





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

### STATE ONLY NATURAL MINOR OPERATING PERMIT

Issue Date: November 24, 2020 Effective Date: December 6, 2023 Revision Date: December 6, 2023 November 23, 2025 **Expiration Date:** 

**Revision Type:** Amendment

15-00081

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

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

### State Only Permit No: 15-00081

**Natural Minor** 

Federal Tax Id - Plant Code: 23-0411710-1

**Owner Information** 

Name: JOHNSON MATTHEY INC

Mailing Address: 1401 KING RD

WEST CHESTER, PA 19380-1467

Plant Information

Plant: JOHNSON MATTHEY INC/WEST WHITELAND

Location: 15 Chester County 15971 West Whiteland Township

SIC Code: 3356 Manufacturing - Nonferrous Rolling And Drawing, Nec

Responsible Official

Name: PETER RAPP Title: SITE MANAGER

Phone: (610) 648 - 8423 Email: peter.rapp@jmusa.com

Permit Contact Person

Name: DAVID CAMPBELL

Title: EH&S MGR

Phone: (610) 648 - 8091 Email: david.campbell@jmusa.com

[Signature] \_

JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER





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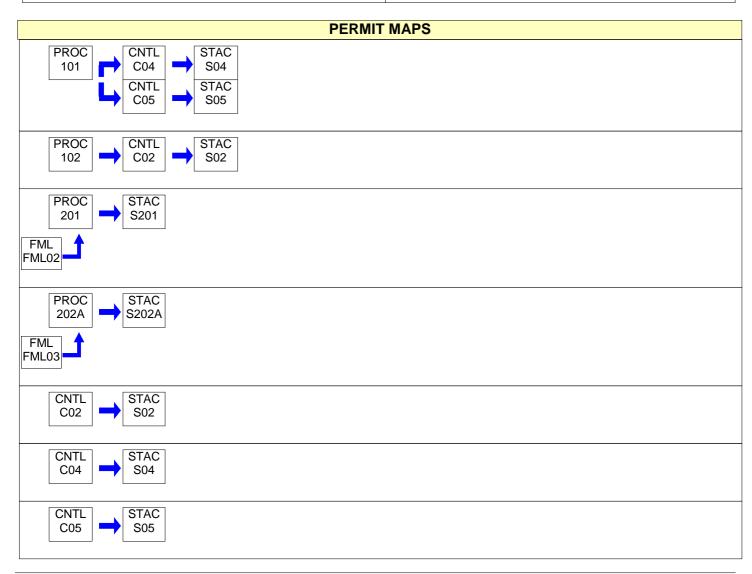
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# SECTION A. Site Inventory List

Source	ID Source Name	Capacity	/Throughput	Fuel/Material
101	METAL MELT ROOM		N/A	METALS
102	ACID METAL STRIPPING ROOM		N/A	METALS
201	200-KW EMERGENCY GENERATOR		N/A	Diesel Fuel
202A	25-KW EMERGENCY GENERATOR	439.000	CF/HR	Natural Gas
C02	VERTICAL WET SCRUBBER (NITRIC SCRUBBER)	0.050	Lbs/HR	NITRIC ACID
C04	MELT ROOM WET SCRUBBER (CHLORINE SCRUBBER)	4.700	Lbs/HR	CHLORINE GAS
C05	MELT ROOM DRY SCRUBBER (CHLORINE SCRUBBER)		N/A	CHLORINE GAS
FML02	DIESEL OIL FUEL TANK			
FML03	PIPELINE NATURAL GAS			
S02	ACID SCRUBBER STACK			
S04	WET SCRUBBER STACK			
S05	DRY SCRUBBER STACK			
S201	200-KW EMERGENCY GENERATOR STACK			
S202A	25-KW EMERGENCY GENERATOR STACK			







#001 [25 Pa. Code § 121.1]

Definitions.

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

#002 [25 Pa. Code § 127.446]

**Operating Permit Duration.** 

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

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

#### Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

# Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
  - (1) For a synthetic minor facility, a fee equal to:
    - (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
    - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
    - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.
- (2) For a facility that is not a synthetic minor, a fee equal to:
  - (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
  - (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.



- (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.
- (b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

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

# **Transfer of Operating Permits.**

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

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

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

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

# Compliance Requirements.

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





(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this subcondition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

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

**Duty to Provide Information.** 

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

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

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

#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]

#### **Operating Permit Modifications**

- (a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:
- (b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.
- (e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#012 [25 Pa. Code § 127.441]

Severability Clause.

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



# #013 [25 Pa. Code § 127.449]

#### De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
  - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
  - (4) Space heaters which heat by direct heat transfer.
  - (5) Laboratory equipment used exclusively for chemical or physical analysis.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.







- (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

# #014 [25 Pa. Code § 127.3]

# Operational Flexibility.

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

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

# #015 [25 Pa. Code § 127.11]

#### Reactivation

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

# #016 [25 Pa. Code § 127.36]

#### Health Risk-based Emission Standards and Operating Practice Requirements.

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

#### #017 [25 Pa. Code § 121.9]

#### Circumvention.

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion





technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

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

#### Reporting Requirements.

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- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager PA Department of Environmental Protection (At the address given in the permit transmittal letter, or otherwise notified)

- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

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

#### Sampling, Testing and Monitoring Procedures.

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

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

# Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
  - (1) The date, place (as defined in the permit) and time of sampling or measurements.
  - (2) The dates the analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of the analyses.
  - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.





(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

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**Property Rights.** 

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

#022 [25 Pa. Code § 127.447]

**Alternative Operating Scenarios.** 

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

#023 [25 Pa. Code §135.3]

### Reporting

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

#024 [25 Pa. Code §135.4]

#### **Report Format**

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

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# 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 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 a 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 (a) -- (h) 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 thre minutes in any 1 hour.
- (b) Equal to or greater than 60% at any time.

# # 006 [25 Pa. Code §123.42]

#### **Exceptions**

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

- (a) When the presence of uncombined water is the only reason for failure 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.





# **SECTION C.** Site Level Requirements

(c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions).

#### # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- (a) The permittee shall ensure that the total emission from any single hazardous air pollutant from the facility shall not exceed 10.0 tons per year as a 12-month rolling sum.
- (b) The permittee shall ensure that the total aggregate emissions of hazardous air pollutants from the facility shall not exceed 25.0 tons per year as a 12-month rolling sum.

### # 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The permittee shall ensure that the total volatile organic compounds (VOC) from the facility shall not exceed 24.9 tons per year as a 12-month rolling sum.
- (b) The permittee shall ensure that the total nitrogen oxide (NOx) from the facility shall not exceed 24.9 tons per year as a 12-month rolling sum.

#### # 009 [25 Pa. Code §129.14]

#### Open burning operations

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

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

#### II. TESTING REQUIREMENTS.

# # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region

RA-EPSEstacktesting@pa.gov

Central Office

RA-EPstacktesting@pa.gov

- (b) The following pertinent information shall be listed on the title page.
- 1. Test Date(s)
- a. For protocols, provide the proposed date on which testing will commence or "TBD"
- b. For reports, provide the first and last day of testing
- 2. Facility Identification Number (Facility ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.





#### SECTION C. **Site Level Requirements**

- 3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment
- 4. Testing Requirements (all that apply) engineer: edit as necessary, be specific if it helps
- a. Plan approval number(s)
- b. Operating permit number
- c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- d. Special purpose(s) (Consent Order, RFD, RACT, Tier II, etc.)
- (c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

#### # 011 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this 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 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.

### MONITORING REQUIREMENTS.

### [25 Pa. Code §123.43]

### Measuring techniques

Visible emissions may be measured using either of the following:

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

#### # 013 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The permittee shall monitor the total VOC emissions from the facility on a monthly basis and as a twelve (12) month rolling sum.
- (b) The permittee shall monitor the total NOx emissions from the facility on a monthly basis and as a twelve (12) month rolling sum.
- (c) The permittee shall monitor the total HAP emissions from the facility on a monthly basis and as a twelve (12) month rolling sum.

# [25 Pa. Code §127.441]

### Operating permit terms and conditions.

- (a) The permittee shall monitor the facility, once per operating day, for the following:
  - (1) odors which may be objectionable (as per 25 Pa. Code §123.31);
  - (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
  - (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2);
- (b) Objectionable odors, which may cause annoyance or discomfort to the public noticed at the site property boundaries that are caused or may be caused by operations at the site, as well as fugitive particulate emissions that originated on-site and cross the property line, and visible emissions that originated on site shall:
  - (1) be investigated;
  - (2) be reported to the facility management, or individual(s) designated by the permittee;



#### SECTION C. **Site Level Requirements**

- (3) have appropriate corrective action taken (for emissions that originate on-site);
- (4) be recorded in a permanent written log.
- (c) 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 and the semi-annual report of monitoring and recordkeeping, complaints, monitoring results, and/or Department findings.

[Note: In a letter dated, 12/15/2006, DEP approved of the company's request to reduce the frequency of monitoring to oncea-week.1

[Note: In a letter dated, 8/1/2007, DEP approved of the company's request to reduce the frequency of monitoring to once-amonth.]

#### IV. RECORDKEEPING REQUIREMENTS.

#### # 015 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- (a) The permittee shall calculate and maintain records of the total VOC emissions from the facility on a monthly basis and as a twelve (12) month rolling sum.
- (b) The permittee shall calculate and maintain records of the total NOx emissions from the facility on a monthly basis and as a twelve (12) month rolling sum.
- (c) The permittee shall calculate and maintain records of the total HAP emissions from the facility on a monthly basis and as a twelve (12) month rolling sum.

# [25 Pa. Code §127.441]

### Operating permit terms and conditions.

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

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

#### # 017 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall ensure that all records, reports, and analysis results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with General State Only Requirement #020(b) and shall be made available to the Department upon written or verbal request within a reasonable time.

#### [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.

#### REPORTING REQUIREMENTS.

#### # 019 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- (b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety,





#### SECTION C. **Site Level Requirements**

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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.

# [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

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





# **SECTION C.** Site Level Requirements

- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If this facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

#### VI. WORK PRACTICE REQUIREMENTS.

# # 021 [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 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 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 other means.

#### # 022 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

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

#### # 023 [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.

#### # 024 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

### VII. ADDITIONAL REQUIREMENTS.

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

### VIII. COMPLIANCE CERTIFICATION.

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

#### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

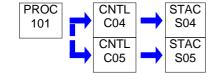






Source ID: 101 Source Name: METAL MELT ROOM

Source Capacity/Throughput: N/A METALS



#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate the Metal Melt Room (Source ID: 101) unless both the wet scrubber (Chlorine Scrubber) (Source ID: C04) and the dry scrubber (Source ID: C05) are in operation.

#### VII. ADDITIONAL REQUIREMENTS.

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

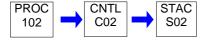






Source ID: 102 Source Name: ACID METAL STRIPPING ROOM

Source Capacity/Throughput: N/A METALS



#### I. RESTRICTIONS.

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

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate the Acid Metal Stripping Room (Source ID: 102) more than 4,320 hours per year, as a 12-month rolling sum.

#### II. TESTING REQUIREMENTS.

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

### III. MONITORING REQUIREMENTS.

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

# IV. RECORDKEEPING REQUIREMENTS.

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

### V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate the Acid Metal Stripping Room (Source ID: 102) unless the Vertical Wet Scrubbers (Nitric Scrubbers) (Source ID: C02) are in operation.

### VII. ADDITIONAL REQUIREMENTS.

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

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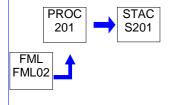


# SECTION D. Source Level Requirements

Source ID: 201 Source Name: 200-KW EMERGENCY GENERATOR

Source Capacity/Throughput: N/A Diesel Fuel

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



#### I. RESTRICTIONS.

#### Fuel Restriction(s).

# 001 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall ensure that this emergency generator shall be fired only on commercial diesel fuel.

#### II. TESTING REQUIREMENTS.

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

### III. MONITORING REQUIREMENTS.

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

# IV. RECORDKEEPING REQUIREMENTS.

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

# V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

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

### VII. ADDITIONAL REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.14(a)(8).]

The 200-kW Emergency Generator (Source ID: 201) is a diesel-fuel fired engine and is manufactered by Onan, Inc., model number DGFC5742108.



# 003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4200] Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines Am I subject to this subpart?

- (a) The permittee shall operate the emergency stationary R.I.C.E. according to the requirements in the most recent version of 40 C.F.R. Section 60.4211(f).
- (b) If the permittee does not operate the engine according to the requirements of 40 C.F.R. Section 60.4211(f), the engine will not be considered an emergency engine under 40 C.F.R. Part 60 Subpart IIII and must meet all requirements for non-emergency engines.



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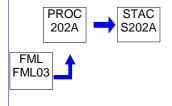


# SECTION D. Source Level Requirements

Source ID: 202A Source Name: 25-KW EMERGENCY GENERATOR

Source Capacity/Throughput: 439.000 CF/HR Natural Gas

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



#### I. RESTRICTIONS.

#### Fuel Restriction(s).

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that this emergency generator shall be fired only on natural gas.

#### II. TESTING REQUIREMENTS.

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

### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

# V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

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

### VII. ADDITIONAL REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.14(a)(8).]

The 25-kW Emergency Generator (Source ID: 202A) is a natural gas-fuel fired engine and is manufactered by Power Solutions International, model number 2.4L.



# 003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4230] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines Am I subject to this subpart?

- (a) The permittee shall operate the emergency stationary R.I.C.E. according to the requirements in the most recent version of 40 C.F.R. Section 60.4243(d).
- (b) If the permittee does not operate the engine according to the requirements of 40 C.F.R. Section 60.4243(d), the engine will not be considered an emergency engine under 40 C.F.R. Part 60 Subpart JJJJ and must meet all requirements for non-emergency engines.



Source ID: C02 Source Name: VERTICAL WET SCRUBBER (NITRIC SCRUBBER)

Source Capacity/Throughput: 0.050 Lbs/HR NITRIC ACID

CNTL STAC S02

### I. RESTRICTIONS.

# **Emission Restriction(s).**

# # 001 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall ensure that outlet pollutant emissions from the Vertical Wet Scrubber (Nitric Scrubber) (Source C02) shall not exceed the following:

- (a) Hydrochloric Acid (HCl): 0.18 ton per year (tpy), as a 12-month rolling sum.
- (b) Nitric Acid (HNO3): 0.7 tpy, as a 12-month rolling sum.

# Control Device Efficiency Restriction(s).

### # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The permittee shall ensure that the Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02) maintains a 86.7% removal efficiency or a maximum outlet concentration of 8.16 ppmdv for hydrochloric acid (HCI), at maximum operating conditions, averaged over a 1-hour period.
- (b) The permittee shall ensure that the Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02) maintains a 34.2% removal efficiency or a maximum outlet concentration of 19.35 ppmdv for nitric acid (HNO3), at maximum operating conditions, averaged over a 1-hour period.

### II. TESTING REQUIREMENTS.

### # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Plan Approval No. 15-0081D requires a source test to confirm compliance with the hydrochloric gas (HCl) and nitric acid (HNO3) emission limits set for this source. A source test was conducted on August 23, 2022 and the source test report was received by DEP on May 25, 2023. The permittee's test report received on May 25, 2023 indicates that the source test results demonstrate compliance with plan approval requirements; however, DEP Source Testing Program has not completed a formal review of the source test report to determine if the test results are acceptable to use for compliance purposes at this time. Plan Approval No. 15-0081D terms and conditions are incorporated into this permit based upon a preliminary review of the source test report. If DEP Source Testing Program determines that the source test is not acceptable to use for compliance purposes, the permittee will be required to retest in accordance with conditions specified in Plan Approval No. 15-0081D and other such conditions, within the capacity of the equipment, which may be requested by DEP.

#### III. MONITORING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall monitor the following for the Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02) on a daily basis, when operating:

- (a) The pressure drop across the online vertical wet scrubber utilizing a differential manometer, or other Department approved equivalent device.
- (b) The water flow rate to the online vertical wet scrubber using a flow meter.
- (c) The pH level of the online vertical wet tower scrubbing solution using an auto-controlled pH metering probe.







(d) The hours of operation for the Acid Metal Stripping Room (Source ID: 102) and the Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02).

#### IV. RECORDKEEPING REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall maintain the following records for the Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02), when operating:

- (a) The pressure drop across the online vertical wet scrubber, on a daily basis.
- (b) The water flow rate to the online vertical wet scrubber, on a daily basis.
- (c) The pH level of the online vertical wet tower scrubbing solution, on a daily basis.
- (d) The hours of operation for the Acid Metal Stripping Room (Source ID: 102) and the Vertical Wet Scrubbers (Nitric Scrubbers) (Source ID C02), on a daily basis.
- (e) The dates, times and results of the inspection of vertical wet scrubbers, on a weekly basis.

#### V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

# # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall ensure that the Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02) shall be flushed with clean water weekly to prevent salt buildup.

### # 007 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The permittee shall not operate the Acid Metal Stripping Room (Source ID: 102) unless the online Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02) is in operation.
- (b) The permittee shall ensure that the fans and hoods associated with the scrubber are equipped with an emergency generator that shall be operationed in the event of a power outage.

# # 008 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall ensure that the scrubber pressure drop shall be maintained between a range 0.5" - 1.5" (w.g.) for the online Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02).

#### # 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall ensure that the flow rate of the online Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02) shall be 30 gallons per minute or greater.

### # 010 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall ensure that the pH level in the scrubber water shall be maintained between 8 and 13 for the online Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02).





# 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the feed tank of the Vertical Wet Scrubber (Nitric Acid) (Source ID: C02) shall be changed weekly with a fresh batch of water and caustic.

# 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall inspect the online Vertical Wet Scrubber (Nitric Scrubber) (Source ID: C02) weekly to ensure the proper operation of the control devices.

# 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the online Vertical Wet Scrubber (Nitric Scrubbers) (Source ID: C02) shall be operated whenever the Acid Metal Stripping Room (Source ID: 102) is in operation.

#### VII. ADDITIONAL REQUIREMENTS.

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

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Source ID: C04 Source Name: MELT ROOM WET SCRUBBER (CHLORINE SCRUBBER)

> Source Capacity/Throughput: 4.700 Lbs/HR CHLORINE GAS



#### RESTRICTIONS.

### **Emission Restriction(s).**

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that emissions of chlorine gas (Cl2) from the Melt Room Wet Scrubber (Chlorine Scrubber) (Source ID: C04) shall not exceed 0.047 lbs/hr at the outlet.

# Control Device Efficiency Restriction(s).

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the Melt Room Wet Scrubber (Chlorine Scrubber) (Source ID: C04) maintains 99% removal efficiency or a maximum outlet concentration of 5 parts per million (ppm), for chloring gas (Cl2) at maximum operating conditions.

#### TESTING REQUIREMENTS. II.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Plan Approval No. 15-0081C requires a source test to confirm compliance with the chlorine gas (Cl2) emission limits set for this source. A source test was conducted on September 30, 2022 and the source test report was received by DEP on August 22, 2023. The permittee's test report received on August 22, 2023 indicates that the source test results demonstrate compliance with plan approval requirements; however, DEP Source Testing Program has not completed a formal review of the source test report to determine if the test results are acceptable to use for compliance purposes at this time. Plan Approval No. 15-0081C terms and conditions are incorporated into this permit based upon a preliminary review of the source test report. If DEP Source Testing Program determines that the source test is not acceptable to use for compliance purposes, the permittee will be required to retest in accordance with conditions specified in Plan Approval No. 15-0081C and other such conditions, within the capacity of the equipment, which may be requested by DEP.

#### III. MONITORING REQUIREMENTS.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following for the Melt Room Wet Scrubber (Chlorine Scrubber) (Source ID: C04) on a daily basis, when operating:

- (a) The pressure drop across the wet scrubber utilizing a differential manometer or equivalent.
- (b) The water flow rate to the wet scrubber.
- (c) The pH levels of the wet scrubbing solution.
- (d) The hours of operation for the Metal Melt Room (Source ID: 101) and the Melt Room Wet Scrubber (Chlorine Scrubber) (Source ID: C04) and the Melt Room Dry Scrubber (Source ID: C05).

#### IV. RECORDKEEPING REQUIREMENTS.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following for the Melt Room Wet Scrubber (Chlorine Scrubber) (Source ID: C04) on a daily basis, when operating:





- (a) The pressure drop across the wet scrubber.
- (b) The water flow rate to the wet scrubber.
- (c) The pH levels of the wet scrubbing solution.
- (d) The hours of operation for the Metal Melt Room (Source ID: 101) and the Melt Room Wet Scrubber (Chlorine Scrubber) (Source ID: C04) and the Melt Room Dry Scrubber (Source ID: C05).

# V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# # 006 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall not operate the Metal Melt Room (Source ID: 101) unless both the wet scrubber (Chlorine Scrubber) (Source ID: C04) and the dry scrubber (Source ID: C05) are in operation.

# 007 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall ensure a minimum scrubber pressure drop of 4 inches (w.g.) is maintained across the Melt Room Wet Scrubber (Chlorine Scrubber) (Source ID: C04), when operating.

# 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall ensure that the pH level of the scrubber water for the Melt Room Wet Scrubber (Chlorine Scrubber) (Source ID: C04) shall be maintained as 9.0 (minimum).

# 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall inspect the Melt Room Wet Scrubber (Chlorine Scrubber) (Source ID: C04) and the Melt Room Dry Scrubber (Source ID: C05) weekly to ensure the proper operation of the control devices.

# 010 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee will operate a conductivity meter which will trigger periodic system blowdowns and partial replacement of the scrubber.

#### VII. ADDITIONAL REQUIREMENTS.

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







Source ID: C05 Source Name: MELT ROOM DRY SCRUBBER (CHLORINE SCRUBBER)

Source Capacity/Throughput: N/A CHLORINE GAS

CNTL STAC S05

#### I. RESTRICTIONS.

# Emission Restriction(s).

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that emissions of chlorine gas (Cl2) from the Melt Room Dry Scrubber (Chlorine Scrubber) (Source ID: C05) shall not exceed 0.047 lbs/hr at the outlet.

#### II. TESTING REQUIREMENTS.

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

### III. MONITORING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following for the Melt Room Dry Scrubber (Chlorine Scrubber) (Source ID: C05) on a daily basis, when operating:

- (a) The pressure drop across the dry scrubber, utilizing a differential manometer or equivalent.
- (b) The adsorbent consumption using an electronic bed monitor (EBM), or equivalent.

#### IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain record of the following for the Melt Room Dry Scrubber (Chlorine Scrubber) (Source ID: C05) on a daily basis, when operating:

- (a) The pressure drop across the dry scrubber.
- (b) The adsorbent consumption.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure to utilize the Melt Room Dry Scrubber (Chlorine Scrubber) (Source ID: C05) to control emergency releases of chlorine gas (Cl2) and potential releases during cylinder changeover.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure a minimum pressure drop of 6 inches (w.g.) is maintained across the Melt Room Dry Scrubber







(Chlorine Scrubber) (Source ID: C05), when operating.

### VII. ADDITIONAL REQUIREMENTS.

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

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### 15-00081



# **SECTION E.** Source Group Restrictions.

Group Name: GRP 1

Group Description: Emergency Generators

Sources included in this group:

ID	Name
201	200-KW EMERGENCY GENERATOR
202/	25-KW EMERGENCY GENERATOR

#### 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 grains per dry standard cubic foot, 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 parts per million, by volume, dry basis.

[Compliance with this condition also assures compliance with the emission standards of §40 CFR 80.510(a).]

#### # 003 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall monitor the following for this emergency generator:

- (a) Hours of operation, monthly and on a 12-month rolling basis.
- (b) Fuel usage, monthly and on a 12-month rolling basis.
- (c) The sulfur content, by weight, and the cetane index or aromatic content, by volume, of the fuel purchased on an "as delivered" basis.
- (d) Emissions of NOx and CO, monthly and on a 12-month rolling basis.

#### IV. RECORDKEEPING REQUIREMENTS.

### # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain the following records for this emergency generator:

- (a) Hours of operation, monthly and on a 12-month rolling basis.
- (b) Fuel usage, monthly and on a 12-month rolling basis.
- (c) Deliveries of diesel fuel, including the quantity of diesel purchased. In addition, certification of the sulfur content, by weight, and the cetane index or aromatic content, by volume, in the diesel fuel shall be maintained at all times.





#### SECTION E. **Source Group Restrictions.**

(d) NOx and CO emissions, monthly and on a 12-month rolling basis.

#### # 006 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

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

#### REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

#### [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The permittee shall ensure that this emergency generator shall only be used for emergency purposes during utility power outages or where a reasonable probability of power outage exists. Reasonable probability of a power outage refers to events, such as, but not limited to, local weather forecasts, or an indication of power instability within the building, such that a high likelihood of loss of the primary power supply to the facility exists. It shall not be used to produce saleable power for peaking purposes.
- (b) The permittee shall ensure that this emergency generator shall be operated and maintained according to manufacturer's specifications and with good air pollution control practices.

# [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall ensure that this emergency generator shall be equipped with a nonresettable hour meter to track the hours of operation.

#### VII. ADDITIONAL REQUIREMENTS.

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

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# **SECTION F.** Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

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Source Id



# **SECTION G.** Emission Restriction Summary.

Source Description

201	200-KW EMERGENC	Y GENERATOR	
Emission Limit			Pollutant
2.750	Tons/OZNESEAS		NOX
6.600	Tons/Yr		NOX
100.000	Lbs/Hr		NOX
1,000.000	Lbs/Day		NOX
500.000	PPMV	dry basis	SOX
0.040	ar/DRY FT3	particulate matter	TSP

202A 25-KW EMERGENCY GENERATOR

2.750 Tons/OZNESEAS       NOX         6.600 Tons/Yr       NOX         100.000 Lbs/Hr       NOX         1,000.000 Lbs/Day       NOX	Emission Limit			Pollutant
100.000 Lbs/Hr NOX 1,000.000 Lbs/Day NOX	2.750	Tons/OZNESEAS		NOX
1,000.000 Lbs/Day NOX	6.600	Tons/Yr		NOX
	100.000	Lbs/Hr		NOX
FOO COO DDM// drub seis	1,000.000	Lbs/Day		NOX
500.000 PPMV dry basis SOX	500.000	PPMV	dry basis	SOX
0.040 gr/DRY FT3 particulate matter TSP	0.040	gr/DRY FT3	particulate matter	TSP

C02 VERTICAL WET SCRUBBER (NITRIC SCRUBBER)

Emission Limit			Pollutant
0.020	Tons/Yr	12-month rolling sum	HNO3
0.040	Tons/Yr	12-month rolling sum	Hydrochloric Acid

C04 MELT ROOM WET SCRUBBER (CHLORINE SCRUBBER)

Emission Limit	Pollutant
0.047 Lbs/Hr	Chlorine

C05 MELT ROOM DRY SCRUBBER (CHLORINE SCRUBBER)

Emission Limit	Pollutant
0.470 Lbs/Hr	Chlorine

# **Site Emission Restriction Summary**

Emission Limit		Pollutant
10.000 Tons/Yr	any single HAP	Hazardous Air Pollutants
25.000 Tons/Yr	aggregate, combination HAPs	Hazardous Air Pollutants
24.900 Tons/Yr	12-month rolling sum	VOC
24.900 Tons/Yr	12-month rolling sum	NOX





**SECTION G.** Emission Restriction Summary.

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#### 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 requirements.
- (1) ZGS Booth (RFD No. 15-A01-628)
- (2) Production Dust Collector #163 (Zirconia Oxide dust) (RFD No. 15-A01-272)
- (3) 4-Production Baghouses #125 (RFD No. 15-A01-273)
- (4) Various Stacks associated with RFD No. 15-A01-574 (Nos. 114, 115, 137, 138, 143, 145, 156, 157, 158, 159, 160, 161, 162, 163, 166, 178 and 186)
- (5) Burn-off Operation Exhaust Hood (RFD No. 15-A01-343)
- (6) 1.70 MMBtu/hr Boiler
- (7) 300,000 Btu/hr natural gas-fired space heater (Tran GMND030ALF2000AC)
- (8) 225,000 Btu/hr natural gas-fired space heater (Tran GMND022ALF2000AC)
- (10) 400,000 Btu/hr natural gas-fired space heater (Tran GMND040ALF2000AC)
- (11) 125,000 btu/hr natural gas-fired space heater (Tran GMND012AHF20000AC)
- (b) The Department has determined that the following sources are exempted from the plan approval construction and installation requirements of 25 Pa. Code §§ 127.11 and 12:
- (1) Metal Melt Room (Source ID: 101)
- (2) Acid Metal Stripping Room (Source ID: 102)
- (3) Copper Stripping Room (Source ID: 104) (RFD No. 15-A01-1027)
- (4) Automated CO Gas Delivery System (RFD No. 5645)
- (5) Coated Wire Bleach Rinse (RFD No. 6140)
- (6) Hot Work Hood Ventilation (RFD No. 6573)
- (7) Propylene Gas Cylinder Ventilation (RFD No. 7203)
- (8) Inductive Couple Plamsa (ICP) Instrumentation Ventilation (RFD No. 7207)
- (9) Laboratory Hood Chemical Usage (RFD No. 7424)
- (c) This State Only Operating Permit (Natural Minor) 15-00081 was originally processed and had an Intent to Issue Operating Permit notice published in the PA Bulletin under the SOOP Permit Number 15-00080.
- (d) This State Only Operating Permit 15-00081 (APS No.: 346179, Auth ID: 817644) has been renewed.
- (e) This State Only Operating Permit 15-00081 (APS No.: 346179, Auth ID: 1060941) has been renewed.
- (f) This State Only Operating Permit 15-00081 (APS No.: 346179, Auth ID: 1312672) has been renewed.
- (g) This State Only Operating Permit 15-00081 (APS ID: 346179, AUTH ID: 1460541) has been administratively amended to incorporate Plan Approvals 15-0081C and 15-0081D.





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