

August 29, 2023

February 21, 2027



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

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

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

Effective Date:

Expiration Date:

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.					
Sta	te Only Permit No: 46-00112				
	Synthetic Minor				
Federal	Tax Id - Plant Code: 23-1467320-1				
	Owner Information				
Name: PALMER INTL INC					
Mailing Address: 2036 LUCON RD					
SKIPPACK, PA 19474					
	Plant Information				
Plant: PALMER INTL INC/SKIPPACK					
Location: 46 Montgomery County	46948 Skippack Township				
SIC Code: 2821 Manufacturing - Plastics Materia	als And Resins				
	Responsible Official				
Name: KEVIN PALMER					
Title: CEO					
Phone: (610) 584 - 3289	Email: KPalmer@palmerint.com				
	Permit Contact Person				
Name: MARC RAGNAUTH					
Title: PROCESS ENGINEER					
Phone: (610) 584 - 3234	Email: mragnauth@palmerint.com				
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER					

46-00112

January 10, 2022

August 29, 2023

Amendment

Issue Date:

**Revision Date:** 

Revision Type:





### **SECTION A. Table of Contents**

### Section A. Facility/Source Identification

Table of Contents Site Inventory List

### Section B. General State Only Requirements

- #001 Definitions.
- #002 Operating Permit Duration.
- #003 Permit Renewal.
- #004 Operating Permit Fees under Subchapter I.
- #005 Transfer of Operating Permits.
- #006 Inspection and Entry.
- #007 Compliance Requirements.
- #008 Need to Halt or Reduce Activity Not a Defense.
- #009 Duty to Provide Information.
- #010 Revising an Operating Permit for Cause.
- #011 Operating Permit Modifications
- #012 Severability Clause.
- #013 De Minimis Emission Increases.
- #014 Operational Flexibility.
- #015 Reactivation
- #016 Health Risk-based Emission Standards and Operating Practice Requirements.
- #017 Circumvention.
- #018 Reporting Requirements.
- #019 Sampling, Testing and Monitoring Procedures.
- #020 Recordkeeping.
- #021 Property Rights.
- #022 Alternative Operating Scenarios.
- #023 Reporting
- #024 Report Format

### Section C. Site Level State Only Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

### Section D. Source Level State Only Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

### Section E. Source Group Restrictions

E-I: Restrictions

PALMER INTL INC/SKIPPACK



**SECTION A. Table of Contents** 

- E-II: Testing Requirements
- E-III: Monitoring Requirements
- E-IV: Recordkeeping Requirements
- E-V: Reporting Requirements
- E-VI: Work Practice Standards
- E-VII: Additional Requirements

### Section F. Alternative Operating Scenario(s)

- F-I: Restrictions
- F-II: Testing Requirements
- F-III: Monitoring Requirements
- F-IV: Recordkeeping Requirements
- F-V: Reporting Requirements
- F-VI: Work Practice Standards
- F-VII: Additional Requirements

### Section G. Emission Restriction Summary

Section H. Miscellaneous





SECTION A. Site Inventory List

Source	D Source Name	Capacity	/Throughput	Fuel/Material
210	BLDG A BOILER	4.200	MMBTU/HR	
		4,078.000	CF/HR	Natural Gas
		45.900	Gal/HR	Propane
211	BLDG A THERMAL OIL BOILER	2.400	MMBTU/HR	
		2,330.000	CF/HR	Natural Gas
		41.070	Gal/HR	Propane
221	B1 THERMAL FLUID HEATER	4.000	MMBTU/HR	
		3,922.000	CF/HR	Natural Gas
		41.070	Gal/HR	Propane
222	B2 THERMAL FLUID HEATER	4.000	MMBTU/HR	
		3,922.000	CF/HR	Natural Gas
		41.070	Gal/HR	Propane
240	BLDG D BOILER	3.000	MMBTU/HR	
		2,912.620	CF/HR	Natural Gas
		32.790	Gal/HR	Propane
103	STORAGE TANKS 001A THROUGH 009A	2,000.000	Lbs/HR	RESIN
104	STORAGE TANK 001A-BCS		N/A	SULFURIC ACID
105	"ROCKET" VESSELS		N/A	LIQUID RESIN W/ VOC
106	"TUG" SYSTEM		N/A	FRICTION PARTICLES
111	TURBO SYSTEM		N/A	FRICTION PARTICLES
113	PRATER SYSTEM		N/A	FRICTION PARTICLES
114	PRATER TRANSFER SYSTEM		N/A	FRICTION PARTICLES
115	10" BROWN TRANSFER SYSTEM		N/A	FRICTION PARTICLES
116	BROWN AND GREEN HOLDING SYSTEMS		N/A	FRICTION PARTICLES
117	BLUE SYSTEM		N/A	FRICTION PARTICLES
118	GREEN SYSTEM		N/A	FRICTION PARTICLES
119	GREEN TRANSFER SYSTEM		N/A	FRICTION PARTICLES
120	BROWN SYSTEM		N/A	FRICTION PARTICLES
121	NAUTA TRANSFER LOADING AND DISCHARGE		N/A	FRICTION PARTICLES
122	NAUTA MIXER		N/A	FRICTION PARTICLES
125	POLYMERIZATION VAT 1	2.000	MMBTU/HR	
		1,942.000	CF/HR	Natural Gas
		21.860	Gal/HR	Propane
126	POLYMERIZATION VAT 2	0.840	MMBTU/HR	
		815.500	CF/HR	Natural Gas
		6.130	Gal/HR	Propane
127	POLYMERIZATION VAT 3	2.000	MMBTU/HR	
		1,942.000	CF/HR	Natural Gas
		21.860	Gal/HR	Propane
128	PROPANE TANKS		N/A	PROPANE
129	REACTOR A		N/A	LIQUID RESIN W/ VOC



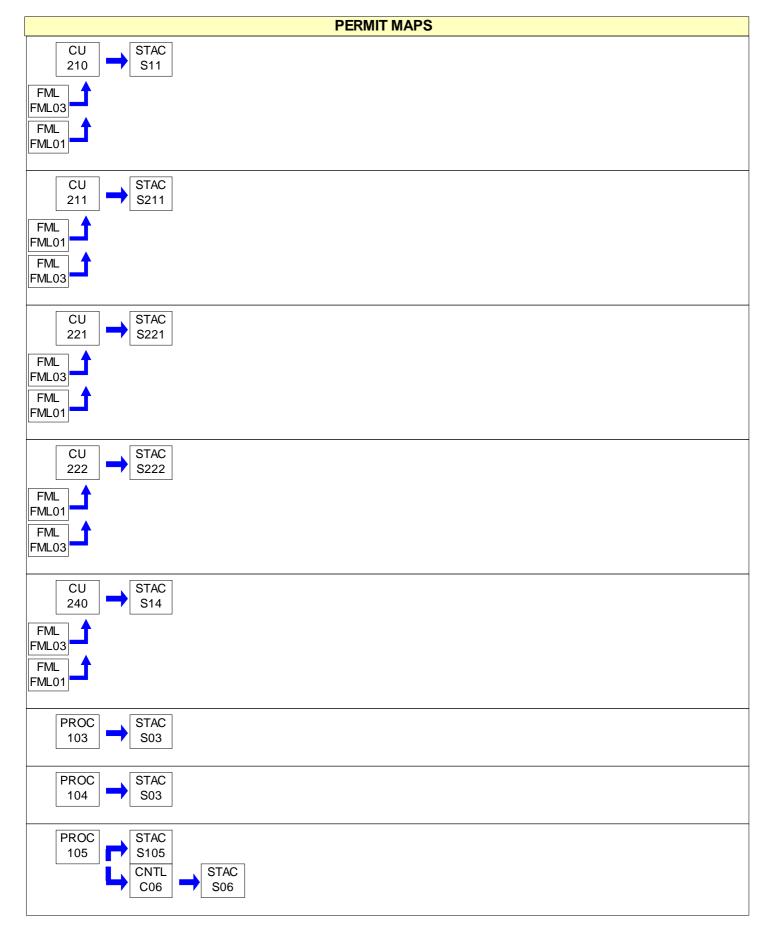


SECTION A. Site Inventory List

Source IE	Source Name	Capacity	Throughput	Fuel/Material
131	PARTS WASHER (MODEL 30)		N/A	SOLVENT
132	REACTOR B		N/A	LIQUID RESIN W/ VOC
133	REACTOR C		N/A	LIQUID RESIN W/ VOC
134	10" BLUE TRANSFER SYSTEM		N/A	FRICTION PARTICLES
700	ONAN EMERG GENERATOR 75KW	1,080.000	CF/HR	Natural Gas
C03	REACTOR A CONDENSER		N/A	
C04	REACTOR B CONDENSER		N/A	
C05	REACTOR C CONDENSER		N/A	
C06	TANN RTO	4,854.000	CF/HR	Natural Gas
		53.190	Gal/HR	Propane
C07	BLDG A DRY SIDE DUST COLLECTOR		N/A	
FML01	NATURAL GAS			
FML03	PROPANE TANK			
S03	FUGITIVE STORAGE TANK EMISSIONS			
S06	TANN RTO STACK			
S07	DUST COLLECTOR/RTO BYPASS			
S105	ROCKET VESSEL STACKS, RELIEF VALVES, & CONSERVATION VENTS			
S106	"TUG" SYSTEM BYPASS			
S11	BLDG A BOILER STACK			
S111	TURBO SYSTEM BYPASS			
S113	PRATER SYSTEM BYPASS			
S114	PRATER TRANSFER SYSTEM STACK			
S115	10" BROWN TRANSFER SYSTEM BYPASS			
S117B	BLUE SYSTEM GRINDING BYPASS			
S118	GREEN SYSTEM GRINDING BYPASS			
S119	GREEN TRANSFER SYSTEM BYPASS			
S120	BROWN SYSTEM GRINDING BYPASS			
S121	NAUTA LOADING/DISCHARGE STACKS			
S122	NAUTA MIXER STACK			
S125	POLYMERIZATON VAT 1 STACK			
S126	POLYMERIZATION VAT 2 STACK			
S127	POLYMERIZATION VAT 3 STACK			
S128	PROPANE TANK RELIEF VENTS			
S14	BLDG D BOILER STACK			
S211	BLDG A THERMAL OIL BOILER STACK			
S221	B1 THERMAL FLUID HEATER STACK			
S222	B2 THERMAL FLUID HEATER STACK			
S700	ONAN EMERG GENERATOR STACK			
Z131	PARTS WASHER (MODEL 30) FUGITIVE EMISSIONS			

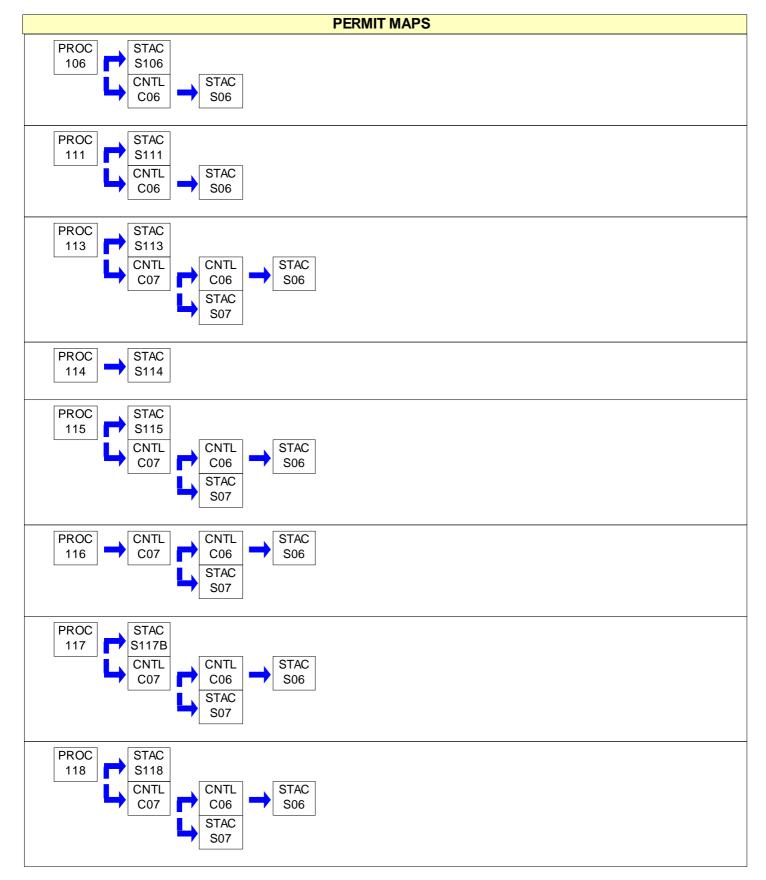
Ž





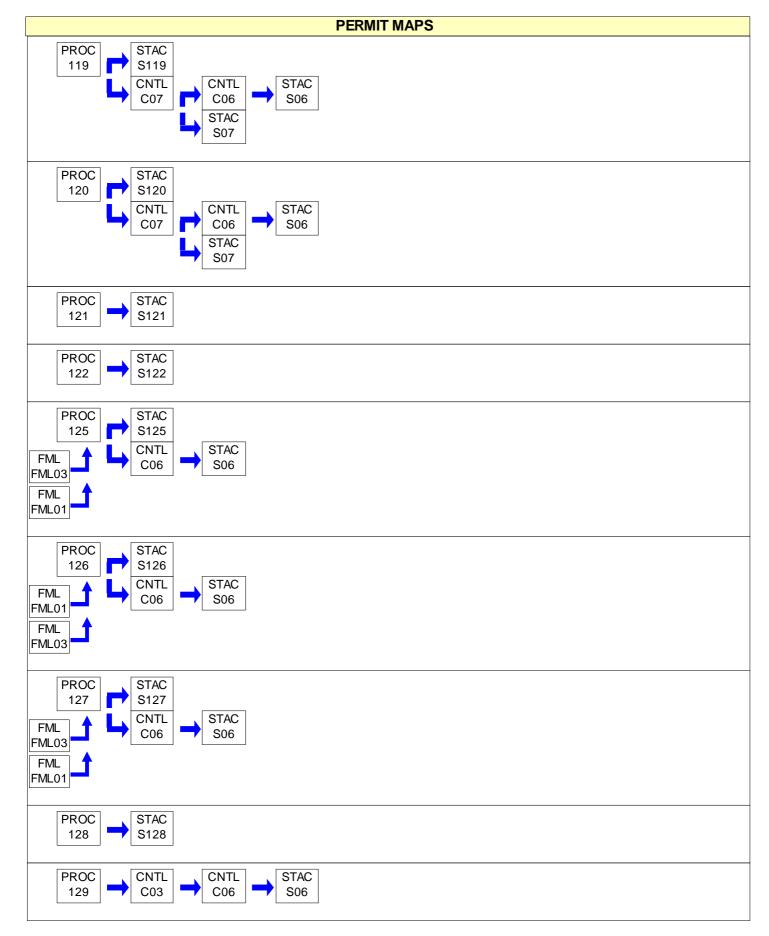




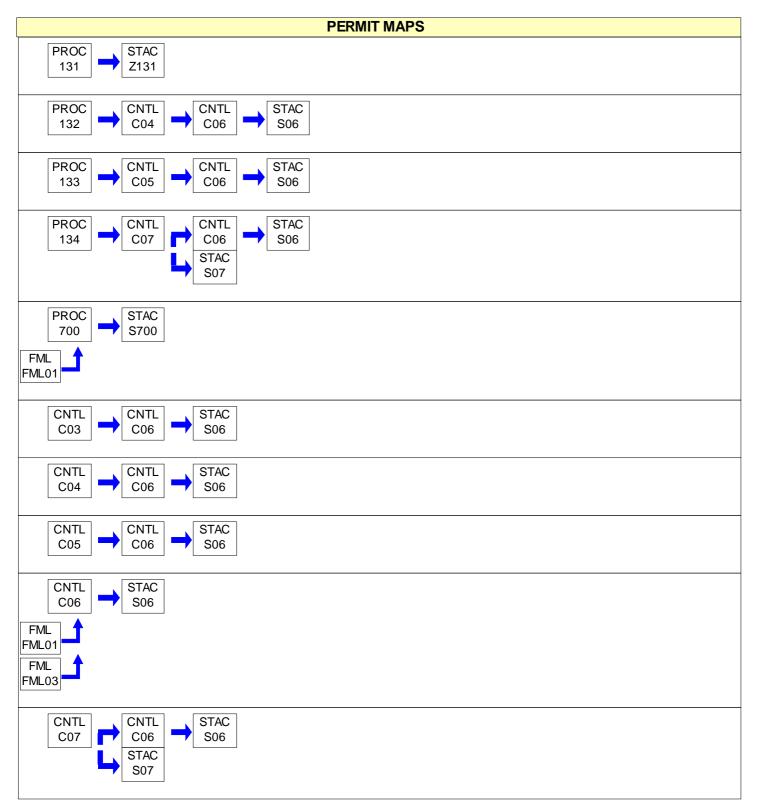
















# #001 [25 Pa. Code § 121.1] Definitions. Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1. #002 [25 Pa. Code § 127.446] **Operating Permit Duration.** (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. #003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)] Permit Renewal. (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit. (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official. (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office. (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j). (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application. #004 [25 Pa. Code § 127.703] **Operating Permit Fees under Subchapter I.** (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year. (1) For a synthetic minor facility, a fee equal to: (i) Four thousand dollars (\$4,000) for calendar years 2021-2025. (ii) Five thousand dollars (\$5,000) for calendar years 2026-2030. (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.



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

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

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

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

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

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

### **Transfer of Operating Permits.**

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

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

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

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

### Inspection and Entry.

(a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:

(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

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

**Compliance Requirements.** 

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:





- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

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

### #008 [25 Pa. Code § 127.441]

### Need to Halt or Reduce Activity Not a Defense.

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

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

### Duty to Provide Information.

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

### #010 [25 Pa. Code § 127.461]

### Revising an Operating Permit for Cause.

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

(1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.

(2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.

(4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

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

### **Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:





(b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

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

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

# #012 [25 Pa. Code § 127.441]

Severability Clause.

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

# #013 [25 Pa. Code § 127.449]

# De Minimis Emission Increases.

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

(c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:



(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

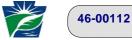
### #014 [25 Pa. Code § 127.3]

### **Operational Flexibility.**

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

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)





	(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]
Reactiv	vation
	(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]
	[25 Pa. Code § 121.9] Ivention.
	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
	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
Circum #018	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
Circum #018	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]
Circum #018	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] ing Requirements. (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.
Circum #018	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] ing Requirements. (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
Circum #018	<ul> <li>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</li> <li>[25 Pa. Code §§ 127.402(d) &amp; 127.442]</li> <li>ing Requirements.</li> <li>(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.</li> <li>(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.</li> </ul>
Circum #018	<ul> <li>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) &amp; 127.442]</li> <li>ing Requirements.</li> <li>(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.</li> <li>(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.</li> <li>(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</li> </ul>





SLUT	ION B. General State Only Requirements
	records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.
#019	[25 Pa. Code §§ 127.441(c) & 135.5]
Samplin	ng, 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]
Recordk	.eeping.
	(a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
	(1) The date, place (as defined in the permit) and time of sampling or measurements.
	(2) The dates the analyses were performed.
	(3) The company or entity that performed the analyses.
	(4) The analytical techniques or methods used.
	(5) The results of the analyses.
	(6) The operating conditions as existing at the time of sampling or measurement.
	(b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
	(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.
#021	[25 Pa. Code § 127.441(a)]
Property	/ Rights.
	This permit does not convey any property rights of any sort, or any exclusive privileges.
#022	[25 Pa. Code § 127.447]
Alternat	ive Operating Scenarios.
	The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.





### #023 [25 Pa. Code §135.3]

### Reporting

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

### #024 [25 Pa. Code §135.4]

### **Report Format**

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





### I. RESTRICTIONS.

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

# # 001 [25 Pa. Code §121.7]

Prohibition of air pollution.

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

# # 002 [25 Pa. Code §123.1]

### Prohibition of certain fugitive emissions

No person may permit the emission into the outdoor atmosphere of 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).

(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, of this Section, if such emissions are visible at the point the emissions pass outside the person's property.

# # 004 [25 Pa. Code §123.31]

### Limitations

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

### # 005 [25 Pa. Code §123.41]

### Limitations

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

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





### # 006 [25 Pa. Code §123.42]

### Exceptions

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

(a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.

(b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

(c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a)(1)-(9) (relating to prohibition of certain fugitive emissions).

### # 007 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The total emissions of volatile organic compounds (VOC) from the entire facility shall not exceed 24.9 tons per 12-month rolling period.

### # 008 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall limit the total nitrogen oxides (NOx) emissions from the entire facility to less than 24.90 tons per year in any consecutive 12-month rolling period.

### # 009 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

For Sources located in Building A and Building B of the facility:

- (a) Volatile organic compounds (VOC) shall not exceed 21.0 tons per year on a 12-month rolling basis.
- (b) Particulate Matter (PM) shall not exceed 19.04 tons per 12-month rolling period.
- (c) Nitrogen Oxides (NOx) shall not exceed 23.16 tons per 12-month rolling period.
- (d) Carbon Monoxide (CO) shall not exceed 50.01 tons per 12-month rolling period.
- (e) Sulfur Oxides (SOx) shall not exceed 37.19 tons per 12-month rolling period.
- (f) Total Hazardous Air Pollutants (HAP) shall not exceed 12.49 tons per 12-month rolling period.

(g) Formaldehyde (a VOC and a HAP) shall not exceed 9.71 tons per 12-month rolling period. Emission limits given in (a) and (f) above include this emission.

(h) Ammonia (NH3) shall not exceed 22.63 tons per 12-month rolling period.

### # 010 [25 Pa. Code §129.14] Open burning operations

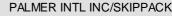
The permittee may not permit the open burning of material in the Southeast Air Basin, except when the open burning results from:

(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.

### # 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 operating permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139 and the most current version of the DEP Source Testing Manual, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

### # 012 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The following applies whenever the permittee is required to submit stack test protocols, stack test reports, notifications pertaining to such stack testing, or any other related documents:

(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)

- (i) For protocols, provide the proposed date on which testing will commence or "TBD"
- (ii) For reports, provide the first and last day of testing

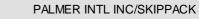
(2) Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF Id under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

(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)

- (i) Plan approval number(s)
- (ii) Operating permit number

(iii) Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)





# Ž

# SECTION C. Site Level Requirements

	(iv) Special purpose(s) (Consent Order, RFD, RACT II, 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".
Ш.	MONITORING REQUIREMENTS.
	# 013 [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.
	# 014 [25 Pa. Code §127.441]
	Operating permit terms and conditions.
	(a) The permittee shall monitor the facility, once per operating day, for the following:
	(1) Odors which may be objectionable (as per 25 Pa. Code §123.31).
	(2) Visible Emissions (as per 25 Pa. Code §§123.41 and 123.42).
	(3) Fugitive Particulate Matter (as per 25 Pa. Code §§ 123.1 and 123.2).
	(b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:
	<ol> <li>Be investigated;</li> <li>Be reported to the facility management, or individual(s) designated by the permittee;</li> <li>Have appropriate corrective action taken (for emissions that originate on-site); and</li> <li>Be recorded in a permanent written log.</li> </ol>
	(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.
IV.	RECORDKEEPING REQUIREMENTS.
ſ	# 015 [25 Pa. Code §127.441]
	Operating permit terms and conditions.
	For sources located in Buildings A and B of this facility, the permittee shall record emissions of the following on a monthly basis and on a consecutive 12-month rolling basis: VOC, PM, NOx, CO, SOx, HAP, Formaldehyde, and NH3.
	# 016 [25 Pa. Code §127.441]
	Operating permit terms and conditions.
	The permittee shall keep on file recordkeeping required by this permit for a period of five (5) years, and the file shall be made available to the Department upon request.
	# 017 [25 Pa. Code §127.441]
	Operating permit terms and conditions.
	The permittee shall compile and record the emissions of VOCs and NOx for the entire facility on a monthly basis and a 12- month rolling basis.





# # 018 [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.

# # 019 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

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

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

### V. REPORTING REQUIREMENTS.

# # 020 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

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

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

(e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b) - (d), as applicable, including any permit specific malfunction reporting requirements.





(f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.

(g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

# # 021 [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 [25 Pa. Code § 127.441(d) and 40 CFR Part 68] 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:

(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:

(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 an annual Compliance Certification submittal for the previous year indicating compliance with the requirements of the terms and conditions of this permit,





and the requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68. The certification shall include:

- (i) The identification of each term or condition of the permit that is the basis of the certification.
- (ii) The compliance status.
- (iii) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (iv) Whether compliance was continuous or intermittent.

(g) The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance of this permit.

# # 022 [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.

The permittee may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

### VI. WORK PRACTICE REQUIREMENTS.

### # 023 [25 Pa. Code §123.1] Prohibition of certain fugitive emissions

A person responsible for any source specified in Condition #002, of this Section, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(a) Use, where possible, of water or suitable chemicals, as approved by the Department, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(b) Application of asphalt, water, or other suitable chemicals, as approved by the Department, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(c) Paving and maintenance of roadways.

(d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.

### # 024 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

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.

### # 025 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

All sources and control devices shall be operated and maintained in accordance with manufacturer's specifications and good air pollution control practices.

### # 026 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

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

(b) If an unauthorized modification of any source(s) occurs at this facility, the permittee shall immediately notify the Department. If so directed by the Department, then this permit, as it pertains to the modified source(s), shall be





suspended and the source(s) shall not be operated until the modification is authorized by the Department.

### 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.



46-00112				PALMER INTL INC/SKIPPACK	P
SECTION D. Source	Level Requirements				
Source ID: 210	Source Name: BLDG A BOILER				
	Source Capacity/Throughput:	4.200	MMBTU/HR		
		4,078.000	CF/HR	Natural Gas	
		45.900	Gal/HR	Propane	
$\begin{array}{c} CU\\ 210 \end{array} \rightarrow \begin{array}{c} STAC\\ S11 \end{array}$					
FML FML01					
FML FML03					

#### **RESTRICTIONS.** I.

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

#### # 001 [25 Pa. Code §123.11]

# **Combustion units**

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of Btus per hour is greater than 2.5 but less than 50.

#### # 002 [25 Pa. Code §123.22]

### **Combustion units**

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from any combustion unit, in the Southeast Air Basin, in excess of 1.2 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

#### П. TESTING REQUIREMENTS.

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

#### MONITORING REQUIREMENTS. Ш.

#### # 003 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall monitor the following information for this source on a monthly basis when this source is in operation:

- (a) The type(s) of fuel consumed by this source.
- (b) The amount of each fuel that is consumed by this source.
- (c) The number of hours that this source is in operation.

# IV. RECORDKEEPING REQUIREMENTS.

#### # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) The permittee shall record the following information for this source on a monthly basis when this source is in operation:

- (1) The type(s) of fuel consumed by this source.
- (2) The amount of each fuel that is consumed by this source.
- (3) The number of hours that this source is in operation.

(b) The permittee shall calculate and record the total amount of fuel consumed and the total number of hours operated for





# SECTION D. Source Level Requirements

this source on a 12-month rolling basis.

(c) The permittee shall calculate and record the emissions of nitrogen oxides, particulate matter, and sulfur dioxide emissions in a manner that demonstrates compliance with the applicable limitations for these pollutants. If a one time calculation can demonstrate that the emissions of particulate matter and/or sulfur dioxide will never exceed 20 percent of the emissions limits stated in the conditions of this permit, that calculation shall be kept on record.

### V. REPORTING REQUIREMENTS.

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

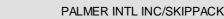
### VI. WORK PRACTICE REQUIREMENTS.

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

### VII. ADDITIONAL REQUIREMENTS.

# 005 [25 Pa. Code §127.441] Operating permit terms and conditions.

This unit was installed in 1971 and is manufactured by Reliance, Model No. 100RH.





SECTION D. Source L	evel Requirements				
Source ID: 211	Source Name: BLDG A THERMAL	OIL BOILE	२		
	Source Capacity/Throughput:	2.400	MMBTU/HR		
		2,330.000	CF/HR	Natural Gas	
		41.070	Gal/HR	Propane	
$ \begin{array}{c} CU\\ 211 \end{array}  STAC\\ S211 \end{array} $ FML FML01 $ \begin{array}{c} FML\\ FML03 \end{array} $					

### I. RESTRICTIONS.

### Emission Restriction(s).

46-00112

### # 001 [25 Pa. Code §123.22] Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from any combustion unit, in the Southeast Air Basin, in excess of 1.2 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

### 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 information for this source on a monthly basis when this source is in operation:

- (a) The type(s) of fuel consumed by this source.
- (b) The amount of each fuel that is consumed by this source.
- (c) The number of hours that this source is in operation.

### IV. RECORDKEEPING REQUIREMENTS.

### # 003 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) The permittee shall record the following information for this source on a monthly basis when this source is in operation:

- (1) The type(s) of fuel consumed by this source.
- (2) The amount of each fuel that is consumed by this source.
- (3) The number of hours that this source is in operation.

(b) The permittee shall calculate and record the total amount of fuel consumed and the total number of hours operated for this source on a 12-month rolling basis.

(c) The permittee shall calculate and record the emissions of nitrogen oxides, particulate matter, and sulfur dioxide emissions in a manner that demonstrates compliance with the applicable limitations for these pollutants. If a one time calculation can demonstrate that the emissions of particulate matter and/or sulfur dioxide will never exceed 20 percent of the emissions limits stated in the conditions of this permit, that calculation shall be kept on record.





# SECTION D. Source Level Requirements

### V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

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

### VII. ADDITIONAL REQUIREMENTS.

# 004 [25 Pa. Code §127.441] Operating permit terms and conditions.

This unit was installed in 2003 and is manufactured by Fulton, Model No. FT-240C.



FML FML01

FML FML03 PALMER INTL INC/SKIPPACK



# Section D. Source Level Requirements Source ID: 221 Source Name: B1 THERMAL FLUID HEATER Source Capacity/Throughput: 4.000 MMBTU/HR

	oouroo oupuony, miroughput.	4.000		
		3,922.000	CF/HR	Natural Gas
		41.070	Gal/HR	Propane
CU 221 → STAC S221				

### I. RESTRICTIONS.

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

# # 001 [25 Pa. Code §123.11]

# **Combustion units**

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of Btus per hour is greater than 2.5 but less than 50.

### # 002 [25 Pa. Code §123.22]

### **Combustion units**

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from any combustion unit, in the Southeast Air Basin, in excess of 1.2 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

### 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.

### # 003 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall monitor the following information for this source on a monthly basis when this source is in operation:

- (a) The type(s) of fuel consumed by this source.
- (b) The amount of each fuel that is consumed by this source.
- (c) The number of hours that this source is in operation.

# IV. RECORDKEEPING REQUIREMENTS.

### # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) The permittee shall record the following information for this source on a monthly basis when this source is in operation:

- (1) The type(s) of fuel consumed by this source.
- (2) The amount of each fuel that is consumed by this source.
- (3) The number of hours that this source is in operation.

(b) The permittee shall calculate and record the total amount of fuel consumed and the total number of hours operated for





# SECTION D. Source Level Requirements

this source on a 12-month rolling basis.

### # 005 [25 Pa. Code §127.441] Operating permit terms and conditions.

For sources located in Buildings A and B of this facility, the permittee shall record emissions from the following on a monthly basis and on a consecutive 12-month rolling basis: VOC, PM, NOx, CO, SOx, HAP, Formaldehyde, and NH3.

### 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.

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

### VII. ADDITIONAL REQUIREMENTS.

### # 006 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) This unit is manufactured by Fulton, Model No. FT-0400C, with serial number 6112C, and a maximum capacity of 4.0 MMBtu/hr.

(b) This unit was installed in April 2013.

(c) This unit is associated with Reactor A (Source ID 129).



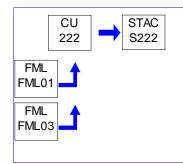
PALMER INTL INC/SKIPPACK



# SECTION D. Source Level Requirements

Source ID: 222 Source Name: B2 THERMAL FLUID HEATER

Source Capacity/Throughput:	4.000	MMBTU/HR	
	3,922.000	CF/HR	Natural Gas
	41.070	Gal/HR	Propane



## I. RESTRICTIONS.

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

# # 001 [25 Pa. Code §123.11]

# **Combustion units**

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of Btus per hour is greater than 2.5 but less than 50.

### # 002 [25 Pa. Code §123.22]

### **Combustion units**

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from any combustion unit, in the Southeast Air Basin, in excess of 1.2 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

### 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.

### # 003 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall monitor the following information for this source on a monthly basis when this source is in operation:

- (a) The type(s) of fuel consumed by this source.
- (b) The amount of each fuel that is consumed by this source.
- (c) The number of hours that this source is in operation.

# IV. RECORDKEEPING REQUIREMENTS.

### # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) The permittee shall record the following information for this source on a monthly basis when this source is in operation:

- (1) The type(s) of fuel consumed by this source.
- (2) The amount of each fuel that is consumed by this source.
- (3) The number of hours that this source is in operation.

(b) The permittee shall calculate and record the total amount of fuel consumed and the total number of hours operated for





# SECTION D. Source Level Requirements

this source on a 12-month rolling basis.

### # 005 [25 Pa. Code §127.441] Operating permit terms and conditions.

For sources located in Buildings A and B of this facility, the permittee shall record emissions from the following on a monthly basis and on a consecutive 12-month rolling basis: VOC, PM, NOx, CO, SOx, HAP, Formaldehyde, and NH3.

### 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.

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

### VII. ADDITIONAL REQUIREMENTS.

### # 006 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) This unit is manufactured by Fulton, Model No. FT-0400C, with serial number 6111C, and a maximum capacity of 4.0 MMBtu/hr.

(b) This unit was installed in April 2013.

(c) This unit is associated with Reactor B (Source ID 132) and Reactor C (Source ID 133).



46-00112				PALMER INTL INC/SKIPPACK
SECTION D. Sourc	e Level Requirements			
Source ID: 240	Source Name: BLDG D BOILER			
	Source Capacity/Throughput:	3.000	MMBTU/HR	
		2,912.620	CF/HR	Natural Gas
		32.790	Gal/HR	Propane
CU 240 → STAC S14	]			
FML FML01				
FML FML03				

### I. RESTRICTIONS.

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

# # 001 [25 Pa. Code §123.11]

# **Combustion units**

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of Btus per hour is greater than 2.5 but less than 50.

### # 002 [25 Pa. Code §123.22]

### **Combustion units**

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from any combustion unit, in the Southeast Air Basin, in excess of 1.2 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

### 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.

### # 003 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall monitor the following information for this source on a monthly basis when this source is in operation:

- (a) The type(s) of fuel consumed by this source.
- (b) The amount of each fuel that is consumed by this source.
- (c) The number of hours that this source is in operation.

# IV. RECORDKEEPING REQUIREMENTS.

### # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) The permittee shall record the following information for this source on a monthly basis when this source is in operation:

- (1) The type(s) of fuel consumed by this source.
- (2) The amount of each fuel that is consumed by this source.
- (3) The number of hours that this source is in operation.

(b) The permittee shall calculate and record the total amount of fuel consumed and the total number of hours operated for





# SECTION D. Source Level Requirements

this source on a 12-month rolling basis.

(c) The permittee shall calculate and record the emissions of nitrogen oxides, particulate matter, and sulfur dioxide emissions in a manner that demonstrates compliance with the applicable limitations for these pollutants. If a one time calculation can demonstrate that the emissions of particulate matter and/or sulfur dioxide will never exceed 20 percent of the emissions limits stated in the conditions of this permit, that calculation shall be kept on record.

### 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.

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

### VII. ADDITIONAL REQUIREMENTS.

# 005 [25 Pa. Code §127.441] Operating permit terms and conditions.

This unit was installed in February 1998 and is manufactured by Fulton, Model No. FT-0240C.

PALMER INTL INC/SKIPPACK

RESIN



46-00112

# SECTION D. Source Level Requirements

Source ID: 103

Source Name: STORAGE TANKS 001A THROUGH 009A

Source Capacity/Throughput: 2,000.000 Lbs/HR

PROC 103 → STAC S03

### 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.

## # 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The throughput and emissions of volatile organic compounds for each storage tank shall be monitored on a monthly basis.

## IV. RECORDKEEPING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

A record of the contents and vapor pressure for each storage tank shall be maintained on site at all times.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The throughput and emissions of volatile organic compounds for each storage tank shall be recorded on a monthly 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.

# 004 [25 Pa. Code §127.441] Operating permit terms and conditions.

Storage Tanks 001A through 009A shall be limited to contents with a vapor pressure less than 1.5 psia.

### VII. ADDITIONAL REQUIREMENTS.

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

46-00112	46-00112		PALMER INTL INC/SKIPPACK	Ž	
SECTION D. S	ource Level Requirements				
Source ID: 104	Source Name: STORAGE TANK 001A	-BCS			
	Source Capacity/Throughput:	N/A	SULFURIC ACID		
	STAC S03				

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.

#### # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The throughput and emissions of volatile organic compounds shall be monitored on a monthly basis.

#### IV. RECORDKEEPING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

A record of the contents and vapor pressure shall be maintained on site at all times.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The throughput and emissions of volatile organic compounds shall be recorded on a monthly 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.

# 004 [25 Pa. Code §127.441] Operating permit terms and conditions.

Storage Tank 001A-BCS shall be limited to contents with a vapor pressure less than 1.5 psia.

#### VII. ADDITIONAL REQUIREMENTS.

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

46-00112			PALMER INTL INC/SKIPPACK	РАСК	
SECTION D. Sour	ce Level Requirements				
Source ID: 105	Source Name: "ROCKET" VESSELS				
	Source Capacity/Throughput:	N/A	LIQUID RESIN W/ VOC		
PROC 105 STAC S105 CNTL C06					

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.

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

Using a Department approved method, the permittee shall monitor the following information on a daily and monthly basis:

- (a) The throughput or production of solvent and non-solvent resins from each "Rocket" vessel.
- (b) The hours of operation for each "Rocket" vessel.

#### IV. RECORDKEEPING REQUIREMENTS.

#### # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall keep records of all inspections and/or maintenance that is performed on the conservation vents and the safety relief vents associated with the three (3) "Rocket" vessels.

#### # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following information on a daily and monthly basis:

- (1) The throughput or production of solvent and non-solvent resins from each "Rocket" vessel.
- (2) The hours of operation for each "Rocket" vessel.

(b) The permittee shall calculate and record the VOC emissions from the three (3) "Rocket" vessels on a monthly basis and a 12-month rolling basis.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

## # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The conservation vents for each of the three (3) "Rocket" vessels shall have a minimum setting of 0.7 psig.





(b) The safety relief vents for each of the three (3) "Rocket" vessels shall have a minimum setting of 1.0 psig.

# # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The conservation vents and the safety relief vents associated with the three (3) "Rocket" vessels shall be inspected and/or maintained on at a minimum of a quarterly basis to ensure that these vents are set properly.

#### # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

All access panels and doors associated with the three (3) "Rockets" shall be kept closed at all times except for during repairs and preventative maintenance or if the vessel is emptied of all VOC compounds.

# 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall exhaust all emissions of VOC from the three (3) "Rockets" to the TANN RTO (Source ID C06).

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The TANN RTO (Source ID C06) shall be operating at a minimum temperature of 1,550 °F before and during operation of the "Rockets".

#### VII. ADDITIONAL REQUIREMENTS.

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

46-00112	46-00112		PALMER INTL INC/SKIPPACK	
SECTION D. Source	e Level Requirements			
Source ID: 106	Source Name: "TUG" SYSTEM			
	Source Capacity/Throughput:	N/A	FRICTION PARTICLES	
PROC 106 S106 CNTL C06	→ STAC S06			

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.

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

(a) The permittee shall equip the filter receiver associated with this source with a device, which is approved by the

Department, for measuring the pressure drop across the filter receiver. The device shall be able to measure the pressure drop between 0.5 and 4 inches water gauge.

(b) The permittee shall monitor the pressure drop across the filter receiver that is associated with this source on a daily basis.

#### # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following for this source on a daily and monthly basis when this source is in operation:

- (a) The throughput or production of materials for this source.
- (b) The hours of operation.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall keep a record for each incident where the "Tug" Mixer bypasses the TANN RTO (Source ID C06). The record should include the following:

(a) Details of the incident.

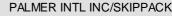
- (b) Starting date and time when the "Tug" Mixer bypassed the RTO.
- (c) Ending date and time when the "Tug" Mixer bypassed the RTO.
- (d) Calculation of the excess emissions of each criteria pollutant emitted during the incident.

# 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following for this source on a daily and monthly basis when this source is in operation:

(1) The throughput or production of materials for this source.





#### (2) The hours of operation.

(b) The permittee shall calculate and record the VOC, particulate matter, nitrogen oxides, carbon monoxide, sulfur oxides, and hazardous air pollutant emissions from this source on a monthly basis and a 12-month rolling basis.

#### # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall record the pressure drop across filter receiver that is associated with this source on a daily basis.

#### V. REPORTING REQUIREMENTS.

# # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall report to the Department within two (2) hours each incident where the "Tug" Mixer bypasses the TANN RTO (Source ID C06). The report should include the following:

#### (a) Details of the incident.

- (b) Starting date and time when the "Tug" Mixer bypassed the RTO.
- (c) Ending date and time when the "Tug" Mixer bypassed the RTO.
- (d) Calculation of the excess emissions of each criteria pollutant emitted during the incident.

#### VI. WORK PRACTICE REQUIREMENTS.

# # 007 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) The TANN RTO (Source ID C06) shall be operating at a minimum temperature of 1,550 °F before and during operation of the "Tug" Mixer and its associated components.

(b) The "Tug" Mixer shall not vent to the atmosphere unless warranted by an emergency situation such as over pressurization, an explosion, or a fire that requires the "Tug" Mixer to bypass the RTO.

(c) When the "Tug" Mixer must be vented, all processes that are required to exhaust to the RTO are to be completed and shut down until all associated equipment is operating properly.

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall maintain the pressure drop range across the filter receiver associated with this source between 0.5 inch water gauge and 4 inches water gauge.

(b) The permittee shall use filter bags or cartridges in the filter receiver associated with this source that are rated and guaranteed with a minimum capture efficiency of 99.9 percent or better.

#### # 009 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

All access panels and doors associated with this source shall be kept closed during operations.

#### # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with the equipment listed under this source, in order to immediately replace any filters or cartridges that require replacement due to deterioration resultling from the routine operation of the equipment listed under this source.

#### VII. ADDITIONAL REQUIREMENTS.

# # 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The "Tug" System includes, but is not limited to, the following components:





- (a) "Tug" Mixer (manufacturered by Greiner 5,600 lb. capacity).
- (b) One Particle Settling Plenum.
- (c) Paddle Blender.
- (d) Two Liquid Weigh Tanks.
- (e) Powder Transfer Station
  - (1) Bulk Bag Discharge Station
  - (2) Wand Discharge Station
  - (3) Filter receiver, manufactured by Mac Equipment, Model No. 19AVRC14STY3.
- (f) Acid IBA Tank Mixer.

46-00112	46-00112		PALMER INTL INC/SKIPPACK	PACK	
SECTION D. Source	e Level Requirements				
Source ID: 111	Source Name: TURBO SYSTEM				
	Source Capacity/Throughput:	N/A	FRICTION PARTICLES		
PROC 111 STAC S111 CNTL C06	STAC S06				

#### Emission Restriction(s).

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

The filter receiver associated with the Turbo System shall exhaust all emissions of particulate matter (PM) to the TANN RTO (Source ID C06).

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13]

## Control Device Efficiency Restriction(s).

# # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.99 percent or better.

#### 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.

#### # 003 [25 Pa. Code §127.441] Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following for this source on a daily and monthly basis when this source is in operation:

(a) The throughput or production of materials for this source.

(b) The hours of operation.

# IV. RECORDKEEPING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following for this source on a daily and monthly basis when this source is in operation:

(1) The throughput or production of materials for this source.

(2) The hours of operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.





# # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall keep a record for each incident where the Turbo System bypasses the TANN RTO (Source ID C06). The following shall be included:

- (a) Details of the incident.
- (b) Starting date and time when the Turbo System bypassed the RTO.
- (c) Ending date and time when the Turbo System bypassed the RTO.
- (d) Calculation of the excess emissions of each criteria pollutant emitted during the incident.

#### # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Maintenance performed on the in-line filter shall be recorded, including cleaning and replacement of the in-line filter.

#### V. REPORTING REQUIREMENTS.

#### # 007 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall report to the Department within two (2) hours each incident where the Turbo System bypasses the TANN RTO (Source ID C06). The report should include the following:

- (a) Details of the incident.
- (b) Starting date and time when the Turbo System bypassed the RTO.
- (c) Ending date and time when the Turbo System bypassed the RTO.
- (d) Calculation of the excess emissions of each criteria pollutant emitted during the incident.

#### VI. WORK PRACTICE REQUIREMENTS.

# 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The filter receiver associated with the Turbo System shall exhaust to the TANN RTO (Source ID C06) at all times that the Turbo System is operating.

(b) The filter receiver shall be followed by an in-line filter with a capture efficiency of 95 percent for fine particulate.

(c) The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

#### # 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) All access panels and doors shall be closed during operations of this source.

(b) The TANN RTO (Source ID C06) shall be operating at a minimum temperature of 1,550 °F before and during operation of the Turbo System.

(c) The Turbo System shall not bypass the RTO unless warranted by an emergency situation, such as over pressurization, an explosion or a fire that requires for the Turbo System to bypass the RTO.

(d) When the Turbo System must bypass the RTO, the Turbo System operations are to be completed and shut down until the Turbo System can be vented to the RTO.

#### VII. ADDITIONAL REQUIREMENTS.

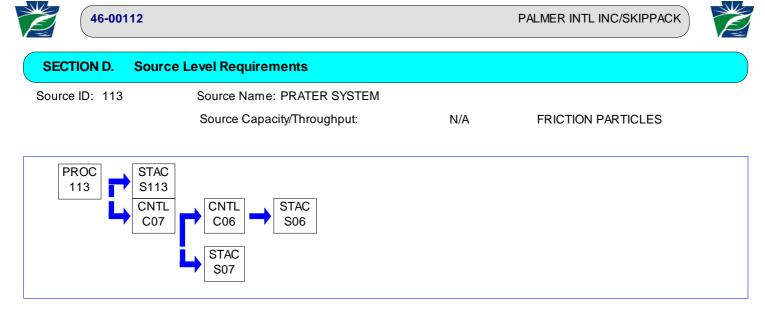
#### # 010 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The Turbo System consists of a Turbo Transfer Receiver, Turbo Mixer, and an exhaust plenum chamber.





(b) The Turbo Transfer Receiver is a filter receiver manufactured by MAC Equipment, Model No. 19RTC3.



#### Emission Restriction(s).

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

The filter receiver associated with the Prater System, while controlled by the Bldg A Dry Side Dust Collector (Source ID C07), shall restrict emissions of particulate matter (PM) to 0.04 grains per dry standard cubic feet when bypassing the TANN RTO (Source ID C06), in accordance with the conditions under Source ID C07.

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13]

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

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.9 percent or better.

#### 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.

# # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

A fabric filter bag leak detector (FFBLD) shall be used to monitor for excess emissions of PM from the filter receiver.

(a) Each triboelectric sensor probe shall be properly located, extending at least halfway across the duct cross-sectional area, and in a length of straight duct, two duct diameters downstream and one-half duct diameter upstream from any flow disturbances.

(b) There shall be proper insulation between each probe and its housing.

(c) The FFBLDs shall have proper sensitivity, response time, and alarm levels.

# # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following for this source on a daily and monthly basis when this source is in operation:

(a) The throughput or production of materials for this source.





(b) The hours of operation.

#### # 005 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall monitor the temperature of gases entering the filter receiver associated with this source, at a minimum of once per day when operating.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The following records shall be maintained for the FFBLD:

(a) All maintenance, repairs, and testing of the FFBLD system shall be recorded. This includes initial calibrations at installation.

(b) Any instances where a FFBLD alarm is triggered, the facility shall document such cases and steps taken to resolve the situation.

(c) When response testing is performed on the FFBLDs, the response time shall be documented each time.

#### # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following for this source on a daily and monthly basis when this source is in operation:

(1) The throughput or production of materials for this source.

(2) The hours of operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.

#### # 008 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall record the temperature of gases entering the filter receiver associated with this source, at a minimum of once per day when operating.

#### 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.

#### # 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Emissions from the Prater System shall be controlled by the Bldg A Dry Side Dust Collector (Source ID C07), followed by the TANN RTO (Source ID C06), except as described under Source ID C07.

#### # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

This process shall be equipped with a FFBLD to monitor for excess emissions of PM from the filter receiver:

(a) The permittee shall maintain an appropriate cleaning and maintenance program, with regards to accumulation of PM on the triboelectric sensor probes.





(b) Response testing shall be performed on all FFBLDs on a monthly basis, unless it can be demonstrated on a unit-to-unit basis that lesser frequency of testing is sufficient and approved by the Department.

# 011 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The temperature of the gases flowing into the filter receiver shall not exceed 275 degrees Fahrenheit.

(b) The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

# 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All access panels and doors shall be closed during operations of this source.

## VII. ADDITIONAL REQUIREMENTS.

# 013 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The Prater System includes the following equipment:

- (a) Prater Grinder with filter receiver.
- (b) Classifier.
- (c) Screens.

PALMER INTL INC/SKIPPACK



Ž	46-00112	

SECTION D.	Source Level Requirements
Source ID: 114	Source Name: PRATER TRANSFER SYSTEM

Source ID: 114

Source Capacity/Throughput:

N/A

FRICTION PARTICLES



#### I. **RESTRICTIONS.**

# **Emission Restriction(s).**

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 123.13]

(a) The permittee shall limit particulate matter (PM) emissions from the Prater Transfer System to the atmosphere to 0.04 grain per dry standard cubic foot.

(b) If the Department believes that the Prater Transfer System is not complying with the above PM emission limit, the PM emission rate shall be validated through stack testing.

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

#### # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.9 percent or better.

#### TESTING REQUIREMENTS. П.

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

#### Ш. MONITORING REQUIREMENTS.

#### # 003 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

#### # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall monitor the temperature of gases entering the filter receiver associated with this source, at a minimum of once per day when operating.

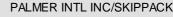
#### IV. RECORDKEEPING REQUIREMENTS.

#### # 005 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis





# Ž

# SECTION D. Source Level Requirements

# # 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Maintenance performed on the in-line filter shall be recorded, including cleaning and replacement of the in-line filter.

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record the temperature of gases entering the filter receiver associated with this source, at a minimum of once per day when operating.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

#### # 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All access panels and doors shall be closed during operations of this source.

# 010 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

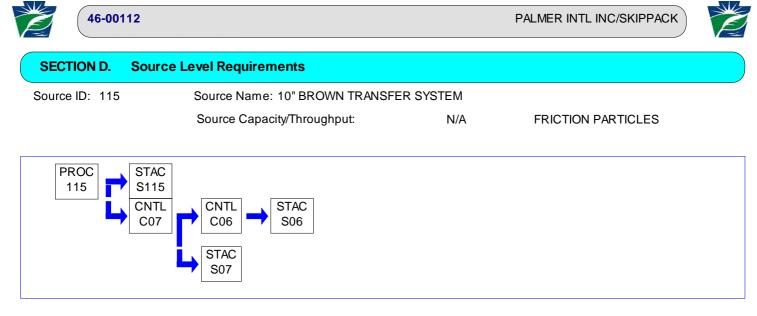
The filter receiver shall be followed by an in-line filter with a capture efficiency of 95 percent for fine particulate.

## VII. ADDITIONAL REQUIREMENTS.

# 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The filter receiver associated with this source is manufactured by Premier Pneumatics, Model No. FR-14-36.



#### Emission Restriction(s).

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

The filter receiver associated with the 10" Brown Transfer System, while controlled by the Bldg A Dry Side Dust Collector (Source ID C07), shall restrict emissions of particulate matter (PM) to 0.04 grains per dry standard cubic feet when bypassing the TANN RTO (Source ID C06).

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13]

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

#### # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.96 percent or better.

#### 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.

# # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

A fabric filter bag leak detector (FFBLD) shall be used to monitor for excess emissions of PM from the filter receiver.

(a) Each triboelectric sensor probe shall be properly located, extending at least halfway across the duct cross-sectional area, and in a length of straight duct, two duct diameters downstream and one-half duct diameter upstream from any flow disturbances.

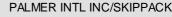
(b) There shall be proper insulation between each probe and its housing.

(c) The FFBLDs shall have proper sensitivity, response time, and alarm levels.

#### # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall monitor the temperature of gases entering the filter receiver associated with this source at a minimum of once per day when this source is in operation.







## # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The following records shall be maintained for the FFBLD:

(a) All maintenance, repairs, and testing of the FFBLD system shall be recorded. This includes initial calibrations at installation.

(b) Any instances where a FFBLD alarm is triggered, the facility shall document such cases and steps taken to resolve the situation.

(c) When response testing is performed on the FFBLDs, the response time shall be documented each time.

# 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall record the temperature of gases entering the filter receiver associated with this source at a minimum of once per day when this source is in operation.

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

## # 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Emissions from the 10" Brown Transfer System shall be controlled by the Bldg A Dry Side Dust Collector (Source ID C07), followed by the TANN RTO (Source ID C06), except as described under Source ID C07.

#### # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The process shall be equipped with the following instrumentation:

(a) A FFBLD to monitor for excess emissions of PM from the filter receiver.

(1) The permittee shall maintain an appropriate cleaning and maintenance program, with regards to accumulation of PM on the triboelectric sensor probes.

(2) Response testing shall be performed on all FFBLDs on a monthly basis, unless it can be demonstrated on a unit-to-unit basis that lesser frequency of testing is sufficient and approved by the Department.





(b) A device, which has been approved by the Department, through which the temperature of the gases entering the filter receiver associated with this source may be monitored and recorded.

#### # 011 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The temperature of the gases flowing into the filter receiver shall not exceed 275 degrees Fahrenheit.

(b) The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

# 012 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

All access panels and doors shall be closed during operations of this source.

#### VII. ADDITIONAL REQUIREMENTS.

# 013 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The 10" Brown Transfer System is a pneumatic discharge line for the "Tug" System (Source ID 106), with a filter receiver. The filter receiver is manufactured by Mikro-Pulsaire, Model No. 100S-6-20. Material transferred from the "Tug" System is discharged into the "Brown Transfer Bin".

46-001	12		PALMER INTL INC/SKIPPACK	
SECTION D.	Source Level Requirements			
Source ID: 116	Source Name: BROWN AND GREEN	HOLDING SYSTE	MS	
	Source Capacity/Throughput:	N/A	FRICTION PARTICLES	
PROC 116	$\begin{array}{c} CNTL \\ C07 \end{array} \xrightarrow{} CNTL \\ C06 \end{array} \xrightarrow{} STAC \\ S06 \end{array}$			

# Emission Restriction(s).

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

The filter receiver associated with the Brown and Green Holding Systems, while controlled by the Bldg A Dry Side Dust Collector (Source ID C07), shall restrict emissions of particulate matter (PM) to 0.04 grains per dry standard cubic feet when bypassing the TANN RTO (Source ID C06).

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13]

## Control Device Efficiency Restriction(s).

## # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.99 percent or better.

#### 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.

# # 003 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following for this source on a daily and monthly basis when this source is in operation:

- (a) The throughput or production of materials for this source.
- (b) The hours of operation.

# IV. RECORDKEEPING REQUIREMENTS.

#### # 004 [25 Pa. Code §127.441] Operating permit terms and conditions.

Maintenance performed on the in-line filter shall be recorded, including cleaning and replacement of the in-line filter.

# # 005 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following for this source on a daily and monthly basis when this source is in operation:

(1) The throughput or production of materials for this source.

(2) The hours of operation.





(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

## # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Emissions from the Brown and Green Holding Systems shall be controlled by the Bldg A Dry Side Dust Collector (Source ID C07), followed by the TANN RTO (Source ID C06), except as described under Source ID C07.

# 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The filter receiver shall be followed by an in-line filter with a capture efficiency of 95 percent for fine particulate.

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

#### # 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

All access panels and doors shall be closed during operations of this source.

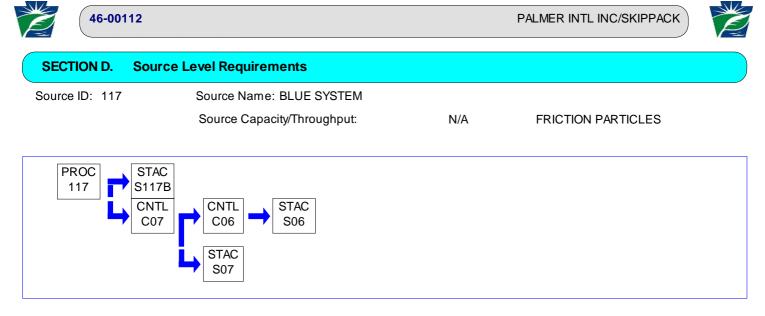
#### VII. ADDITIONAL REQUIREMENTS.

# # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The Brown Holding System consists of the "Brown" Vac-u-max filter receiver, and a "Brown Holding Bin".

(b) The "Brown" Vac-u-max filter receiver associated with this source is manufactured by Vac-u-max, Model No. MDL105045.



#### Emission Restriction(s).

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

The filter receiver associated with the Blue System, while controlled by the Bldg A Dry Side Dust Collector (Source ID C07), shall restrict emissions of particulate matter (PM) to 0.04 grains per dry standard cubic feet when bypassing the TANN RTO (Source ID C06).

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13]

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

#### # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.99 percent or better.

#### 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.

# # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

A fabric filter bag leak detector (FFBLD) shall be used to monitor for excess emissions of PM from the filter receiver.

(a) Each triboelectric sensor probe shall be properly located, extending at least halfway across the duct cross-sectional area, and in a length of straight duct, two duct diameters downstream and one-half duct diameter upstream from any flow disturbances.

(b) There shall be proper insulation between each probe and its housing.

(c) The FFBLDs shall have proper sensitivity, response time, and alarm levels.

# # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following for this source on a daily and monthly basis when this source is in operation:

(a) The throughput or production of materials for this source.





(b) The hours of operation.

#### # 005 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The permittee shall monitor the temperature of gases entering filter receivers associated with this source, at a minimum of once per day when operating.

(b) Compliance with paragraph (a), above, may be accomplished by monitoring the temperature of gasses entering the filter receiver most upstream from the other filter receivers if they are operated in series.

#### IV. RECORDKEEPING REQUIREMENTS.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following records shall be maintained for the FFBLD:

(a) All maintenance, repairs, and testing of the FFBLD system shall be recorded. This includes initial calibrations at installation.

(b) Any instances where a FFBLD alarm is triggered, the facility shall document such cases and steps taken to resolve the situation.

(c) When response testing is performed on the FFBLDs, the response time shall be documented each time.

# 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following for this source on a daily and monthly basis when this source is in operation:

(1) The throughput or production of materials for this source.

(2) The hours of operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.

#### # 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall record the temperature of gases entering filter receivers associated with this source, at a minimum of once per day when operating:

(b) Compliance with paragraph (a), above, may be accomplished by recording the temperature of gasses entering the filter receiver most upstream from the other filter receivers if they are operated in series.

#### 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.

# 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Emissions from the Blue System shall be controlled by the Bldg A Dry Side Dust Collector (Source ID C07), followed by the TANN RTO (Source ID C06), except as described under Source ID C07.





## # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

This process shall be equipped with a FFBLD to monitor for excess emissions of PM from the filter receiver:

(a) The permittee shall maintain an appropriate cleaning and maintenance program, with regards to accumulation of PM on the triboelectric sensor probes.

(b) Response testing shall be performed on all FFBLDs on a monthly basis, unless it can be demonstrated on a unit-to-unit basis that lesser frequency of testing is sufficient and approved by the Department.

#### # 011 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The temperature of the gases flowing into the filter receiver shall not exceed 275 degrees Fahrenheit.

(b) The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

#### # 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

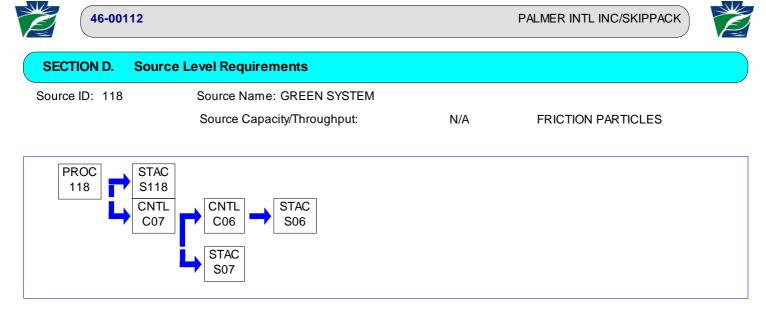
All access panels and doors shall be closed during operations of this source.

#### VII. ADDITIONAL REQUIREMENTS.

# 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Blue System consists of the "Blue" grinding filter receiver, screens, and a grinder.



#### Emission Restriction(s).

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

The filter receiver associated with the Green System, while controlled by the Bldg A Dry Side Dust Collector (Source ID C07), shall restrict emissions of particulate matter (PM) to 0.04 grains per dry standard cubic feet when bypassing the TANN RTO (Source ID C06).

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13]

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

## # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.96 percent or better.

#### 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.

# # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

A fabric filter bag leak detector (FFBLD) shall be used to monitor for excess emissions of PM from the filter receiver.

(a) Each triboelectric sensor probe shall be properly located, extending at least halfway across the duct cross-sectional area, and in a length of straight duct, two duct diameters downstream and one-half duct diameter upstream from any flow disturbances.

(b) There shall be proper insulation between each probe and its housing.

(c) The FFBLDs shall have proper sensitivity, response time, and alarm levels.

# # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following for this source on a daily and monthly basis when this source is in operation:

(a) The throughput or production of materials for this source.





(b) The hours of operation.

#### # 005 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The permittee shall monitor the temperature of gases entering filter receivers associated with this source, at a minimum of once per day when operating.

(b) Compliance with paragraph (a), above, may be accomplished by monitoring the temperature of gasses entering the filter receiver most upstream from the other filter receivers if they are operated in series.

#### IV. RECORDKEEPING REQUIREMENTS.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following records shall be maintained for the FFBLD:

(a) All maintenance, repairs, and testing of the FFBLD system shall be recorded. This includes initial calibrations at installation.

(b) Any instances where a FFBLD alarm is triggered, the facility shall document such cases and steps taken to resolve the situation.

(c) When response testing is performed on the FFBLDs, the response time shall be documented each time.

# 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following for this source on a daily and monthly basis when this source is in operation:

- (1) The throughput or production of materials for this source.
- (2) The hours of operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# # 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Emissions from the Green System shall be controlled by the Bldg A Dry Side Dust Collector (Source ID C07), followed by the TANN RTO (Source ID C06), except as described under Source ID C07.

#### # 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

This process shall be equipped with a FFBLD to monitor for excess emissions of PM from the filter receiver:

(a) The permittee shall maintain an appropriate cleaning and maintenance program, with regards to accumulation of PM on the triboelectric sensor probes.





(b) Response testing shall be performed on all FFBLDs on a monthly basis, unless it can be demonstrated on a unit-to-unit basis that lesser frequency of testing is sufficient and approved by the Department.

# 010 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The temperature of the gases flowing into the filter receiver shall not exceed 275 degrees Fahrenheit.

(b) The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

# 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

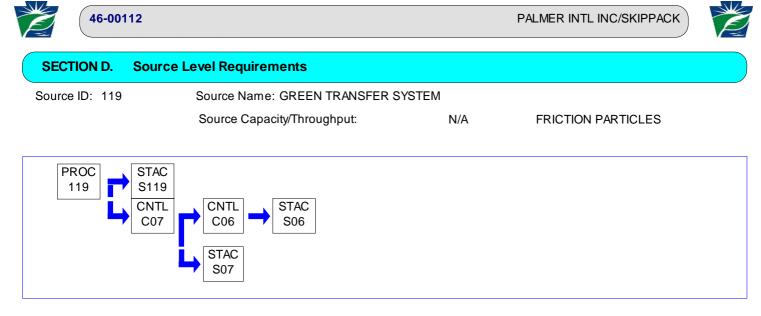
All access panels and doors shall be closed during operations of this source.

#### VII. ADDITIONAL REQUIREMENTS.

# 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Green System consists of the "Green" grinding filter receiver, screens, and a grinder.



#### Emission Restriction(s).

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

The filter receiver associated with the Green Transfer System, while controlled by the Bldg A Dry Side Dust Collector (Source ID C07), shall restrict emissions of particulate matter (PM) to 0.04 grains per dry standard cubic feet when bypassing the TANN RTO (Source ID C06).

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13]

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

#### # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.96 percent or better.

#### 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.

# # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

A fabric filter bag leak detector (FFBLD) shall be used to monitor for excess emissions of PM from the filter receiver.

(a) Each triboelectric sensor probe shall be properly located, extending at least halfway across the duct cross-sectional area, and in a length of straight duct, two duct diameters downstream and one-half duct diameter upstream from any flow disturbances.

(b) There shall be proper insulation between each probe and its housing.

(c) The FFBLDs shall have proper sensitivity, response time, and alarm levels.

#### # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.





# # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall monitor the temperature of gases entering filter receivers associated with this source, at a minimum of once per day when operating.

(b) Compliance with paragraph (a), above, may be accomplished by monitoring the temperature of gasses entering the filter receiver most upstream from the other filter receivers if they are operated in series.

#### IV. RECORDKEEPING REQUIREMENTS.

## # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The following records shall be maintained for the FFBLD:

(a) All maintenance, repairs, and testing of the FFBLD system shall be recorded. This includes initial calibrations at installation.

(b) Any instances where a FFBLD alarm is triggered, the facility shall document such cases and steps taken to resolve the situation.

(c) When response testing is performed on the FFBLDs, the response time shall be documented each time.

# 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Emissions from the Green Transfer System shall be controlled by the Bldg A Dry Side Dust Collector (Source ID C07), followed by the TANN RTO (Source ID C06), except as described under Source ID C07.

# 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

This process shall be equipped with a FFBLD to monitor for excess emissions of PM from the filter receiver:

(a) The permittee shall maintain an appropriate cleaning and maintenance program, with regards to accumulation of PM on the triboelectric sensor probes.

(b) Response testing shall be performed on all FFBLDs on a monthly basis, unless it can be demonstrated on a unit-to-unit basis that lesser frequency of testing is sufficient and approved by the Department.

#### # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The temperature of the gases flowing into the filter receiver associated with this source shall not exceed 275 degrees Fahrenheit.





(b) The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

# 011 [25 Pa. Code §127.441] Operating permit terms and conditions.

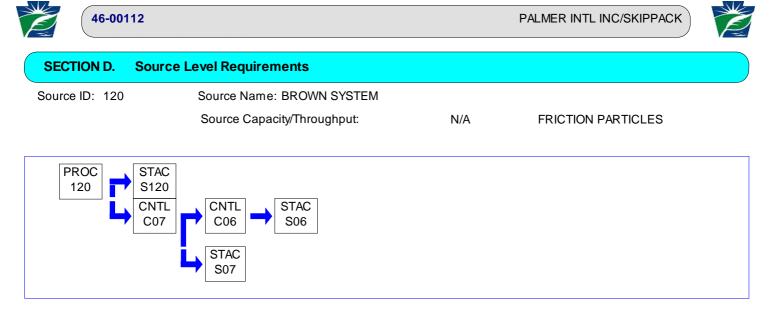
All access panels and doors shall be closed during operations of this source.

#### VII. ADDITIONAL REQUIREMENTS.

## # 012 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The Green Transfer System is a pneumatic line connected to a "Green" transfer filter receiver.

(b) The "Green" transfer filter receiver associated with this source is manufactured by Mikro Pul, Model No. 16-8-100.



#### Emission Restriction(s).

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

The filter receiver associated with the Brown System, while controlled by the Bldg A Dry Side Dust Collector (Source ID C07), shall restrict emissions of particulate matter (PM) to 0.04 grains per dry standard cubic feet when bypassing the TANN RTO (Source ID C06).

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13]

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

#### # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.96 percent or better.

#### 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.

# # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

A fabric filter bag leak detector (FFBLD) shall be used to monitor for excess emissions of PM from the filter receiver.

(a) Each triboelectric sensor probe shall be properly located, extending at least halfway across the duct cross-sectional area, and in a length of straight duct, two duct diameters downstream and one-half duct diameter upstream from any flow disturbances.

(b) There shall be proper insulation between each probe and its housing.

(c) The FFBLDs shall have proper sensitivity, response time, and alarm levels.

# # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following for this source on a daily and monthly basis when this source is in operation:

(a) The throughput or production of materials for this source.





(b) The hours of operation.

#### # 005 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The permittee shall monitor the temperature of gases entering filter receivers associated with this source, at a minimum of once per day when operating.

(b) Compliance with paragraph (a), above, may be accomplished by monitoring the temperature of gasses entering the filter receiver most upstream from the other filter receivers if they are operated in series.

#### IV. RECORDKEEPING REQUIREMENTS.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following records shall be maintained for the FFBLD:

(a) All maintenance, repairs, and testing of the FFBLD system shall be recorded. This includes initial calibrations at installation.

(b) Any instances where a FFBLD alarm is triggered, the facility shall document such cases and steps taken to resolve the situation.

(c) When response testing is performed on the FFBLDs, the response time shall be documented each time.

# 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following for this source on a daily and monthly basis when this source is in operation:

- (1) The throughput or production of materials for this source.
- (2) The hours of operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# # 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Emissions from the Brown System shall be controlled by the Bldg A Dry Side Dust Collector (Source ID C07), followed by the TANN RTO (Source ID C06), except as described under Source ID C07.

#### # 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

This process shall be equipped with a FFBLD to monitor for excess emissions of PM from the filter receiver:

(a) The permittee shall maintain an appropriate cleaning and maintenance program, with regards to accumulation of PM on the triboelectric sensor probes.





(b) Response testing shall be performed on all FFBLDs on a monthly basis, unless it can be demonstrated on a unit-to-unit basis that lesser frequency of testing is sufficient and approved by the Department.

# # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The temperature of the gases flowing into the filter receiver associated with this source shall not exceed 275 degrees Fahrenheit.

(b) The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

#### # 011 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

All access panels and doors shall be closed during operations of this source.

#### VII. ADDITIONAL REQUIREMENTS.

## # 012 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The Brown System consists of the "Brown" grinding filter receiver, screens, and a grinder.

PALMER INTL INC/SKIPPACK





# SECTION D. Source Level Requirements

Source ID: 121

Source Name: NAUTA TRANSFER LOADING AND DISCHARGE

Source Capacity/Throughput:

N/A

FRICTION PARTICLES



# I. RESTRICTIONS.

# **Emission Restriction(s).**

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 123.13]

(a) The permittee shall limit particulate matter (PM) emissions to the atmosphere from each of the two filter receivers associated with the Nauta Transfer Loading and Discharge system to 0.04 grain per dry standard cubic foot.

(b) If the Department believes that either of the filter receivers associated with the Nauta Transfer Loading and Discharge system is not complying with the above PM emission limit, the PM emission rate shall be validated through stack testing.

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

# 002 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The Nauta Loader filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.9 percent or better.

(b) The Nauta MAC filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.99 percent or better.

## 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.

# # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.

## # 005 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Maintenance performed on the in-line filters shall be recorded, including cleaning and replacement of the in-line filters.





#### 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 keep on hand a sufficient quantity of spare filters or cartridges for the filter receivers associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

#### # 007 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

All access panels and doors shall be closed during operations of this source.

# 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Each filter receiver shall be followed by an in-line filter with a capture efficiency of 95 percent for fine particulate.

#### VII. ADDITIONAL REQUIREMENTS.

#### # 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The Nauta Transfer Loading and Discharge system consists of two pneumatic lines, each connected to a filter receiver. The pneumatic lines are used to transfer material into and out of the Nauta Mixer (Source ID 122). The two filter receivers are identified as:

(1) Nauta Transfer Loading filter receiver

(2) Nauta Transfer Discharge filter receiver

(b) The Nauta Transfer Loading filter receiver is manufactured by Flex Kleen, Model No. 58-CTBS-14.

(c) The Nauta Transfer Discharge filter receiver is manufactured by Mac Equipment, Model No. 39AVRC7.

46-0011	46-00112		PALMER INTL INC/SKIPPACK		
SECTION D.	Source Level Requirements				
Source ID: 122	Source Name: NAUTA MIXER				
	Source Capacity/Throughput:	N/A	FRICTION PARTICLES		
	STAC S122				

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

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

(a) The permittee shall limit particulate matter (PM) emissions from the Nauta Mixer to the atmosphere to 0.02 grain per dry standard cubic foot.

(b) If the Department believes that the Nauta Mixer is not complying with the above PM emission limit, the PM emission rate shall be validated through stack testing.

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13]

#### 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.

Using a Department approved method, the permittee shall monitor the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

All access panels and doors shall be closed during operations.



PALMER INTL INC/SKIPPACK



# SECTION D. Source Level Requirements

#### VII. ADDITIONAL REQUIREMENTS.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Nauta Mixer is manufactured by Mixer Day Mixing, Model No. RB-229.

SECTION D. Source	Level Requirements		
ource ID: 125	Source Name: POLYMERIZATIO	N VAT 1	
	Source Capacity/Throughput:	2.000 MMBTU/HF	र
		1,942.000 CF/HR	Natural Gas
		21.860 Gal/HR	Propane
PROC 125 AL 01 AL 03 AL 03 AL 03 AL 03 AL 03 AL 03 AL 01 AL 01 AL 01 AL 01 AL 01 AL 01 AL 01 AL 01 0 AL 01 0 AL 01 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	STAC S06		

#### Fuel Restriction(s).

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

The permittee shall use natural gas as the primary fuel for heating in this source; only propane may be used as the alternate fuel for this source.

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

#### # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following for this source on a daily and monthly basis when this source is in operation:

- (a) The throughput or production of materials for this source.
- (b) The hours of operation.

#### # 003 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall monitor the following for this source on a monthly basis:

- (a) The type of fuel consumed by this source.
- (b) The amount of fuel consumed by this source.

#### IV. RECORDKEEPING REQUIREMENTS.

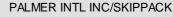
## # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following for this source on a daily and monthly basis when this source is in operation:

- (1) The throughput or production of materials for this source.
- (2) The hours of operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month





rolling basis.
# 005 [25 Pa. Code §127.441] Operating permit terms and conditions.
The permittee shall record the following for this source on a monthly basis:

- (a) The type of fuel consumed by this source.
- (b) The amount of fuel consumed by this source.

## 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 equip this source with a gauge for tracking the usage of fuel, both natural gas and propane, by this source.

## # 007 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The TANN RTO (Source ID C06) shall be operating at a minimum temperature of 1,550 °F before and during the processing of material in this polymerization vat.

### VII. ADDITIONAL REQUIREMENTS.

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

46-00112		F	
SECTION D. Source	Level Requirements		
Source ID: 126	Source Name: POLYMERIZATION	N VAT 2	
	Source Capacity/Throughput:	0.840 MMBTU/HR 815.500 CF/HR 6.130 Gal/HR	Natural Gas Propane
FML FML01 FML03	→ STAC S06		

## I. RESTRICTIONS.

## Fuel Restriction(s).

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

The permittee shall use natural gas as the primary fuel for heating in this source; only propane may be used as the alternate fuel for this source.

## II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

## # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following for this source on a daily and monthly basis when this source is in operation:

- (a) The throughput or production of materials for this source.
- (b) The hours of operation.

### # 003 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall monitor the following for this source on a monthly basis:

- (a) The type of fuel consumed by this source.
- (b) The amount of fuel consumed by this source.

## IV. RECORDKEEPING REQUIREMENTS.

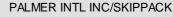
## # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following for this source on a daily and monthly basis when this source is in operation:

- (1) The throughput or production of materials for this source.
- (2) The hours of operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month





rolling basis.
# 005 [25 Pa. Code §127.441] Operating permit terms and conditions.
The permittee shall record the following for this source on a monthly basis:

- (a) The type of fuel consumed by this source.
- (b) The amount of fuel consumed by this source.

### 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 TANN RTO (Source ID C06) shall be operating at a minimum temperature of 1,550 °F before and during the processing of material in this polymerization vat.

### # 007 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The permittee shall equip this source with a gauge for tracking the usage of fuel, both natural gas and propane, by this source.

#### VII. ADDITIONAL REQUIREMENTS.

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

SECTION D. Sour	ce Level Requirements			
Source ID: 127	Source Name: POLYMERIZATIC	ON VAT 3		
	Source Capacity/Throughput:	2.000	MMBTU/HR	
		1,942.000	CF/HR	Natural Gas
		21.860	Gal/HR	Propane
FML ML03				

## Fuel Restriction(s).

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

The permittee shall use natural gas as the primary fuel for heating in this source; only propane may be used as the alternate fuel for this source.

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

## # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following for this source on a daily and monthly basis when this source is in operation:

- (a) The throughput or production of materials for this source.
- (b) The hours of operation.

### # 003 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall monitor the following for this source on a monthly basis:

- (a) The type of fuel consumed by this source.
- (b) The amount of fuel consumed by this source.

## IV. RECORDKEEPING REQUIREMENTS.

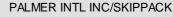
## # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following for this source on a daily and monthly basis when this source is in operation:

- (1) The throughput or production of materials for this source.
- (2) The hours of operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month





rolling basis.
# 005 [25 Pa. Code §127.441] Operating permit terms and conditions.
The permittee shall record the following for this source on a monthly basis:

- (a) The type of fuel consumed by this source.
- (b) The amount of fuel consumed by this source.

## 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 TANN RTO (Source ID C06) shall be operating at a minimum temperature of 1,550 °F before and during the processing of material in this polymerization vat.

### # 007 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The permittee shall equip this source with a gauge for tracking the usage of fuel, both natural gas and propane, by this source.

#### VII. ADDITIONAL REQUIREMENTS.

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

46-00112			PALMER INTL INC/SKIPPACK	Ž
SECTION D. Source	Level Requirements			
Source ID: 128	Source Name: PROPANE TANKS			
	Source Capacity/Throughput:	N/A	PROPANE	
128 S128				

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.

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of all inspections and/or maintenance that is performed on the propane tank.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep a record of the vapor pressure for the propane in this source to demonstrate compliance with the criteria used to determine applicability of 25 Pa. Code § 129.57 with this source.

### 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.

# 003 [25 Pa. Code §127.441] Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.56(g) and 129.57.]

(a) The safety relief vents shall have a minimum setting of 0.7 psig pressure or 0.3 psig vaccum or the highest possible pressure setting or vacuum setting in accordance with state or local fire codes or the National Fire Prevention Association guidelines or other national consensus standards acceptable to the Department for storage vessels with a capacity between 2,000 gallons and 40,000 gallons and contains VOC with a vapor pressure (as determined through the methods of paragraph (b) of this condition) greater than 1.5 psia.

(b) For volatile organic compounds whose storage temperature is governed by ambient weather conditions, the vapor pressure under actual storage conditions shall be determined using a temperature which is representative of the average storage temperature for the hottest month of the year in which the storage takes place.





# # 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

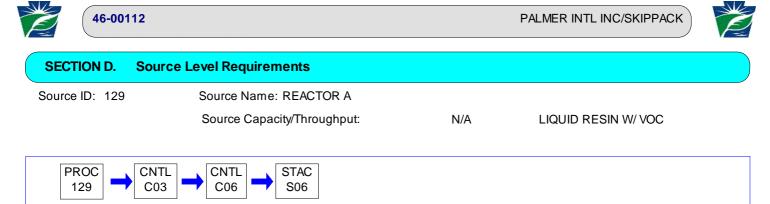
The permittee shall inspect each propane tank on a quarterly basis for integrity, vapor pressure, and tank level.

## VII. ADDITIONAL REQUIREMENTS.

# 005 [25 Pa. Code §127.441] Operating permit terms and conditions.

Source ID 128 is for the following propane tank(s):

12,000 gallon propane tank, adjacent to Building E, used as a backup fuel for the facility; measuring 46 feet and 10.5 inches in length.



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

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

The average emission rate of volatile organic compounds (VOC), including all hazardous air pollutants (HAP), from Reactor A shall be limited to 4.69 lbs/hr following the Reactor A Condenser (Source ID C03) but prior to the TANN RTO (Source ID C06).

#### **Throughput Restriction(s).**

#### # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Reactor A shall be limited to a production rate (finished product) of 1,546 tons per 12-month rolling period.

#### II. TESTING REQUIREMENTS.

#### # 003 [25 Pa. Code §139.3]

#### General requirements.

The Department reserves the right to require testing if the Department has just cause that emissions from Reactor A exceed the allowable controlled emission rate approved for this source. If necessary, testing could be required for Reactor A, the Reactor A Condenser, the TANN RTO (Source ID C06), or a combination of the three.

#### III. MONITORING REQUIREMENTS.

### # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following information per batch and on a monthly basis:

- (a) The amount of raw materials fed into the reactor;
- (b) The amount of product produced from the reactor;
- (c) The amount of condensate obtained from the condenser;
- (d) The amount of emissions emitted from the reactor;
- (e) The hours of the batch, including date, start time, and finish time; and,
- (f) The type of batch (i.e. Cashewthane or Phenalkamine).

#### IV. RECORDKEEPING REQUIREMENTS.

### # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall keep records of all inspections and/or maintenance that is performed on the safety relief vents associated with the reactor, noting the settings.

#### # 006 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following information per batch and on a monthly basis:



- (1) The amount of raw materials fed into the reactor;
- (2) The amount of product produced from the reactor;
- (3) The amount of condensate obtained from the condenser;
- (4) The amount of emissions emitted from the reactor;
- (5) The hours of the batch, including date, start time, and finish time; and,
- (6) The type of batch (i.e. Cashewthane or Phenalkamine).

(b) The permittee shall calculate and record the VOC and HAP emissions from the reactor on a monthly basis and as a 12month rolling sum. The permittee shall also record the emissions of formaldehyde separately on a monthly basis and as a 12-month rolling sum.

## V. REPORTING REQUIREMENTS.

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

## VI. WORK PRACTICE REQUIREMENTS.

## # 007 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The permittee shall exhaust all process emissions from the reactor to the associated condenser (Source ID C03), followed by the TANN RTO (Source ID C06).

(b) The TANN RTO (Source ID C06) shall be operating at a minimum temperature of 1,550 °F before and during operation of the reactor,

(c) Emissions resulting from the dispensing of product into containers shall be captured and directed to the RTO.

(d) The permittee may not bypass the associated condenser and/or RTO unless there is an emergency situation where fumes cannot vent to the condenser and/or the RTO. If this occurs, the existing batch shall be completed and the reactor shall be shut down until the reactor can be properly exhausted to the associated condenser and RTO.

(e) Subpart (d) above does not exempt the permittee from complying with any emission limits applicable to the source.

(f) Subparts (a) - (d) above do not apply if the reactor is not producing any air contaminants.

## # 008 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

All access panels and doors associated with the reactor shall be kept closed at all times except for during repairs and preventative maintenance or if the reactor is emptied of all VOC and HAP compounds.

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Before operation of the reactor begins:

(a) The associated condenser (Source ID C03) shall be working properly, in accordance with the conditions contained herein this plan approval.

(b) The TANN RTO (Source ID C06) shall have reached it's required minimum temperature. The RTO shall continue to operate at the required minimum temperature until the reactor, along with all other sources that exhaust to the RTO, has completed operation.

## # 010 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) The safety relief vents associated with the reactor shall be installed according to manufacturer's specifications such that they do not result in fugitive emissions of VOC or HAP from the reactor.





(b) To ensure that the safety relief vents associated with the reactor are set properly, the permittee shall inspect and maintain the vents on a quarterly basis.

## VII. ADDITIONAL REQUIREMENTS.

# 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Reactor A is custom made, with a maximum capacity of 2,500 gallons.

# 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

An "emergency situation" shall be defined as any deviation from routine operation inconsistent with the plans approved by the Department.

46-001	12		PALMER INTL INC/SKIPPACK	Ž
SECTION D.	Source Level Requirements			
Source ID: 131	Source Name: PARTS WASHER (MOD	EL 30)		
	Source Capacity/Throughput:	N/A	SOLVENT	
PROC 131	STAC Z131			

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

#### II. TESTING REQUIREMENTS.

# # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) If the permittee does not have a Material Safety Data Sheet (MSDS) or Certified Product Data Sheet (CPDS) that contains the VOC and HAP content for solvents being used in the parts washer, both by weight and volume, then the permittee shall perform testing to determine the VOC and HAP content.

(b) The VOC and HAP content shall be determined using a Department approved test method(s).

#### III. MONITORING REQUIREMENTS.

## # 002 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) The amount of solvent that is added and removed from the parts washer shall be monitored, per each delivery.

(b) The composition of wastes removed from the parts washer shall be monitored on a monthly basis.

(c) The permittee shall monitor emissions of VOC and HAP on a monthly basis.

## IV. RECORDKEEPING REQUIREMENTS.

## # 003 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

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

(a) A person who sells or offers for sale any solvent containing VOC for use in a parts washer shall provide, to the purchaser, the following written information:

- (1) The name and address of the solvent supplier.
- (2) The type of solvent including the product or vendor identification number.
- (3) The vapor pressure of the solvent measured in mm Hg at 20 degrees C (68 degrees F).

(b) The permittee shall maintain for at least two (2) years and shall provide to the Department, on request, the information specified in paragraph (a) above. An invoice, bill of sale, certificate that corresponds to the number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

### # 004 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) The amount of solvent that is added and removed from the parts washer shall be recorded, per each delivery.

(b) The composition of wastes removed from the parts washer shall be recorded on a monthly basis.

(c) The permittee shall record emissions of VOC and HAP on a monthly 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.

# 005 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.63(a)]
(a) The parts washer shall have a freeboard ratio of 0.50 or greater.
(b) The parts washer shall be operated in accordance with the following procedures:
(1) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
(2) Flushing of parts using a flexible hose or other flushing device shall be performed only within the parts washer. The solvent spray shall be a solid fluid stream, not a atomized or shower spray.
(3) Sponges, fabric, wood, leather, paper products and other absorbent material may not be cleaned in the parts washer.
(4) Air agitated solvent baths may not be used.
(5) Spills during solvent transfer and use of the parts washer shall be cleaned up immediately.
(c) The parts washer shall:
(1) Have a permanent conspicuous label summarizing the operating procedures in paragraphs (b)(1) - (b)(5) listed above. In addition, the label shall include the following discretionary good operating practices:
(i) Cleaned parts should be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining tipping, or rotating, the parts should be positioned so that the solvent drains directly back into the parts washer.
(ii) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
(iii) Work area fans should be located and positioned so that they do not blow across the opening of the parts washer.
(2) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. In the case of the remote reservoir parts washer, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.
# 006 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.63(a)]
(a) The permittee shall not use any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5 % VOC by weight, measured at 20 degrees C (68 degrees F) containing VOC.
(b) Paragraph (a) does not apply if the freeboard ratio is equal to or greater than 0.75.





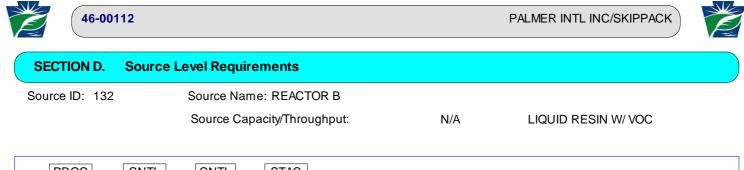
## # 007 [25 Pa. Code §127.441] Operating permit terms and conditions.

The following solvents shall not be used in the parts washer:

- (a) Methylene chloride (CAS No. 75-09-2)
- (b) Perchloroethylene (CAS No. 127-18-4)
- (c) Trichloroethylene (CAS No. 79-01-6)
- (d) 1,1,1-trichloroethane (CAS No. 71-55-6)
- (e) Carbon tetrachloride (CAS No. 56-23-5)
- (f) Chloroform (CAS No. 67-66-3)
- (g) Any combination of the above halogenated HAP solvents, in concentrations greater than 5.0 percent by weight.

## VII. ADDITIONAL REQUIREMENTS.

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





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

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

The average emission rate of volatile organic compounds (VOC), including all hazardous air pollutants (HAP), from Reactor B shall be limited to 0.81 lbs/hr following the Reactor B Condenser (Source ID C04) but prior to the TANN RTO (Source ID C06).

#### Throughput Restriction(s).

#### # 002 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) Reactor B shall only be used to produce Phenalkamine products.

(b) Reactor B shall be limited to a production rate (finished product) of 2,356 tons per 12-month rolling period.

## II. TESTING REQUIREMENTS.

## # 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Department reserves the right to require testing if the Department has just cause that emissions from Reactor B exceed the allowable controlled emission rate approved for this source. If necessary, testing could be required for Reactor B, the Reactor B Condenser, the TANN RTO (Source ID C06), or a combination of the three.

#### III. MONITORING REQUIREMENTS.

### # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following information per batch and on a monthly basis:

- (a) The amount of raw materials fed into the reactor;
- (b) The amount of product produced from the reactor;
- (c) The amount of condensate obtained from the condenser;
- (d) The amount of emissions emitted from the reactor; and,
- (e) The hours of the batch, including date, start time, and finish time.

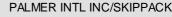
## IV. RECORDKEEPING REQUIREMENTS.

## # 005 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following information per batch and on a monthly basis:

- (1) The amount of raw materials fed into the reactor;
- (2) The amount of product produced from the reactor;
- (3) The amount of condensate obtained from the condenser;
- (4) The amount of emissions emitted from the reactor; and,





(5) The hours of the batch, including date, start time, and finish time.

(b) The permittee shall calculate and record the VOC and HAP emissions from the reactor on a monthly basis and as a 12month rolling sum. The permittee shall also record the emissions of formaldehyde separately on a monthly basis and as a 12-month rolling sum.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of all inspections and/or maintenance that is performed on the safety relief vents associated with the reactor, noting the settings.

### V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

## # 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All access panels and doors associated with the reactor shall be kept closed at all times except for during repairs and preventative maintenance or if the reactor is emptied of all VOC and HAP compounds.

### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall exhaust all process emissions from the reactor to the associated condenser (Source ID C04), followed by the TANN RTO (Source ID C06).

(b) The TANN RTO (Source ID C06) shall be operating at a minimum temperature of 1,550 °F before and during operation of the reactor.

(c) Emissions resulting from the dispensing of product into containers shall be captured and directed to the RTO.

(d) The permittee may not bypass the associated condenser and/or RTO unless there is an emergency situation where fumes cannot vent to the condenser and/or the RTO. If this occurs, the existing batch shall be completed and the reactor shall be shut down until the reactor can be properly exhausted to the associated condenser and RTO.

(e) Subparts (d) above does not exempt the permittee from complying with any emission limits applicable to the source.

(f) Subparts (a) - (d) above do not apply if the reactor is not producing any air contaminants.

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Before operation of the reactor begins:

(a) The associated condenser (Source ID C04) shall be working properly, in accordance with the conditions contained herein this plan approval.

(b) The TANN RTO (Source ID C06) shall have reached it's required minimum temperature. The RTO shall continue to operate at the required minimum temperature until the reactor, along with all other sources that exhaust to the RTO, has completed operation.

# 010 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) The safety relief vents associated with the reactor shall be installed according to manufacturer's specifications such that they do not result in fugitive emissions of VOC or HAP from the reactor.





(b) To ensure that the safety relief vents associated with the reactor are set properly, the permittee shall inspect and maintain the vents on a quarterly basis.

## VII. ADDITIONAL REQUIREMENTS.

# 011 [25 Pa. Code §127.441]

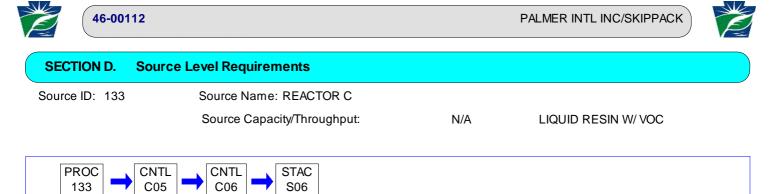
Operating permit terms and conditions.

Reactor B is custom made, with a maximum capacity of 3,708 gallons.

# 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

An "emergency situation" shall be defined as any deviation from routine operation inconsistent with the plans approved by the Department.



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

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

The average emission rate of volatile organic compounds (VOC), including all hazardous air pollutants (HAP), from Reactor C shall be limited to 4.94 lbs/hr following the Reactor C Condenser (Source ID C05) but prior to the TANN RTO (Source ID C06).

#### Throughput Restriction(s).

#### # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Reactor C shall be limited to a production rate (finished product) of 407 tons per 12-month rolling period.

#### II. TESTING REQUIREMENTS.

#### # 003 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The Department reserves the right to require testing if the Department has just cause that emissions from Reactor C exceed the allowable controlled emission rate approved for this source. If necessary, testing could be required for Reactor C, the Reactor C Condenser, the TANN RTO (Source ID C06), or a combination of the three.

#### III. MONITORING REQUIREMENTS.

### # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the following information per batch and on a monthly basis:

- (a) The amount of raw materials fed into the reactor;
- (b) The amount of product produced from the reactor;
- (c) The amount of condensate obtained from the condenser;
- (d) The amount of emissions emitted from the reactor;
- (e) The hours of the batch, including date, start time, and finish time; and,
- (f) The type of batch (i.e. Cashewthane or Phenalkamine).

#### IV. RECORDKEEPING REQUIREMENTS.

### # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall keep records of all inspections and/or maintenance that is performed on the safety relief vents associated with the reactor, noting the settings.

#### # 006 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the following information per batch and on a monthly basis:



- (1) The amount of raw materials fed into the reactor;
- (2) The amount of product produced from the reactor;
- (3) The amount of condensate obtained from the condenser;
- (4) The amount of emissions emitted from the reactor;
- (5) The hours of the batch, including date, start time, and finish time; and,
- (6) The type of batch (i.e. Cashewthane or Phenalkamine).

(b) The permittee shall calculate and record the VOC and HAP emissions from the reactor on a monthly basis and as a 12month rolling sum. The permittee shall also record the emissions of formaldehyde separately on a monthly basis and as a 12-month rolling sum.

## V. REPORTING REQUIREMENTS.

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

## VI. WORK PRACTICE REQUIREMENTS.

## # 007 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The permittee shall exhaust all process emissions from the reactor to the associated condenser (Source ID C05), followed by the TANN RTO (Source ID C06).

(b) The TANN RTO (Source ID C06) shall be operating at a minimum temperature of 1,550 °F before and during operation of the reactor.

(c) Emissions resulting from the dispensing of product into containers shall be captured and directed to the RTO.

(d) The permittee may not bypass the associated condenser and/or RTO unless there is an emergency situation where fumes cannot vent to the condenser and/or the RTO. If this occurs, the existing batch shall be completed and the reactor shall be shut down until the reactor can be properly exhausted to the associated condenser and RTO.

(e) Subparts (d) above does not exempt the permittee from complying with any emission limits applicable to the source.

(f) Subparts (a) - (d) above do not apply if the reactor is not producing any air contaminants.

## # 008 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Before operation of the reactor begins:

(a) The associated condenser (Source ID C05) shall be working properly, in accordance with the conditions contained herein this plan approval.

(b) The TANN RTO (Source ID C06) shall have reached it's required minimum temperature. The RTO shall continue to operate at the required minimum temperature until the reactor, along with all other sources that exhaust to the RTO, has completed operation.

## # 009 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

All access panels and doors associated with the reactor shall be kept closed at all times except for during repairs and preventative maintenance or if the reactor is emptied of all VOC and HAP compounds.

## # 010 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) The safety relief vents associated with the reactor shall be installed according to manufacturer's specifications such that they do not result in fugitive emissions of VOC or HAP from the reactor.





(b) To ensure that the safety relief vents associated with the reactor are set properly, the permittee shall inspect and maintain the vents on a quarterly basis.

## VII. ADDITIONAL REQUIREMENTS.

# 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Reactor C is custom made, with a maximum capacity of 660 gallons.

# 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

An "emergency situation" shall be defined as any deviation from routine operation inconsistent with the plans approved by the Department.

46-00112			PALMER INTL INC/SKIPPACK	Ž
SECTION D. Sour	ce Level Requirements			
Source ID: 134	Source Name: 10" BLUE TRANSFER	SYSTEM		
	Source Capacity/Throughput:	N/A	FRICTION PARTICLES	
PROC 134 → CNT C07				

## Control Device Efficiency Restriction(s).

#### # 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The filter receiver associated with this source shall only use bags/cartridges with a removal efficiency of 99.99 percent or better.

#### 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 temperature of gases entering the filter receiver associated with this source at a minimum of once per day when this source is in operation.

#### # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Using a Department approved method, the permittee shall monitor the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

## # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

A fabric filter bag leak detector (FFBLD) shall be used to monitor for excess emissions of PM from the filter receiver.

(a) Each triboelectric sensor probe shall be properly located, extending at least halfway across the duct cross-sectional area, and in a length of straight duct, two duct diameters downstream and one-half duct diameter upstream from any flow disturbances.

(b) There shall be proper insulation between each probe and its housing.

(c) The FFBLDs shall have proper sensitivity, response time, and alarm levels.

## IV. RECORDKEEPING REQUIREMENTS.

### # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The following records shall be maintained for the FFBLD:

(a) All maintenance, repairs, and testing of the FFBLD system shall be recorded. This includes initial calibrations at installation.





(b) Any instances where a FFBLD alarm is triggered, the facility shall document such cases and steps taken to resolve the situation.

(c) When response testing is performed on the FFBLDs, the response time shall be documented each time.

# 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall record the temperature of gases entering the filter receiver associated with this source at a minimum of once per day when this source is in operation.

#### # 007 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) Using a Department approved method, the permittee shall record the throughput or production of materials for this source on a daily and monthly basis when this source is in operation.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis and a 12-month rolling basis.

### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

## # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The temperature of the gases flowing into the filter receiver associated with this source shall not exceed 275 degrees Fahrenheit.

## # 009 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The 10" Blue Transfer System shall exhaust to the Bldg A Dry Side Dust Collector (Source ID C07) and the TANN RTO (Source ID C06) at all times that the source is operating.

### # 010 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The permittee shall keep on hand a sufficient quantity of spare filters or cartridges for the filter receiver associated with this source, in order to immediately replace any filters or cartridges when they require replacement.

# 011 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

All access panels and doors shall be closed during operations of this source.

### # 012 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The process shall be equipped with the following instrumentation:

(a) A FFBLD to monitor for excess emissions of PM from the filter receiver.

(1) The permittee shall maintain an appropriate cleaning and maintenance program, with regards to accumulation of PM on the triboelectric sensor probes.

(2) Response testing shall be performed on all FFBLDs on a monthly basis, unless it can be demonstrated on a unit-to-unit basis that lesser frequency of testing is sufficient and approved by the Department.

(b) A device, which has been approved by the Department, through which the temperature of the gases entering the filter



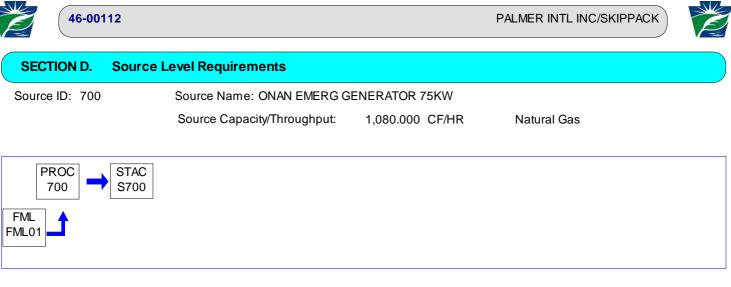


receiver associated with this source may be monitored and recorded.

## VII. ADDITIONAL REQUIREMENTS.

# 013 [25 Pa. Code §127.441] Operating permit terms and conditions.

The 10" Blue Transfer System is a pneumatic discharge line for the Turbo System (Source ID 111), with a filter receiver manufactured by MAC Process, Model No. 39RTC21. Material transferred from the Turbo System is transferred to the "Blue Transfer Bin".



## Emission Restriction(s).

### # 001 [25 Pa. Code §123.13]

### Processes

The permittee may not permit the emission into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

### # 002 [25 Pa. Code §123.21]

General

The permittee may not permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

# 003 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall limit total nitrogen oxide (NOx) emissions from this source and any other internal combustion engine that is installed without a Plan Approval to less than 100 lbs/hr, 1000 lbs/day, 2.75 tons per ozone season and 6.6 tons per year, based on a 12-month rolling basis.

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

## # 004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]

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

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

The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

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

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

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

For this source to meet the definition of an emergency generator in accordance with 40 CFR Part 63, Subpart ZZZZ, the source shall be operated in accordance with the most current version of 40 CFR § 63.6640(f). Operations not approved under the most current version of 40 CFR § 63.6640(f) are prohibited.

## 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.

# 006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625] Subpart ZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

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

This source shall be equipped with a functional, non-resettable hour meter to monitor the hours of operation of the engine.

#### IV. RECORDKEEPING REQUIREMENTS.

### # 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 63.6655(f)]

(a) The permittee shall keep records of the hours of operation of the engine each time that it is operated.

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

(c) The permittee shall maintain the necessary records required under 40 CFR § 63.6655(f) as it pertains to 40 CFR § 63.6640(f), which includes the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

# 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655] Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

What records must I keep?

(a) The permittee shall maintain the following records for this source:

(1) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or monitoring equipment.

(2) Records of all required maintenance performed on the source and on the monitoring equipment, including oil analysis and results.

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

(b) The permittee shall keep records of the maintenance conducted on the source in order to demonstrate that the source is operated and maintained according to source's maintenance plan.

(c) If the permittee participates in an oil analysis program pursuant to 40 CFR § 63.6625(i), the permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. Otherwise, the permittee shall maintain the necessary documentation to demonstrate compliance with the oil change requirements identified under Work Practice Requirements, pursuent to 40 CFR § 63.6640.

(d) The permittee must keep a copy of each notification and report that is submitted to comply with Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that is submitted, according to the requirement in §63.10(b)(2)(xiv).

### # 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6660]

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

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

(a) Records must be in a form suitable and readily available for expeditious review according to 40 CFR § 63.10(b)(1).





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

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

## V. REPORTING REQUIREMENTS.

# 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]

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

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

The permittee shall report each instance in which the source does not comply with oil change requirements, spark plug inspection requirements, and hoses and belt inspection requirements. These deviations must be reported according to the requirements in 40 CFR § 63.6650.

# 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6650]

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

What reports must I submit and when?

The permittee shall submit an annual report according to the requirements of 40 CFR § 63.6650(h), if applicable.

## VI. WORK PRACTICE REQUIREMENTS.

# 012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625] Subpart ZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal

Combustion Engines What are my monitoring, installation, operation, and maintenance requirements?

[Additional authority for this permit condition is also derived from 40 CFR § 63.6605]

(a) The permittee shall operate and maintain each RICE identified under Source ID 770 according to the manufacturer's emission-related written instructions or develop a source specific maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(b) If the permittee participates in an oil analysis program pursuant to 40 CFR 63.6625(i), the analysis program must be part of the maintenance plan for each engine.

# 013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]

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

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

[Additional authority for this permit condition is also derived from 40 CFR §§ 63.6603 and 63.6625]

(a) The following requirements apply to this source:

(1) The permittee shall change the oil and filter every 500 hours of operation or annually, whichever comes first;

(2) The permittee shall inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and,

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





(b) The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirements in paragraph (a), above. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following, such that the oil meets all applicable conditions:

(1) Total Acid Number, such that it is has not increased by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from the Total Acid Number of the oil when new;

(2) Viscosity, such that it has not changed more than 20% from the viscosity of the oil when new; and,

(3) Percent water content (by volume), such that it is not greater than 0.5.

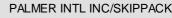
(c) If the permittee complies with all applicable parameters in paragraph (b) above, the permittee is not required to change the oil. If any of the parameters are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later.

### VII. ADDITIONAL REQUIREMENTS.

# 014 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) This source is an emergency generator manufactured by Onan, Model No. 75 OKR-15R131/19763J, rated 159 BHP.

(b) This source is subject to 40 CFR Part 63, Subpart ZZZZ.





46-00112

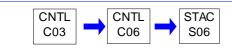
## SECTION D. Source Level Requirements

Source ID: C03

Source Name: REACTOR A CONDENSER

Source Capacity/Throughput:

N/A



## 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.

## # 001 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) The condenser shall be equipped with the necessary devices to monitor the following on a continuous basis, with an accuracy of +/- 1 degree Fahrenheit:

- (1) Inlet temperature of the liquid coolant
- (2) Inlet temperature of the incoming effluent gas
- (3) Outlet temperature of the outgoing effluent gas

(b) The permittee shall have the means to track the date and time associated with the temperature readings.

## IV. RECORDKEEPING REQUIREMENTS.

## # 002 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) The following shall be recorded on a continuous basis, with an accuracy of +/- 1 degree Fahrenheit:

- (1) Inlet temperature of the liquid coolant
- (2) Inlet temperature of the incoming effluent gas
- (3) Outlet temperature of the outgoing effluent gas

(b) The date and time shall be documented along with the temperature readings.

## 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.

# 003 [25 Pa. Code §127.441] Operating permit terms and conditions.

The condenser shall vent all effluent gases to the TANN RTO (Source ID C06).

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The condenser shall not use any ChloroFluoroCarbon (CFC) refrigerants.





## # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) When Reactor A is producing a Cashewthane product, the outlet temperature of the effluent gas shall not exceed 120°F.

(b) When Reactor A is producing a Phenalkamine product, the outlet temperature of the effluent gas shall not exceed 158°F.

(c) The inlet temperature of the liquid coolant shall be such that the outlet temperature of the effluent gas complies with the appropriate temperature limit.

#### # 006 [25 Pa. Code §127.441]

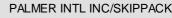
#### Operating permit terms and conditions.

(a) The condenser shall be designed and operated such that the emissions of VOC and HAP are minimized.

(b) Emissions resulting from the dispensing of condensate into storage containers shall be captured and directed to the TANN RTO (Source ID C06).

#### VII. ADDITIONAL REQUIREMENTS.

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





46-00112

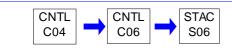
## SECTION D. Source Level Requirements

Source ID: C04

Source Name: REACTOR B CONDENSER

Source Capacity/Throughput:

N/A



## 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.

## # 001 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) The condenser shall be equipped with the necessary devices to monitor the following on a continuous basis, with an accuracy of +/- 1 degree Fahrenheit:

- (1) Inlet temperature of the liquid coolant
- (2) Inlet temperature of the incoming effluent gas
- (3) Outlet temperature of the outgoing effluent gas

(b) The permittee shall have the means to track the date and time associated with the temperature readings.

## IV. RECORDKEEPING REQUIREMENTS.

## # 002 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) The following shall be recorded on a continuous basis, with an accuracy of +/- 1 degree Fahrenheit:

- (1) Inlet temperature of the liquid coolant
- (2) Inlet temperature of the incoming effluent gas
- (3) Outlet temperature of the outgoing effluent gas

(b) The date and time shall be documented along with the temperature readings.

### 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.

# 003 [25 Pa. Code §127.441] Operating permit terms and conditions.

The condenser shall vent all effluent gases to the TANN RTO (Source ID C06).

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The condenser shall not use any ChloroFluoroCarbon (CFC) refrigerants.





## # 005 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) When Reactor B is producing a Phenalkamine product, the outlet temperature of the effluent gas shall not exceed 158°F.

(b) The inlet temperature of the liquid coolant shall be such that the outlet temperature of the effluent gas complies with the appropriate temperature limit.

#### # 006 [25 Pa. Code §127.441]

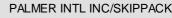
#### Operating permit terms and conditions.

(a) The condenser shall be designed and operated such that the emissions of VOC and HAP are minimized.

(b) Emissions resulting from the dispensing of condensate into storage containers shall be captured and directed to the TANN RTO (Source ID C06).

## VII. ADDITIONAL REQUIREMENTS.

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





46-00112

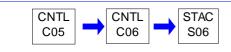
## SECTION D. Source Level Requirements

Source ID: C05

Source Name: REACTOR C CONDENSER

Source Capacity/Throughput:

N/A



## 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.

## # 001 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) The condenser shall be equipped with the necessary devices to monitor the following on a continuous basis, with an accuracy of +/- 1 degree Fahrenheit:

- (1) Inlet temperature of the liquid coolant
- (2) Inlet temperature of the incoming effluent gas
- (3) Outlet temperature of the outgoing effluent gas

(b) The permittee shall have the means to track the date and time associated with the temperature readings.

## IV. RECORDKEEPING REQUIREMENTS.

## # 002 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) The following shall be recorded on a continuous basis, with an accuracy of +/- 1 degree Fahrenheit:

- (1) Inlet temperature of the liquid coolant
- (2) Inlet temperature of the incoming effluent gas
- (3) Outlet temperature of the outgoing effluent gas

(b) The date and time shall be documented along with the temperature readings.

## 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.

# 003 [25 Pa. Code §127.441] Operating permit terms and conditions.

The condenser shall vent all effluent gases to the TANN RTO (Source ID C06).

## # 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The condenser shall not use any ChloroFluoroCarbon (CFC) refrigerants.





## # 005 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

(a) When Reactor C is producing a Cashewthane product, the outlet temperature of the effluent gas shall not exceed 120°F.

(b) When Reactor C is producing a Phenalkamine product, the outlet temperature of the effluent gas shall not exceed 158°F.

(c) The inlet temperature of the liquid coolant shall be such that the outlet temperature of the effluent gas complies with the appropriate temperature limit.

## # 006 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The condenser shall be designed and operated such that the emissions of VOC and HAP are minimized.

(b) Emissions resulting from the dispensing of condensate into storage containers shall be captured and directed to the TANN RTO (Source ID C06).

## VII. ADDITIONAL REQUIREMENTS.

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

46-00112			PALMER INTL INC/SKIPPACK	A
SECTION D. Source	Level Requirements			
Source ID: C06	Source Name: TANN RTO			
	Source Capacity/Throughput:	4,854.000 CF/HR	Natural Gas	
		53.190 Gal/HR	Propane	
$ \begin{array}{c} CNTL\\ C06 \end{array} \rightarrow STAC\\ S06 \end{array} $ FML FML01 FML FML03 FML FML03				

## Emission Restriction(s).

### # 001 [25 Pa. Code §123.13]

### Processes

The permittee may not permit the emission into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

#### # 002 [25 Pa. Code §123.21]

General

The permittee may not permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

## Fuel Restriction(s).

#### # 003 [25 Pa. Code §127.441] Operating permit terms and conditions.

The RTO shall use natural gas as the primary fuel. Propane shall only be used as the alternate fuel for this source.

## Control Device Efficiency Restriction(s).

### # 004 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The RTO shall maintain, at a minimum, a destruction efficiency of 98 percent for Volatile Organic Compounds (VOC), or a maximum concentration of 20 ppmv (as propane).

## II. TESTING REQUIREMENTS.

### # 005 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) Within 180 days of completing the installation of the RTO and commencing operation, the permittee shall perform a stack test on the RTO using Department approved procedures for stack testing, to determine compliance with the destruction efficiency requirement. Thereafter, testing shall be performed every five (5) years.

(b) The stack test shall, at a minimum, test for VOC at the inlet and outlet of the RTO to determine the destruction efficiency of the RTO. Tests shall be conducted in accordance with the provisions of EPA Method 25/25A (or equivalent) and 25 Pa. Code Chapter 139.

(c) At least 90 days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch indicating the location of the sampling ports and other data necessary to ensure the collection of representative samples.





(d) At least 30 days prior to the test, the permittee shall notify the Regional Air Quality Manager of the date and time of the test.

(e) Within 30 days after the source test, two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

#### III. MONITORING REQUIREMENTS.

## # 006 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

The permittee shall monitor the following for this source on a monthly basis when this source is in operation:

(a) The type of fuel consumed.

(b) The amount of each fuel consumed.

(c) The hours of operation.

## # 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The exiting combustion chamber flue gas temperature shall be continuously monitored.

#### IV. RECORDKEEPING REQUIREMENTS.

# 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The exiting combustion chamber flue gas temperature shall be continuously recorded.

# 009 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The permittee shall record the following for this source on a monthly basis when this source is in operation:

(a) The type of fuel consumed.

(b) The amount of each fuel consumed.

(c) The hours of operation.

## 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.

# 010 [25 Pa. Code §127.441] Operating permit terms and conditions.

The RTO shall be equipped with gauges for tracking fuel usage (both natural gas and propane).

# 011 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The RTO shall be equipped with a device, which has been approved by the Department, that continuously monitors and records the temperature of gases exiting the combustion chamber (zone).

### # 012 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The RTO shall reach a minimum temperature of 1,550 °F before processes are exhausted to it. The RTO shall continue to operate at 1,550 °F until all processes exhausting to it have been completed and shut down, unless a source is approved





#### for bypassing the RTO.

(b) The above temperature setting may be reduced if the permittee can demonstrate through stack testing that at a lower temperature the RTO can still comply with all the applicable emission limits and the minimum destruction efficiency requirements.

## # 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The RTO shall not be bypassed, unless approved by the Department.

#### VII. ADDITIONAL REQUIREMENTS.

## # 014 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The RTO shall be manufactured by TANN Corporation, Model No. TR 2092, or equivalent, with a maximum burner capacity of 5.0 MMBtu/hr.



PALMER INTL INC/SKIPPACK



## SECTION D. Source Level Requirements

Source ID: C07

Source Name: BLDG A DRY SIDE DUST COLLECTOR

Source Capacity/Throughput:

N/A



## I. RESTRICTIONS.

## Emission Restriction(s).

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

The dust collector shall restrict emissions of filterable particulate matter (PM) to 0.04 grains per dry standard cubic feet when bypassing the TANN RTO, when permitted to do so in accordance with this operating permit.

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13]

### II. TESTING REQUIREMENTS.

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

### III. MONITORING REQUIREMENTS.

# # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The dust collector shall be equipped with a device for monitoring the pressure differential across the dust collector filters.

(b) The permittee shall monitor the pressure drop across the dust collector filters once a day, when the dust collector is operating.

### IV. RECORDKEEPING REQUIREMENTS.

## # 003 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) The permittee shall record the pressure drop across the dust collector filters once a day, when the dust collector is operating.

(b) Whenever the dust collector bypasses the TANN RTO (Source ID C06), as approved herein this operating permit, the permittee shall document the following:

(1) Acknowledgement that the permittee meets each of the conditions for bypassing the TANN RTO, as reflected under Work Practice Requirements.

(2) Name of the person acknowledging the bypass.

(3) When the bypass starts and finishes, including date and time.

(4) Emissions of particulate matter and volatile organic compounds, in tons, on a monthly basis and as a 12-month rolling sum.

(c) The permittee shall maintain a logbook of the result of preventive maintenance performed on the dust collector,





including repairs to the dust collector, adjustments to the reverse pulse jets, and replacement of dust collector bags.

#### 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 pressure drop across the Bldg A Dust Collector filters shall remain within the range of 0.5 to 2.0 inches water guage.

## # 005 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

(a) Under normal operations, the Bldg A Dry Side Dust Collector shall vent to the TANN RTO (Source ID C06).

(b) The Bldg A Dry Side Dust Collector may be approved to bypass the TANN RTO on the conditions:

(1) The only sources operating are transferring, grinding, and screening operations; and,

(2) All other processes in Building A and Building B that are identified herein this operating permit that result in air pollution have discontinued operating for the day.

### # 006 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall keep on hand a sufficient quantity of spare dust collector bags for the control device, in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the sources and the control device.

### VII. ADDITIONAL REQUIREMENTS.

## # 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The dust collector is manufactured by Schenck Process, Model No. 55LSTC144 Style III.





SECTION E. Source Group Restrictions.



PALMER INTL INC/SKIPPACK



## SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





## SECTION G. Emission Restriction Summary.

Source Description	or		
TANN RTO			
		Pollutant	
PPMV	Determined on a dry basis	SOX	
gr/DRY FT3	Applies to filterable PM only	TSP	
BLDG A DRY SID	E DUST COLLECTOR		
		Pollutant	
gr/DRY FT3	Applies to filterable PM only	TSP	
	TANN RTO PPMV gr/DRY FT3	PPMV     Determined on a dry basis       gr/DRY FT3     Applies to filterable PM only       BLDG A DRY SIDE DUST COLLECTOR	TANN RTO         Pollutant         PPMV       Determined on a dry basis       SOX         gr/DRY FT3       Applies to filterable PM only       TSP         BLDG A DRY SIDE DUST COLLECTOR       Pollutant

## **Site Emission Restriction Summary**

Emission Limit		Pollutant
12.490 Tons/Yr	Total HAP; Building A and B sources; Determined on a 12-month rolling basis	Hazardous Air Pollutants
19.040 Tons/Yr	Building A and B sources; Determined on a 12-month rolling basis	TSP
9.710 Tons/Yr	Building A and B sources; Determined on a 12-month rolling basis	Formaldehyde
50.010 Tons/Yr	Building A and B sources; Determined on a 12-month rolling basis	СО
22.630 Tons/Yr	Building A and B sources; Determined on a 12-month rolling basis	Ammonia
37.190 Tons/Yr	Building A and B sources; Determined on a 12-month rolling basis	SOX
24.900 Tons/Yr	Site-wide Limit; Determined on a 12-month rolling period	NOX
23.160 Tons/Yr	Building A and B sources; Determined on a 12-month rolling basis	NOX
24.900 Tons/Yr	Site-wide Limit; Determined on a 12-month rolling period	VOC
21.000 Tons/Yr	Building A and B sources; Determined on a 12-month rolling basis	VOC



## SECTION H. Miscellaneous.

#001 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:

- (a) Ribbon Blender (Bldg A).
- (b) Building B Boiler (previously Source ID 220) and Two (2) Drum Heating Cabinets (Bldg B).
- (c) Quality Control Laboratory, Sigma Blade Mixer, and 90-liter Batch Pilot Reactor (Bldg C).
- (d) Distillation Unit (Bldg D).
- (e) R&D Laboratory (Bldg E).
- (f) Four roof top HVAC Units for the office building (125,000 BTU/hr total heat input).

#002 The permittee shall make a one time only calculation for each source listed in Condition #001 of this section to demonstrate that the sources are insignificant. The permittee shall keep these calculations on record, and these calculations will be compiled with other sources to demonstrate compliance with the applicable limits of this permit.

#003 Certain terms and conditions of this permit were derived through the incorporation of the following plan approvals into this State Only Operating Permit:

- (a) PA-46-0112 (APS No.: 334000, Auth ID: 340456)
- (b) PA-46-0112A (APS No.: 464771, Auth ID: 480360)
- (c) PA-46-0112B (APS No.: 473499, Auth ID: 490660)
- (d) PA-46-0112C (APS No.: 504101, Auth ID: 529518)

#004 This initial State Only Operating Permit (APS No.: 345671, Auth ID: 354477) incorporates Plan Approval Nos. PA-46-0112, PA-46-0112A, and PA-46-0112B.

#005 This State Only Operating Permit (APS No.: 345671, Auth ID: 712326) has been administratively amended to incorporate Plan Approval No. PA-46-0112C.

#006 This State Only Operating Permit (APS No. 345671, Auth ID: 858444) has been modified through a Minor Operating Permit Modification, to reduce the lower limit of pressure drop requirements under Source ID 106, and the removal of Source IDs 109 and 110. There shall be no increase in emissions of particulate matter (PM) as a result of this modification.

#007 This State Only Operating Permit (APS No.: 345671, Auth ID: 878153) has been renewed for another 5-year term. This State Only Operating Permit also incorporates the following Request for Determinations (RFD):

- (a) RFD No. 43, for a replacement parts washer; Source ID 131 replaces Source ID 124.
- (b) RFD No. 1672, for modifications to the Brown Holding System (Source ID 116).

#008 This State Only Operating Permit (APS No.: 345671, AUTH ID: 906340) has been administratively amended to incorporate Plan Approval No. 46-0112E.

#009 This State Only Operating Permit (APS No.: 345671, AUTH ID: 999204) has been administratively amended to incorporate Plan Approval No. 46-0112F. This State Only Operating Permit also incorporates Request for Determination (RFD) No. 3816, for the installation of a new, larger distillation stage two on the facility's cashew nutshell liquid (CNSL) distillation process.

#010 This State Only Operating Permit (APS No.: 345671, Auth ID: 1141034) has been renewed for another 5-year term. The following sources have been removed from Section D and are deemed insignificant, but require that the permittee still monitor and record the necessary data to demonstrate compliance with all applicable emission limits under Section C of the operating permit:

- (a) Source ID 220 (Bldg B Boiler), rated at 0.6 MMBtu/hr, operating on natural gas and propane.
- (b) Source ID 230 (Bldg C Boiler), rated at 0.8 MMBtu/hr, operating on natural gas and propane.

#011 This State Only Operating Permit (APS No.: 345671, Auth ID: 1359270) has been renewed for another 5-year term. This State Only Operating Permit also incorporates Request for Determination (RFD) No. 6014, for the installation of a 90 liter batch pilot reactor for research and development purposes.

#012 This State Only Operating Permit (APS No.: 345671, Auth ID: 1444522) has been amended to incorporate Plan Approval No. 46-0112H. This State Only Operating Permit also authorizes a de minimis increase in VOC emissions resulting during the Grinding and Screening Bypass scenario (Source ID 130).





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