the rate of 4 pounds per million Btu of heat input over a 1-hour period.

### II. TESTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

# 003 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.97(c)(2)]

The owner and operator of a source specified in this subsection, which is located at a major VOC emitting facility subject to §129.96 shall install, maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices.



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### **SECTION D.** Source Level Requirements

### VII. ADDITIONAL REQUIREMENTS.

# 004 [25 Pa. Code §127.512]

Operating permit terms and conditions.

Source ID 034 consists of one (1) natural gas-fired Cleaver Brooks boiler with a heat input rating of 9.39MMBtu/hr and forty-two natural gas-fired heaters each with a heat input rating of 0.175 MMBtu/hr.

\*\*\* Permit Shield in Effect. \*\*\*



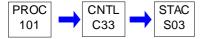
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## SIE

### **SECTION D.** Source Level Requirements

Source ID: 101 Source Name: EPS MANUFACTURING

Source Capacity/Throughput: 4,000.000 Lbs/HR PENTANE



### I. RESTRICTIONS.

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

# 001 [25 Pa. Code §123.13]

### **Processes**

The concentration of particulate matter in the exhaust of Source ID 101 shall not exceed 0.04 grains per dry standard cubic foot of effluent gas volume.

# 002 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.99(c).]

The annual VOC emissions from this source shall not exceed 88.8 tons per year based on a 12 month rolling sum, as calculated by the company and approved by the Department.

### **Throughput Restriction(s).**

# 003 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.99]

- 1. The permittee shall only use expandable polystyrene (EPS) beads with pentane as the sole blowing agent.
- 2. The maximum hourly pentane throughput shall not exceed 4,000 lbs/hr, based on a daily average.

### Control Device Efficiency Restriction(s).

# 004 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.99(c)]

The facility shall achieve at least 99% destruction efficiency for the volatile organic compounds (VOC) emissions in the control device (C33) to demonstrate compliance with Condition #002.

### II. TESTING REQUIREMENTS.

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

### III. MONITORING REQUIREMENTS.

# 005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The company shall ensure the control device (C33) is equipped with the applicable monitoring equipment and the monitoring equipment shall be installed, calibrated, operated, and maintained according to vendors specifications at all times this source is in use.







#### SECTION D. **Source Level Requirements**

# 006 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.100]

- 1. The facility shall ensure that the boiler is equipped with the applicable monitoring equipment and the monitoring equipment shall be installed, calibrated, and maintained in accordance with good manufacturing practices at all times the boiler is in use.
- 2. The operating range of the boiler shall be 15-270 psi of steam pressure. The permittee shall monitor the steam pressure once a day during normal operating hours whenever source 101 is in operation (excluding weekends and holidays). If the boiler fails, pentane will still be collected by Process 101 until the concentration reaches 50% of the LEL, at which point the pentane is released and emitted. When the boiler is operating properly and pentane concentration in Process 101 reaches 85% of the LEL, then pentane is released and emitted. This would constitute a failure of the control device.

### IV. RECORDKEEPING REQUIREMENTS.

# 007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The company shall record the hours of operation and the quantity of beads used on a daily basis in order to show compliance with the emission rate of Condition #002.

# 008 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The company shall monitor and record on a daily basis the amount of natural gas and pentane being fired in the control device (C33).

# 009 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.100(d).]

All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.

1. The Permittee shall maintain daily usage records of all expandable polystyrene (EPS) beads processed at the facility. These records shall include the total weight and the volatile organic compound content (expressed as a weight percentage).

All calculations used to determine usages should be kept as part of the monthly record. These usage records shall be made available for inspection or submittal for five years from the date of record.

2. The Permittee shall use the daily records required in part 1 of this condition above to calculate and record the total monthly pentane emissions using the following calculation:

VOC emissions = A-B, where:

A = The starting quantity of pentane, calculated as the total amount of beads processed, in pounds, multiplied by the weight percent of pentane in the beads, as provided by the manufactures; and

B= the total of the residual pentane in the final product prior to shipment, in pounds, plus the quantity of pentane destroyed in the boiler, in pounds.

3. The Permittee shall use this calculation to determine the twelve month rolling total VOC emissions from expandable polystyrene associated with Source 101 for each month. All calculations used to determine the twelve month rolling total VOC emissions should be kept as part of the monthly record.



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### **SECTION D.** Source Level Requirements

# 010 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.100]

The permittee shall record the steam pressure once a day during normal operating hours whenever source 101 is in operation (excludes weekends and holidays).

### V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

# 011 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The facility shall store the molded blocks for 24 hours for stabilization purposes prior to fabrication.

# 012 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.100]

The company shall ensure the capture system and control device (C33) are operated at all times the source (101) is in operation. The boiler must be operating within the parameters established in the CAM plan whenever the EPS Manufacturing process is operating.

### VII. ADDITIONAL REQUIREMENTS.

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

### \*\*\* Permit Shield in Effect. \*\*\*



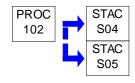


### SECTION D. Source Level Requirements

Source ID: 102 Source Name: POLYURETHANE FOAM MFG

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 1



### I. RESTRICTIONS.

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

# 001 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.99(c).]

The annual VOC emissions from this source shall not exceed 20.0 tons per year based on a 12 month rolling sum, as calculated by the company and approved by the Department.

# 002 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The annual HAPs emission rate from this source shall not exceed 1.0 ton per year based on a 12-month rolling sum.

### II. TESTING REQUIREMENTS.

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

### IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Compliance with the HAPs emission limit of Condition #002 shall be demonstrated by recording the chemical usage for the foam line on a daily and monthly basis.

# 004 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.100(d).]

1. The owner/operator shall record the chemical usage for the foam line on a daily and monthly basis for calculating VOC emissions to show compliance with the VOC emissions limit.

### V. REPORTING REQUIREMENTS.

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



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### **SECTION D.** Source Level Requirements

### VI. WORK PRACTICE REQUIREMENTS.

# 005 [25 Pa. Code §127.512]

Operating permit terms and conditions.

All clean up solvent operations must comply with Best Available Technology to minimize VOC emissions. All cleaning operations must store new and used cleaning solvents in closed containers.

# 006 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The company shall use only non-HAPs based clean up solvents (i.e. n,methylpyrrolidine) in the clean up solvent operations.

# 007 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.99.]

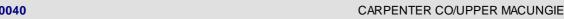
The company shall use only a non-traditional blowing agent (i.e. carbon dioxide) in its polyurethane foam manufacturing process. VOC/HAP blowing agents are prohibited from being used.

### VII. ADDITIONAL REQUIREMENTS.

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

### \*\*\* Permit Shield in Effect. \*\*\*



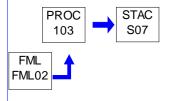


#### SECTION D. **Source Level Requirements**

Source ID: 103 Source Name: FIBER OVEN

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 1



### RESTRICTIONS.

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

# 001 [25 Pa. Code §123.13]

### **Processes**

The concentration of particulate matter in the exhuast of Source ID 103 shall not exceed 0.04 grains per dry standard cubic foot of effluent gas volume.

# 002 [25 Pa. Code §123.21]

### General

The concentration of sulfur oxides, expressed as sulfur dioxide (SO2), in the exhaust of Source ID 103 shall not exceed 500 parts per million, by volume, dry basis.

#### TESTING REQUIREMENTS. П.

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

#### MONITORING REQUIREMENTS. III.

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

#### RECORDKEEPING REQUIREMENTS. IV.

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

#### WORK PRACTICE REQUIREMENTS. VI

# 003 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.97(c)(2)]

The owner and operator of a source specified in this subsection, which is located at a major VOC emitting facility subject to §129.96 shall install, maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices.





# M. S.

### **SECTION D.** Source Level Requirements

### VII. ADDITIONAL REQUIREMENTS.

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

\*\*\* Permit Shield in Effect. \*\*\*

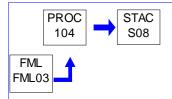




### **SECTION D.** Source Level Requirements

Source ID: 104 Source Name: DIESEL FIRE PUMP

Source Capacity/Throughput:



### I. RESTRICTIONS.

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

# 001 [25 Pa. Code §123.13]

### **Processes**

The concentration of particulate matter in the exhaust of Source ID 104 shall not exceed 0.04 grains per dry standard cubic foot of effluent gas volume.

# 002 [25 Pa. Code §123.21]

### **General**

The concentration of sulfur oxides, expressed as sulfur dioxide (SO2), in the exhaust of Source ID 104 shall not exceed 500 parts per million, by volume, dry basis.

# 003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4205]
Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
What emission standards must I meet for emergency engines if I am an owner or operator of a stationary CI internal co
(a) - (b) Not applicable.

(c) Owners and operators of fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in table 4 to this subpart, for all pollutants.

[Excerpt from Table 4]

As stated in §60.4205(c), you must comply with the following emission standards for stationary fire pump engines:

Maximum engine power greater than or equal to 300 HP and less than 600 HP; for model year 2008 and earlier;

NMHC + NOx: 10.5 g/kW-hr (7.8 g/HP-hr) CO: 3.5 g/kW-hr (2.6 g/HP-hr) PM: 0.54 g/kW-hr (0.40 g/HP-hr)

(d) - (f) Not applicable.

### Fuel Restriction(s).

# 004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4207]
Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
What fuel requirements must I meet if I am an owner or operator of a stationary CI internal combustion engine subject to
(a) Not applicable.

(b) Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted.

[Excerpt from 40 CFR 80.510(b)]



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### **SECTION D.** Source Level Requirements

The maximum sulfur content for non-road diesel is 15 ppm.

(c) [Reserved]

(d) - (e) Not applicable.

### **Operation Hours Restriction(s).**

# 005 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The combined nitrogen oxide (NOx, expressed as NO2) emission from the fire pump shall not exceed 100 pounds per hour, 1000 pounds per day, 2.75 tons per ozone season and 6.6 tons in any 12 consecutive month period.

### II. TESTING REQUIREMENTS.

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

### III. MONITORING REQUIREMENTS.

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

### IV. RECORDKEEPING REQUIREMENTS.

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

### V. REPORTING REQUIREMENTS.

# 006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4214]
Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary CI internal combustion engine?

- (a) Not applicable.
- (b) If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.
- (c) (e) Not applicable.

### VI. WORK PRACTICE REQUIREMENTS.

# 007 [25 Pa. Code §127.512]

Operating permit terms and conditions.

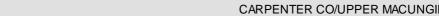
[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.97(c)(8)]

The owner and operator of a source specified in this subsection, which is located at a major VOC emitting facility subject to §129.96 shall install, maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices.

# 008 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4206]
Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

How long must I meet the emission standards if I am an owner or operator of a stationary CI internal combustion





#### SECTION D. **Source Level Requirements**

### engine?

Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §§60.4204 and 60.4205 over the entire life of the engine.

# 009 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4209] Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?

If you are an owner or operator, you must meet the monitoring requirements of this section. In addition, you must also meet the monitoring requirements specified in §60.4211.

- (a) If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.
- (b) Not applicable.
- # 010 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4211] Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?
- (a) If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:
- (1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;
- (2) Change only those emission-related settings that are permitted by the manufacturer; and
- (3) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.
- (b) If you are an owner or operator of a pre-2007 model year stationary CI internal combustion engine and must comply with the emission standards specified in §§60.4204(a) or 60.4205(a), or if you are an owner or operator of a CI fire pump engine that is manufactured prior to the model years in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) through (5) of this section.
- (1) Purchasing an engine certified according to 40 CFR part 89 or 40 CFR part 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.
- (2) Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.
- (3) Keeping records of engine manufacturer data indicating compliance with the standards.
- (4) Keeping records of control device vendor data indicating compliance with the standards.
- (5) Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in §60.4212, as applicable.
- (c) (e) Not applicable.
- (f) If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (3) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)

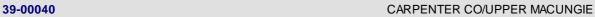


### **SECTION D.** Source Level Requirements

through (3) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

- (1) There is no time limit on the use of emergency stationary ICE in emergency situations.
- (2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (f)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).
- (i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
- (ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
- (iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- (3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraph (f)(3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
- (i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
- (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
- (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
- (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
- (D) The power is provided only to the facility itself or to support the local transmission and distribution system.
- (E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
- (ii) [Reserved]
- (g) (h) Not applicable.





#### **SECTION D. Source Level Requirements**

### VII. ADDITIONAL REQUIREMENTS.

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

\*\*\* Permit Shield in Effect. \*\*\*







### SECTION E. Source Group Restrictions.

Group Name:

1

Group Description: 40 CFR Part 63 Subpart OOOOOO

Sources included in this group

ID	Name
033	BOILER - EPS BUILDING
034	MISC. NATURAL GAS USAGE
102	POLYURETHANE FOAM MFG
103	FIBER OVEN

### I. RESTRICTIONS.

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

### II. TESTING REQUIREMENTS.

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

### III. MONITORING REQUIREMENTS.

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

### IV. RECORDKEEPING REQUIREMENTS.

### # 001 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Authority for this condition is derived from §63.11417]

- (a) If you own or operate a slabstock flexible polyurethane foam production affected source, you must comply with the requirements in paragraph (b) of this section.
- (b) Each owner or operator of a new or existing slabstock flexible polyurethane foam production affected source who chooses to comply with §63.11416(b)(2) must comply with paragraphs (b)(2) and (3) of this section.
- (1) Not applicable.
- (2) You must submit a notification of compliance status report no later than 180 days after your compliance date. The report must contain this certification of compliance, signed by a responsible official, for the standards in §63.11416(b)(2): "This facility uses no material containing methylene chloride for any purpose on any slabstock flexible foam process."
- (3) You must maintain records of the information used to demonstrate compliance, as required in §63.11416(f). You must maintain the records for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site.

### V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

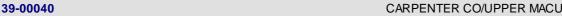
### # 002 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Authority for this condition is derived from §63.11416]

(a) If you own or operate a slabstock flexible polyurethane foam production affected source, you must meet the requirements in paragraph (b) of this section.





#### SECTION E. **Source Group Restrictions.**

- (b) If you own or operate a new or existing slabstock polyurethane foam production affected source, you must comply with the requirements in either paragraph (b)(1) or (2) of this section.
- (1) Not applicable.
- (2) Use no material containing methylene chloride for any purpose in any slabstock flexible foam production process.
- (c) (e) Not applicable.
- (f) You may demonstrate compliance with the requirements in paragraphs (b)(2) and (c) through (e) of this section using adhesive usage records, Material Safety Data Sheets, and engineering calculations.

### VII. ADDITIONAL REQUIREMENTS.

#### # 003 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Authority for this condition is derived from §63.11414]

- (a) You are subject to this subpart if you own or operate an area source of hazardous air pollutant (HAP) emissions that meets the criteria in paragraph (a)(1) or (2) of this section.
- (1) You own or operate a plant that produces flexible polyurethane foam or rebond foam as defined in §63.1292 of subpart III.
- (2) Not applicable.
- (b) The provisions of this subpart apply to each new and existing affected source that meets the criteria listed in paragraphs (b)(1) through (4) of this section.
- (1) A slabstock flexible polyurethane foam production affected source is the collection of all equipment and activities necessary to produce slabstock flexible polyurethane foam.
- (2) (4) Not applicable.
- (c) An affected source is existing if you commenced construction or reconstruction of the affected source on or before April 4, 2007.
- (d) (f) Not applicable.

### \*\*\* Permit Shield in Effect. \*\*\*





## **SECTION F.** Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.





## **SECTION G.** Emission Restriction Summary.

No emission restrictions listed in this section of the permit.





## SECTION H. Miscellaneous.

- (a) The Department received the operating permit application for this facility on 10/23/17.
- (b) This permit is a renewal Operating Permit No. 39-00040.
- (c) This is a Title V Operating Permit facility.
- (d) The following is a list of sources that have been determined by the Department to be of minor significance under 25 Pa. Code Chapter 127, Section 127.14 (a)(8) and are not regulated in this Title V Operating permit. However, this determination does not exempt the sources from compliance with all applicable air quality regulations specified in 25 Pa. Code Chapters 121-143.
- Eight (8) wall exhaust fans in polyurethane foam curing area.
- Five (5) wall exhaust fans in EPS curing area.
- One (1) polyester fiber line with (2) exhaust stacks.
- One (1) bonded foam line (BFL) exhaust stack.
- (e) The following request for Determination (RFD's) have been approved for this facility.
- (A) RFD approved on 12/4/2008 for CaCo3 unloading operation.
- (B) RFD approved on 12/09/2008 for switch from TDI to MDI chemicals (HAPs & VOCs).
- (C) RFD # 39-0639 approved on 5/322/2009 for switching to soy polyol.
- (D) RFD # 39-0674 approved on 8/4/2010 for adding methyl format to foam blowing.
- (E) RFD # 39-0678 approved on 09/03/2010 for use MDI based binder in carpet foam.
- (F) RFD # 39-0677 approved on 09/03/2010 for Enercon corona treater.
- (G) RFD # 39-0825 approved on 2/4/2015 for relocation of laser cutters.
- (H) RFD # 39-0848 approved on 11/19/2016 for addition of a glue station.

On 10/15/2018, this permit was modify to include the newly applicable RACT II requirements for the sources operating at the facility.

DEP Auth ID: 1193647





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