

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: December 5, 2023 Effective Date: December 5, 2023

Expiration Date: December 4, 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: 46-00090

Federal Tax Id - Plant Code: 23-2367622-1

Owner Information				
Name: TUBE METHODS INC				
Mailing Address: 416 DEPOT ST				
BRIDGEPORT, PA 19405-0460				
	Plant Information			
	Fiant information			
Plant: TUBE METHODS INC/BRIDGEPORT				
Location: 46 Montgomery County	46811 Bridgeport Borough			
SIC Code: 3317 Manufacturing - Steel Pipe And Tu	ubes			
	Responsible Official			
Name: STAN GAWEL				
Title: GEN MGR/VP				
Phone: (610) 279 - 7700	Email: Stan.Gawel@tubemethods.com			
Permit Contact Person				
Name: NICHOLAS RICCI				
Title: PLANT METALLURGIST/ QA MG				
Phone: (610) 279 - 7700	Email: Nick.Ricci@tubemethods.com			
[Signature]				
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER				



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Source	ID Source Name	Capacity/Throughput	Fuel/Material
101	VAPOR DEGREASER	6.400 Lbs/HR	SOLVENT
Z101	UNSPECIFIED NAME		

PERMIT MAPS

PROC STAC Z101



#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.

46-00090 TUBE METHODS INC/BRIDGEPORT



SECTION C. **Site Level Requirements**

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

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

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

- (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) (relating to prohibition of certain fugitive emissions) 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]

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) (relating to prohibition of certain





SECTION C. Site Level Requirements

fugitive emissions).

007 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material in the Southeast Air Basin except 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.

II. TESTING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 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, the most current version of the DEP Source Testing Manual, and the EPA Clean Air Act National Stack Testing Guidance, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.

009 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurements; 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.



SECTION C. **Site Level 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 § 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.

IV. RECORDKEEPING REQUIREMENTS.

[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.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a). Records of the monitoring and supporting data required by this Operating Permit shall be retained for a minimum of five (5) years.
- (b). Within thirty (30) days after permit issuance, the permittee shall submit, to the Department for approval, the proposed recordkeeping formats required in subparagraph (a), above.

013 [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:



SECTION C. Site Level Requirements

- (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.

V. REPORTING REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this 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. 46-00090, Tube Methods Inc."
- (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).

015 [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



SECTION C. Site Level Requirements

justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.

- (f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.
- (g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

VI. WORK PRACTICE REQUIREMENTS.

016 [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.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129,91]

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.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]

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.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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



SECTION C. Site Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

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 ***



SECTION D. Source Level Requirements

Source ID: 101 Source Name: VAPOR DEGREASER

Source Capacity/Throughput: 6.400 Lbs/HR SOLVENT

PROC STAC Z101

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- A. HAP Emissions shall not exceed 22 tons per year, on a 12 month-rolling basis, when Trichloroethylene (TCE) is used as a solvent in the degreaser (Source ID 101).
- B. VOC Emissions shall not exceed 22 tons per year, on a 12 month-rolling basis, when Trichloroethylene (TCE) is used as a solvent in the degreaser (Source ID 101).
- C. The permittee is authorized to use n-propyl bromide in the vapor degreaser, as a substitute for TCE.
- 1. HAP Emissions shall not exceed 23 tons per year, on a 12 month-rolling basis, when n-Propyl Bromide (n-PB) is used as a solvent in the degreaser (Source ID 101).
- 2. VOC Emissions shall not exceed 23 tons per year, on a 12 month-rolling basis, when n-Propyl Bromide (n-PB) is used as a solvent in the degreaser (Source ID 101).
- D. There shall be no increase in HAP emissions under this modified Operating Permit.
- E. Should the permittee opt to discontinue the use of TCE altogether in the vapor degreaser, the permittee shall notify the Department. The Department may revise the applicable conditions pertaining to the use of TCE and those written under the MACT regulations to make the discontinuation enforceable.
- F. Once the permittee makes a replacement of TCE by nPB as a solvent in a source and then decides to switch back to TCE from nPB, the Department shall be notified in writing, 10 working days prior to the switch back. The Department reserves the right to ask for additional information regarding the use of TCE.

Operation Hours Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate this source more than 6120 hours per year.

Control Device Efficiency Restriction(s).

003 [25 Pa. Code §129.63]

Degreasing operations

When using n-Propyl Bromide (nPB), the permittee shall continue to use the following control combinations:

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





SECTION D. **Source Level Requirements**

004 [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.

[Compliance with the condition below assures compliance with 40 CFR § 63.463 (b)(2)(i).]

[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 § 127.512.]

[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, is no greater than 30 percent of the solvent's boiling point.
- (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.
- (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.

[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 condition below assures compliance with 40 CFR § 63.463 (a).]

- (a) Except as provided in §63.464 for all cleaning machines, each owner or operator of a solvent cleaning machine subject to the provisions of this subpart shall ensure that each existing or new batch vapor or in-line solvent cleaning machine subject to the provisions of this subpart conforms to the design requirements specified below.
- (1) Each cleaning machine shall be designed or operated to meet the control equipment or technique requirements as below:
- (i) An idling and downtime mode cover, that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
 - (ii) A reduced room draft.
- (2) Each cleaning machine shall have a freeboard ratio of 0.75 or greater.



SECTION D. Source Level Requirements

- (3) Each cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
- (4) Each vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils. This requirement does not apply to a vapor cleaning machine that uses steam to heat the solvent.
- (5) Each vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- (6) Each vapor cleaning machine shall have a primary condenser.
- (7) Each cleaning machine that uses a lip exhaust shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber.

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.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following:

- (a). Amount of solvent (virgin or recycled) added to the batch solvent cleaning machine on a weekly basis.
- (b). The amount of solvent removed from the batch solvent cleaning machine on a weekly basis.
- (c). The hours of operation for the batch solvent cleaning machine on a daily basis.
- (d). Calculate VOC emissions based on inventory losses monthly.
- (e). The temperature of the vapor space between the refrigerant coils and the temperature of the refrigerant in and out of the coils on a daily basis.

[Compliance with (e) above assures compliance with 40 CFR § 63.466.]

008 [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. Compliance with the condition below assures compliance with 40 CFR § 63.466 (d)(1).]

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 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.





SECTION D. Source Level Requirements

- (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.

009 [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.]

Each owner or operator of a batch vapor solvent cleaning machine complying with the equipment or idling standards in 40 C.F.R. § 63.463 shall monitor the hoist speed as described in paragraphs (a) through (d) below.

- (a). The owner or operator shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
- (b). The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly.
- (c). If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
- (d). If an owner or operator can demonstrate to the Administrator's satisfacton in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

IV. RECORDKEEPING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of the following:

- (a). Amount of solvent (virgin or recycled) added to the batch solvent cleaning machine on a weekly basis.
- (b). The amount of solvent removed from the batch solvent cleaning machine on a weekly basis.
- (c). The hours of operation for the batch solvent cleaning machine on a daily basis.
- (d). The VOC emissions monthly.
- (e). The temperature of the vapor space between the refrigerant coils and the temperature of the refrigerant in and out of the coils on a daily basis.

[Compliance with (e) above assures compliance with 40 CFR § 63.466.]

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a). The permittee shall record the results of the monitoring of the room parameters established during the initial compliance test that was used to achieve the reduced room draft on a weekly basis.
- (b). The permittee shall record the results for the monitoring of the windspeed across the batch solvent cleaning machine on a quarterly basis.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.





SECTION D. **Source Level Requirements**

- (a). The permittee shall record the results of the monitoring of the hoist speed established during the initial compliance test.
- (b). The permittee shall record the results for the monitoring of the hoist speed across the batch solvent cleaning machine whenever the hoist speed is measured.

013 [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 shall maintain records in written or electronic form specified as follows 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 of 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) If a dwell is used to comply with these standards, records of the test required to determine an appropriate dwell time for each part or parts basket.
 - (4). 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 of the data for the freeboard refrigeration device and reduced room draft either in electronic or written form for a period of 5 years.

V. REPORTING REQUIREMENTS.

014 [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 is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions in paragraphs (a) through (c) of this section are met.

- (a). The source has demonstrated a full year of compliance without an exceedance.
- (b). The permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in subpart A (General Provisions) and in 40 CFR Part 63, Subpart T.
- (c). The Administrator does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of 40 CFR Part 63, Subpart A (General Provisions).

[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 operates 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





SECTION D. Source Level Requirements

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 this section 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 CFR 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.

016 [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.

017 [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 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.





SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the batch vapor solvent cleaning machine conforms to the design requirements specified in paragraphs (a) through (g) below.

- (a). Minimize solvent carryout by: racking all parts to allow full drainage; moving parts in and out of the degreaser at less than 11 feet per minute; decreasing the workload in the vapor zone at least 30 seconds or until condensation ceases; tipping out any pools of solvent on the cleaned parts before removal; and allowing parts to dry within the degreaser for at least 15 seconds or until visually dry.
- (b). The degreaser should be equipped with a safety switch which shuts off the sump heat if condenser coolant is either not circulating or too warm -- condenser flow switch and thermostat.
- (c). The degreaser should be equipped with a safety switch which shuts off the spray pump if the vapor level drops more than 4 inches.
 - (d). Repair solvent leaks immediately or shutdown the degreaser.
- (e). Do not dispose of waste solvent or transfer it to to another party such that greater than 20% of the waste by weight will evaporate into the atmosphere; store waste solvent only in closed containers.
- (f). Exhaust ventilation should not exceed 65 cfm per square foot of degreaser open area, unless necessary to meet OSHA requirements; ventilation fans should not be used near the degreaser opening.
 - (g). Water should not be visually detectable in solvent exiting the water separator.

019 [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 and 129.63.]

- (a). The permittee which uses an existing batch vapor solvent cleaning machine shall meet all of the following required work and operational practices specified below as applicable.
- (1). Control air disturbances across the cleaning machine opening by incorporating the following control equipment or techniques.
- (i). The cover to the solvent cleaning machine shall be in place during the idling and downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover to not be in place.
 - (ii). A reduced room draft across the degreaser.
 - (2). The cleaning machine shall have a freeboard ratio of 0.75 or greater.
- (3). The parts basket 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





SECTION D. **Source Level Requirements**

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). The 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.

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

ADDITIONAL REQUIREMENTS. VII.

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For the purpose of this Title V Permit, the terms cleaning machine, batch solvent cleaning machine, batch solvent vapor cleaning machine, solvent cleaning machine and vapor degreaser have the same meaning.

[25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of the following 2.3 ft wide, 31 ft long and 4 ft deep vapor degreaser:

Manufacturer: Ultra-Kool Model No.: 372-28-27 Installation Date: 01/01/1987

Dimensions: 2.3 ft wide; 31 ft long; and 4 ft deep

*** Permit Shield in Effect. ***





SECTION E. Source Group Restrictions.

SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.







SECTION G. Emission Restriction Summary.

Source Id	Source Description		
101	VAPOR DEGREASER		
Emission Limit			Pollutant
22.000	Tons/Yr	12-month rolling basis,When using TCE	Hazardous Air Pollutants
23.000	Tons/Yr	12-month rolling basis, When using n-PB	Hazardous Air Pollutants
22.000	Tons/Yr	12-month rolling basis,When using TCE	VOC
23.000	Tons/Yr	12-month rolling basis, When using n-PB	VOC

Site Emission Restriction Summary

Emission Limit	Pollutant
Elilloololi Elillit	1 Ollatarit

46-00090 TUBE MET



SECTION H. Miscellaneous.

- (A) The Department has determined that the emissions from the following activities, excluding those indicated as site level requirements, in Section C, of this permit, do not require additional limitations, monitoring, or recordkeeping:
- Gas Fired water heater (700,000 BTU/hr heat input) for Source 101 (Degreaser).
- Two dust collectors used for removing Chromium fines from the process for proper disposal. The units are enclosed.
- The hydrogen/vapor fired annealing furnaces whose emissions are minimal
- Seven (7) natural gas fired space heaters rated at 200,000 BTU/hr each. Total heat input from the space heaters is equal to 1.4 MMBTU/hr.
- (B) The following previously issued Operating Permits serve as the basis for certain terms and conditions set forth in this Title V Permit:
- Permit No.46-327-010
- Permit No.46-327-010A
- (C) MARCH 2007. APS No. 344994; AUTH ID 627341: Title V Operating Permit Renewal.
- APRIL 2008. APS No. 344994; AUTH ID 712170: Title V Minor Operating Permit Modification.
- MARCH 2012. APS No. 344994; AUTH ID 896195: Title V Operating Permit Renewal.
- MARCH 2018. APS No. 344994; AUTH ID 1145114: Title V Operating Permit Renewal.
- DECEMBER 2023. APS No. 344994; AUTH ID 1405795: This Title V Permit is a Renewal.





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