



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: November 24, 2020 Effective Date: November 24, 2020

Expiration Date: November 23, 2025

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 unless otherwise designated.

State Only Permit No: 46-00100

Synthetic Minor

Federal Tax Id - Plant Code: 04-1680390-1

Owner Information	tior	orm of	Int	Owner
	шог	omia	ш	Owner

Name: SAINT GOBAIN ABRASIVES INC

Mailing Address: 200 COMMERCE DR

MONTGOMERYVILLE, PA 18936-9640

Plant Information

Plant: SAINT GOBAIN ABRASIVES INC/MONTGOMERYVILLE

Location: 46 Montgomery County 46940 Montgomery Township

SIC Code: 3291 Manufacturing - Abrasive Products

Responsible Official

Name: DENNIS J MUELLER

Title: PLT MGR

Phone: (267) 218 - 7100

Permit Contact Person

Name: DAVID SANTANGELO Title: PROCESS ENGR Phone: (267) 218 - 7635

JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAMMANAGER







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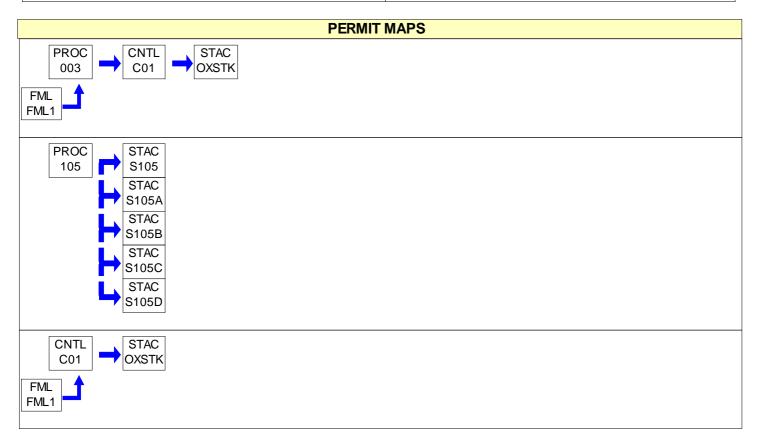






SECTION A. Site Inventory List

Source	D Source Name	Capacity/Throughput	Fuel/Material
003	SURFACE COATING OPERATONS		
105	UV-CURE SURFACE COATING LINE		
C01	THERMAL OXIDIZER		
FML1	NATURAL GAS LINE		
OXSTK	OXIDIZER STACK		
S105	UV-CURE LINE STACK		
S105A	UV-CURE LINE OVEN 1 STACK		
S105B	UV-CURE LINE OVEN 2 STACK		
S105C	UV-CURE LINE OVEN 3 STACK		
S105D	UV-CURE LINE OVEN 4 STACK		







#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 in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

- (a) 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.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating 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.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)]

Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.
- (d) 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.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) 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 as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,





modification, revision, renewal, and re-issuance of each operating permit or part thereof.

- (b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).
 - (1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.
 - (2) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.
- (c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund".

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

Transfer of Operating Permits.

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and 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 a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008] Inspection and Entry.

- (a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a 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, at reasonable times, any records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, any 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, any 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 or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.
- (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.

#007 [25 Pa. Code §§ 127.441 & 127.444]

Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes







a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one 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 for the source is 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 State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

#009 [25 Pa. Code §§ 127.442(a) & 127.461]

Duty to Provide Information.

- (a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.
- (b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450 & 127.462]

Operating Permit Modifications

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and







significant operating permit modifications, under this permit, as outlined below:

- (b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]

Severability Clause.

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

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. 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.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized 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, the regulations thereunder 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, the regulations thereunder or 25 Pa. Code Article III.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:

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SECTION B. General State Only Requirements

- (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 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.
- (e) 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 (c)(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 this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (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, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making 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.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

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

#015 [25 Pa. Code § 127.11]

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Reactivation

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (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).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

- (a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
- (b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]

Circumvention.

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 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#018 [25 Pa. Code §§ 127.402(d) & 127.442]

Reporting Requirements.

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) 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 in the permit transmittal letter, or otherwise notified)

- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such







records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#019 [25 Pa. Code §§ 127.441(c) & 135.5]

Sampling, Testing and Monitoring Procedures.

- (a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
- (b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#020 [25 Pa. Code §§ 127.441(c) and 135.5]

Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
 - (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 any 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.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.





#023 [25 Pa. Code §135.3]

Reporting

- (a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.
- (b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]

Report Format

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.





I. RESTRICTIONS.

Emission Restriction(s).

001 [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).

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

- (a) construction or demolition of buildings or structures;
- (b) grading, paving and maintenance of roads and streets;
- (c) 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;
 - (d) clearing of land;
 - (e) stockpiling of materials;
 - (f) open burning operations, as specified in 25 Pa. Code § 129.14;
 - (g) blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting;
- (h) coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in 25 Pa. Code §§ 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations); and
- (i) sources and classes of sources other than those identified in (a)-(h), above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution; and
- (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [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 25 Pa. Code § 123.1(a)(1)-(9), if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]

Limitations

A person may not permit the emission 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.

005 [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:

- (a) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (b) Equal to or greater than 60% at any time.





006 [25 Pa. Code §123.42]

Exceptions

The opacity limitations of 25 Pa. Code § 123.41 shall not apply to a visible emission in either of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from sources specified in 25 Pa. Code § 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit facility-wide VOC emissions to less than 25 tons per year, based on a 12-month rolling sum.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit facility-wide HAP emissions as follows:

- (a) less than 25 tons per year, any combination of HAP, based on a 12-month rolling sum.
- (b) less than 10 tons per year, any individual HAP, based on a 12-month rolling sum.

009 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material in the Southeast Air Basin except where the open burning operations result from:

- (a) 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:
- (b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department;
- (c) A fire set for the prevention and control of disease or pests, when approved by the Department;
- (d) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation;
- (e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure;
- (f) A fire set solely for recreational or ceremonial purposes; or
- (g) A fire set solely for cooking food.

II. TESTING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) If at any time DEP has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this Permit, or established pursuant to any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by DEP to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139 and the most current version of the DEP Source Testing Manual, when applicable, and in accordance with any restrictions or limitations established by DEP at such time as it notifies the permittee that testing is required.





III. MONITORING REQUIREMENTS.

011 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurements.
- (b) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall monitor the facility, once per operating day, for the following:
 - (1) odors which may be objectionable (as per 25 Pa. Code §123.31);
 - (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
 - (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).
- (b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:
 - (1) be investigated;
 - (2) be reported to the facility management, or individual(s) designated by the permittee;
 - (3) have appropriate corrective action taken (for emissions that originate on-site); and
 - (4) be recorded in a permanent written log.
- (c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification, complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

- (a) Date, time, and location of the incident(s).
- (b) The cause of the event.
- (c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

- (a) Emissions increase of minor significance without notification to the Department.
- (b) De minimis increases with notification to the Department, via letter.
- (c) Increases resulting from a Request for Determination (RFD) to the Department.
- (d) Increases resulting from the issuance of a plan approval and subsequent operating permit.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.





- (a) The permittee shall maintain a record of monthly and 12-month rolling sums of facility-wide VOC emissions.
- (b) The permittee shall maintain a record of monthly and 12-month rolling sums of facility-wide HAP emissions.

V. REPORTING REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 68.]

- (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 threshold quantity at a 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 40 CFR § 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 this 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 this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If this 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 this 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 the permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process





equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

- (b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.
- (c) The report shall describe the following:
 - (1) Name, permit or authorization number, and location of the facility;
 - (2) Nature and cause of the malfunction, emergency or incident;
 - (3) Date and time when the malfunction, emergency or incident was first observed;
 - (4) Expected duration of excess emissions;
 - (5) Estimated rate of emissions; and
 - (6) Corrective actions or preventative measures taken.
- (d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.
- (e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.
- (f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.
- (g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

VI. WORK PRACTICE REQUIREMENTS.

018 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following

- (a) Use, where possible, of water or suitable chemicals, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land;
- (b) Application of asphalt, water, or other suitable chemicals, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts;
- (c) Paving and maintenance of roadways; and
- (d) 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 by other means.





019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee may not modify any air contaminant system identified in this permit prior to obtaining DEP approval, except those modifications authorized by Condition #013(g) of Section B of this permit.

[25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the source(s) and air pollution control device(s) listed in Section A and Section H of this permit are operated and maintained in a manner consistent with good operating and maintenance practices and in accordance with manufacturer's specifications.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall immediately, upon discovery, implement measures which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A of this permit is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to 25 Pa. Code Article III or any other applicable rule promulgated under the Clean Air Act.

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

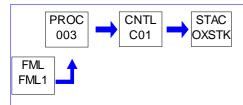




SECTION D. **Source Level Requirements**

Source ID: 003 Source Name: SURFACE COATING OPERATONS

Source Capacity/Throughput:



RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Volatile Organic Compounds (VOC) emissions from the following sources, including the clean-up solvent emissions, shall not exceed 4.23 lb/hr based on a 24 hour average and 7.90 tons per year based on both a 12-month calendar year and 12-month rolling sum:

- (a) Line 1 and oven
- (b) Line 2 and oven
- (c) Coating room.

Control Device Efficiency Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Operating Permit condition is from 25 Pa. Code Sections 129.51(a)(2) and 129.52(b)(2).]

- (a) The thermal oxidizer shall be operated at a minimum VOC destruction efficiency of 95 percent. The stack test performed on October 24, 2017, at which 98.3 percent VOC destruction efficiency was achieved, will serve as the compliance demonstration for this requirement. The Department reserves the right to require additional testing for additional verification of the destruction efficiency.
- (b) The thermal oxidixer shall be operated at a minimum temperature of 1500 degrees Fahrenheit in the combustion chamber with an exhaust gas retention time of one (1) second.
- (c) The thermal oxidizer shall not be bypassed.
- (d) The thermal oxidizer shall achieve a temperature of 1500° Fahrenheit before the coating line is operated. The thermal oxidizer shall be operated a minimum of fifteen minutes after the coating line has stopped operating and the source has been cleaned.

TESTING REQUIREMENTS.

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

MONITORING REQUIREMENTS. III.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall monitor the following on a daily basis:
- (1) the identification and amount of coatings, thinner, cleaning solvents or other components as applied,



SECTION D. Source Level Requirements

46-00100

- (2) the date and hours of operation,
- (3) the VOC content of each coating, thinner, cleaning solvent or other components as applied.
- (b) The permittee shall calculate the hourly emissions based on a 24 hour average and the yearly emissions based on 12-month calender year and 12-month rolling sum, in order to demonstrate compliance with the VOC limitations in Condition #001 for this source.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the temperature of the combustion chamber of the thermal oxidizer continuously, when in operation.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall maintain records of the hourly emissions based on a 24-hour average and the yearly emissions based on 12-month calender year and 12-month rolling sum, in order to demonstrate compliance with the VOC emissions limitations listed in Condition #001 for this source.
- (b) The permittee shall keep a record of the data used in the calculations of the emissions.
- (c) The permittee shall maintain records of the temperature chart recordings.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall keep the following records on a daily basis:
 - (1) the identification and amount of each coating, thinner, cleaning solvent and other component as applied,
 - (2) the date and hours of operation,
 - (3) the VOC content of each coating, thinner, cleaning solvent and other component as applied.
- (b) The permittee shall keep records of all bypasses of the thermal oxidizer, including:
 - (1) date of occurrence,
 - (2) duration of the bypass,
- (3) the corrective action taken.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record the following:

- (a) the date and results of the annual inspection of the thermal oxidizer.
- (b) the date, the results, and the procedure used for the annual monitoring thermocouple validation.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep a copy of the report for all stack tests performed to demonstrate compliance with the VOC destruction efficiency limit of 95%.

V. REPORTING REQUIREMENTS.

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







SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall on an annual basis:

- (a) inspect the thermal oxidizer to include the oxidizer burners.
- (b) validate the two monitoring thermocouples in the combustion chamber of the thermal oxidizer.

010 [25 Pa. Code §129.52b]

Control of VOC emissions from paper, film and foil surface coating processes.

The permittee shall comply with the following work practices for cleaning materials:

- (a) Store all VOC-containing cleaning materials and used shop towels in closed containers.
- (b) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times, except when depositing or removing these materials.
- (c) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.
- (d) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- (e) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.

VII. ADDITIONAL REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of the following, which vent to the thermal oxidizer:

- (a) Coating lines
 - (1) Line 1 Oven 13" Ultralap nominal surface coating maximum with a 14-inch coating head.
 - (2) Line 2 Oven 25" Ultralap surface coating maximum with a 26-inch coating head.
- (b) Coating room exhaust.

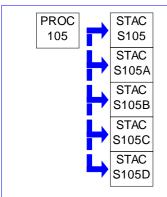




SECTION D. Source Level Requirements

Source ID: 105 Source Name: UV-CURE SURFACE COATING LINE

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The volatile organic compounds (VOC) emissions from this source, shall not be greater than the more stringent of the following:

- (a) including cleaning solvent emissions: 2.15 tons/year on a 12-month rolling basis.
- (b) for the coating process: 3 lb/hr, 15 lb/day, and 2.7 tons/year on a calendar year basis.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall monitor the following daily for this line:
 - (1) the amount of coatings, thinner, cleaning solvents, or other components, as applied,
 - (2) the date and hours of operation,
 - (3) The VOC content of each coating, thinner, cleaning solvent, or other components, as applied.
- (b) The permittee shall calculate the VOC emissions in the following ways:
 - (1) maximum hourly emissions, from the coating process per job,
 - (2) emissions per calendar day, from the coating process,
 - (3) emissions monthly and on a 12-month rolling basis, including cleaning solvents,
- (4) emissions on a calendar year basis, from the coating process.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the Operating Permit condition is from 25 Pa. Code Section 129.51(d)(3).]





SECTION D. **Source Level Requirements**

The permittee shall keep records of the monitoring required for this source and any additional data used in performing the VOC emissions calculations for this source.

REPORTING REQUIREMENTS.

46-00100

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §129.52b]

Control of VOC emissions from paper, film and foil surface coating processes.

The permittee shall comply with the following work practices for cleaning materials:

- (a) Store all VOC-containing cleaning materials and used shop towels in closed containers.
- (b) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times, except when depositing or removing these materials.
- (c) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.
- (d) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- (e) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.

VII. ADDITIONAL REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source comprises the following equipment:

- (a) one (1) 26-inch coating line with three (3) banks of UV Lights,
- (b) four (4) post cure ovens.



SECTION E. Source Group Restrictions.

No Source Groups exist for this permit.

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SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this permit.

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SECTION G. Emission Restriction Summary.

Source Id	Source Description		
003	SURFACE COATING	OPERATONS	
Emission Limit			Pollutant
4.230	Lbs/Hr	24-hour average	VOC
7.900	Tons/Yr	calendar year and 12-month rolling basis	VOC

105 UV-CURE SURFACE COATING LINE

Emission Limit			Pollutant
2.150	Tons/Yr	with cleaning solvents, 12 month rolling basis	VOC
2.700	Tons/Yr	calendar year basis	VOC
3.000	Lbs/Hr		VOC
15.000	Lbs/Day		VOC

Site Emission Restriction Summary

Emission Limit		Pollutant
24.900 Tons/Yr	based on a 12-month rolling sum	VOC
24.900 Tons/Yr	any combination HAP, based on a 12-month rolli	ing sum Hazardous Air Pollutants
9.900 Tons/Yr	any individual HAP, based on a 12-month rolling	sum Hazardous Air Pollutants



SECTION H. Miscellaneous.

- (1) The Department has determined that the emissions from the following activities, excluding those indicated as site level requirements in Section C of this permit do not require additional limitations, monitoring, or recordkeeping:
 - (a) space heaters (10)
 - (b) Mill Room
 - (c) Formulation Room with 2 solvent distillation units
 - (d) Fume Hood
 - (e) R&D Operations, RFD No. 6132

(2) The previously issued Operating Permit No. 46-318-038 serves as the basis for certain terms and conditions set forth in this Permit.
NOVEMBER 2008
AUTH ID 354072 - Moyco Tech, Inc. REPLACED and TRANSFERRED in eFACTS on 11/05/2008.
AUTH ID 759247 (APS 666985) - Transfer of Ownership to Saint Gobain Abrasives, Inc. effective 10/28/2008.
AUTH ID 920166 (APS 666985) - Administrative Amendment to Change Responsible Official/Permit Contact to Wayne E. Shaw.

MARCH 2015

AUTH ID 989468 (APS 666985) - Renewal Permit. The following changes have been made with the renewal permit:

- (1) Source ID 105 RFD 1279 is incorporated for the UV Surface Coating Line and now appears in Section A with applicable requirements listed in Section D of the permit.
- (2) Section C has been updated according to current DEP Guidelines for the Southeast Regional Office. Refer to the review memo associated with the renewal permit AUTH ID 989468 for a detailed summary of the changes that were made to Section C with the renewal issuance.
- (3) Section A and D The emergency generator (Source ID 002) and stack S04 has been added to the permit map and Site Inventory with applicable requirements of 40 CFR Part 60 Subpart ZZZZ included at the Source Level.
- (4) The bypass stack S01 has been removed from the Site Inventory and permit maps since aqueous solutions are no longer used.
- (5) Natural gas FLM1 is added to permit map for Source ID 003, Surface Coating Operations since the ovens use a small amount of natural gas.
- (6) Source ID 003: The Line 3 Coating Line has been removed from Source ID 003. The emission limitations for the source were updated to the total allowed for Line 1 and Line 2. Monitoring and recordkeeping conditions have been clarified as necessary. The requirements of 25 Pa. Code Section 129.52(c)(1) were removed. The company has elected to comply with the updated regulation in 129.52b (d), by use of an oxidizer at 95% destruction efficiency, to reduce the VOC from both coating lines, regardless of VOC content of the coating.
- (7) Additional Testing Conditions: Testing condition for VOC and VOC destruction efficiency has been included on a once in 5-year or once during the term of the permit basis, in accordance with DEP guidelines and as an alternate compliance demonstration



SECTION H. Miscellaneous.

pursuant to 25 Pa. Code Section 129.51. A condition summarizing content format for stack test reports was included, under the authority of 25 Pa. Code Section 139.53. A condition indicating the requirement for use of PSIMS when it becomes available was included, under the authority of 25 Pa. Code Section 139.53. ** UPDATED 2018 ** see Amendment AUTH 1233752 (#4) below **

JULY 2018

AUTH 1233752 - Amendment - Plan Approval No. 46-0100 has been incorporated to the SMOP. The following changes to the Operating Permit were made. Condition numbers refer to the March 12, 2015 issuance of the Operating Permit.

- (1) The Permit Contact has been updated to Dennis J. Mueller.
- (2) Section A & Section D, Source ID 002 The Propane Fired Emergency Generator (23 hp) (Source ID 002), and the Propane Storage Tank (Source ID FML2) were removed from the Site Inventory List and the Permit Maps, since they are no longer operative. All associated conditions were removed from Section D.
- (3) Section D, Source ID 003, Condition #001 VOC emissions limits from the Plan Approval for all the sources have been incorporated.
- (4) A note was included that the October 24, 2017 stack test is accepted as the compliance demonstration of the required oxidizer efficiency and that the Department reserves the right to require additional testing for additional verification of the destruction efficiency. As such, Source Testing Conditions #003, #004, and #005 of Source ID 003 Section D have been removed from the permit.

NOVEMBER 2020

AUTH ID 1284031 - Renewal Permit - The following changes have been made with this renewal permit:

- (1) Section C (Site Level Requirements) of the permit has been updated to the most current template language used for State Only Operating Permits issued in the Southeast Region. The original intent of permit conditions has not changed. Due to a change to the AIMS permitting system, the Emission Restriction Summary now appears as Section G, and the Miscellaneous Section is now Section H of the permit.
- (2) Request for Determination (RFD) No. 6132 Installation of a research and development operation. The R&D operation is now listed in this section as (1)(e) as an insignificant source of emissions.
- (3) On August 12, 2020 the permittee requested a reduction in the frequency of facility-wide perimeter monitoring for fugitive and visible emissions and odors listed in Section C of the permit. DEP granted a reduction from daily to weekly on August 24, 2020. At this time, the facility is currently on a weekly perimeter monitoring frequency for fugitive emissions, visible emissions, and odors.
- (4) Facility-wide VOC and HAP emission limits and associated recordkeeping requirements have been added to Section C of the permit in order for the synthetic minor and area source category limits to be enforceable and accountable.

DEP Auth ID: 1284031





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