



STATE ONLY OPERATING PERMIT

Issue Date: July 14, 2020 Effective Date: September 29, 2020

Expiration Date: September 29, 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: 39-00037

Synthetic Minor

Federal Tax Id - Plant Code: 43-0470580-2

	Owner Information			
Name: NESTLE PURINA PETCARE CO Mailing Address: 2050 POPE RD ALLENTOWN, PA 18104-9308				
Plant Information				
Plant: NESTLE PURINA/PETCARE PLT Location: 39 Lehigh County SIC Code: 2047 Manufacturing - Dog And Cat Food	39919	South Whitehall Township		
	Responsible Official			
Name: BRIAN BLANCK Title: ALLENTOWN PLANT MANAGER Phone: (610) 398 - 4682				
F	Permit Contact Person			
Name: JEANNE LEE Title: ENVIRONMENTAL SPECIALIST Phone: (610) 398 - 4672				
[Signature]	PROGRAM MANAGER			





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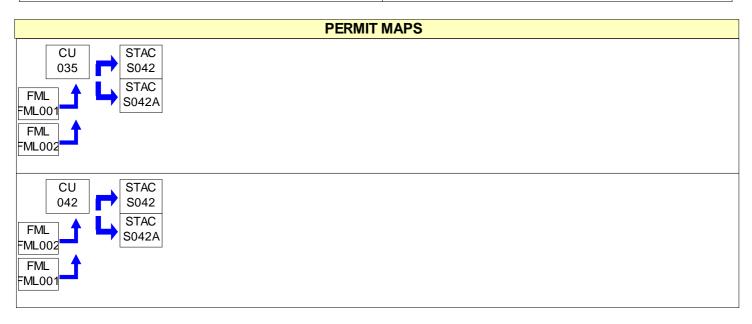
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SECTION A. Site Inventory List

Source I	D Source Name	Capacity/	Throughput	Fuel/Material
035	BOILER 3	92.900	MMBTU/HR	
042	BOILER 5	75.600	MMBTU/HR	
FML001	NATURAL GAS			
FML002	#2 FUEL OIL			
S042	STACK - BOILERS 3 AND 5			
S042A	STACK - CHX CONDENSER			







#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:





- (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]

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.





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) Sources and classes of sources other than those identified in paragraphs (1)-(6), 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.

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

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.

004 [25 Pa. Code §123.41]

Limitations

- (a) 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

- (a) 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 §127.441]

Operating permit terms and conditions.

- (1) The total facility emission of Sulfur Oxides (SOx), Particulate Matter (PM), Carbon Monoxide (CO), and Nitrogen Oxides (NOx) shall not equal or exceed 100 tons in any 12 consecutive month period (12 month rolling sum) for each pollutant.
- (2) The total facility emission of Volatile Organic Compounds (VOCs) shall not equal or exceed 50 tons in any 12 consecutive month period (12 month rolling sum).
- (3) The total facility emission of Hazardous Air Pollutants (HAPs) shall not equal or exceed 25 tons in any 12 consecutive month period (12 month rolling sum) for multiple pollutants, and 10 tons in any 12 consecutive month period (12 month rolling sum) for any single pollutant.





SECTION C. Site Level Requirements

Fuel Restriction(s).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

SYNTHETIC MINOR STATUS

- (a) The facility shall not exceed 2,000,000 gallon (12 month rolling sum) of No. 2 fuel oil.
- (b) The facility shall not exceed 1,250 MMSCF (12 month rolling sum) of natural gas.

II. TESTING REQUIREMENTS.

008 [25 Pa. Code §139.1]

Sampling facilities.

If requested by the Department, the permittee shall conduct performance (stack) tests in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department. The permittee will provide adequate sampling ports, safe sampling platforms, and adequate utilities for the performance by the Department of tests on such source(s). The Department will set forth, in the request, the time period in which the facilities shall be provided as well as the specifications for such facilities.

009 [25 Pa. Code §139.11]

General requirements.

- (a) 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 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 any 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 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.

010 [25 Pa. Code §123.43]

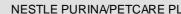
Measuring techniques

- (a) Visible emissions may be measured using either of the following:
 - (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall ensure that the control devices shall be equipped with the applicable monitoring equipment and the monitoring equipment shall be installed, calibrated, operated, and maintained according to the vendors specifications at all times the control equipment is in use.
- (b) The permittee shall monitor pressure drops across control devices to insure the pressure drop is within manufacturers specifications.





SECTION C. **Site Level Requirements**

39-00037

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the quantity and type of fuel burned. The type of fuel shall be determined by certified fuel tests provided by the supplier or through certified testing conducted through the permittee. The testing shall, at a minimum, detail the sulfur and ash content of the fuels that are delivered to the facility, except natural gas and propane.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) A visual inspection of the facility shall be performed on a weekly basis to determine if fugitive or visible emissions are detectable at the facility.
- (b) Visible emissions may be measured according to the methods specified in SECTION C, Condition #010, or alternatively, plant personnel who observe any visible emissions will report the incident of the visible emission to the Department within four hours of each incident and make arrangements for a certified observer to verify the opacity of the visible emissions.

IV. RECORDKEEPING REQUIREMENTS.

[25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a record of the results of the facilities visible and fugitive emissions inspections. At a minimum, the permittee shall record the date, time, results of the inspection, and individual conducting the inspection.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall maintain fuel certification, fuel usage, and facility emission records at the facility. These records shall be updated on a monthly basis and the emissions shall be calculated on a 12 month rolling sum.
- (b) All records shall be maintained for a period of not less than five (5) years and shall be made available to the Department upon request.

[25 Pa. Code §127.441]

Operating permit terms and conditions.

The pressure drops across the control devices shall be recorded and the results provided to the Department upon request.

REPORTING REQUIREMENTS.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The company, within one (1) hour of occurrence, shall notify the Department, at 610-861-2070 (Bethlehem), of any malfunction of the sources or associated air cleaning devices 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 regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection.
- (b) A written report shall be submitted to the Department within two (2) working days following the incident describing the malfunctions and corrective actions taken.

[25 Pa. Code §127.441]

Operating permit terms and conditions.

Annual Emissions (AIMS report) are reported annually via the AES*Online web portal, March 1st annually.

019 [25 Pa. Code §135.4]

Report format

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





SECTION C. Site Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

020 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

- (a) The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. 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.
 - (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.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The use of any in-plant roads associated with the aforementioned sources shall not result in the emission of fugitive particulate matter in excess of the limitation specified in Section 123.1 and 123.2 of the Rules and Regulations of the Department of Environmental Protection.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain all equipment identified in this permit in accordance with the manufacturer's specifications, perform annual tune-ups as specified by the manufacturers, and maintain records of any maintenance performed.

023 [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 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.

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.



SECTION C. Site Level Requirements

No compliance milestones exist.

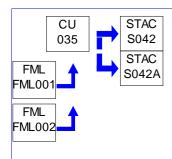




Source ID: 035 Source Name: BOILER 3

Source Capacity/Throughput: 92.900 MMBTU/HR

Conditions for this source occur in the following groups: GROUP 01



I. RESTRICTIONS.

Fuel Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The No. 3 boiler is to be fired only on gas (natural or LP) or No. 2 fuel oil to which there has been no reclaimed or waste oil or other waste materials added. Additionally, the sulfur content of the No.2 fuel oil fired in the No.3 boiler shall not, at any time, exceed 0.3% (by weight).

II. TESTING REQUIREMENTS.

002 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.42c]
Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units Standard for sulfur dioxide.

- (h) For affected facilities listed under paragraphs (h)(1), (2), or (3) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f), as applicable.
 - (1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr).
 - (2) n/a
- (3) n/a

003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.44c]
Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units
Compliance and performance test methods and procedures for sulfur dioxide.

(h) For affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO2 standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under §60.48c(f), as applicable.

004 [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.

- (f) Fuel supplier certification shall include the following information:
 - (1) For distillate oil:
 - (i) The name of the oil supplier;
- (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and
 - (iii) The sulfur content of the oil.





III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of fuel certification reports as stated in source level condition #004 (40 CFR 60.48c). These records shall be kept for a five (5) year minimum period and be made available to the Department upon request.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The No. 2 fuel oil firing rate for the No. 3 boiler shall be recorded monthly and added to the preceding 11 month total No. 2 fuel oil usage (12 month rolling sum). Records of the annual No. 2 fuel oil shall be maintained at the facility for no less than five (5) years following the date of such record.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall comply with the recordkeeping and certification requirements in accordance with 40 CFR §§60.46c(e), 60.42c(h) and 60.48c(f)(1). Reports shall be submitted in accordance with 40 CFR 60.48c(j) for semiannual reporting.

V. REPORTING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The No. 3 boiler (Tampella Power) is subject to Subpart Dc of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 40 CFR 60.4 requires submission of copies of all requests, reports, applications, submittals and other communications to both EPA and the Department.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Reports containing information as outlined in 40 CFR, Part 60, Section 60.48c that are applicable to the No.3 boiler shall be submitted to the Bethlehem District Office. Each report is due no later than thirty (30) days after the end of each semiannual reporting period.

010 [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.

- (e) The owner or operator of each affected facility subject to the SO2 emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable:
- (11) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1), (2), (3), or (4) of this section, as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

VI. WORK PRACTICE REQUIREMENTS.

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





VII. ADDITIONAL REQUIREMENTS.

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

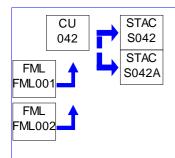




Source ID: 042 Source Name: BOILER 5

Source Capacity/Throughput: 75.600 MMBTU/HR

Conditions for this source occur in the following groups: GROUP 01



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Pursuant to the provision of 25 Pa. Code §123.11 (relating to combustion units),

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the following:

The rate determined by the following formula:

 $A = 3.6E^{(-0.56)}$

where

A = Allowable emissions in pounds per million BTUs of heat input,

and

E = Heat input to the combustion unit in millions of BTUs per hour,

when E is equal to or greater than 50 but less than 600.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Pursuant to the provision of 25 Pa. Code, Chapter 123, Section 123.41, & New Source Performance Standards (NSPS) Subpart Dc, the visible air contaminant from the boiler shall not be emitted in such a manner that the opacity of the emissions is equal to or greater than 20 % for a period or periods aggregating more than 3 minutes in any one hour; or equal to or greater than 60% at any time.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Pursuant to the Best Available Technology provision of 25 Pa. Code §§127.1 and 127.12(a)(5), the new boiler is subject to the following air contaminant emission limitations:

Pollutant

Nitrogen Oxides (NOX) 30 ppmdv at 3% O2, 2.42 lb/hr, while firing Natural Gas

90 ppmdv at 3 % O2, 10.33 lb/hr, while firing #2 Fuel Oil

Carbon Monoxide (CO) 100 ppmdv at 3% O2, 6.35 lb/hr, while firing Natural Gas

100 ppmdv at 3% O2, 2.58 lb/hr, while firing #2 Fuel Oil





Fuel Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The sulfur content of No.2 fuel oil shall not exceed 0.3% by weight at any time pursuant to the limitations of 25 Pa. Code, Chapter 123, Section 123.22(a)(2).

II. TESTING REQUIREMENTS.

005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.42c]
Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units Standard for sulfur dioxide.

- (h) For affected facilities listed under paragraphs (h)(1), (2), or (3) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under \$60.48c(f), as applicable.
 - (1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr).

006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.44c]
Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units
Compliance and performance test methods and procedures for sulfur dioxide.

- (h) For affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO2 standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under §60.48c(f), as applicable.
- # 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.
- (f) Fuel supplier certification shall include the following information:
 - (1) For distillate oil:
 - (i) The name of the oil supplier;
- (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and
 - (iii) The sulfur content or maximum sulfur content of the oil.

III. MONITORING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall install and maintain the necessary meter(s) to determine and to record amount of fuel usage.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall maintain a file containing all records and other data that are required to be collected pursuant to the various provisions of respective plan approval(s) and this operating permit. The file shall include, but not be limited to: all air pollution control systems performance evaluations and records of calibration checks, adjustments and maintenance performed on all equipment which are subject to respective plan approval(s) and this operating permit. All measurements, records and other data required to be maintained by the company, including a determination of each emissions unit 12-month rolling total emissions and other records required by 40 CFR 52.21(aa)(13), shall be retained for at least five years following the date on which such measurements, records or data are recorded.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall comply with the recordkeeping and certification requirements in accordance with 40 CFR §§60.46c(e), 60.42c(h) and 60.48c(f)(1). Reports shall be submitted on a quarterly basis unless no excess emissions occurred. If there are no excess emissions, the company shall semi-annually report that no excess emissions occurred during the semi-annual reporting period.





011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall monitor sulfur content of #2 fuel oil by certification from the fuel supplier for each shipment prior to any amount of fuel oil being combusted. The certification required by this condition may be based on sampling by the fuel supplier of the oil placed in storage in the tank or tanks from which the fuel supplier draws oil for shipment to the company.

IV. RECORDKEEPING REQUIREMENTS.

012 [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.

(g)(2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

V. REPORTING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The new boiler is subject to Subpart Dc of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 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:

Office of Air Enforcement and Compliance Assistance (3AP20)

United States Environmental Protection Agency

Region 3

1650 Arch Street

Philadelphia, PA 19103-2029

014 [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.

- (e) The owner or operator of each affected facility subject to the SO2 emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable:
- (11) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1), (2), (3), or (4) of this section, as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

VI. WORK PRACTICE REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The aforementioned source may only be operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department) and in accordance with any conditions set forth herein.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall maintain and operate the boiler in accordance with the manufacturer's specification and with good engineering practice.







VII. ADDITIONAL REQUIREMENTS.

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





SECTION E. Source Group Restrictions.

Group Name: GROUP 01
Group Description: BOILERS
Sources included in this group

ID	Name
035	BOILER 3
042	BOILER 5

I. RESTRICTIONS.

Fuel Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The boilers are exempt from 40 CFR 63 Subpart JJJJJJ, if they meet the following requirement(s).

- (a) The boilers shall only fire natural gas except during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.
- (b) Whenever the boilers are fired on anything other than natural gas, the facility shall keep records of the hours of operation and type of fuel used.
- (c) (g) n/a.
- (h) For affected boilers that switch fuels or make a physical change to the boiler that results in the applicability of a different subcategory within subpart JJJJJJ or the boiler becoming subject to subpart JJJJJJ, you must demonstrate compliance within 180 days of the effective date of the fuel switch or the physical change. Notification of such changes must be submitted according to §63.11225(g).

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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.

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

VII. ADDITIONAL REQUIREMENTS.

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





SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this permit.

DEP Auth ID: 1312189



39-00037



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 03/24/2020. The annual operating permit administrative fee per 25 Pa. Code, Chapter 127, Section 127.703(c)(3) for this permit is due within 30-days prior to the annual anniversary date of the issuance of this permit.
- (b) This permit is a renewal of Operating Permit No. SM 39-00037.
- (c) This is a Synthetic Minor Operating Permit facility.

This operating permit was amended on February 23, 2006 to incorporate the boiler constructed under plan approval 39-302-179.

Other sources at this facility that have been found to be exempt and that do not need further permitting:

(1) Emergency Fire Pump

The emergency fire pump is subject to the following NESHAP requirements: 40 CFR 63.6625(f), 40 CFR 63.6640(f), 40 CFR 63.6625(e) and Table 6, 40 CFR 63.6625(i) and Subpart ZZZZ Table 2d, 40 CFR 63.6655, and 40 CFR 63.6675.

- (2) TVP Pneumatic Conveyance System.
- (3) Three (3) large space heaters, each rated at 4.4 MMBtu/hr.
- (4) Thirty (30) space heaters total heat capacity of 14.7MMBtu/hr.
- (5) Three (3) Bradford White Hot Water Heaters.
- (6) Storage Silo Dust Collectors.
- (7) Automated Batching System.
- (8) Silo delivery System with Vacuum Conveyor.
- (9) Refrigerated Trailers Engines.
- (10) Ink Jet Coders.
- (11) Kitchen Exhausts.
- (12) Vibrating Conveyors.
- (13) Fuel Storage Tanks.
- (14) Wastewater Treatment.
- (15) RFD #39-0662 upgrade silo delivery system w/ vacuum conveyor & dust collector.





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