

Issue Date:

July 27, 2021



#### **COMMONWEALTH OF PENNSYLVANIA** DEPARTMENT OF ENVIRONMENTAL PROTECTION **AIR QUALITY PROGRAM**

STATE ONLY NATURAL MINOR OPERATING PERMIT

Issue Date:	July 27, 2021	Effective Date:	August 26, 2021
Expiration Date:	August 25, 2026		
amended permittee operate t condition with all a The regu	cordance with the provisions of the Air Pollution Co d, and 25 Pa. Code Chapter 127, the Owner, [a e) identified below is authorized by the Departm he air emission source(s) more fully described in s specified in this permit. Nothing in this permit re pplicable Federal, State and Local laws and regula latory or statutory authority for each permit condition rmit are federally enforceable unless otherwise de	and Operator if not nent of Environmen this permit. This Fa elieves the permitted ations. on is set forth in bra	ed] (hereinafter referred to as tal Protection (Department) to cility is subject to all terms and e from its obligations to comply
	State Only Permit No	: 46-00282	
	Natural Mino		
	Federal Tax Id - Plant Cod	le: 22-3404063-2	
	Owner Inform	nation	
Nam	e: TITAN INTL INC		
Mailing Addres	ss: 740 QUEEN ST		
	POTTSTOWN, PA 19464-6008		
	Plant Inform:	ation	
Plant: TITAN	I INTL/POTTSTOWN		
Location: 46	Montgomery County	46005 Potts	town Borough
SIC Code: 3341	Manufacturing - Secondary Nonferrous Metals		
	Responsible	Official	
Name: ROBE	RT HAYES		
Title: CFO			
Phone: (856) 7	735 - 2220 Ext.150	Email: rhayes@	Ititanintl.com
	Permit Contact	Person	
Name: ROBIN Title: EH&S			
Phone: (856) 7	/35 - 2220 Ext.150	Email: rgardner	@titanintl.com
[Signature]			
	PCHAK SOUTHEAST REGION AIR PROGRAMM	IANAGER	
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER			





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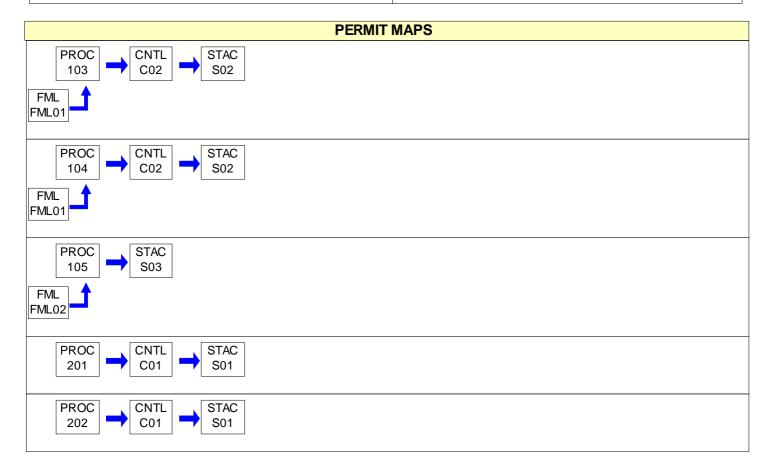
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# SECTION A. Site Inventory List

Source	ID Source Name	Capacity/Throughput	Fuel/Material
103	NATURAL GAS COOKING KETTLE 1 (KETTLE 31)	N/A	
104	NATURAL GAS COOKING KETTLE 5 (KETTLE 32)	N/A	
105	300 KW DIESEL EMER GENERATOR	20.000 Gal/HR	Diesel Fuel
201	REACTOR TANK 10	N/A	
202	REACTOR TANK 11	N/A	
C01	HCL FUME SCRUBBER		
C02	AMMONIA FUME SCRUBBER		
FML01	NATURAL GAS		
FML02	DIESEL FUEL OIL		
S01	HCL FUME SCRUBBER STACK		
S02	AMMONIA FUME SCRUBBER STACK		
S03	EMERGENCY GENERATOR EXHAUST		







# #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)]

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 as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.

(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 the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.

- (1) For a synthetic minor facility, a fee equal to:
  - (i) Four thousand dollars (\$4,000) for calendar years 2021-2025.
  - (ii) Five thousand dollars (\$5,000) for calendar years 2026-2030.
  - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.



(2) For a facility that is not a synthetic minor, a fee equal to:

(i) Two thousand dollars (\$2,000) for calendar years 2021-2025.

(ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026-2030.

(iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.

(b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

# #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, 127.465 & 127.703]

#### **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 submit the application for 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 submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.

(e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

# #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.

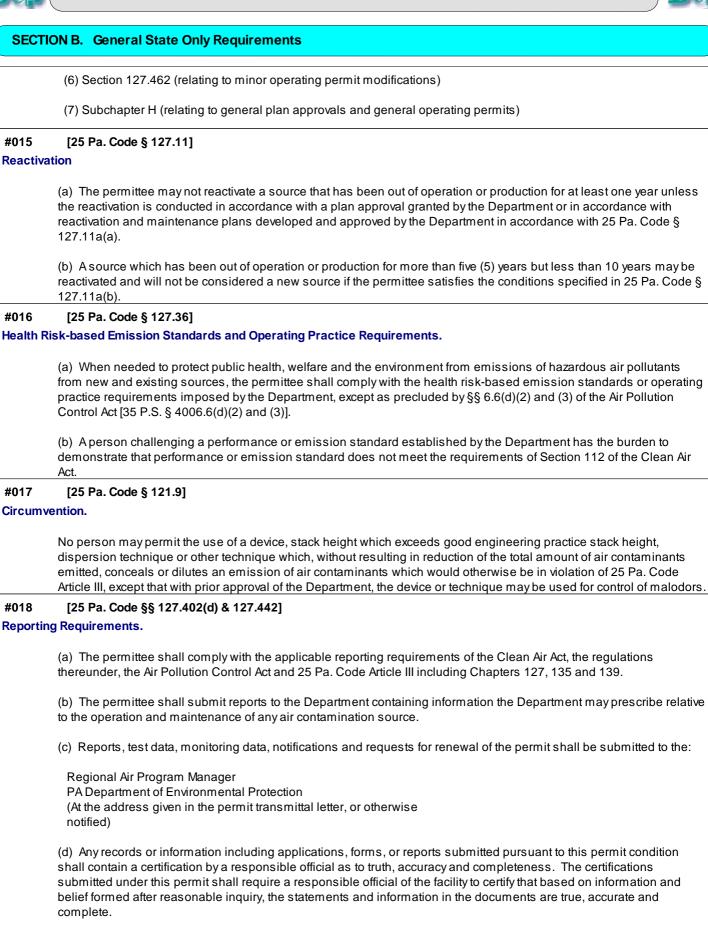
# #014 [25 Pa. Code § 127.3]

#### **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)





(e) Any records, reports or information submitted to the Department shall be available to the public except for such

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# **SECTION B. General State Only Requirements** 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) Sources and classes of sources other than those identified in (a)-(f), 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 any 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 §129.14]

#### Open burning operations

No person may permit the open burning of material in the Southeast Air Basin except when 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) A 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 solely for recreational or ceremonial purposes.

(e) A fire set solely for cooking food.

#### II. TESTING REQUIREMENTS.

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this operating 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 the Department 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 the Department at such time as it notifies the permittee that testing is required.

#### III. MONITORING REQUIREMENTS.

#### # 009 [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.

# # 010 [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).
- (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 monitoring frequency 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.

### # 011 [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) De minimis increases 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.

#### # 012 [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.

#### V. REPORTING REQUIREMENTS.

#### # 013 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

[Additional authority for this 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 USEPA 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 USEPA 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.

# # 014 [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 at 484-250-5920. 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.

#### # 015 [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.

#### # 016 [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 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 operating 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.

#### # 017 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall ensure that all sources and control devices are operated and maintained in accordance with manufacturer's specifications and good engineering and air pollution control practices.

#### # 018 [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 Department approval, except those modifications authorized by Condition #013(g) of Section B, of this permit.

#### # 019 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall perform and maintain good housekeeping procedures for storage, use and disposal of chemicals used on site.

(b) The permittee shall keep all tanks, containers, and vessels containing process chemicals and process by-products closed or covered when not in use, as appropriate.

# 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.



# SECTION D. Source Level Requirements

Source ID: 103

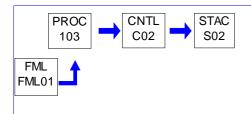
46-00282

Source Name: NATURAL GAS COOKING KETTLE 1 (KETTLE 31)

Source Capacity/Throughput:

N/A

Conditions for this source occur in the following groups: GROUP 2



# I. RESTRICTIONS.

#### Emission Restriction(s).

#### # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall limit total post-control ammonia (NH3) emissions from this source and Source ID 104 to less than 0.093 tons per year, based on a 12-month rolling sum.

[Compliance with this permit condition assures compliance with an ammonia emission concentration of 25 ppmv, the lowest-observed adverse effects level for ammonia.]

#### II. TESTING REQUIREMENTS.

No additional testing 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).

#### 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.

No additional record keeping 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).

#### V. REPORTING REQUIREMENTS.

No additional reporting 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).

#### 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).



# SECTION D. Source Level Requirements

Source ID: 104

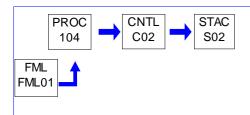
46-00282

Source Name: NATURAL GAS COOKING KETTLE 5 (KETTLE 32)

Source Capacity/Throughput:

N/A

Conditions for this source occur in the following groups: GROUP 2



#### I. RESTRICTIONS.

#### Emission Restriction(s).

#### # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall limit total post-control ammonia (NH3) emissions from this source and Source ID 103 to less than 0.093 tons per year, based on a 12-month rolling sum.

[Compliance with this permit condition assures compliance with an ammonia emission concentration of 25 ppmv, the lowest-observed adverse effects level for ammonia.]

#### II. TESTING REQUIREMENTS.

No additional testing 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).

#### 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.

No additional record keeping 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).

#### V. REPORTING REQUIREMENTS.

No additional reporting 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).

#### 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).

46-00282			
SECTION D. Source	Level Requirements		
Source ID: 105	Source Name: 300 KW DIESEL E	MER GENERATOR	
	Source Capacity/Throughput:	20.000 Gal/HR	Diesel Fuel
$\begin{array}{c} PROC\\ 105 \end{array} \longrightarrow \begin{array}{c} STAC\\ S03 \end{array}$ $\begin{array}{c} FML\\ FML02 \end{array}$			

#### I. RESTRICTIONS.

#### Emission Restriction(s).

#### # 001 [25 Pa. Code §123.13]

#### Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from a process in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

[Compliance with this condition is demonstrated through the use of proper fuels as approved herein.]

#### # 002 [25 Pa. Code §123.21]

#### General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

[Compliance with this condition may be demonstrated by verifying that the sulfur content of the diesel fuel oil is equal to or less than 0.0015% by weight (15 ppm), as derived from 25 Pa. Code § 123.22(e)(2)(i).]

#### # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall limit the aggregate NOx emissions from all exempt generators on site to less than 100 lbs/hr, 1000 lbs/day, 2.75 tons per ozone season and 6.6 tons per year on a 12-month rolling basis.

# Fuel Restriction(s).

#### # 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall burn diesel only in this emergency generator.

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

# 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirement

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.35.]

(a) The permittee shall operate the emergency stationary RICE according to the requirements of 40 CFR § 63.6640(f)(1), (2)(i), (3), and (4) as follows:

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) The permittee shall may operate the emergency stationary RICE for the purpose specified in 40 CFR § 63.6640(f)(2)(i)





# SECTION D. Source Level Requirements

for a maximum of 100 hours per calendar year, as follows: Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(3) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) of this Subpart ZZZZ, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(b) If the permittee does not operate the engine according to the requirements above, the engine will not be considered an emergency engine under 40 CFR Part 63 Subpart ZZZZ and must meet all requirements for non-emergency engines.

#### II. TESTING REQUIREMENTS.

#### # 006 [25 Pa. Code §139.16] Sulfur in fuel oil.

(a) The following are applicable to tests for the analysis of commercial fuel oil:

(1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) Test methods and procedures for the determination of viscosity shall be that specified in 25 Pa. Code § 139.4(11) (relating to references). The viscosity shall be determined at 100°F.

(3) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).

(4) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

(b) The testing requirements in subpart (a) above, shall be waived in the event that a delivery receipt from the supplier, showing the percentage sulfur in the fuel, is obtained each time a fuel oil delivery is made.

#### 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.

# # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain monthly records of the aggregate NOx emissions from all exempt engines on site including pounds per hour, pounds per day, ozone season (i.e., the period from May 1 through September 30 of each year) sums, and 12-month rolling sums to demonstrate compliance with the NOx emission limits for this source.

#### # 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

What records must I keep?



# **46-00282**

# SECTION D. Source Level Requirements

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.35.]

The permittee shall keep the following records, according to 40 CFR § 63.6655(a)(2), (4), and (5):

(a) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

(b) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(c) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR § 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

# # 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

#### What records must I keep?

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.35.]

(a) The permittee shall keep records of the O&M Plan or manufacturer's specifications to show continuous compliance with the work management practices according to 40 CFR § 63.6655(d) and Item No. 9 of Table 6 of 40 CFR Part 63 Subpart ZZZZ.

(b) The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE according to the facility O&M Plan, according to 40 CFR § 63.6655(e).

# 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

### What records must I keep?

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.35.]

(a) The permittee shall keep monthly records of the hours of operation of the engine that is recorded through the non-resettable hour meter, according to 40 CFR § 63.6655(f).

(b) The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

# 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6660]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

#### In what form and how long must I keep my records?

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.35.]

(a) The permittee shall maintain records in a form suitable and readily available for expeditious review according to 40 CFR § 63.10(b)(1).

(b) As specified in 40 CFR § 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) The permittee shall must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR § 63.10(b)(1).





# SECTION D. Source Level 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.

# 012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6603] Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.35.]

(a) The permittee shall comply with the following requirements for this emergency stationary CI RICE according to 40 CFR § 63.6603(a) and Item No. 4 of Table 2d of 40 CFR Part 63 Subpart ZZZZ:

(1) Change oil and filter every 500 hours of operation or annually, whichever comes first;

(2) Inspect air cleaner annually and replace as necessary; and

(3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

(b) In accordance with 40 CFR § 63.6625(i), the permittee has the option of utilizing an oil analysis program in order to extend the oil change requirement. The oil analysis must be performed at the same frequency specified above for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

# # 013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6605]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

# What are my general requirements for complying with this subpart?

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.35.]

(a) The permittee shall be in compliance with the applicable requirements of 40 CFR Part 63 Subpart ZZZZ at all times.

(b) At all times the permittee shall operate and maintain the affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

# # 014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

# What are my monitoring, installation, operation, and maintenance requirements?

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.35.]

The permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or facility-developed maintenance plan which must provide to the extent practicable for the maintenance and





# SECTION D. Source Level Requirements

operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions, according to 40 CFR § 63.6625(e)(3).

#### VII. ADDITIONAL REQUIREMENTS.

# 015 [25 Pa. Code §127.441] Operating permit terms and conditions.

The 300-kW emergency generator manufactured by Kohler is powered by a Cummins diesel engine. The unit was manufactured in 1973 and installed in 1974.



SECTION D. Source Level Requirements

Source ID: 201

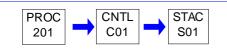
46-00282

Source Name: REACTOR TANK 10

Source Capacity/Throughput:

N/A

Conditions for this source occur in the following groups: GROUP 1



# I. RESTRICTIONS.

#### Emission Restriction(s).

#### # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall limit the total post-control HCl emissions from this source and Source ID 202 to less than 0.042 tons per year, based on a 12-month rolling sum.

#### # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall limit the total NOx emissions from this source and Source ID 202 to less than 12.375 tons per year, based on a 12-month rolling sum.

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### 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).



SECTION D. Source Level Requirements

Source ID: 202

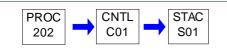
46-00282

Source Name: REACTOR TANK 11

Source Capacity/Throughput:

N/A

Conditions for this source occur in the following groups: GROUP 1



# I. RESTRICTIONS.

#### Emission Restriction(s).

#### # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall limit the total post-control HCI emissions from this source and Source ID 201 to less than 0.042 tons per year, based on a 12-month rolling sum.

#### # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall limit the total NOx emissions from this source and Source ID 201 to less than 12.375 tons per year, based on a 12-month rolling sum.

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### 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).





Group Name: GROUP 1

Group Description: Reactor Tanks

Sources included in this group

ID	Name
201	REACTOR TANK 10
202	REACTOR TANK 11

#### I. RESTRICTIONS.

#### Control Device Efficiency Restriction(s).

#### # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain a minimum of 99.5% HCl removal efficiency for the HCl Fume Scrubber (C01) associated with this reactor tank.

[Compliance with this permit condition is demonstrated through monitoring and recordkeeping of the operating parameters listed in Work Practice Standards for this source.]

#### 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 continuously monitor the pH of the scrubbing solution in the HCl Fume Scrubber sump during reaction, using a Walchem or equivalent automated pH monitoring equipment.

(b) The permittee shall continuously monitor the HCI Fume Scrubber solution recirculation mass flow rate and density (or specific gravity) during reaction, using a Coriolis mass flow measuring system.

(c) The permittee shall continuously monitor the pressure drop across the HCI Fume Scrubber using a photohelic pressure gauge.

#### # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall calculate post-control HCI emissions on a monthly and 12-month rolling basis, based on the amount of HCI used per batch (gal HCI/batch), number of batches per month, and the removal efficiency or the emission factor determined during the initial stack test (0.0056 lb HCI emitted/gal HCI used).

(b) The permittee shall calculate NOx emissions on a monthly and 12-month rolling basis, based on the amount of HNO3 used per batch (gal HNO3/batch), number of batches per month, and the emission factor determined during the initial stack test (0.6515 lb NOx emitted/gal HNO3 used).

#### IV. RECORDKEEPING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall record the following parameters on an hourly basis during each batch reaction through the use of the PLC system:

(1) HCI Fume Scrubber solution pH;

(2) HCI Fume Scrubber solution recirculation mass flow rates and density (or specific gravity);

(3) HCI Fume Scrubber pressure drop.

(b) The permittee shall specify in the recordkeeping log the time interval at which the above readings are made.





(c) The permittee shall maintain records of the time at which any chemicals are added to the HCI Fume Scrubber sump during each batch reaction, including the amount and type of chemicals added.

#### # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall maintain records of the following operating parameters for each reactor tank on a per batch basis:

(1) amount and type of each process chemical used (gallons/batch),

(2) length of time each batch ran (per tank),

(3) number of batches processed per month (per tank).

(b) The permittee shall maintain monthly and 12-month rolling sums of post-control HCI emissions, based on the above information and the removal efficiency or emission factor determined during the stack test, as appropriate.

(c) The permittee shall maintain monthly and 12-month rolling sums of NOx emissions, based on the above information and the emission factor determined during the stack test, as appropriate.

#### # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain a log of any inspections or actions performed according to the HCI Fume Scrubber Operation and Maintenance (O&M) Plan, including any deficiencies noted and corrective actions taken.

#### # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain records of each chemical analysis of rhenium metal received including the lot number and the weight of material.

#### 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.

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall vent emissions from each reactor tank to the HCI Fume Scrubber (C01) at all times during operation of a batch in either Reactor Tank 10 or 11.

#### # 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall maintain the HCI Fume Scrubber solution at a pH range of 10 - 14 during operation of a batch in either Reactor Tank 10 or 11.

(b) The permittee shall add sodium hydroxide (NaOH or caustic soda) to the HCI Fume Scrubber sump using the automated PLC system when the pH of the scrubbing solution drops below 11 during operation of a batch in either Reactor Tank 10 or 11.

(c) The permittee shall maintain a scrubber recirculation flow rate of 40 - 65 gallons per minute during operation of a batch in either Reactor Tank 10 or 11.

(d) The permittee shall maintain the specific gravity of the HCI Fume Scrubber recirculation solution less than or equal to 1.21 during operation of a batch in either Reactor Tank 10 or 11.

(e) The permittee shall add water to the scrubber tank when the recirculation solution specific gravity reading is greater than 1.21 during operation of a batch in either Reactor Tank 10 or 11.

(f) The permittee shall maintain a pressure drop range between 1.0 - 5.0" water gauge across the HCI Fume Scrubber.





# # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall implement an Operation and Maintenance (O&M) Plan for the HCI Fume Scrubber, including but not limited to:

- (a) Inspection of the blower motor including bearings,
- (b) Inspection of the spray pattern and volume,
- (c) Inspection of the stack discharge,
- (d) Inspection of the recirculation pump,
- (e) Cleaning of the nozzles and header,
- (f) Cleaning of chevron mist elminator and dual mist eliminator.
- (g) Calibration of automated monitoring equipment.

### VII. ADDITIONAL REQUIREMENTS.

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



# SECTION E. Source Group Restrictions.

Group Name: GROUP 2

Group Description: Cooking Kettles

# Sources included in this group

ID	Name
103	NATURAL GAS COOKING KETTLE 1 (KETTLE 31)
104	NATURAL GAS COOKING KETTLE 5 (KETTLE 32)

#### I. RESTRICTIONS.

#### Control Device Efficiency Restriction(s).

#### # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain a minimum of 99.5% ammonia (NH3) removal efficiency for the Ammonia Fume Scrubber (C02) associated with this natural gas cooking kettle.

[Compliance with this condition is demonstrated through monitoring and recordkeeping of the operating parameters listed in Work Practice Standards outlined for this source.]

#### 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 continuously monitor the pH of the scrubbing solution in the Ammonia Fume Scrubber during the extraction batch or ammonia cycle, using a Walchem or equivalent automated pH monitoring equipment.

(b) The permittee shall continuously monitor the Ammonia Fume Scrubber solution recirculation mass flow rate and density (or specific gravity) during the extraction batch or ammonia cycle, using a Coriolis mass flow measuring system.

(c) The permittee shall continuously monitor the pressure drop across the Ammonia Fume Scrubber using a photohelic pressure gauge.

#### # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall calculate post-control ammonia (NH3) emissions on a monthly basis, based on the amount of ammonia hydroxide solution used per extraction batch or ammonia cycle (pounds/extraction batch or ammonia cycle) and the number of extraction batches or ammonia cycles per month.

#### IV. RECORDKEEPING REQUIREMENTS.

#### # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall record the following parameters on an hourly basis during each extraction batch or ammonia cycle through the use of the PLC system:

(1) Ammonia Fume Scrubber solution pH;

- (2) Ammonia Fume Scrubber solution mass flow rate and density (or specific gravity);
- (3) Ammonia Fume Scrubber pressure drop.

(b) The permittee shall specify in the recordkeeping log the time interval at which the above readings are made.

(c) The permittee shall maintain records of the time at which any chemicals are added to the Ammonia Fume Scrubber sump during each extraction batch or ammonia cycle, including the amount and type of chemicals added.





# # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall maintain records of the following operating parameters for the gas kettles as a single unit:

(1) amount and type of each process chemical used (pounds/extraction batch or ammonia cycle),

(2) length of time each extraction batch or ammonia cycle ran,

(3) number of extraction batches or ammonia cycles processed per month.

(b) The permittee shall maintain monthly and 12-month rolling sums of post-control ammonia emissions based on the above information, as appropriate.

#### # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain a log of any inspections or actions performed according to the Ammonia Fume Scrubber Operation and Maintenance (O&M) Plan, including any deficiencies noted and corrective actions taken.

#### 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.

# # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall maintain the Ammonia Fume Scrubbing solution at a pH range of 1.0 - 3.5 during operation of an extraction batch or ammonia cycle.

(b) The permittee shall add sulfuric acid to the Ammonia Fume Scrubber tank using the automated PLC system when the pH of the scrubbing solution is greater than 3.0 during operation of an extraction batch or ammonia cycle.

(c) The permittee shall maintain a scrubber recirculation flow rate of 25 - 35 gallons per minute during operation of an extraction batch or ammonia cycle.

(d) The permittee shall maintain the specific gravity of the Ammonia Fume Scrubber recirculation solution less than or equal to 1.21 during operation of an extraction batch or ammonia cycle.

(e) The permittee shall add water to the scrubber tank when the recirculation solution specific gravity reading is greater than 1.21 during operation of an extraction batch or ammonia cycle.

(f) The permittee shall maintain a pressure drop range between 1.5 - 5.0" water gauge across the Ammonia Fume Scrubber.

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall implement an Operation and Maintenance (O&M) Plan for the Ammonia Fume Scrubber, including but not limited to:

- (a) Inspection of the blower motor including bearings,
- (b) Inspection of the spray pattern and volume,
- (c) Inspection of the stack discharge,
- (d) Inspection of the recirculation pump,
- (e) Cleaning of the nozzles and header,

(f) Cleaning of chevron mist elminator and dual mist eliminator,

(g) Calibration of automated monitoring equipment.

### # 009 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall vent emissions from each gas kettle to the Ammonia Fume Scrubber (C02) at all times during





operation of the extraction batch or ammonia cycle occuring in each gas kettle.

# 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 State Only facility.





# SECTION G. Emission Restriction Summary.

Source Id	Source Descriptior		
103	NATURAL GAS COOKING KETTLE 1 (KETTLE 31)		
<b>Emission Limit</b>			Pollutant
0.093	Tons/Yr	aggregate 103 + 104, based on a 12-month rolling sum	Ammonia
104	NATURAL GAS COOKING KETTLE 5 (KETTLE 32)		
<b>Emission Limit</b>			Pollutant
0.093	Tons/Yr	aggregate 103 + 104, based on a 12-month rolling sum	Ammonia
105	300 KW DIESEL EMER GENERATOR		
<b>Emission Limit</b>			Pollutant
2.750	Tons/OZNESEAS		NOX
6.600	Tons/Yr	based on a 12-month rolling sum	NOX
100.000	Lbs/Hr		NOX
1,000.000	Lbs/Day		NOX
0.040	gr/DRY FT3		PM10
500.000	PPMV		SOX
201	REACTOR TANK 10		
<b>Emission Limit</b>			Pollutant
0.042	Tons/Yr	aggregate 201 + 202, based on a 12-month rolling sum	Hydrochloric Acid
12.375	Tons/Yr	aggregate 201 + 202, based on a 12-month rolling sum	NOX
202	REACTOR TANK 11		
<b>Emission Limit</b>			Pollutant
0.042	Tons/Yr	aggregate 201 + 202, based on a 12-month rolling sum	Hydrochloric Acid
12.375	Tons/Yr	aggregate 201 + 202, based on a 12-month rolling sum	NOX

# Site Emission Restriction Summary

**Emission Limit** 

Pollutant





# SECTION H. Miscellaneous.

#### -----AUGUST 2016 - INITIAL PERMIT

#### ------

(A) The following previously issued Plan Approval serves as the basis for certain terms and conditions set forth in this Operating Permit:

Plan Approval No. 46-0282: Source ID 101 (Reactor Tank 1), Source ID 102 (Reactor Tank 2), Source ID 103 (NG Kettle 1), and Source ID 104 (NG Kettle 5)

(B) The Department has determined that the emissions from the combustion of natural gas in the various supporting units do not require additional limitations, monitoring, or recordkeeping, other than the requirements set forth in Section C of this permit:

- (1) Smith Boiler 722,000 Btu/hr
- (2) Cambridge Heaters (9) units each rated at 860,000 Btu/hr
- (3) Hasting Heaters (2) units each rated at 400,000 Btu/hr
- (4) SolarFlo Radiant Heaters (39) units each rated at 60,000 Btu/hr
- (5) American Standard (7) units each rated at 80,000 Btu/hr
- (6) American Standard (8) units each rated at 100,000 Btu/hr
- (7) Becker Furnace 500,000 Btu/hr
- (8) Source ID 103 Kettle 1 (Kettle 31) 135,000 Btu/hr
- (9) Kettle 3 (Kettle 38) 120,000 Btu/hr
- (10) Source ID 104 Kettle 5 (Kettle 32) 135,000 Btu/hr
- (11) Kettle 6 (Kettle 39) 100,000 Btu/hr
- (12) Electric Furnaces (2) units RFD No. 8492

(C) The Department has determined that the following sources do not require additional limitations, monitoring, or recordkeeping other than the requirements set forth in Section C of this permit:

(1) RFD No. 5880 - five (5) polypropylene reactor tanks DT3/RT51, DT4/RT52, DT5/RT53, DT6/RT54, DT7/RT55. \*June 2021 UPDATE\* \*These tanks were not installed\*

# AUGUST 2021 RENEWAL

AUGUOT ZUZT KENEWAE

(D) AUTH ID 1340319 - The following items have been addressed with the renewal permit:

(1) The responsible official has been updated from Mr. William Glycenfer to Mr. Robert Hayes, Chief Financial Officer. The permit contact has been updated from Mr. William Glycenfer to Mr. Robin Gardner, Environmental Health and Safety Manager.

(2) Section B and Section C have been updated according to current language used for State Only Operating Permits issued in SERO.

(3) The following RFDs have been submitted and reviewed since the last permit action:

RFD No. 5880 (August 2016) – Five (5) new Electrolytic Cell Reactor Tanks. This project was not pursued, and the reactor tanks were not installed.

RFD No. 7047/7226 (August 2018) – Replace 500-gallon reactors tanks (Source ID 101 and 102) with 1,000-gallon reactors (Source ID 201 and 202). Exempt from plan approval; however, the permit is modified to reflect the change in process units.

RFD No. 7326 (October 2018) – Electrowinning System. The installation and operation of the source are exempt from plan approval requirements; however, the unit has since been removed from the plant.

RFD No. 8492 (May 2020) – Two (2) Electric Furnaces. Installation and operation of the furnaces are exempt from plan approval requirements and are listed above in Section H of the permit under (B)(12).





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