

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: August 8, 2016 Effective Date: August 8, 2016

Expiration Date: August 8, 2021

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: 46-00051

Federal Tax Id - Plant Code: 23-1509932-1

	Owner Information
Name: SCHLOSSER STEEL INC	
Mailing Address: PO BOX 638	
2641 TOWNSHIP LINE RD	
HATFIELD, PA 19440-0116	
	Plant Information
Plant: SCHLOSSER STEEL INC/HATFIELD	
Location: 46 Montgomery County	46930 Hatfield Township
SIC Code: 3441 Manufacturing - Fabricated Structur	ral Metal
	Responsible Official
Name: PHILLIP SCHLOSSER	
Title: PRESIDENT	
Phone: (215) 723 - 9883	
<u> </u>	Permit Contact Person
	Permit Contact Person
Name: JOSEPH M AMELIO	
Title: OPERATIONS MANAGER	
Phone: (215) 723 - 9883	
[Signature]	
JAMES D. REBARCHAK, SOUTHEAST REGION AIR	R PROGRAM MANAGER





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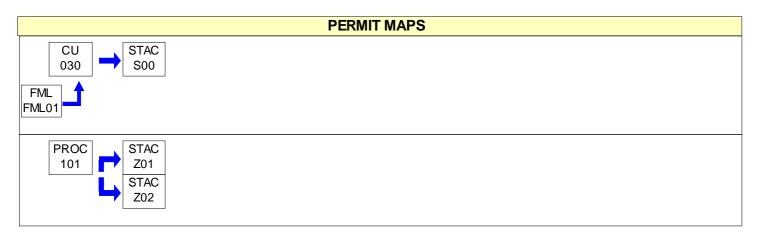
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SECTION A. Site Inventory List

Source	ID Source Name	Capacity/Throughput	Fuel/Material
030	SPACE HEATERS (27)	29.860 Gal/HR	#2 Oil
101	STEEL PAINTING OPERATION	N/A	STEEL PAINTING MAT'LS
		N/A	M.SPIRITS, XYLENE, MEK
FML01	2,500-GAL NO. 2 FUEL OIL AST		
S00	SPACE HEATER STACKS (30)		
Z01	STEEL PAINTING OPERATION FUGITIVES		
Z02	CLEAN-UP OPERATION FUGITIVES		







SECTION B. General Title V Requirements

#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 § 127.512(c)(4)]

Property Rights

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

#003 [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.

#004 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]

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.
- (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.

#005 [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.

#006 [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.

#007 [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. Aperson 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.

#008 [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.







#009 [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.

#010 [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.

#011 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

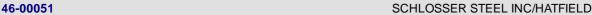
As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

#012 [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.





#013 [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).

#014 [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).
- (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.

#015 [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.

#016 [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).
- (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 administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.
- (f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

#017 [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





SECTION B. General Title V Requirements

- (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.

#018 [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).

#019 [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.

#020 [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:

Office of Air Enforcement and Compliance Assistance (3AP20) United States Environmental Protection Agency Region 3 1650 Arch Street Philadelphia, PA 19103-2029

(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.

#021 [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.

#022 [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.



#023 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

46-00051

- (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 #020(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.

#024 [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 and EPA in accordance with the submission requirements specified in condition #020 of this section.

#025 [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)



SECTION B. General Title V Requirements

- (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)

#026 [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 Condition #24 of Section B of this Title V 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).





#027 [25 Pa. Code § 127.512(e)]

46-00051

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.

#028 [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.





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 a fugitive air contaminant from a source other than the following:

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving, and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Open burning operations, as specified in 25 Pa. Code § 129.14;
- (g) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting;
- (h) Coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in 25 Pa. Code §§ 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations); and
- (i) Sources, and classes of sources, other than those identified in (a) (h) above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1(b), that fugitive emissions from the source, after appropriate controls, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution; and
 - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Condition # 002, Section C, of this permit, 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

The permittee shall ensure that emission into the outdoor atmosphere of visible air contaminants from this facility occurs in such a manner that the opacity of the emission is neither of the following:

- (a) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour.
- (b) Equal to or greater than 60% at any time.





M Same

SECTION C. Site Level Requirements

006 [25 Pa. Code §123.42]

Exceptions

The emission limitations indicated in Condition # 005, Section C, of this permit, 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 of the emission to meet the limitations.
- (b) When the emission results from sources specified in Condition # 002, Section C, of this permit.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall restrict site-wide emissions of volatile organic compounds (VOC) to 70.08 tons per 12-month rolling period.
- (b) The permittee shall restrict site-wide emissions of individual hazardous air pollutants (HAP) to less than 9.9 tons per 12-month rolling period.
- (c) The permittee shall restrict site-wide emissions of total HAP to less than 24.9 tons per 12-month rolling period.

008 [25 Pa. Code §129.14]

Open burning operations

The permittee may not permit the open burning of material in the Southeast Air Basin, except when the open burning results 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.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.513]

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source listed in Section A, of this permit, 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, 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.



SECTION C. Site Level Requirements

III. MONITORING REQUIREMENTS.

010 [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.

011 [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).
 - (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 for the next six month period.
- (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, complaints, monitoring results, and/or Department findings.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate emissions of VOC and HAP on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record emissions of VOC and HAP on a monthly basis and as a 12-month rolling sum.

014 [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.
- (c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.



SECTION C. Site Level Requirements

46-00051

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]

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

- (a) De minimis increases without notification to the Department;
- (b) De minimis increases with notification to the Department, via letter:
- (c) Increases resulting from a Request for Determination (RFD) to the Department; and
- (d) Increases resulting from the issuance of a plan approval and subsequent operating permit.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

Records required per this operating permit shall be retained for a minimum of 5 years and made readily available upon the Department's request.

[Compliance with this streamlined condition ensures compliance with RACT]

V. REPORTING REQUIREMENTS.

017 [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, within two (2) hours of discovery of any occurrence, notify the Department, at (484) 250-5920, of any malfunction(s) of the sources or associated air pollution control devices listed in Section A, of this permit, which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit, or of a regulation contained in 25 Pa. Code Article III.
- (b) Any malfunction(s) which occurs at this facility, and poses an imminent danger to public health, safety, welfare, and the environment, and would violate permit conditions if the source(s) were to continue to operate after the malfunction(s), shall immediately be reported to the Department by telephone at the above number.
- (c) A written report shall be submitted to the Department within 2 working days following the notification of the incident, and shall describe, at a minimum, the following:
 - (1) The malfunction(s).
 - (2) The emission(s).
 - (3) The duration.
 - (4) Any corrective action taken.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (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 #24 of section B of this permit.
- (b) A semi annual deviation report, 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).

019 [25 Pa. Code §135.21]

Emission statements

The permittee shall submit by March 1, of each year, an annual emission statement for the preceding calendar year.





SECTION C. **Site Level Requirements**

020 [25 Pa. Code §135.3]

Reporting

The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from all 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, including those sources listed in the Miscellaneous Section of this permit.

VI. WORK PRACTICE REQUIREMENTS.

021 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from any source specified in Condition # 002, Section C, of this permit, 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, oil, 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 roads 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.

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

The permittee may not modify any air contaminant system identified in Section A, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition # 017(g), Section B, of this permit.

023 [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 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 Section A, of this permit, is causing the emission of air contaminants in excess of the limitations specified in this permit or in, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III or the Clean Air Act.

024 [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)]

- (a) The permittee shall ensure that the sources and air pollution control devices listed in Sections A and G, of this permit, are operated and maintained in accordance with manufacturers' specifications as well as good operating and maintenance practices.
- (b) The permittee shall maintain an operator training program to assist in assuring compliance with (a), above.

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.





SECTION C. Site Level Requirements

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 ***



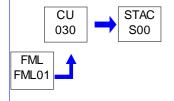




SECTION D. Source Level Requirements

Source ID: 030 Source Name: SPACE HEATERS (27)

Source Capacity/Throughput: 29.860 Gal/HR #2 Oil



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.22]

Combustion units

- (a) A person may not permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit except as provided in 25 Pa. Code §§ 125.22(e)(3) or (5), in excess of 1.2 pounds per million Btu of heat input.
- (b) The following conditions apply to the use of commercial fuel oil:
 - (1) Except as specified in subparagraphs (b)(2) and (b)(3):
 - (i) Prior to July 1, 2016, a person may not offer for sale, deliver for use, exchange in trade or permit the use of commercial fuel oil in a combustion unit in the Outer Zone of the Southeast Pennsylvania air basin if the commercial fuel oil is No. 2 or lighter (viscosity less than or equal to 5.82cSt) and contains sulfur in excess of 0.3 percent by weight.
 - (ii) Beginning July 1, 2016, a person may not offer for sale, deliver for use, exchange in trade or permit the use of commercial fuel oil in a combustion unit in the Outer Zone of the Southeast Pennsylvania air basin if the commercial fuel oil is No. 2 or lighter (viscosity less than or equal to 5.82cSt) and contains sulfur in excess of 0.05 percent by weight.
 - (2) Commercial fuel oil that was stored in the Commonwealth of Pennsylvania by the ultimate consumer prior to July 1, 2016, which met the applicable maximum allowable sulfur content for commercial fuel oil through June 30, 2016, in subparagraph (b)(1)(i) at the time it was stored, may be used by the ultimate consumer in this Commonwealth on and after July 1, 2016.
 - (3) Beginning July 1, 2016, the Department may temporarily suspend or increase the applicable maximum allowable sulfur content for a commercial fuel oil for reasons identified under 25 Pa. Code § 123.22(e)(2)(iii).
 - (4) The Department will limit a suspension or increase in the applicable maximum allowable sulfur content granted under subparagraph (b)(3), above, to the shortest duration in which adequate supplies of compliant commercial fuel oil can be made reasonably available, but in no case longer than 60 days from the date the Department grants the suspension or increase.
- (c) A person may not permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit using a noncommercial fuel, in excess of the rate of 1.2 pounds per million Btu of heat input in the Outer Zone.
- (d) Paragraph (b), above, does not apply to a person who uses equipment or a process, or to the owner or operator of an installation where equipment or a process is used, to reduce the sulfur emissions from the burning of a fuel with a higher sulfur content than that specified in paragraph (b). The emissions may not exceed those which would result from the use of commercial fuel oil that meets the applicable maximum allowable sulfur content specified in paragraph (b).





SECTION D. **Source Level Requirements**

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 030 shall comply with the following combined emission limits:

Nitrogen Oxides (NOx) -0.646 lbs/hr and 2.83 tons per 12-month rolling sum Carbon Monoxide (CO) -0.162 lbs/hr and 0.71 tons per 12-month rolling sum Volatile Organic Compounds (VOC) -0.018 lbs/hr and 0.08 tons per 12-month rolling sum Particulate Matter (PM) -0.065 lbs/hr and 0.28 tons per 12-month rolling sum Sulfur Oxides (SOx) -0.032 lbs/hr and 0.14 tons per 12-month rolling sum

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §123.22]

Combustion units

- (a) Prior to July 1, 2016, if the permittee receives a delivery of fuel oil that is unaccompanied by a fuel receipt identifying the sulfur content, the permittee shall determine the sulfur content of the fuel oil by one of the following:
 - (1) In accordance with the sample collection, test methods and procedures specified under 25 Pa. Code § 139.16 (relating to sulfur in fuel oil).
 - (2) Other methods developed or approved by the Department or the Administrator of the EPA, or both.
- (b) Beginning July 1, 2016, a refinery owner or operator who produces commercial fuel oil intended for use or used in the Commonwealth of Pennsylvania is required to sample, test and calculate the actual sulfur content of each batch of the commercial fuel oil as specified in paragraph (a).
- (c) Beginning July 1, 2016, and prior to offering for sale, delivering for use, exchanging in trade or permitting the use of commercial fuel oil in the Commonwealth of Pennsylvania, a person other than the ultimate consumer that accepts a shipment of commercial fuel oil from a refinery or other transferor, shall sample, test and calculate the actual sulfur content of the commercial fuel oil in accordance with paragraph (a) if the shipment lacks the record required under 25 Pa. Code § 123.22(g)(1) that enables the transferee to determine if the sulfur content of the shipment of commercial fuel oil meets the applicable maximum allowable sulfur content.

III. MONITORING REQUIREMENTS.

004 [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) For these space heaters, the permittee shall monitor the following operating parameters on a monthly basis:
 - (1) The hours of operation.
 - (2) The amount of No. 2 fuel oil consumed.
- (b) The permittee shall monitor emissions of NOx, CO, VOC, PM, and SOx on a monthly basis and as a 12-month rolling sum.

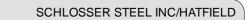
IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §123.22]

Combustion units

(a) Beginning with the refinery owner or operator who sells or transfers commercial fuel oil into or within this Commonwealth for use in this Commonwealth and ending with the ultimate consumer, each time the physical custody of, or title to, a shipment of commercial fuel oil changes hands on or after July 1, 2016, the transferor shall provide to the transferee an electronic or paper record described in this paragraph. This record must legibly and conspicuously contain the following information:





SECTION D. Source Level Requirements

- (1) The date of the sale or transfer.
- (2) The name and address of the transferor.
- (3) The name and address of the transferee.
- (4) The volume of commercial fuel oil being sold or transferred.
- (5) The identification of the sulfur content of the shipment of commercial fuel oil, determined using the sampling and testing methods specified under 25 Pa. Code §123.22(f)(1), expressed as the following for shipments of No. 2 and lighter commercial fuel oil: "The sulfur content of this shipment is 500 ppm or below."
- (6) The location of the commercial fuel oil at the time of transfer.
- (7) Except for a transfer to a truck carrier, an owner or operator of a retail outlet or an ultimate consumer, the transferor may substitute the information required under subparagraphs (1)—(6) with the use of a product code if the following are met:
 - (i) The product code includes the information required under subparagraphs (1)—(6).
 - (ii) The product code is standardized throughout the distribution system in which it is used.
 - (iii) Each downstream party is given sufficient information to know the full meaning of the product code.
- (b) The ultimate consumer shall maintain in electronic or paper format the record containing the information listed in paragraph (a), above.

006 [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) For these space heaters, the permittee shall maintain records of the following operating parameters on a monthly basis:
 - (1) The hours of operation.
 - (2) The amount of No. 2 fuel oil consumed.
- (b) The permittee shall record emissions of NOx, CO, VOC, PM, and SOx on a monthly basis and as a 12-month rolling sum.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain appropriate records to demonstrate that the heaters are being maintained and operated in accordance with manufacturers' specifications.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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(h)]







SECTION D. Source Level Requirements

The permittee shall operate and maintain each of these heaters in accordance with manufacturers' specifications.

VII. ADDITIONAL REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) This source grouping consists of twenty-seven (27) No. 2 fuel oil-fired space heaters, as follows:

Manufacturer	Model No.	Quantity
Modine	POR100B-01-01	1
SolarTemp	GPH1	26

(b) The total Btu rating for the combined space heaters shall not exceed 4.027 MMBtu/hr.

*** Permit Shield in Effect. ***



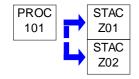
SCHLOSSER STEEL INC/HATFIELD

SECTION D. **Source Level Requirements**

Source ID: 101 Source Name: STEEL PAINTING OPERATION

> Source Capacity/Throughput: N/A STEEL PAINTING MAT'LS

N/A M.SPIRITS, XYLENE, MEK



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 §§ 127.443, 129.91, and 130.603]

- (a) The permittee shall only use coatings that comply with a volatile organic compound (VOC) concentration of 340 gram/liter (2.835 lbs/gallon) of coating, thinned to the manufacturer's maximum recommendation, excluding the volume of any water, exempt compounds, or colorant added to tint bases.
- (b) The permittee shall not accept for use any architectural or industrial maintenance coating that does not comply with the labeling requirements of 25 Pa. Code 130.604. As per 25 Pa. Code § 130.604, coating containers shall be labeled with the following information:
 - (1) The date the coating was manufactured, or a date code representing the manufactured date.
 - (2) A statement of the manufacturer's recommendation regarding maximum thinning of the coating.
 - (i) This requirement does not apply to the thinning of coatings with water.
 - (ii) If thinning of the coating prior to use is not necessary, the recommendation shall specify that the coating is to be applied without thinning
 - (3) The VOC content, as supplied, in grams/liter.
 - (4) One or more of the following descriptions:
 - (i) "For industrial use only."
 - (ii) "For professional use only."
 - (iii) "Not for residential use."
 - (iv) "Not intended for residential use."
- (c) The permittee shall ensure that emissions into the outdoor atmosphere of VOC from the steel painting equipment of this steel painting operation does not exceed 15.37 lbs/hr or 67.30 tons/yr, calculated monthly as a twelve (12)-month rolling sum.

[Compliance with this streamlined condition ensures compliance with the RACT VOC limit of 3.5 pounds per gallon of coating (minus water), as applied.]

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443 and 129.91]

The permittee shall ensure that emission into the outdoor atmosphere of VOC and HAP from cleanup operations for this steel painting operation do not exceed three (3) lbs/hr, fifteen (15) lbs/day, or 2.7 tons/yr, calculated monthly as a 12-month rolling sum.







SECTION D. Source Level Requirements

Throughput Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall have only five (5) painting stations.

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. Part 60 (Appendix A) and 25 Pa. Code §§ 127.443, 129.91, and 130.611]

- (a) The permittee shall test their coating(s), as applied, to determine the VOC content, in grams of VOC per liter of coating, in accordance with Method 24 (specified in 40 CFR Part 60, Appendix A) or in accordance with SCAQMD Method 304-91 [South Coast Air Quality Management District, part of the California Air Resources Board (CARB)]. The following data shall be obtained:
 - (1) Weight of volatiles, in grams
 - (2) Weight of water, in grams
 - (3) Weight of exempt compounds, in grams
 - (4) Volume of coating, in liters
 - (5) Volume of water, in liters
 - (6) Volume of exempt compounds, in liters
- (b) The permittee shall test each coating for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.
- (c) Sampling and testing shall be done in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 (relating to sampling and testing).
- (d) The above testing requirements shall be waived if the permittee has obtained either of the following, which contain all the data required under subpart (a) above:
 - (1) A Certified Product Data Sheet (CPDS) from the supplier, certifying that either EPA Method 24 or SCAQMD Method 304-91 was used to determine the coating properties; or
 - (2) A Safety Data Sheet (SDS) from the supplier, certifying that either EPA Method 24 or SCAQMD Method 304-91 was used to determine the coating properties.

III. MONITORING REQUIREMENTS.

005 [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, 129.91, and 130.611]

For this steel painting operation, the permittee shall monitor the following on a per job basis:

- (a) The hours of operation for the steel painting equipment and associated cleanup operations.
- (b) The following parameters for each coating, thinner and other component as supplied:
 - (1) The coating, thinner or component name and identification number.
 - (2) The volume used.
 - (3) The mix ratio.
 - (4) The density or specific gravity.
 - (5) The weight percent of total volatiles, water, solids and exempt solvents.
 - (6) The volume percent of total volatiles, water, solids and exempt solvents.





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- (c) The VOC content of each coating, thinner and other component as supplied.
- (d) The VOC content of each as applied coating:

Where:

VOC Content = grams of VOC per liter of coating

Ws = weight of volatiles, in grams

Ww = weight of water, in grams

Wec = weight of exempt compounds, in grams

Vm = volume of coating, in liters

Vw = volume of water, in liters

Vec = volume of exempt compounds, in liters

(e) The average hourly VOC emissions for the steel painting equipment.

006 [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]

For this steel painting operation, the permittee shall monitor the following on a monthly and 12-month rolling basis:

- (a) The amount of each as applied coating and cleanup solvent, in tons.
- (b) The total amount of all as applied coatings and cleanup solvents, in tons.
- (c) The total VOC and HAP emissions from the steel painting equipment and associated cleanup solvents.

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 §§ 127.443, 127.511, and 129.91]

For this steel painting operation, the permittee shall maintain records of the following on a per job basis:

- (a) The hours of operation for the steel painting equipment and associated cleanup operations.
- (b) The following parameters for each coating, thinner and other component as supplied:
 - (1) The coating, thinner or component name and identification number.
 - (2) The volume used.
 - (3) The mix ratio.
 - (4) The density or specific gravity.
 - (5) The weight percent of total volatiles, water, solids and exempt solvents.
 - (6) The volume percent of total volatiles, water, solids and exempt solvents.
- (c) The VOC content of each coating, thinner and other component as supplied.
- (d) The VOC content of each as applied coating:
 - (1) The coating name and identification number, where applicable.
 - (2) The amount used, in pounds and gallons.



SECTION D.



Source Level Requirements



- (3) The VOC content.
- (d) The average hourly VOC emissions for the steel painting equipment.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443, 127.511, and 129.91]

For this steel painting operation, the permittee shall maintain records of the following on a monthly and 12-month rolling basis:

- (a) The amount of each as applied coating and cleanup solvent, in tons.
- (b) The total amount of all as applied coatings and cleanup solvents, in tons.
- (c) The total VOC and HAP emissions from the steel painting equipment and associated cleanup solvents.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443, 127.511, and 129.91]

The permittee shall maintain a documented training program, which includes, at a minimum, the following:

- (a) A list of all personnel by name and job description who are required to be trained;
- (b) An outline of the subjects to be covered in the initial and refresher training for each person, or group of personnel;
- (c) Lesson plans for courses to be given at the initial and annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes;
- (d) A description of the methods to be used at the completion of the initial or refresher training to demonstrate and document successful completion; and
- (e) Certification for passing the training for all personnel that are required to be trained.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443, 127.511, and 129.91]

The permittee shall maintain a written leak inspection and maintenance plan that specifies the following:

- (a) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply finishing materials or organic solvents.
- (b) An inspection/maintenance schedule for equipment when leaks occur or there is an equipment malfunction.
- (c) Methods for documenting the date and results of each inspection and any repairs that were made.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443, 127.511, and 129.91]

The permittee shall maintain an organic solvent accounting form to record:

(a) The monthly quantity and type of organic solvent used for wash-off and cleaning.







SECTION D. Source Level Requirements

- (b) The monthly quantity of spent organic solvent generated from each activity, and whether it is recycled onsite or disposed offsite.
- (c) The number of pieces washed off and the reason for the wash-off.

V. REPORTING REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443, 127.511, and 129.91]

- (a) The permittee shall submit a report, summarizing the VOC emissions from this steel painting operation, on a quarterly basis by the 30th day following the end of each calendar quarter, unless another date is agreed upon by the Department.
- (b) The report shall indicate all periods in which the VOC emission rates specified in Conditions #001 and #002, Section D (under Source ID 101), of this permit, were exceeded.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443 and 129.91]

The permittee shall maintain an updated listing of the steel painting materials used in this steel painting operation, and shall make it available to the Department upon request.

VI. WORK PRACTICE REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443, 127.512, and 129.91]

The permittee shall operate and maintain this steel painting operation in a manner consistent with good air pollution control practices. The practices shall include, but not be limited to, the following:

- (a) Good housekeeping procedures for the storage, use, and disposal of steel painting materials.
- (b) All VOC-containing materials shall be stored in covered containers when not being mixed or transferred to another container.
- (c) Keeping all steel painting material-laden shop towels in closed containers when not in use.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Spray guns shall be cleaned by means of disassembling the spray gun and cleaning it in a vat that is kept closed when not in use.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443, 127.512, and 129.91]

The permittee shall implement the following operation training procedures:

- (a) All personnel who will be involved with the Steel Painting Operation shall receive initial training prior to performing any painting or cleaning operations that may result in emissions of VOC.
- (b) All personnel who are involved with the Steel Painting Operation shall receive refresher training annually.





SECTION D. Source Level Requirements

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443, 127.512, and 129.91]

The permittee shall perform leak inspections and maintain the Steel Painting Operation in accordance with the leak inspection and maintenance plan developed in accordance with RACT Operating Permit No. OP-46-0051.

VII. ADDITIONAL REQUIREMENTS.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source is an indoor steel painting operation comprised of the following equipment and operations:

- (a) Five (5) economy airless pumps, Model No. 41-8870, with dedicated spray guns, Model No. 50A, all manufactured by Binks.
- (b) Two (2) airless paint sprayers, Model Nos. Ultimate Plus+ 1000 and Ultramax 795, both manufactured by Graco, Inc.
- (c) Cleanup operations associated with the use of (a) (b), above.

*** Permit Shield in Effect. ***





SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.







SECTION F. Emission Restriction Summary.

Source id	Source Description
030	SPACE HEATERS (27)

mission Limit			Pollutant	
0.162	Lbs/Hr		CO	
0.710	Tons/Yr	Determined on a 12-month rolling basis	CO	
0.646	Lbs/Hr		NOX	
2.830	Tons/Yr	Determined on a 12-month rolling basis	NOX	
0.032	Lbs/Hr		SOX	
0.140	Tons/Yr	Determined on a 12-month rolling basis	SOX	
1.200	Lbs/MMBTU		SOX	
0.065	Lbs/Hr		TSP	
0.280	Tons/Yr	Determined on a 12-month rolling basis	TSP	
0.018	Lbs/Hr		VOC	
0.080	Tons/Yr	Determined on a 12-month rolling basis	VOC	

101 STEEL PAINTING OPERATION

ission Limit			Pollutant
2.700	Tons/Yr	From Clean-up Operations	Hazardous Air Pollutants
3.000	Lbs/Hr	From Clean-up Operations	Hazardous Air Pollutants
15.000	Lbs/Day	From Clean-up Operations	Hazardous Air Pollutants
2.700	Tons/Yr	From Clean-up Operations; 12-Month Rolling Sum, Calculated Monthly	VOC
2.835	Lbs/Gal	From the Steel Painting Equipment; thinned to the manufacturer's maximum recommendation, excluding the volume of any water, exempt compounds, or colorant added to tint bases	VOC
3.000	Lbs/Hr	From Clean-up Operations	VOC
15.000	Lbs/Day	From Clean-up Operations	VOC
15.370	Lbs/Hr	From the Steel Painting Equipment	VOC
67.300	Tons/Yr	From the Steel Painting Equipment; 12-Month Rolling Sum, Calculated Monthly	VOC

Site Emission Restriction Summary

Emission Limit		Pollutant
70.080 Tons/Yr	Determined on a 12-month rolling basis	VOC
24.900 Tons/Yr	Applies to total HAP; Determined on a 12-month rolling basis	Hazardous Air Pollutants
9.900 Tons/Yr	Applies to individual HAP; Determined on a 12-month rolling basis	Hazardous Air Pollutants



SECTION F. Emission Restriction Summary.





SECTION G. Miscellaneous.

46-00051

- (a) The plant address is: 2641 Township Line Road, Hatfield, PA 19440.
- (b) Previously issued RACT Operating Permit No. OP-46-0051 serves as the basis for certain terms and conditions set forth in this permit.
- (c) This facility is not subject to the Compliance Assurance Monitoring (CAM) requirements of 40 C.F.R. Part 64.
- (d) The following sources have been determined by the Department to be insignificant sources of air emissions, and therefore do not require additional limitations, monitoring, or recordkeeping. They are still subject to any applicable federal, state, and local regulations that may apply, including those indicated in Section C, of this permit:
 - (1) Arc welding.
 - (2) Grinding.
 - (3) Two closed-looped baghouses, Model No. M50, manufactured by Brooks-McMichaels Corp. Both baghouses collect dust emissions from (d)(1) (2), above, and do not exhaust to the outdoor atmosphere.
 - (4) Forklifts.
 - (5) Gasoline-powered tow motors.
 - (6) A mixing/agitating operation (i.e., mechanical paint stirring).
 - (7) A 2,500-gal No. 2 fuel oil AST (Source ID FML01).
 - (8) A 250-gal No. 2 fuel oil tank (feed tank for the space heaters).
 - (9) A 3,000-gal unleaded gasoline underground storage tank (UST).
 - (10) A 3,000-gal diesel fuel UST.
 - (11) Maintenance and upkeep activities, including those associated with the facility-wide gasoline and diesel fuel dispensing operations, above, respectively.
 - (12) Storage containment for paint and waste.
- (e) This permit is a renewal of Title V Operating Permit No. TVOP-46-00051, originally issued on February 1, 1999 (APS No. 346119, Auth ID 354925). This permit has been renewed under APS No. 346119, Auth ID 612829.
- (f) This Title V Operating Permit has been renewed for another 5-year term, under APS No. 346119, AUTH No. 866487. This Title V Operating Permit incorporates the requirements of 25 Pa. Code §§ 130.601 130.611, replacing the requirements of 25 Pa. Code § 129.52. Under this operating permit, the list of insignificant sources at the facility has been amended. With restrictions on HAP emissions, this facility is not a major source for HAP and, therefore, not subject to 40 C.F.R. Part 63, Subpart MMMM.
- (g) This Title V Operating Permit has been renewed for another 5-year term, under APS No. 346119, AUTH No. 1096901. Per this Operating Permit, the Space Heaters, previously identified as Source ID 100, are now identified under Source ID 030, to reflect that these space heaters are operated as combustion units, as defined under 25 Pa. Code § 121.1.



M Som

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