

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: January 19, 2023 Effective Date: January 19, 2023

Expiration Date: January 18, 2028

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 46-00046

Federal Tax Id - Plant Code: 23-1721795-1

| | Owner information | | | | |
|---|---------------------------------------|--|--|--|--|
| Name: VIANT COLLEGEVILLE LLC Mailing Address: 200 W 7TH AVE TRAPPE, PA 19426-2112 | | | | | |
| · | | | | | |
| | Plant Information | | | | |
| Plant: VIANT COLLEGEVILLE LLC | | | | | |
| Location: 46 Montgomery County | 46950 Trappe Borough | | | | |
| SIC Code: 3317 Manufacturing - Steel Pipe And Tu | ubes | | | | |
| | Responsible Official | | | | |
| Name: GABE ABBOTT | | | | | |
| Title: DIRECTOR OF OPERATIONS | | | | | |
| Phone: | Email: Gabe.Abbott@viantmedical.com | | | | |
| Permit Contact Person | | | | | |
| Name: DARIN HILBERT | | | | | |
| Title: MANAGER FACILITIES ENGR | | | | | |
| Phone: (610) 409 - 2348 | Email: darin.hilbert@viantmedical.com | | | | |
| | | | | | |
| [Signature] | | | | | |
| IAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER | | | | | |
| | | | | | |



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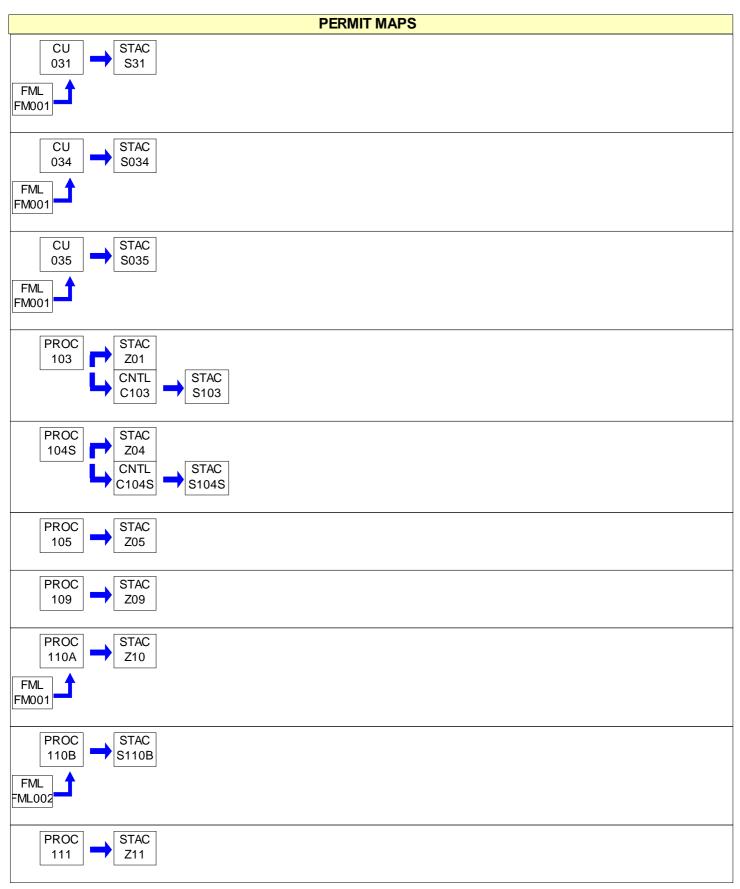
SECTION A. Site Inventory List

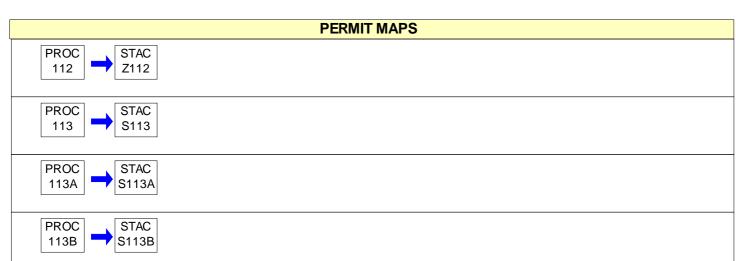
| | SECTIONA. Site inventory List | | | | |
|-----------------------------|--|-----------|-------------|----------------------|--|
| Source II | | | Throughput | Fuel/Material | |
| 031 | PLANT 2 KAWANEE BOILER (UNIT NO. 3534) | 2.900 | MMBTU/HR | | |
| | | 2,900.000 | | Natural Gas | |
| 034 PLANT 1 COLUMBIA BOILER | 3.360 | MMBTU/HR | | | |
| | | 3,360.000 | | Natural Gas | |
| 035 PLANT 2 BOILER 2 (4024) | 2.520 | MMBTU/HR | | | |
| | 2.520 | MCF/HR | Natural Gas | | |
| 103 | PLANT 1 VAPOR DEGREASER | 8.526 | Lbs/HR | TRICHLOROETHYLENE | |
| 104S | PLANT 2 VAPOR DEGREASER | 9.707 | Lbs/HR | TRICHLOROETHYLENE | |
| 105 | FABRICATION VAPOR DEGREASER | 0.913 | Lbs/HR | TRICHLOROETHYLENE | |
| 109 | ID PLASTIC COATING | 0.151 | Gal/HR | N-PROPYL BROMIDE/TET | |
| 110A | NATURAL GAS FIRED SPACE HEATERS (34 TOTAL) | | N/A | Natural Gas | |
| 110B NO. | NO. 2 FUEL OIL FIRED SPACE HEATERS (3 TOTAL) | 0.420 | MMBTU/HR | | |
| | | 2.990 | Gal/HR | #2 Oil | |
| 111 | OD PLASTIC COATING | 0.081 | Gal/HR | N-PROPYL BROMIDE | |
| 112 | PARTS WASHERS (2 TOTAL) | 0.301 | Lbs/HR | SAFETY KLEEN | |
| 113 | PLANT 1 PICKLE ROOM | | | | |
| 113A | PLANT 2 PICKLE ROOM | | | | |
| 113B | FABRICATIONS PICKLE ROOM | | | | |
| C103 | PLANT 1 CARBON ADSORPTION UNIT | | | | |
| C104S | PLANT 2 CARBON ADSORPTION UNIT | | | | |
| FM001 | NATURAL GAS LINE | | | | |
| FML002 | NO. 2 FUEL OIL TANKS | | | | |
| S034 | PLANT 1 COLUMBIA BOILER STACK | | | | |
| S035 | PLANT 2 BOILER 2 STACK | | | | |
| S103 | PLANT 1 CARBON ADSORPTION UNIT STACK | | | | |
| S104S | PLANT 2 CARBON ADSORPTION UNIT STACK | | | | |
| S110B | NO. 2 FUEL OIL FIRED SPACE HEATER STACKS (3 TOTAL) | | | | |
| S113 | EMISSIONS FOR PLANT 1 PICKLING TANKS (2) | | | | |
| S113A | EMISSIONS FOR PLANT 2 PICKLING TANKS (3) | | | | |
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| Z04 | PLANT 2 DEGREASER EMISSIONS | | | | |
| Z05 | FABRICATION DEGREASER EMISSIONS | | | | |
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| Z10 | SPACE HEATERS EMISSIONS | | | | |
| Z11 | OD PLASTIC COAT EMISSIONS | | | | |
| Z112 | FUGITIVE EMISSIONS FOR PARTS WASHERS | | | | |

PERMIT MAPS













#001 [25 Pa. Code § 121.1]

Definitions

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1......

#002 [25 Pa. Code § 121.7]

Prohibition of Air Pollution

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

#003 [25 Pa. Code § 127.512(c)(4)]

Property Rights

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

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

Permit Expiration

This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e), 127.503 & 127.704(b)]

Permit Renewal

- (a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.
- (b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.
- (c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).
- (d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

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

Transfer of Ownership or Operational Control

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





the Department.

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

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

Inspection and Entry

- (a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
 - (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

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

Compliance Requirements

- (a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:
 - (1) Enforcement action
 - (2) Permit termination, revocation and reissuance or modification
 - (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

#009 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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





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

Duty to Provide Information

- (a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.
- (b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

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

Reopening and Revising the Title V Permit for Cause

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

#012 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

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

#013 [25 Pa. Code § 127.522(a)]

Operating Permit Application Review by the EPA

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

R3_Air_Apps_and_Notices@epa.gov

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





#014 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

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

#015 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

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

R3_Air_Apps_and_Notices@epa.gov

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

#016 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

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

R3_Air_Apps_and_Notices@epa.gov

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

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

#017 [25 Pa. Code § 127.512(b)]

Severability Clause

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

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

Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). 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.
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.





- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.
- (1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.
- (2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.
- (3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

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

Authorization for De Minimis Emission Increases

- (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:
 - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

- (b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.



- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.
- (e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

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

Reactivation of Sources

- (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#021 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the





phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

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

Submissions

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager

PA Department of Environmental Protection

(At the address given on the permit transmittal letter, or otherwise notified)

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

Enforcement & Compliance Assurance Division Air, RCRA and Toxics Branch (3ED21) Four Penn Center 1600 John F. Kennedy Boulevard Philadelphia, PA 19103-2852

The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

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

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

Sampling, Testing and Monitoring Procedures

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

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

Recordkeeping Requirements

- (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:
 - (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.





- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

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

Reporting Requirements

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

#026 [25 Pa. Code § 127.513]

Compliance Certification

- (a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:
- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.





#027 [25 Pa. Code § 127.3]

Operational Flexibility

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

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

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

Risk Management

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





- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
- (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.
- (2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

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

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

Permit Shield

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

#031 [25 Pa. Code §135.3]

Reporting

- (a) 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 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.

#032 [25 Pa. Code §135.4]

Report Format

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

- (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, as specified in 25 Pa. Code § 129.14.
 - (7) N/A
 - (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) of this condition, for which the permittee 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.

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) 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; or
- (b) Equal to or greater than 60% at any time.

006 [25 Pa. Code §123.42]

Exceptions

The opacity limitations as per 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 the sources specified in 25 Pa. Code § 123.1(a) (1).





007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91 - 129.95.]

The total VOC emissions from this facility shall not exceed 56 tons per year on a 12-month rolling sum basis.

[Compliance with this condition also demonstrates compliance with original RACT VOC emissions limit under Condition #005, Permit No. OP-46-0046A]

008 [25 Pa. Code §129.14]

Open burning operations

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

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

Throughput Restriction(s).

009 Elective Restriction

The permittee shall limit the amount of natural gas that is consumed by the sources listed in this permit to 197 million cubic feet per any consecutive 12-month rolling period.

II. TESTING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.512.]

- (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 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.

011 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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





012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

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

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For the VOC sources listed in this Tittle V permit, the permittee shall monitor the VOC sources and perform the following:

- (a). Record the VOC emissions from the combination of facility fuel fired sources and from each other VOC emitting source at this facility on a monthly basis. Fuel fired source monthly emission estimates must be based on EPA emission factors, overall metered natural gas consumption and an estimate of small heater fuel oil consumption (e.g., using degree days and historical consumption averages). Each other VOC emitting source emission estimate must be based on a mass balance using logged amounts of solvent added and solvent waste removed from each source process and may consider other documented transfers (e.g., between source processes).
- (b). Calculate the total VOC emissions for the entire facility on the basis of a 12-month rolling summation to determine compliance with the total VOC emissions limitation.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the total amount of fuel that is consumed by all the sources at this facility on at least a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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





016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]

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; and
- (c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

The Department reserves the right to change the above recordkeeping requirements at any time, based on but not limited to: the review of the compliance certification and the semi-annual report of monitoring and record keeping, complaints, monitoring results, and/or Department findings.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For each time that the facility is monitored for odors, visible emissions, and fugitive particulate matter, the observations and findings shall be recorded.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall keep records of the total amount of natural gas that is consumed by all of the sources at the facility on at least a monthly basis.
- (b) The permittee shall calculate and record the total amount of natural gas consumed by the facility on a 12-month rolling basis.

V. REPORTING REQUIREMENTS.

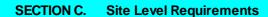
019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]

- (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.

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c).]

The report of the deviations required by Condition #026(b), of Section B, of this permit, shall be submitted to the Department, within six (6) months after final permit issuance, and, at a frequency of at least every six (6) months thereafter.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c).]

The permittee shall submit the following:

- (a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under condition #26 of section B of this permit. The annual certificate of compliance shall be submitted to DEP electronically, and to EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov. The subject line shall read: "TVOP No. xxxx, Facility Namexxxx."
- (b) A semi-annual deviation report to DEP, due by October 1 of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the obligation for the second deviation reporting period (July 1 through December 31 of the previous year).

022 [25 Pa. Code §135.21]

Emission statements

The permittee shall submit by March 1, of each year, an annual emission statement for NOx and VOC emissions for the preceding calendar year. Additionally, a description of the method used to calculate the emissions shall be included. The statement shall contain a certification by a company official or plant manager that the information contained in the statement is true and accurate.



VI. WORK PRACTICE REQUIREMENTS.

023 [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.
- (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.

024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.512.]

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

025 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

026 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91-129.95]

- (a). All lids from drums and containers containing volatile organic compounds and hazardous air pollutants shall be kept closed except when the contents are being transferred.
- (b). Any spills of solvents shall be cleaned up as soon as possible.

027 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall reduce emissions of Class I and Class II refrigerants during the service, maintenance, repair, and disposal of equipment in accordance with the requirements of 40 C.F.R. Part 82, Subpart F, Recycling and Emissions Reduction.

028 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.512.]

The permittee may not modify any air contaminant system identified in this permit, prior to obtaining Department approval, except those modifications authorized by Condition #019(g), of Section B, of this permit.





029 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The source(s) listed in this Permit, may be operated and used only so long as any associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s) and this Title V Permit.

VII. ADDITIONAL REQUIREMENTS.

030 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The facility is a major source of VOCs for federal RACT II purposes, and sources in this operating permit have been evaluated for RACT II regulations. The following sources comply with RACT II by meeting the presumptive RACT requirements as stated under each source where applicable: Source Id Nos. 031, 034, 109,110A, 110B, and 111.

The following sources are not subject to RACT II regulations: Source Id Nos. 035, 103, 104S, 105, 112, 113, 113A and 113B.

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Effect ***



Source ID: 031 Source Name: PLANT 2 KAWANEE BOILER (UNIT NO. 3534)

Source Capacity/Throughput: 2.900 MMBTU/HR

2,900.000 CF/HR Natural Gas

Conditions for this source occur in the following groups: 001



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records on file of the one-time energy assessment performed for this Source ID Nos. 031 in compliance with the requirements of 40 C.F.R. Part 63, Subpart DDDDD.

[Compliance with this condition also demonstrates compliance RecordKeeping Requirements of Section C, under Condition #004, Permit No. OP-46-0046A]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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





*** Permit Shield in Effect. ***



Source ID: 034 Source Name: PLANT 1 COLUMBIA BOILER

Source Capacity/Throughput: 3.360 MMBTU/HR

3,360.000 CF/HR Natural Gas

Conditions for this source occur in the following groups: 001



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



Source ID: 035 Source Name: PLANT 2 BOILER 2 (4024)

Source Capacity/Throughput: 2.520 MMBTU/HR

2.520 MCF/HR Natural Gas

Conditions for this source occur in the following groups: 001



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



Source ID: 103 Source Name: PLANT 1 VAPOR DEGREASER

Source Capacity/Throughput: 8.526 Lbs/HR TRICHLOROETHYLENE

Conditions for this source occur in the following groups: 004



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 129.91 - 129.95]

The total VOC emissions to the atmosphere from the Plant 1 Vapor Degreaser shall not exceed 37.5 tons per year on a 12 month rolling basis.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



Source ID: 104S Source Name: PLANT 2 VAPOR DEGREASER

Source Capacity/Throughput: 9.707 Lbs/HR TRICHLOROETHYLENE

Conditions for this source occur in the following groups: 004



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



Source ID: 105 Source Name: FABRICATION VAPOR DEGREASER

Source Capacity/Throughput: 0.913 Lbs/HR TRICHLOROETHYLENE

PROC STAC Z05

I. RESTRICTIONS.

Control Device Efficiency Restriction(s).

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.463] Subpart T--National Emission Standards for Halogenated Solvent Cleaning Batch vapor and in-line cleaning machine standards

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall comply with the following control combination set in the MACT Standards for halogenated solvent degreasers with a solvent/air interface area greater than 1.21 square meters (13 square feet) [40 CFR §63.463 (b) (2) (i)]:

- (a). Dwell Time
- (b). Freeboard refrigeration device
- (c). Reduced room draft.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.463] Subpart T--National Emission Standards for Halogenated Solvent Cleaning Batch vapor and in-line cleaning machine standards

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

[Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in the applicable requirements of Pa. Code § 129.63.]

- (a). For a freeboard refrigeration device, the permittee shall ensure that the chilled air blanket temperature (in degrees F) measured at the center of the air blanket during the idling mode, is no greater than 30 percent of the solvent's boiling point. An exceedance has occurred if this requirement has not been met and has not been corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.
- (b). For the reduced room draft, the permittee shall comply with the following requirements:
- (1). Ensure that the flow or movement of air across the top of the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the monitoring requirements for this degreaser. An exceedance has occurred if this requirement has not been met and has not been corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.
- (2). Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less.
- (c). For the dwell, the permittee shall comply with the following requirements:
- (1). Determine the appriopriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket, which is determined through the following procedures:





- (i). Determine the amount of time for the part or parts basket to cease dripping once placed into the vapor zone. The part or parts basket used for this determination must be at room temperature before being placed in the vapor zone.
- (ii). The proper dwell time for parts to remain in the freeboard area above the vapor zone is no less than 35 percent of the time determined in section (C)(1)(i) above.
- (2) Ensure that, after cleaning, each part is held in the solvent cleaning machine freeboard area above the vapor zone for the dwell time determined for that particular part or parts basket, or for the maximum dwell time determined using the most complex part type or parts basket.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following on a monthly basis:

- (a) Amount of solvent (virgin or recycled) added to the batch solvent cleaning machine.
- (b) The amount of solvent removed from the batch solvent cleaning machine.
- (c) The hours of operation for the batch solvent cleaning machine.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a quarterly basis, the permittee shall monitor the hoist speed for parts entering and exiting the vapor degreaser to determine compliance with 40 C.F.R. § 63.463 and 25 Pa. Code § 129.63.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.466]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning

Monitoring procedures

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

For the maintenance of reduced room draft by the control of room parameters (i.e., redirecting fans, closing doors and windows, etc.), the permittee shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly monitoring of room parameters specified as follows:

- (a). Measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the following procedures:
- (1). Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
 - (2). Orient the velometer in the direction of the wind current at each of the four corners of the machine.
 - (3). Record the reading for each corner.
 - (4). Average the values obtained at each corner and record the average wind speed.





(b). Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.466]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning

Monitoring procedures

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

For a dwell used as a control device, the permittee shall determine the actual dwell time by measuring the period of time that the parts are held with in the freeboard area of the solvent cleaning machine after cleaning. The permittee shall monitor and record the results on a monthly basis.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.466]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning

Monitoring procedures

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

For the freeboard refrigeration device, the owner or operator shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode on a weekly basis.

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of the following on a monthly basis:

- (a) Amount of solvent (virgin or recycled) added to the batch solvent cleaning machine.
- (b) The amount of solvent removed from the batch solvent cleaning machine.
- (c) The hours of operation for the batch solvent cleaning machine.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a). On a quarterly basis, the permittee shall keep records of the hoist speed for parts entering and exiting the vapor degreaser to determine compliance with Conditions #015 and #018 under this source.
- (b). The permittee shall keep the records of information collected through paragraph (a) above for a period of five (5) years, and the records shall be made available to the Department upon request.

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.467]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning

Recordkeeping requirements

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

- (a). The permittee who uses a batch vapor solvent cleaning machine shall maintain records in written or electronic form specified in (1) through (3) of this section for the lifetime of the machine.
- (1). Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.



- (2). The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - (3). Records of the halogenated HAP solvent content for each solvent used.
- (b). Each owner or operator of a batch vapor solvent cleaning machine shall maintain records specified in paragraphs (1) through (3) of this section either in electronic or written form for a period of 5 years.
 - (1). The results of freeboard refrigeration device, reduced room draft, and dwell time monitoring.
- (2). Information on the actions taken to comply with the dwell, freeboard refrigeration device, and the reduced room draft standards. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (3). Estimates of annual solvent consumption on a 12 month rolling basis for this solvent cleaning machine.

V. REPORTING REQUIREMENTS.

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.468] Subpart T--National Emission Standards for Halogenated Solvent Cleaning Reporting requirements

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee which uses a batch vapor solvent cleaning machine complying with the provisions of 40 C.F.R. § 63.463 shall submit to the Administrator an initial statement of compliance for each solvent cleaning machine. For existing sources, this report shall be submitted to the Administrator no later than 150 days after the compliance date specified in 40 C.F.R. § 63.460(d). For new sources, this report shall be submitted to the Administrator no later than 150 days after startup or May 1, 1995, whichever is later. This statement shall include the requirements specified in paragraphs (a) through (e) of this section.

- (a) The name and address of the owner or operator.
- (b) The address (i.e., physical location) of the solvent cleaning machine(s).
- (c) A list of the control equipment used to achieve compliance for each solvent cleaning machine.
- (d) For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.
 - (e) Conditions to maintain the wind speed requirements of 40 C.F.R. § 63.463(e)(2)(ii), if applicable.

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.468]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning Reporting requirements

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee who uses a batch vapor solvent cleaning machine complying with the provisions of 40 C.F.R. § 63.463 shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements specified in paragraphs (a) and (b) of this section.

(a). A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the





test required in 40 C.F.R. § 63.463(d)(10)."

(b). An estimate of solvent consumption for each solvent cleaning machine during the reporting period.

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.468]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning

Reporting requirements

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee which uses a batch vapor solvent cleaning machine shall submit an exceedance report to the Administrator semiannually except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph (i) of 40 C.F.R. § 63.468 is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in paragraphs (a) through (c) of this section.

- (a). Information on the actions taken to comply with 40 C.F.R. § 63.463(e). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (b). If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
- (c) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

VI. WORK PRACTICE REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa.§ Code 129.63.]

In addition to the work practice standards from 40 C.F.R. § 63.463, the permittee shall ensure that the batch vapor solvent cleaning machine conforms to the design requirements specified as follows:

- (a). The permittee shall minimize solvent carryout by moving parts in and out of the degreaser at a rate less than 11 feet per minute if the parts occupy less then 50 percent of the solvent/air interface area.
- (b). The permittee shall minimize solvent carryout by placing the workload in the vapor zone at least 30 seconds or until condensation ceases.
- (c). A safety switch (thermostat and condenser flow switch) which shuts off the sump heat if the coolant is not circulating.
- (d). A vapor up control switch which shuts off the spray pump if vapor is not present. A vapor control switch is not required if the vapor cleaning machine is not equipped with a spray pump.
- (e). Water should not be visually detectable in solvent exiting the water separator.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall implement an employee training program for all new and existing employees involved in parts cleaning operations. This training shall address steps to reduce VOC and HAP usage, the requirements of this permit, as well as





the requirements of all applicable State and Federal regulations. The training program will include the following:

- (a). A list of personnel by name and job description that are required to be trained and outline of the subjects to be covered in the initial and refresher training for each person, or group of personnel.
- (b). Lesson plans for courses to be given at the initial and the annual refresher training that include appropriate application techniques and ways to minimize cleaning solvent usage.
- (c). A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain this source in accordance with manufacturer's specifications and good engineering practices.

017 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.463]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning Batch vapor and in-line cleaning machine standards

[Additional authority for this permit condition is also derived form 25 Pa. Code § 127.441.]

[Compliance with the requirements in this streamlined permit condition assures compliance with provisions found in applicable requirements of 25 Pa. Code § 129.63.]

The permittee which uses an existing or new batch vapor solvent cleaning machine shall meet all of the following required work and operational practices specified in paragraph (a) through (l) of this section as applicable.

- (a). Control air disturbances across the cleaning machine opening(s) by incorporating the control equipment or techniques in paragraph (1) or (2) of this section.
- (1). Cover(s) to each solvent cleaning machine shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
 - (2). A reduced room draft.
- (b). The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
- (c). Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
- (d). Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Administrator.
 - (e). Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - (f). During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
- (g). During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.





- (h). When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- (i). Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer.
- (j). Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures (40 CFR Part 63 Subpart B Appendix B) if requested during an inspection by the Administrator.
- (k). Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - (I). Sponges, fabric, wood, and paper products shall not be cleaned in the vapor cleaning machine.

VII. ADDITIONAL REQUIREMENTS.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

By complying with 40 CFR Part 63 Subpart T and 25 Pa. Code § 129.63, this source demonstrates compliance with RACT II requirements in accordance with 25 Pa. Code § 129.96 (a).

*** Permit Shield in Effect. ***



46-00046

VIANT COLLEGEVILLE LLC

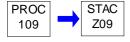


SECTION D. Source Level Requirements

Source ID: 109 Source Name: ID PLASTIC COATING

Source Capacity/Throughput: 0.151 Gal/HR N-PROPYL BROMIDE/TETRACHL

Conditions for this source occur in the following groups: 003



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

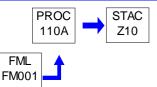
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

*** Permit Shield in Effect. ***



Source ID: 110A Source Name: NATURAL GAS FIRED SPACE HEATERS (34 TOTAL)

Source Capacity/Throughput: N/A Natural Gas



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 each space heater listed under this source at any time, in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from each space heater listed under this source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 ppmvd.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The equipment listed under Source ID No. 110A and Source ID Nos 031, 034 and 035 combined, shall be operated with volatile organic compounds (VOCs) emission rates no greater than 3.0 pounds per hour, 15.0 pounds per day, or 2.7 tons per year on a 12-month rolling period. [Permit # OP-46-0046A, Condition #007].

[Compliance with these emission limits demonstrated by complying with Condition #009, Section C]

Fuel Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall only use natural gas in the equipment listed under Source ID No. 110A.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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



IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices.

[Compliance with this condition demonstrates compliance with RACT II requirements in accordance with 25 Pa. Code §129.97 (c) (3)]

VII. ADDITIONAL REQUIREMENTS.

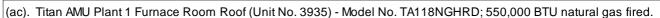
006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID No. 110A includes, but is not limited to, the following space heaters:

- (a). Trane Packaged Roof Top Space Heater (Unit No. 3484) Model No. YCD090D3LABE; 97,200 BTU/hr.
- (b). Plant 1 Weil McLein Boiler (Unit No. 3486) Model No. J-10; 1,350,000 BTU/hr.
- (c). Plant 1 Small Mill Trane HVAC (Unit No. 129) Model YCD360BFH-1B1CE1; 600,000 Btu/hr natural gas fired.
- (d). Plant 1 Roof COE & Metalurgy HVAC (Unit No. 4084)-600,000 BTU/hr natural gas fired.
- (e). Plant 1 Cafeteria Roof (Unit No. 4014) 250,000 BTU/hr natural gas fired.
- (f). Plant 1 General Office York HVAC (Unit No. 3517) Model No. SS122-G275-28A; 275,000 BTU/hr natural gas fired.
- (g). Plant 1 T&D HVAC (Unit No. 4016) -400,000 BTU/hr natural gas fired.
- (h). Plant 1 Engineering York HVAC (Unit No. 3526) Model No. SS092-G200-28A; 275,000 BTU/hr natural gas fired.
- (i). Plant 1 Coil Draw 1050 HVAC (Unit No. 4015) 350,000 BTU/hr natural gas fired.
- (j). Plant 2 North End New York Blower Air Make Up (Unit No. 3538) Model No. D1580; 1,320,000 BTU/hr natural gas fired.
- (k). Plant 2 South End New York Blower Air Make Up (Unit No. 3539) Model No. D4580; 3,960,000 BTU/hr natural gas fired.
- (I). Plant 2 North End RTU HVAC (Unit No. 4026) 350,000 BTU/hr natural gas fired.
- (m). Plant 2 RTU HVAC (Unit No. 4027) 350,000 BTU/hr natural gas fired.
- (n). Plant 2 RTU HVAC (Unit No. 4028) 350,000 BTU/hr natural gas fired.
- (o). Plant 2 RTU HVAC (Unit No. 4029) 350,000 BTU/hr natural gas fired.
- (p). Plant 2 RTU HVAC (Unit No. 4030) 350,000 BTU/hr natural gas fired.
- (q). Plant 2 RTU HVAC (Unit 4131) 350,000 BTU/hr natural gas fired.
- (r). Plant 2 York HVAC (Unit No. 3546) Model No. SS182G40046A; 400,000 BTU/hr natural gas fired.
- (s). Plant 2 York HVAC (Unit No. 3547) Model No. DISS180G40046A; 400,000 BTU/hr natural gas fired.
- (t). Plant 2 RTU HVAC (Unit No. 4034) 120,000 BTU/hr natural gas fired.
- (u). Lobby Roof Trane (Unit No. 3838) Model No. YCO060C410AA; 90,000 BTU/hr natural gas fired.
- (v). Room between Tumbling Room and Hall near Maintenance (Unit No. 3867) 50,000 BTU/hr natural gas fired.
- (w). Plant 1 Coil Drawing North Roof (Unit No. 3868) Model No. SFHFC40FHV10669DIE01A0D; 850,000 BTU/hr natural gas fired.
- (x). Roof Loading Dock SE (Unit No. 3869) Model No. HRGB100-8; 100,000 BTU/hr natural gas fired.
- (y). Trane Packaged Roof Top (Unit No. 3878) Model No. YCD090D3H0BE; 205,000 BTU/hr natural gas fired.
- (z). Trane Plant 1 Roof (Unit No. 3907) Model No. YCH300B3H0HB; 400,000 BTU/hr natural gas fired.
- (aa). Trane Plant 1 Roof (Unit No. 3908) Model No. YCH480ALHUZB3LGHRD; 800,000 BTU/hr natural gas fired.
- (ab). AO Smith Plant 1 Hot Water Mens Room (Unit No. 3930) Model No. BTH199 100; 199,900 BTU/hr natural gas fired.





- (ad). Trane Plant 1 Intermediate Mill Roof (Unit No. 3939) Model No. YCD360BFHC1B5AC10B0D0; 600,000 BTU/hr natural gas fired.
- (ae). Plant 1 CAS Evaporator (Plant 1 Degreaser Room) 440.000 BTU/hr natural gas fired.
- (af). Plant 2 CAS Evaporator (Plant 2 Degreaser Room) 440,000 BTU/hr natural gas fired.
- ag). Trane Packaged RoofTop (Unit No. 3516) Model No. YCH048E3RLA; 60,000 BTU/hr natural gas fired.
- ah). Trane Packaged RoofTop (Unit No. 3890) Model No. YCH048A4RMA 80,000 BTU/hr natural gas fired.

*** Permit Shield in Effect. ***

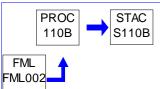




Source ID: 110B Source Name: NO. 2 FUEL OIL FIRED SPACE HEATERS (3 TOTAL)

Source Capacity/Throughput: 0.420 MMBTU/HR

2.990 Gal/HR #2 Oil



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 this source at any time, in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 ppmvd.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §139.16]

Sulfur in fuel oil.

- (a). The following are applicable to 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 sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).
- (b). The requirements in subpart (a), above, shall be waived in the event that a delivery receipt from the supplier, showing the maximum percent sulfur in the fuel, is obtained each time a fuel oil delivery is made.

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the amount of fuel consumed for this source on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Using a Department approved method, the permittee shall record the amount of fuel consumed for this source on a monthly

46-00046





SECTION D. Source Level Requirements

basis.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of all testing for sulfur content of the No. 2 Fuel Oil or certifications on sulfur content of the No. 2 Fuel Oil from the supplier for each delivery of No. 2 Fuel Oil to the facility.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices.

[Compliance with this condition demonstrates compliance with RACT II requirements in accordance with 25 Pa. Code §129.97 (c) (3)]

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

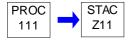




Source ID: 111 Source Name: OD PLASTIC COATING

Source Capacity/Throughput: 0.081 Gal/HR N-PROPYL BROMIDE

Conditions for this source occur in the following groups: 003



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



46-00046

VIANT COLLEGEVILLE LLC



SECTION D. Source Level Requirements

Source ID: 112 Source Name: PARTS WASHERS (2 TOTAL)

Source Capacity/Throughput: 0.301 Lbs/HR SAFETY KLEEN

PROC STAC Z112

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of VOC and/or HAP containing material added to each parts washer and removed from each parts washer during each delivery.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of the amount of VOC and/or HAP containing material added to each parts washer and removed from each parts washer during each delivery.

003 [25 Pa. Code §129.63]

Degreasing operations

- (a). A person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:
 - (1). The name and address of the solvent supplier.
 - (2). The type of solvent including the product or vendor identification number.
 - (3). The vapor pressure of the solvent measured in mm hg at 20°C (68°F).
- (b). A person who operates a cold cleaning machine shall maintain for at least 2 years and shall provide to the Department, on request, the information specified in paragraph (a). An invoice, bill of sale, certificate that corresponds to a number of sales, Safety Data Sheet (SDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

V. REPORTING REQUIREMENTS.

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





VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain the equipment listed under this source in accordance with manufacturer's specifications.

005 [25 Pa. Code §129.63]

Degreasing operations

The following requirements apply to cold cleaning machines that are used to remove grease dirt, or oil from metal parts. This condition applies to cold cleaning machines that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.

- (a). Each cold cleaning machine shall:
 - (1). Have a permanent, conspicuous label summarizing the operating requirements in paragraph
- (b). In addition, the label shall include the following discretionary good operating practices:
- (A). Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.
- (B). When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
 - (C). Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.
- (2). Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent.
- (b). Cold cleaning machines shall be operated in accordance with the following procedures:
- (1). Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (2). Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (3). Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
 - (4). Air agitated solvent baths may not be used.
 - (5). Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.
- (c). A person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.
- (d). Paragraph (c) does not apply:
 - (1). To cold cleaning machines used in extreme cleaning service.
- (2). If the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with paragraph (c) will result in unsafe operating conditions.





006 [25 Pa. Code §129.63]

Degreasing operations

The Model 81 Parts Washer, an immersion cold cleaning machine, shall have a freeboard ratio of 0.50 or greater.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID No. 112 includes, but is not limited to, the following parts washers:

- (a). One Model 30 Parts Washer (15 gallons) Reservoir Type.
- (b). One Model 81 Parts Washer (69 gallons) Immersion Type.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Compliance with 25 Pa. Code §129.63 demonstrates compliance with RACT II for this source in accordance with 25 Pa. Code §129.96 (a).

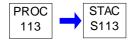
*** Permit Shield in Effect. ***



Source ID: 113 Source Name: PLANT 1 PICKLE ROOM

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 002



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source includes the following pickling tanks:

Plant 1 HF Bath: 20 ft X7 inches X8 inches.

Plant 1 Titanium Reactive Coat: 25 ft X 11.75 inches X 12.5 inches

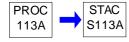
*** Permit Shield in Effect. ***



Source ID: 113A Source Name: PLANT 2 PICKLE ROOM

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 002



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source includes the following pickling tanks:

Plant 2 Passivation Tank (2480): 40 ft X 21.5 inches X 18 inches.

Plant 2 Pickle or "Hot" Tank (2482): 40 ft X 27 inches X 20 inches.

Plant 2 De-Smut/ "Zinc" Tank (2483): 40 ft X 28 inches X 20 inches.

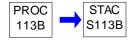
*** Permit Shield in Effect. ***



Source ID: 113B Source Name: FABRICATIONS PICKLE ROOM

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 002



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source includes the following pickling tanks:

Fab Passivation 2451 (Nitric 3): 2.5 ft X 30 inches X 20 inches

Fab Passivation 4061 (Nitric 4): 2.5 ft X 30 inches X 20 inches

Fab Pickle Tank (4069): 1.625 ft X 17.5 inches X 28 inches

*** Permit Shield in Effect. ***



Group Name: 001

Group Description: NATURAL GAS BOILERS

Sources included in this group

| ID | Name |
|-----|--|
| 031 | PLANT 2 KAWANEE BOILER (UNIT NO. 3534) |
| 034 | PLANT 1 COLUMBIA BOILER |
| 035 | PLANT 2 BOILER 2 (4024) |

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.11(a)(1).

[Burning natural gas in this source demonstrates compliance with this condition]

002 [25 Pa. Code §123.22]

Combustion units

A person may not permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit in excess of 1.2 pounds per million Btu of heat input, in accordance with 25 Pa. Code § 123.22(e)(1).

[Use of natural gas in this source demonstrates compliance with this condition]

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91 - 129.95, Permit # OP-46-0046A Condition #007]

Sources 031, 034, 035 and 110A combined, shall be operated with aggregate VOC emission rates of no greater than 3 pounds per hour, 15 pounds per day or 2.7 tons per year on 12 month rolling basis.

[Compliance with these emission limits demonstrated by complying with Condition #009, Section C. Compliance with this condition demonstrates compliance with RACT II requirements in accordance with 25 Pa. Code §129.97 (c) (2)]

Fuel Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 25 Pa. Code § 127.444.]

The permittee shall use only natural gas as fuel for the combustion units of this source group.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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





IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.7555(a)(1).]

The owner or operator shall keep records of a copy of each notification and report that was submitted to comply with 40 C.F.R. Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 C.F.R. §63.10(b)(2)(xiv).

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator shall keep records of each tune-up that is performed on each boiler in compliance with 40 C.F.R. Part 63, Subpart DDDDD.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.7560.]

- (a). The records kept in compliance with the requirements of 40 C.F.R. Part 63, Subpart DDDDD shall be in a form suitable and readily available for expeditious review, according to 40 C.F.R. § 63.10(b)(1).
- (b). As specified in 40 C.F.R. § 63.10(b)(1), the owner or operator shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c). The owner or operator shall keep each record on site, or the records shall be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 C.F.R. § 63.10(b)(1). The owner or operator can keep the records off site for the remaining 3 years.

V. REPORTING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R.§ 63.7545.]

- (a). The owner or operator shall submit to the Administrator all of the notifications in 40 C.F.R. §§ 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to this source by the dates specified.
- (b). If a unit designed to burn natural gas, refinery gas, or other gas 1 fuels that is subject to 40 C.F.R. Part 63, Subpart DDDDD is operated, and the owner or operator intends to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of 40 C.F.R. Part 60, 61, or 65, or other gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in 40 C.F.R. § 63.7575, you must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in 40 C.F.R. § 63.7575. The notification shall include the information specified in the following paragraphs:
- (1). Company name and address.
- (2). Identification of the affected unit.
- (3). Reason the owner or operator is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began.
- (4). Type of alternative fuel that is intended to be used.
- (5). Dates when the alternative fuel use is expected to begin and end.
- (c). If the owner or operator has switched fuels or made a physical change to the boiler and the fuel switch or physical change resulted in the applicability of a different subcategory, the owner or operator shall provide notice of the date upon which you switched fuels or made the physical change within 30 days of the switch/change. The notification shall identify:
- (1). The name of the owner or operator of the affected source, as defined in 40 C.F.R. § 63.7490, the location of the source, the boiler(s) that have switched fuels, were physically changed, and the date of the notice.
- (2). The currently applicable subcategory under 40 C.F.R. Part 63, Subpart DDDDD.



(3). The date upon which the fuel switch or physical change occurred.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.7550.]

A compliance report must contain the following information for a facility that is subject to the requirements of a 5-year tuneup:

- (a). Company and Facility name and address.
- (b). Process unit information, emissions limitations, and operating parameter limitations.
- (c). Date of report and beginning and ending dates of the reporting period.
- (d). The total operating time during the reporting period.
- (e). Include the date of the most recent tune-up for each unit subject to only the requirement to conduct a 5-year tune-up according to 40 C.F.R. § 63.7540(a)(12). Include the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.

VI. WORK PRACTICE REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. §§ 63.7500(a)(1), 63.7500(e), 63.7515(d), 63.7540(a)(12), and 63.7540(a)(13).]

- (a). The owner or operator shall conduct a tune-up on each boiler from this source group in accordance with the procedures in 40 C.F.R. § 63.7540(a)(10)(i) through 63.7540(a)(10)(vi) every 5 years in accordance with 40 C.F.R. §§ 63.7500(e) and 63.7540(a)(12).
- (b). In accordance with 40 C.F.R. § 63.7515(d), the 5-year tune-up shall be conducted no more than 61 months after the previous tune-up.
- (c). If a boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup in accordance with 40 C.F.R. § 63.7540(a)(13).

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. §§ 63.7540(a)(10) and 63.7540(a)(12).]

The owner or operator shall conduct tune-ups of each boiler to demonstrate continuous compliance as specified in paragraphs (a) through (f) below as directed in 40 C.F.R. §§ 63.7540(a)(10)(i) through (a)(10)(vi) and 63.7540(a)(12).

- (a). As applicable, inspect the burner(s), and clean or replace any components of the burner(s) as necessary (the owner or operator may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- (b). Inspect the flame pattern, as applicable, and adjust the burner(s) as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- (c). Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the owner or operator may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;
- (d). Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any applicable NOX requirements.





- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- (f). Maintain on-site and submit, if requested by the Administrator, an annual report for the latest tune up containing the information in the following paragraphs:
- (1). The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of each boiler or process heater;
- (2). A description of any corrective actions taken as a part of the tune-up; and
- (3). The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.7500(a)(3).]

At all times, the owner or operator shall operate and maintain any affected source (as defined in 40 C.F.R. § 63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that 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.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R.§§ 63.7500(f) and 63.7505(a).]

The owner or operator shall be in compliance with all applicable conditions of 40 C.F.R. Part 63, Subpart DDDDD at all times, except for periods during startup and shutdown of the boiler.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices.

[Compliance with this condition demonstrates compliance with RACT II requirements in accordance with 25 Pa. Code §129.97 (c) (3)]

VII. ADDITIONAL REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.7565 and Table 10 of 40 C.F.R. Part 63, Subpart DDDDD.]

The owner or operator shall refer to Table 10 of 40 C.F.R. Part 63, Subpart DDDDD for the parts of the General Provisions in 40 C.F.R. §§ 63.1 through 63.15 that apply to this source.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.7570.]

(a). In delegating implementation and enforcement authority of 40 C.F.R. Part 63, Subpart DDDDD to a state, local, or tribal agency under 40 CFR part 63, subpart E, the authorities listed in paragraphs below are retained by the EPA Administrator and are not transferred to the state, local, or tribal agency, however, the EPA retains oversight of 40 C.F.R. Part 63, Subpart DDDDD and can take enforcement actions, as appropriate.





- (1). Approval of alternatives to the non-opacity emission limits and work practice standards in 40 C.F.R. § 63.7500(a) and (b) under 40 C.F.R. § 63.6(g).
- (2). Approval of alternative opacity emission limits in 40 C.F.R. § 63.7500(a) under 40 C.F.R. § 63.6(h)(9).
- (3). Approval of major change to test methods in Table 5 of 40 C.F.R. Part 63, Supbart DDDDD under 40 C.F.R. § 63.7(e)(2)(ii) and (f) and as defined in 40 C.F.R. § 63.90, and alternative analytical methods requested under 40 C.F.R. § 63.7521(b)(2).
- (4). Approval of major change to monitoring under 40 C.F.R. § 63.8(f) and as defined in 40 C.F.R. § 63.90, and approval of alternative operating parameters under 40 C.F.R. § 63.7500(a)(2) and 40 C.F.R. §63.7522(g)(2).
- (5). Approval of major change to recordkeeping and reporting under §63.10(e) and as defined in 40 C.F.R. § 63.90.

*** Permit Shield in Effect. ***





Group Name: 002

Group Description: PICKLING OPERATIONS

Sources included in this group

| ID | Name |
|------|--------------------------|
| 113 | PLANT 1 PICKLE ROOM |
| 113A | PLANT 2 PICKLE ROOM |
| 113B | FABRICATIONS PICKLE ROOM |

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The aggregate NOx and HF emissions from all pickling operations shall not exceed 4.55 tons per year and 8.52 tons per year respectively on a 12-month rolling period.

Throughput Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The NOx and hydrofluoric acid (HF) emissions from all pickling operations (Source ID Nos. 113, 113A, and 113B) shall not exceed 1.06 lb/hr and 1.98 lb/hr respectively.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of nitric and hydrofluoric acid added to and/or removed from each pickling tank daily, or when in use. When acid is added, the permittee shall monitor whether the acid in each tank was fully replaced or replenished.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the temperature of each pickling tank on a daily basis, when in use.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the hours of operations for each tank when heated and filled with acidic solution.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For each air sparged tank, the permittee shall monitor the air sparging rate and duration of air sparging for each tank daily.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

A. The permittee shall record the amount of nitric and hydrofluoric acid added to and/or removed from each pickling tank daily, or when in use. When acid is added, the permittee shall record whether the acid in each tank was fully replaced or





replenished.

- B. The permittee shall record the temperature of each pickling tank on a daily basis, when in use.
- C. For each air sparged tank, the permittee shall record the air sparging rate and duration of air sparging for each tank daily.
- D. The permittee shall record the hours of operations for each tank when heated and filled with acidic solution,

Using Data from paragraphs A-D, the permittee shall perform annual calculations to demonstrate compliance with the 12 consecutive month NOx emission limit.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of inspections and/or maintenance performed on the temperature and air sparging rate monitoring systems for each tank.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall install, maintain, and operate the pickling operation according to the manufacturer's specification as well as good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



Group Name: 003

Group Description: PLASTIC COATING

Sources included in this group

| ID | Name |
|-----|--------------------|
| 109 | ID PLASTIC COATING |
| 111 | OD PLASTIC COATING |

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not permit VOC emissions from Sources 109 or 111 in excess of 1 ton on a 12-month rolling basis, each.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following for this source:

- (a). The amounts of each VOC and HAP containing coating raw materials used to replenish each ID and OD Coating admixture made at the facility.
- (b). The permittee shall also maintain any data or information required for determining compliance with the VOC emissions limitations and make it available to the Department upon request.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records showing the following:

- (a). A log of the amounts of each VOC and HAP containing coating raw materials used to replenish each ID and OD Coating admixture made at the facility.
- (b). The permittee shall also keep records of any data or information required for determining compliance with the VOC emissions limitations and make it available to the Department upon request.
- (c). The monthly summation of the VOCs and HAPs in the coatings on a 12- month rolling basis.

V. REPORTING REQUIREMENTS.

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





VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain and operate these sources in accordance with the manufacturer's specifications and with good operating practices.

[Compliance with this condition demonstrates compliance with RACT II requirements in accordance with 25 Pa. Code §129.97 (c) (2)]

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



Group Name: 004

Group Description: VAPOR DEGREASERS (2)

Sources included in this group

| ID | Name |
|------|---------------------------|
| 103 | PLANT 1 VAPOR DEGREASER |
| 1048 | S PLANT 2 VAPOR DEGREASER |

I. RESTRICTIONS.

Control Device Efficiency Restriction(s).

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.463]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning Batch vapor and in-line cleaning machine standards

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall comply with the following control combination set in the MACT Standards for halogenated solvent degreasers with a solvent/air interface area greater than 1.21 square meters (13 square feet):

- (a). Freeboard ratio of 1.0 or greater
- (b). Freeboard refrigeration device
- (c). Reduced room draft.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.463]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning Batch vapor and in-line cleaning machine standards

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

[Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in the applicable requirements of Pa. Code § 129.63.]

- (a). For a freeboard refrigeration device, the permittee shall ensure that the chilled air blanket temperature (in degrees F) measured at the center of the air blanket during the idling mode, is no greater than 30 percent of the solvent's boiling point. An exceedance has occurred if this requirement has not been met and has not been corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.
- (b). For the reduced room draft, the permittee shall comply with the following requirements:
- (1). Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the monitoring requirements for determining reduced room draft for this degreaser. An exceedance has occurred if this requirement has not been met and has not been corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.
- (2). Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as measured using the monitoring requirements for determining reduced room draft for this degreaser.
- (c). The freeboard ratio of the degreaser shall be 1.0 or greater.

Note: The boiling point temperature for Trichloroethylene is listed in references as 189 degrees Fahrenheit. The temperature at 30 percent of the boiling point temperature of Trichloroethylene is 56.7 degrees Fahrenheit.





II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall analyze the carbon in the carbon adsorption system for carbon effectiveness on an annual basis. The carbon in the carbon adsorption system shall be replaced every three (3) to five (5) years or at an alternative frequency requested by the permittee based on the history of carbon effectiveness analysis and recovery efficiency results and which is subsequently approved by the department. In the event that such a request is granted by the department, the permittee shall:

- (a) analyze the carbon in the carbon adsorption system for carbon effectiveness on a semi-annual basis and test results shall be forwarded to the department for review.
- (b) keep enough carbon in reserve for an immediate replacement if needed.

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following on a monthly basis:

- (a). The amount of solvent dispensed into each degreaser.
- (b). The amount of solvent removed from each degreaser.
- (c). The amount of solvent recovered from each carbon adsorber.
- (d). The hours of operation of each degreaser.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a quarterly basis, the permittee shall monitor the hoist speed for parts entering and exiting each vapor degreaser to demonstrate compliance with 40 C.F.R. § 63.463 and 25 Pa. Code § 129.63.

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.466]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning

Monitoring procedures

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

For each freeboard refrigeration device, the permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode on a weekly basis.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.466]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning

Monitoring procedures

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

For the maintenance of reduced room draft by the control of room parameters (i.e., redirecting fans, closing doors and windows, etc.), the permittee shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly monitoring of room parameters specified as follows:

- (a). Measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the following procedures:
- (1). Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
 - (2). Orient the velometer in the direction of the wind current at each of the four corners of the machine.
 - (3). Record the reading for each corner.





- (4). Average the values obtained at each corner and record the average wind speed.
- (b). Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall keep records of the following on a monthly basis:
 - (1). The amount of solvent dispensed into each degreaser.
 - (2). The amount of solvent removed from each degreaser.
 - (3). The amount of solvent recovered from each carbon adsorber.
 - (4). The hours of operation of each degreaser.
- (b) The permittee shall calculate VOC emissions using the information under paragraph (a) and VOC content of the solvent and keep records of VOC emissions from these sources on a monthly and 12-month rolling sum basis.
- (c) The permittee shall keep records of inspections and/or maintenance performed on the carbon adsorption systems including the annual analysis of carbon effectiveness.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.468.]

The permittee shall keep records on file of the report on the Initial Statement of Compliance with the requirements of 40 C.F.R. Part 63, Subpart T for each vapor degreaser. The permittee shall show the records of this report, including the date of submittal, to the Department upon request.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) On a quarterly basis, the permittee shall record the hoist speed for parts entering and exiting the vapor degreaser to determine compliance with 40 C.F.R. § 63.463 and 25 Pa. Code § 129.63.
- (b) The permittee shall keep the records of information collected through paragraph (a) above for a period of five (5) years, and the records shall be made available to the Department upon request.

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.467]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning

Recordkeeping requirements

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

- (a). The permittee which uses a batch vapor solvent cleaning machine shall maintain records in written or electronic form specified in (1) through (3) of this section for the lifetime of the machine.
- (1). Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
- (2). The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - (3). Records of the halogenated HAP solvent content for each solvent used.





- (b). The permittee which uses a batch vapor solvent cleaning machine shall maintain records specified in paragraphs (1) through (3) of this section either in electronic or written form for a period of 5 years.
 - (1). The results of freeboard refrigeration device and reduced room draft monitoring.
- (2). Information on the actions taken to comply with the freeboard refrigeration device and the reduced room draft standards. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (3). Estimates of annual solvent consumption on a 12 month rolling basis for this solvent cleaning machine.

V. REPORTING REQUIREMENTS.

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.468] Subpart T--National Emission Standards for Halogenated Solvent Cleaning Reporting requirements

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee who uses a batch vapor solvent cleaning machine complying with the provisions of 40 C.F.R. § 63.463 shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements specified in paragraphs (a) and (b) of this section.

- (a). A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 C.F.R. § 63.463(d)(10)."
 - (b). An estimate of solvent consumption for each solvent cleaning machine during the reporting period.

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.468] Subpart T--National Emission Standards for Halogenated Solvent Cleaning Reporting requirements

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee which uses a batch vapor solvent cleaning machine shall submit an exceedance report to the department semiannually except when, the department determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph (i) of 40 C.F.R. § 63.468 is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in paragraphs (a) through (c) of this section.

- (a). Information on the actions taken to comply with 40 C.F.R. § 63.463(e). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (b). If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
- (c). If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.





VI. WORK PRACTICE REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa.§ Code 129.63.]

In addition to the work practice standards from 40 C.F.R. § 63.463, the permittee shall ensure that each batch vapor solvent cleaning machine conforms to the design requirements specified as follows:

- (a). The permittee shall minimize solvent carryout by moving parts in and out of each degreaser at a rate less than 11 feet per minute if the parts occupy less then 50 percent of the solvent/air interface area.
- (b). The permittee shall minimize solvent carryout by placing the workload in the vapor zone at least 30 seconds or until condensation ceases.
- (c). A safety switch (thermostat and condenser flow switch) which shuts off the sump heat if the coolant is not circulating.
- (d). A vapor up control switch which shuts off the spray pump if vapor is not present. A vapor control switch is not required if the vapor cleaning machine is not equipped with a spray pump.
- (e). Water should not be visually detectable in solvent exiting the water separator.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The exhaust from each vapor degreaser shall be directed to the associated carbon adsorption system, except as necessary to facilitate degreaser shutdown in the event of a malfunction.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall implement an employee training program for all new and existing employees involved in parts cleaning operations. This training shall address steps to reduce VOC and HAP usage, the requirements of this permit, as well as the requirements of all applicable State and Federal regulations. The training program will include the following:

- (a) A list of personnel by name and job description that are required to be trained and outline of the subjects to be covered in the initial and refresher training for each person, or group of personnel.
- (b) Lesson plans for courses to be given at the initial and the annual refresher training that include appropriate application techniques and ways to minimize cleaning solvent usage.
- (c) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain this source in accordance with manufacturer's specifications and good engineering practices.

018 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.463]

Subpart T--National Emission Standards for Halogenated Solvent Cleaning

Batch vapor and in-line cleaning machine standards

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.63 and from 25 Pa. Code § 127.441.]

[Compliance with the requirements in this streamlined permit condition assures compliance with provisions found in applicable requirements of 25 Pa. Code § 129.63.]

The permittee which uses an existing or new batch vapor solvent cleaning machine shall meet all of the following required work and operational practices specified in paragraph (a) through (I) of this section as applicable.



- (a). Control air disturbances across the cleaning machine opening(s) by incorporating the control equipment or techniques in paragraph (1) or (2) of this section.
- (1). Cover(s) to each solvent cleaning machine shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
 - (2). A reduced room draft.
- (b). The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
- (c). Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
- (d). Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Administrator.
 - (e). Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - (f). During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
- (g). During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- (h). When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- (i). Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer.
- (j). Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures (40 CFR Part 63 Subpart B Appendix B) if requested during an inspection by the Administrator.
- (k). Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - (I). Sponges, fabric, wood, and paper products shall not be cleaned in the vapor cleaning machine.

VII. ADDITIONAL REQUIREMENTS.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

By complying with 40 CFR Part 63 Subpart T and 25 Pa. Code § 129.63, this source group demonstrates compliance with RACT II requirements in accordance with 25 Pa. Code § 129.96 (a).

*** Permit Shield in Effect. ***





SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.





SECTION G. Emission Restriction Summary.

| Source Id | Source Descri | ptior | | |
|--------------|---------------|----------------------------|-----------|--|
| 031 | PLANT 2 KAWA | NEE BOILER (UNIT NO. 3534) | | |
| Emission Lim | nit | | Pollutant | |
| 2.70 | 00 Tons/Yr | 12-month rolling sums | VOC | |
| | | | | |

| 034 | PLANT 1 COLUMBIA BOILER | |
|------|-------------------------|--|
| 1034 | PLANT I COLUMBIA BOILER | |

| Emission Limit | | | Pollutant | |
|-----------------------|---------|-----------------------|-----------|--|
| 2.700 | Tons/Yr | 12-month rolling sums | VOC | |

035 PLANT 2 BOILER 2 (4024)

| Emission Limit | | | Pollutant | |
|-----------------------|---------|-----------------------|-----------|--|
| 2.700 | Tons/Yr | 12-month rolling sums | VOC | |

103 PLANT 1 VAPOR DEGREASER

| Emission Limit | | | Pollutant | |
|-----------------------|---------|------------------------|-------------------|--|
| 37.500 | Tons/Yr | 12 month rolling basis | Trichloroethylene | |

109 ID PLASTIC COATING

| Emission Limit | | | Pollutant | |
|-----------------------|---------|------------------------|-----------|--|
| 1.000 | Tons/Yr | 12-month rolling basis | VOC | |

110A NATURAL GAS FIRED SPACE HEATERS (34 TOTAL)

| Emission Limit | | | Pollutant |
|-----------------------|---------|---|-----------|
| 500.000 | PPMV | dry standard conditions; each space heater | SOX |
| 0.040 | gr/CF | dry standard conditions; each space heater | TSP |
| 2.700 | Tons/Yr | Combined emissions from Source Id Nos.031, 034, 035 and 110A on any consecutive 12-month rolling period | VOC |
| 3.000 | Lbs/Hr | | VOC |
| 15.000 | Lbs/Day | | VOC |

110B NO. 2 FUEL OIL FIRED SPACE HEATERS (3 TOTAL)

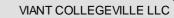
| E | Emission Limit | | | Pollutant | |
|---|----------------|-------|-------------------------|-----------|--|
| | 500.000 | PPMV | dry standard conditions | SOX | |
| | 0.040 | gr/CF | dry standard conditions | TSP | |

111 OD PLASTIC COATING

| Emission Limit | | | Pollutant | |
|-----------------------|---------|------------------------|-----------|--|
| 1.000 | Tons/Yr | 12-month rolling basis | VOC | |

113 PLANT 1 PICKLE ROOM

| Emission Limit | | | Pollutant |
|-----------------------|---------|--|-----------|
| 8.520 | Tons/Yr | Combined for Sources 113, 113A, and 113B | NOX |
| | | | |





SECTION G. Emission Restriction Summary.

| Source Id | Source Descriptior | | | | |
|-----------------------|--------------------------|--|-----------|--|--|
| 113A | PLANT 2 PICKLE ROOM | | | | |
| Emission Limit | | | Pollutant | | |
| 8.520 | Tons/Yr | Combined for Sources 113, 113A, and 113B | NOX | | |
| 113B | FABRICATIONS PICKLE ROOM | | | | |
| Emission Limit | | | Pollutant | | |

Site Emission Restriction Summary

8.520 Tons/Yr

| Emission Limit | | Pollutant |
|----------------|------------------------|-----------|
| 56.000 Tons/Yr | 12-month rolling basis | VOC |

Combined for Sources 113, 113A, and 113B NOX





SECTION H. Miscellaneous.

#001. The Department has determined that the emissions from the following sources are of minor significance since each of these sources have a potential to emit less than 1 ton per year NOx, VOCs or HAPs. The following sources are subject to the site level requirements listed in Section C of this Title V permit.

- (a). Waste Solvent Storage TCE Still bottoms, ID plastic Coating waste, and OD plastic coating waste all VOCs, are stored at the main hazardous waste storage area or a satellite accumulation area.
 - (b). Groundwater Remediation (VOC and HAP).
 - (c). Pickling Processes (Plant 1, Plant 2, and Fabrication Department) (NOx).
- (d). Emergency Generators there are six (6) emergency generators that operate on natural gas at this facility. Five (5) of these emergency generators operate at a nominal 1 Phase rating of 7.5 KW (maximum 134,000 BTU/hr heat input), and the other emergency generator has a nominal rating of 7.7 KW (144,000 BTU/hr heat input) (VOC, TP, and NOx).
 - (e). Space Heaters there are 25 space heaters that operate using electricity at this facility.
 - (f). Three 275 gallon aboveground No. 2 Fuel Oil tanks (VOC).
 - (g). Two 1,000 gallon aboveground tanks for Oxsol 100.
 - (h). Three 1,000 gallon aboveground tanks for TCE (VOC and HAP).
 - (i). One 2,000 gallon aboveground storage tank for TCE (VOC and HAP).
 - (j). Annealing Processes Electrical.
 - (k). Air Conditioning losses.
 - (I). Refrigeration losses.
 - (m). Portable Propane-fired Space Heaters.
 - (n). Portable Propane-fired Forklifts.
 - (o). Dewatering Acetone used in dewatering is an exempt VOC.
 - (p). Benchtop Lubrication non-VOC solvents used in the benchtop lubrication process.
 - (g). Coiled Tube Lubrication VOC and non-VOC solvent blend.

#002. The following previously issued Operating Permit(s) serve(s) as the basis for certain terms and conditions set forth in this Title V Permit:

OP-46-0046A 46-327-013

46-327-014

#003. The throughputs and/or capacities listed in Sections A and D of this permit are used for descriptive purposes. These throughputs and/or capacities are not considered limitations or enforceable conditions by the Department.

#004. APS No. 346668; Authorization No. 621707 - created for the renewal of the Title V Permit for Accellent Collegeville. Items changed from the initial Title V Permit include, but are not limited to, the following:

- (a). The addition of a facility-wide restriction on natural gas use to show compliance of all natural gas sources with applicable VOC limits. Monitoring and recordkeeping of natural gas usage was transferred to the site level for demonstration of compliance. Monitoring and recording of fuel usage at the source level for the boilers was removed from the permit.
 - (b). A condition for recording each time the facility is monitored for odors, visible emissions, and fugitive particulate matter was



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added to the permit.

- (c). Some conditions in 40 C.F.R. Section 63 Subpart T were corrected to reflect the language written in the requirement.
- (d). The monitoring and recordkeeping requirements of Source ID Nos. 109 and 111 have been changed to a frequency based on the admixtures that are created for the sources.
- (e). The space heaters listed in the initial Title V were place erroneously into the Title V as combustion units. This has been corrected by placing the natural gas fired sources under Source ID No. 110A and the No. 2 Fuel Oil sources under Source ID No. 110B.
- (f). The parts washers now have applicable requirements under 25 Pa. Code Section 129.63 so they were placed into Section D of the permit.
- (g). The insignificant source list was updated and corrected for fuel tanks and other sources that were not included in the initial Title V Permit.

#005. APS No. 346668; Authorization No. 796825: This Administrative Order revises the conditions for the Plant 1 Vapor Degreaser and the Plant 2 Vapor Degreaser (Source ID Nos. 103 and 104S respectively) in the Title V Permit for Accellent, Inc. to reflect the voluntary installation of a carbon adsorption system to each affected vapor degreaser (Source ID Nos. C103 and C104S). With the voluntary addition of the carbon adsorption systems to Source ID Nos. 103 and 104S, Accellent, Inc. has also taken a voluntary reduction in the facility-wide annual VOC emission rate on a 12-month rolling basis. The Title V Operating Permit was revised to reflect this voluntary reduction in VOC emissions.

#006. APS No. 346668; Authorization No. 878168: This action is for the renewal of the Title V Operating Permit for Accellent, Inc. Revisions to the permit include the change to the facility-wide VOC limit. The limit proposed by Accellent, Inc. only covered the emissions from Source ID Nos. 103 and 104S after the installation of the carbon adsorption units. The revision of the facility-wide VOC limit reflects the permit limits and potential emissions from all VOC emitting sources at this facility. Source ID No. 033 was replaced by Source ID No. 034, and the permit was revised to address this change. Two of the parts washers in Source ID No. 112 were removed from the facility. The permit was revised to address the number of parts washers that still remain at the facility.

#007. APS No. 34668, Auth No. 1159222: Administrative Amendment

The operating permit was amended to incorporate the requirements of plan approval No. 46-0046A. In addition, the following changes have been made to the permit:

- (i) Source 032 was replaced by Source 035;
- (ii) The facility installed a natural gas-fired space heater and it has been added under Source 110A; and
- (iii) One Safety Kleen Parts Washer (Model 14, 5 Gallons) was removed from Source Id 112.

#008. APS: 346668, Auth: 1151695 (formerly), 1164706 and 1166833: Renewal and Minor Modification (i) Condition #001 for Source Id Nos. 109 and 111 has been revised to reduce the VOC emission limits from 6.4 TPY to 2.7 TPY, under Minor Mod (Auth:1166833). These new limits were taken to be in compliance with presumptive RACT in accordance with 25 Pa. Code §129.97 (c) (2).

(ii) The permit has been streamlined to address RACT II.

#009. This permit is being amended to address a change of ownership from Accellent, Inc. with Federal Tax ID 84-1507827 to UTI Holdings, LLC (dba Lake Region Medical) with Federal Tax ID 23-1721795. This permit is being processed under APS No. 971891 and AUTH No. 1235272.

January 2023

This permit is the Title V Renewal Operating Permit (AUTH ID 1370189; APS ID 346668; PF ID 3108).

The following items have been addressed with issuance of the renewal permit:

- (1) Permit Contact on record will be updated from Daniel Hilbert to Jeremy Gross EHS.
- (2) Pickling Operations, Sources 113, 113A and 113B, were added to the Source Inventory Section, Pickling Operations was previously identified as an insignificant source and listed in the Miscellaneous Section.





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(3) The updated list of insignificant sources are as follows:

Waste Solvent Storage -TCE Still bottoms, ID Plastic Coating waste and OD Plastic Coating waste all containing VOCs are stored at the main hazardous waste storage area or a satellite accumulation area (VOC and HAP).

Groundwater Remediation (VOC and HAP).

Four (4) natural gas-fired Emergency Generators - Three (3) of these emergency generators have a nominal 1 Phase rating of 7.5 KW (134,000 BTU/hr. heat input), and one has a nominal rating of 60 KW (980 490 BTU/hr.) (VOC, TP and NOx).

Space Heaters -there are numerous electric space heaters.

Three (3) 275 -gallon aboveground No. 2 Fuel Oil tanks (VOC)

Four (4) 1,000 - gallon and one (1) 1610 - gallon AST, and associated process equipment for Oxsol 100 (non-VOC, non-HAP solvent).

Three (3) 1,000 - gallon AST for TCE (VOC and HAP).

One (1) 2,000 - gallon AST for TCE (VOC and HAP)

Electrical annealing Processes

Conditioning losses.

Refrigeration losses.

Portable Propane-fired Space Heaters (VOC).

Portable Propane-fired Forklifts (VOC).

Dewatering -Acetone used in dewatering is an exempt VOC.

Benchtop Lubrication -non-VOC solvents used in the benchtop lubrication process.

December 2022

This permit is the Title V Renewal Operating Permit (AUTH ID 1370189; APS ID 346668; PF ID 3108).

The following items have been addressed with issuance of the renewal permit:

- (1) Pickling Operations, Sources 113, 113A and 113B, were added to the Source Inventory Section, Pickling Operations was previously identified as an insignificant source and listed in the Miscellaneous Section.
- (2) The updated list of insignificant sources are as follows:

Coiled Tube Lubrication - VOC and non-VOC solvent blend.

(3) Based on request from facility, the elective emission limit for Source IDs 109 and 111 decreased from 2.7 tons per year VOC to 1 ton per year VOC. As a result, the sources are not subject to RACT III





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