



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: May 14, 2025

Effective Date: May 14, 2025

Expiration Date: November 30, 2026

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 construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval 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 plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 24-00012N

Federal Tax Id - Plant Code: 04-3583868-2

Owner Information

Name: GRAFTECH USA LLC
Mailing Address: 800 THERESIA ST
SAINT MARYS, PA 15857-1831

Plant Information

Plant: GRAFTECH USA LLC/ST MARYS
Location: 24 Elk County 24814 Saint Marys City
SIC Code: 3624 Manufacturing - Carbon And Graphite Products

Responsible Official

Name: TRAVIS M REED
Title: GENERAL MANAGER
Phone: (814) 781 - 2393 Email: Travis.Reed@graftech.com

Plan Approval Contact Person

Name: RACHEL KRIEG
Title: HSEP MANAGER
Phone: (814) 781 - 2221 Email: rachel.krieg@graftech.com

[Signature] _____
LORI L. MCNABB, NORTHWEST REGION AIR PROGRAM MANAGER



Plan Approval Description

The Department hereby authorizes plan approval 24-00012N to GrafTech USA, LLC for production changes at their facility in the City of Saint Marys, Elk County. This plan approval replaces 24-0012K which is no longer valid. This project proposes sources, control devices, and existing source modifications related to their change in the diameter of electrodes processed. The allowable coke sulfur content would be increased as part of this project and a SO₂ scrubber would be installed to control the associated emissions. The stack testing requirements of this plan approval differ from the plan approval it replaces.

GrafTech's Title V facility (TVOP 24-00012) is located at 800 Theresia Street in St Marys (15857). The facility is located near N 41° 25' 43", W -78° 33' 31". The site and application contact is Travis Reed who can be reached at 814-781-2393 and Travis.Reed@graftech.com. Another application contact is Rachel Krieg who can be reached at 814-781-2221 and Rachel.Krieg@graftech.com.



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

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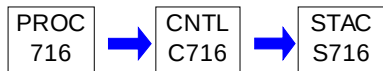
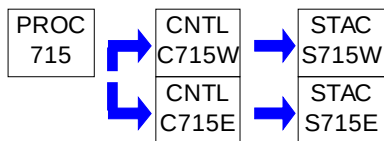
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**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
158	L.G. COKE SCREENING	20.000 Tons/HR	Coke
187	LONGITUDINAL GRAPHITIZERS (20) BLDG 800	5.000 Tons/HR	Carbon/Graphite
715	MACHINING OPERATIONS		
716	COLUMN BUILD END MILL		
717	INSPECTION CORING & PIN LINE MACHINING		
C158	LG COKE SCREENING BAGHOUSE		
C158A	NEW BAGHOUSE FOR COKE SCREENING		
C187	LONGITUDINAL GRAPHITIZERS S02 SCRUBBER		
C715E	BAGHOUSE		
C715W	BAGHOUSE		
C716	CARTRIDGE DUST COLLECTOR FOR COLUMN BUILD END MILL		
C717	BAGHOUSE FOR INSPECTION CORING & PIN LINE MACHINING		
S158A	NEW STACK FOR C158A BAGHOUSE		
S187	LONGITUDINAL GRAPHITIZERS		
S715E	STACK		
S715W	STACK		
S716	STACK FOR COLUMN BUILD END MILL		
S717	STACK FOR INSPECTION CORING & PIN LINE MACHINING		

PERMIT MAPS

**SECTION B. General Plan Approval Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

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

#002 [25 Pa. Code § 127.12b (a) (b)]**Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]**Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]**Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]**Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.12b]**Plan Approval terms and conditions.**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

#007 [25 Pa. Code § 127.32]**Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(a)(4) & 35 P.S. § 4008 & § 114 of the CAA]**Inspection and Entry**

(a) 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.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

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

#009 [25 Pa. Code 127.13a]**Plan Approval Changes for Cause**

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

(a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.

(b) 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.

(c) The permittee fails to submit a report required by this plan approval.

(d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

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

#011 [25 Pa. Code § 127.12c]**Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

Regional Air Program Manager

PA Department of Environmental Protection

(At the address given on the plan approval transmittal letter or otherwise notified)

#012 [25 Pa. Code § 127.12(a)(9) & 40 CFR Part 68]**Risk Management**

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:

**SECTION B. General Plan Approval Requirements**

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or the Environmental Protection Agency 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 plan approval 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.

#013 [25 Pa. Code § 127.25]**Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.



SECTION C. Site Level Plan Approval Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- a) No person may permit air pollution as that term is defined in the act.
- b) 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:
 - (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
 - (2) Equal to or greater than 60% at any time.
- c) The limitations of 123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:
 - (1) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
 - (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
 - (3) When the emission results from sources specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).
 - (4) Not applicable

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- a) The permittee shall conduct weekly inspections of the area surrounding the plant to detect the presence of fugitive emissions, visible emissions, and malodors. A log of these inspections shall be maintained and shall be made available to the Department upon request.
- b) Any fugitive emissions, visible emissions, and/or malodors that are detected by plant personnel shall be reported to the Shift Supervisor. The Shift Supervisor shall record the event on the maintenance log. Appropriate corrective action shall be taken and noted in the maintenance log.
- c) Visible emissions may be measured using either of the following:
 - (1) A device approved by the Department and maintained to provide accurate opacity measurements.
 - (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- a) All logs and required records shall be maintained on site for a minimum of five years and shall be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- a) If, for any reason, the permittee does not comply or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide the Department with the following information as soon as possible but no later than



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five (5) days after such conditions become know to the permittee:

- 1) description of non-compliance;
- 2) cause of non-compliance;
- 3) anticipated time the non-compliance is expected to continue or, if corrected, the actual duration of non-compliance;
- 4) steps taken by the permittee to minimize or eliminate the non-compliance; and
- 5) steps taken by the permittee to prevent recurrence of the non-compliance.

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- a) Each shipment of coke shall be accompanied by a certificate demonstrating that ASTM Methods for sulfur sampling of coke (ASTM Method C816-85 and/or Method D4294) have been performed, and that coke sulfur levels are in compliance with levels defined in this condition.
- b) The sulfur content of petroleum coke, by weight as received, shall be recorded.
- c) The sulfur content of metallurgical coke, by weight as received, shall be recorded.
- d) The sulfur content of coke received shall not exceed the highest coke sulfur content historically used during a Department approved stack testing program which demonstrated compliance with the emission restrictions of this plan approval except as provided in Condition e). The permittee may perform additional Department approved stack testing for SO_x and SO_x control efficiency while using a new coke sulfur content to demonstrate compliance with the emission restrictions of this plan approval and to establish a new coke sulfur content limit.
- e) GrafTech may request a small increase in the current coke sulfur content restriction. The request shall be accompanied by mass balance equations estimating the resulting increase in SO_x emissions from Source 187. The request may be approved at the Department's discretion.

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- a) Any information required to be submitted as part of this plan approval should be submitted to the attention of New Source Review Section Chief, Air Quality Program, Northwest Regional Office, 230 Chestnut Street, Meadville, PA 16335.
- b) Issuance of an Operating Permit or incorporation of a plan approval into a current Operating Permit is contingent upon satisfactory compliance with the plan approval conditions, upon the source and control device being installed and operated as stated within the application, and upon satisfactory demonstration that the emissions from the source will not be in violation of applicable Rules and Regulations of the Department.
- c) If at any time the Department has reason to believe that the air contaminant emissions are, or maybe, in excess of any applicable air contaminant emission limitation, the owner or operator shall conduct such stack tests or source tests requested by the Department to determine the actual air contaminant emission rate. The owner or operator shall perform any such testing in accordance with the applicable provisions of 25 Pa. Code, Chapter 139 (relating to sampling and testing) as well as in accordance with any additional requirements or conditions established by the Department at the time the owner or operator is notified, in writing, of the need to conduct testing.
- d) The existing sources contained in this plan approval will remain subject to the conditions of GrafTech's current operating permit unless said conditions are superseded by the conditions of plan approval 24-012N. Plan approval 24-012K is replaced by this plan approval and is no longer valid.

VIII. COMPLIANCE CERTIFICATION.



SECTION C. Site Level Plan Approval Requirements

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 158

Source Name: L.G. COKE SCREENING

Source Capacity/Throughput:

20.000 Tons/HR

Coke

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- a) No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of total particulate matter (TPM) (filterable only) in the effluent gas exceeds 0.02 grain per dry standard cubic foot.
- b) PM₁₀ emissions (filterable) emitted from the control device's stack shall not exceed:
- (1) 2.78 lbs/hr
 - (2) 12.17 tpy (calculated as a 12-month rolling total)

II. TESTING REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- a) Within 180 days after initial startup of the source, a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The stack test shall be performed while the source is operating at its maximum achievable or normal production rate as stated in the application. The stack test shall determine the PM₁₀ emission rate (filterable only, lb/hr and tpy) and the TSP emission rates (filterable only, gr/dscf) over three 1-hour segments (averaged).
- b) One electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager.
- Electronic copies shall be sent to the following e-mail addresses:
CENTRAL OFFICE:
RA-EPstacktesting@pa.gov
- NORTHWEST REGIONAL OFFICE:
RA-EPNWstacktesting@pa.gov
- c) At least 90 days prior to performing a stack test, a protocol shall be submitted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. Submit the protocol via the instructions in b). The protocol shall contain, at a minimum, location of sampling ports, planned production rates, and any other information applicable to the stack testing. Performing a stack test prior to Department approval of the protocol may invalidate the results.
- d) At least 2 weeks prior to the test, the Department shall be informed, in writing, of the date and time of the test.
- e) Within 60 days after completion of the test, the complete test report, including, but not limited to, production rates during testing, calculation methods and results, and any other applicable testing information that will allow for a complete review of the test and results, shall be submitted to the Department for approval. Submit the report via the instructions in b).
- f) Actions Related to Noncompliance Demonstrated by a Stack Test:
- (1) When the results of a stack test performed in conformance with this Condition exceed the level specified in any condition



SECTION D. Source Level Plan Approval Requirements

of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to the Department, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to the Department within thirty (30) days of receipt of the notice of deficiency. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(2) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to the Department that retesting in one hundred and twenty (120) days is not practicable, the Department may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

g) If, at any time, the Department has reason to believe that the air contaminant emissions from the source are, or may be, in excess of any applicable air contaminant emission limitation, the owner or operator shall conduct stack tests as are deemed necessary by the Department to determine the actual air contaminant emission rate. The owner or operator shall perform any such testing in accordance with the applicable provisions of 25 Pa. Code, Chapter 139 (relating to sampling and testing) as well as in accordance with any additional requirements or conditions established by the Department at the time the owner or operator is notified, in writing, of the need to conduct testing.

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION D. Source Level Plan Approval Requirements**

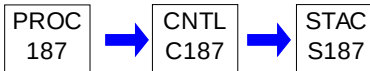
Source ID: 187

Source Name: LONGITUDINAL GRAPHITIZERS (20) BLDG 800

Source Capacity/Throughput:

5.000 Tons/HR

Carbon/Graphite

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.****a) SOx Emissions Restrictions:**

(1) SOx emissions from Source 187 directed to Stack 187 shall be reduced by 85% (at a minimum) by scrubber C187 when inlet SOx concentrations are equal to or greater than 100ppm.

(2) SOx emissions from C187 calculated as a 24-hour average shall not exceed 19.6 lb/hr.

(3) Annual SOx emissions from C187, calculated as a 12-month rolling total, shall not exceed 85.9 tpy.

b) PM10 emissions (filterable and condensable) from the stack exiting scrubber C187 shall not exceed the following:

(1) PM10 emissions calculated as a 24-hour average shall not exceed 6.33 lb/hr.

(2) Annual PM10 emissions, calculated as a 12-month rolling total, shall not exceed 27.74 tpy.

c) PM2.5 emissions (filterable and condensable) from the stack exiting scrubber C187 shall not exceed the following:

(1) PM2.5 emissions calculated as a 24-hour average shall not exceed 4.80 lb/hr.

(2) Annual PM2.5 emissions, calculated as a 12-month rolling total, shall not exceed 21.01 tpy.

d) VOC emissions from the stack exiting scrubber C187 shall not exceed the following:

(1) VOC emissions calculated as a 24-hour shall not exceed 4.50 lb/hr.

(2) Annual VOC emissions, calculated as a 12-month rolling total, shall not exceed 19.73 tpy.

e) CO emissions from the stack exiting scrubber C187 shall not exceed the following:

(1) CO emissions calculated as a 24-hour shall not exceed 614.53 lb/hr.

(2) Annual CO emissions, calculated as a 12-month rolling total, shall not exceed 2,705 tpy.

f) H2S emissions from the stack exiting scrubber C187 shall not exceed the following:

(1) H2S emissions calculated as a 24-hour average shall not exceed 0.03 lb/hr.

(2) Annual H2S emissions, calculated as a 12-month rolling total, shall not exceed 0.13 tpy.

g) The permittee shall not exceed the following emission rates from the building 800 monitor (internal resistance graphitizer) source:

(1) 18.3 lbs/hr of particulate matter

(2) 30.51 lbs/hr of SOx (24-hour average)

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(3) 544.8 lbs/hr of Carbon Monoxide

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

a) Within 60 days of achieving the source's normal production rate but no later than one hundred and eighty (180) days after source/control device startup, the permittee shall perform stack testing of the source/control device to determine the following:

(1) The control device's (C187) average SO_x control efficiency (when over 100 ppm) and the control devices' 24-hour PM₁₀, PM_{2.5}, SO_x, VOC, CO, H₂S, and H₂SO₄ emission rates (lb/hr, tpy).

i. Control efficiency shall be determined over three 1-hour segments (averaged) which compare the precontrol emissions rates to the stack emission rates when the control device inlet SO_x concentration exceeds 100 ppm.

ii. The 24-hour tests shall be conducted over three 8-hour segments (averaged).

(2) The stack test program shall determine the roof monitor's ("Gulper") SO₂, VOC, and CO emission rate averages (lb/hr, tpy) over three 1-hour runs.

Testing shall occur when the source is operating at its maximum achievable production rate. Stack testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.

b) One electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager.

Electronic copies shall be sent to the following e-mail addresses:

CENTRAL OFFICE:

RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE:

RA-EPNWstacktesting@pa.gov

c) At least 90 days prior to performing a stack test, a protocol shall be submitted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. Submit the protocol via the instructions in b). The protocol shall contain, at a minimum, location of sampling ports, planned production rates, and any other information applicable to the stack testing. Performing a stack test prior to Department approval of the protocol may invalidate the results.

d) At least 2 weeks prior to the test, the Department shall be informed, in writing, of the date and time of the test.

e) Within 60 days after completion of the test, the complete test report, including, but not limited to, production rates during testing, calculation methods and results, and any other applicable testing information that will allow for a complete review of the test and results, shall be submitted to the Department for approval. Submit the report via the instructions in b).

f) Actions Related to Noncompliance Demonstrated by a Stack Test:

(1) When the results of a stack test performed in conformance with this Condition exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to the Department, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to the Department within thirty (30) days of receipt of the notice of deficiency. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

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(2) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to the Department that retesting in one hundred and twenty (120) days is not practicable, the Department may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

g) If, at any time, the Department has reason to believe that the air contaminant emissions from the source are, or may be, in excess of any applicable air contaminant emission limitation, the owner or operator shall conduct stack tests as are deemed necessary by the Department to determine the actual air contaminant emission rate. The owner or operator shall perform any such testing in accordance with the applicable provisions of 25 Pa. Code, Chapter 139 (relating to sampling and testing) as well as in accordance with any additional requirements or conditions established by the Department at the time the owner or operator is notified, in writing, of the need to conduct testing.

h) Within twelve (12) to eighteen (18) months prior to the expiration of the facility operating permit, a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection and Conditions (a)-(g) above.

III. MONITORING REQUIREMENTS.**# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

a) The following parameters shall be monitored:

- (1) Scrubber liquid flow rate
- (2) Scrubber liquid pH
- (3) Inlet gas temperature

b) All monitoring devices employed must be capable of measuring the appropriate parameter over a range that extends at least 20 percent beyond the normal expected operating range of values for that parameter and be accurate within plus or minus two percent (+/- 2%) of full scale reading.

c) All monitoring devices employed shall be maintained, operated, and calibrated as recommended by the manufacturer. Calibrations shall occur at a minimum of once every 24 months.

d) All monitoring devices employed shall be readable from a convenient location.

IV. RECORDKEEPING REQUIREMENTS.**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

a) The permittee shall maintain a record of all preventive maintenance and inspections of the control device. The records shall include, at a minimum:

- (1) the dates of the inspections/maintenance,
- (2) the name of the person performing the inspection/maintenance,
- (3) the initials of the person performing the inspection/maintenance,
- (4) any problems or defects identified,
- (5) any actions taken to correct the problems or defects,
- (6) any routine maintenance performed,
- (7) and weekly visible inspections of the control device effluent for the presence of visible emissions.

b) The permittee shall continuously record the following operational data from the control device (these records may be done with strip charts, recorders, or data acquisition systems):

- (1) Scrubber liquid flow rate
- (2) Scrubber liquid pH
- (3) Inlet gas temperature

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c) Records of sulfur content analysis of each shipment of coke shall be maintained onsite for a minimum of five years and shall be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- a) The permittee shall operate the control device at all times that the source is in operation.
- b) The permittee shall maintain and operate the source and control device in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.
- c) The permittee shall adhere to the approved indicator range for the control device so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion. The approved indicator range for the following shall be determined during the initial performance test or any subsequently approved performance tests unless otherwise stated:
 - (1) Scrubber liquid flow rate
 - (2) Scrubber liquid pH
 - (3) Inlet gas temperature
- d) The permittee, with prior Departmental approval, may conduct additional performance tests to determine a new indicator range.
- e) The permittee shall install audible alarms which sound if the following monitored parameters leave their approved indicator ranges:
 - (1) Scrubber liquid flow rate
 - (2) Scrubber liquid pH
- f) The permittee shall perform preventative maintenance inspection of the control device including, but not limited to, the following:
 - (1) A weekly visible inspection of the control device's effluent for the presence of visible emissions.
 - (2) All other maintenance activities which shall be performed on the control device at the frequency recommended by the manufacturer.

VII. ADDITIONAL REQUIREMENTS.**# 006 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.1]****Sections of PART 64****Definitions**

The following definitions apply to this part. Except as specifically provided in this section, terms used in this part retain the meaning accorded them under the applicable provisions of the Act.

Act means the Clean Air Act, as amended by Pub.L. 101-549, 42 U.S.C. 7401, et seq.

Applicable requirement shall have the same meaning as provided under part 70 of this chapter.

Capture system means the equipment (including but not limited to hoods, ducts, fans, and booths) used to contain, capture and transport a pollutant to a control device.

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Continuous compliance determination method means a method, specified by the applicable standard or an applicable permit condition, which:

- (1) Is used to determine compliance with an emission limitation or standard on a continuous basis, consistent with the averaging period established for the emission limitation or standard; and
- (2) Provides data either in units of the standard or correlated directly with the compliance limit.

Control device means equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere. The types of equipment that may commonly be used as control devices include, but are not limited to, fabric filters, mechanical collectors, electrostatic precipitators, inertial separators, afterburners, thermal or catalytic incinerators, adsorption devices (such as carbon beds), condensers, scrubbers (such as wet collection and gas absorption devices), selective catalytic or non-catalytic reduction systems, flue gas recirculation systems, spray dryers, spray towers, mist eliminators, acid plants, sulfur recovery plants, injection systems (such as water, steam, ammonia, sorbent or limestone injection), and combustion devices independent of the particular process being conducted at an emissions unit (e.g., the destruction of emissions achieved by venting process emission streams to flares, boilers or process heaters). For purposes of this part, a control device does not include passive control measures that act to prevent pollutants from forming, such as the use of seals, lids, or roofs to prevent the release of pollutants, use of low-polluting fuel or feedstocks, or the use of combustion or other process design features or characteristics. If an applicable requirement establishes that particular equipment which otherwise meets this definition of a control device does not constitute a control device as applied to a particular pollutant-specific emissions unit, then that definition shall be binding for purposes of this part.

Data means the results of any type of monitoring or method, including the results of instrumental or non-instrumental monitoring, emission calculations, manual sampling procedures, recordkeeping procedures, or any other form of information collection procedure used in connection with any type of monitoring or method.

Emission limitation or standard means any applicable requirement that constitutes an emission limitation, emission standard, standard of performance or means of emission limitation as defined under the Act. An emission limitation or standard may be expressed in terms of the pollutant, expressed either as a specific quantity, rate or concentration of emissions (e.g., pounds of SO₂ per hour, pounds of SO₂ per million British thermal units of fuel input, kilograms of VOC per liter of applied coating solids, or parts per million by volume of SO₂) or as the relationship of uncontrolled to controlled emissions (e.g., percentage capture and destruction efficiency of VOC or percentage reduction of SO₂). An emission limitation or standard may also be expressed either as a work practice, process or control device parameter, or other form of specific design, equipment, operational, or operation and maintenance requirement. For purposes of this part, an emission limitation or standard shall not include general operation requirements that an owner or operator may be required to meet, such as requirements to obtain a permit, to operate and maintain sources in accordance with good air pollution control practices, to develop and maintain a malfunction abatement plan, to keep records, submit reports, or conduct monitoring.

Emissions unit shall have the same meaning as provided under part 70 of this chapter.

Exceedance shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Excursion shall mean a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.

Inherent process equipment means equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered a control device.

Major source shall have the same meaning as provided under part 70 or 71 of this chapter.

Monitoring means any form of collecting data on a routine basis to determine or otherwise assess compliance with

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emission limitations or standards. Recordkeeping may be considered monitoring where such records are used to determine or assess compliance with an emission limitation or standard (such as records of raw material content and usage, or records documenting compliance with work practice requirements). The conduct of compliance method tests, such as the procedures in appendix A to part 60 of this chapter, on a routine periodic basis may be considered monitoring (or as a supplement to other monitoring), provided that requirements to conduct such tests on a one-time basis or at such times as a regulatory authority may require on a non-regular basis are not considered monitoring requirements for purposes of this paragraph. Monitoring may include one or more than one of the following data collection techniques, where appropriate for a particular circumstance:

- (1) Continuous emission or opacity monitoring systems.
- (2) Continuous process, capture system, control device or other relevant parameter monitoring systems or procedures, including a predictive emission monitoring system.
- (3) Emission estimation and calculation procedures (e.g., mass balance or stoichiometric calculations).
- (4) Maintenance and analysis of records of fuel or raw materials usage.
- (5) Recording results of a program or protocol to conduct specific operation and maintenance procedures.
- (6) Verification of emissions, process parameters, capture system parameters, or control device parameters using portable or in situ measurement devices.
- (7) Visible emission observations.
- (8) Any other form of measuring, recording, or verifying on a routine basis emissions, process parameters, capture system parameters, control device parameters or other factors relevant to assessing compliance with emission limitations or standards.

Owner or operator means any person who owns, leases, operates, controls or supervises a stationary source subject to this part.

Part 70 or 71 permit shall have the same meaning as provided under part 70 or 71 of this chapter, provided that it shall also refer to a permit issued, renewed, amended, revised, or modified under any federal permit program promulgated under title V of the Act.

Part 70 or 71 permit application shall mean an application (including any supplement to a previously submitted application) that is submitted by the owner or operator in order to obtain a part 70 or 71 permit.

Permitting authority shall have the same meaning as provided under part 70 or 71 of this chapter.

Pollutant-specific emissions unit means an emissions unit considered separately with respect to each regulated air pollutant.

Potential to emit shall have the same meaning as provided under part 70 or 71 of this chapter, provided that it shall be applied with respect to an "emissions unit" as defined under this part in addition to a "stationary source" as provided under part 70 or 71 of this chapter.

Predictive emission monitoring system (PEMS) means a system that uses process and other parameters as inputs to a computer program or other data reduction system to produce values in terms of the applicable emission limitation or standard.

Regulated air pollutant shall have the same meaning as provided under part 70 or 71 of this chapter.

007 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.10]**Sections of PART 64****Savings provisions**

(a) Nothing in this part shall:

- (1) Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as

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part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.

(2) Restrict or abrogate the authority of the Administrator or the permitting authority to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.

(3) Restrict or abrogate the authority of the Administrator or permitting authority to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.

008 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.2]**Sections of PART 64****Applicability**

(a) General applicability. Except for backup utility units that are exempt under paragraph (b)(2) of this section, the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

(1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;

(2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and

(3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

(b) N/A

009 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.3]**Sections of PART 64****Monitoring design criteria**

(a) General criteria. To provide a reasonable assurance of compliance with emission limitations or standards for the anticipated range of operations at a pollutant-specific emissions unit, monitoring under this part shall meet the following general criteria:

(1) The owner or operator shall design the monitoring to obtain data for one or more indicators of emission control performance for the control device, any associated capture system and, if necessary to satisfy paragraph (a)(2) of this section, processes at a pollutant-specific emissions unit. Indicators of performance may include, but are not limited to, direct or predicted emissions (including visible emissions or opacity), process and control device parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities conducted by the owner or operator.

(2) The owner or operator shall establish an appropriate range(s) or designated condition(s) for the selected indicator(s) such that operation within the ranges provides a reasonable assurance of ongoing compliance with emission limitations or standards for the anticipated range of operating conditions. Such range(s) or condition(s) shall reflect the proper operation and maintenance of the control device (and associated capture system), in accordance with applicable design properties, for minimizing emissions over the anticipated range of operating conditions at least to the level required to achieve compliance with the applicable requirements. The reasonable assurance of compliance will be assessed by maintaining performance within the indicator range(s) or designated condition(s). The ranges shall be established in accordance with the design and performance requirements in this section and documented in accordance with the requirements in §64.4. If necessary to assure that the control device and associated capture system can satisfy this criterion, the owner or operator shall monitor appropriate process operational parameters (such as total throughput where necessary to stay within the

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rated capacity for a control device). In addition, unless specifically stated otherwise by an applicable requirement, the owner or operator shall monitor indicators to detect any bypass of the control device (or capture system) to the atmosphere, if such bypass can occur based on the design of the pollutant-specific emissions unit.

(3) The design of indicator ranges or designated conditions may be:

(i) Based on a single maximum or minimum value if appropriate (e.g., maintaining condenser temperatures a certain number of degrees below the condensation temperature of the applicable compound(s) being processed) or at multiple levels that are relevant to distinctly different operating conditions (e.g., high versus low load levels).

(ii) Expressed as a function of process variables (e.g., an indicator range expressed as minimum to maximum pressure drop across a venturi throat in a particulate control scrubber).

(iii) Expressed as maintaining the applicable parameter in a particular operational status or designated condition (e.g., position of a damper controlling gas flow to the atmosphere through a by-pass duct).

(iv) Established as interdependent between more than one indicator.

(b) Performance criteria. The owner or operator shall design the monitoring to meet the following performance criteria:

(1) Specifications that provide for obtaining data that are representative of the emissions or parameters being monitored (such as detector location and installation specifications, if applicable).

(2) For new or modified monitoring equipment, verification procedures to confirm the operational status of the monitoring prior to the date by which the owner or operator must conduct monitoring under this part as specified in §64.7(a). The owner or operator shall consider the monitoring equipment manufacturer's requirements or recommendations for installation, calibration, and start-up operation.

(3) Quality assurance and control practices that are adequate to ensure the continuing validity of the data. The owner or operator shall consider manufacturer recommendations or requirements applicable to the monitoring in developing appropriate quality assurance and control practices.

(4) Specifications for the frequency of conducting the monitoring, the data collection procedures that will be used (e.g., computerized data acquisition and handling, alarm sensor, or manual log entries based on gauge readings), and, if applicable, the period over which discrete data points will be averaged for the purpose of determining whether an excursion or exceedance has occurred.

(i) At a minimum, the owner or operator shall design the period over which data are obtained and, if applicable, averaged consistent with the characteristics and typical variability of the pollutant-specific emissions unit (including the control device and associated capture system). Such intervals shall be commensurate with the time period over which a change in control device performance that would require actions by owner or operator to return operations within normal ranges or designated conditions is likely to be observed.

(ii) For all pollutant-specific emissions units with the potential to emit, calculated including the effect of control devices, the applicable regulated air pollutant in an amount equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source, for each parameter monitored, the owner or operator shall collect four or more data values equally spaced over each hour and average the values, as applicable, over the applicable averaging period as determined in accordance with paragraph (b)(4)(i) of this section. The permitting authority may approve a reduced data collection frequency, if appropriate, based on information presented by the owner or operator concerning the data collection mechanisms available for a particular parameter for the particular pollutant-specific emissions unit (e.g., integrated raw material or fuel analysis data, noninstrumental measurement of waste feed rate or visible emissions, use of a portable analyzer or an alarm sensor).

(iii) For other pollutant-specific emissions units, the frequency of data collection may be less than the frequency specified in paragraph (b)(4)(ii) of this section but the monitoring shall include some data collection at least once per 24-hour period (e.g., a daily inspection of a carbon adsorber operation in conjunction with a weekly or monthly check of emissions with a portable analyzer).

(c) Evaluation factors. In designing monitoring to meet the requirements in paragraphs (a) and (b) of this section, the owner or operator shall take into account site-specific factors including the applicability of existing monitoring equipment and procedures, the ability of the monitoring to account for process and control device operational variability, the reliability and latitude built into the control technology, and the level of actual emissions relative to the compliance limitation.

(d) N/A

**SECTION D. Source Level Plan Approval Requirements****# 010 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.4]****Sections of PART 64****Submittal requirements**

(a) The owner or operator shall submit to the permitting authority monitoring that satisfies the design requirements in §64.3. The submission shall include the following information:

- (1) The indicators to be monitored to satisfy §§64.3(a)(1)-(2);
- (2) The ranges or designated conditions for such indicators, or the process by which such indicator ranges or designated conditions shall be established;
- (3) The performance criteria for the monitoring to satisfy §64.3(b); and
- (4) N/A

(b) As part of the information submitted, the owner or operator shall submit a justification for the proposed elements of the monitoring. If the performance specifications proposed to satisfy §64.3(b)(2) or (3) include differences from manufacturer recommendations, the owner or operator shall explain the reasons for the differences between the requirements proposed by the owner or operator and the manufacturer's recommendations or requirements. The owner or operator also shall submit any data supporting the justification, and may refer to generally available sources of information used to support the justification (such as generally available air pollution engineering manuals, or EPA or permitting authority publications on appropriate monitoring for various types of control devices or capture systems). To justify the appropriateness of the monitoring elements proposed, the owner or operator may rely in part on existing applicable requirements that establish the monitoring for the applicable pollutant-specific emissions unit or a similar unit. If an owner or operator relies on presumptively acceptable monitoring, no further justification for the appropriateness of that monitoring should be necessary other than an explanation of the applicability of such monitoring to the unit in question, unless data or information is brought forward to rebut the assumption. Presumptively acceptable monitoring includes:

- (1) Presumptively acceptable or required monitoring approaches, established by the permitting authority in a rule that constitutes part of the applicable implementation plan required pursuant to title I of the Act, that are designed to achieve compliance with this part for particular pollutant-specific emissions units;
- (2) Continuous emission, opacity or predictive emission monitoring systems that satisfy applicable monitoring requirements and performance specifications as specified in §64.3(d);
- (3) Excepted or alternative monitoring methods allowed or approved pursuant to part 75 of this chapter;
- (4) Monitoring included for standards exempt from this part pursuant to §64.2(b)(1)(i) or (vi) to the extent such monitoring is applicable to the performance of the control device (and associated capture system) for the pollutant-specific emissions unit; and
- (5) Presumptively acceptable monitoring identified in guidance by EPA. Such guidance will address the requirements under §§64.4(a)>64.4(a), (b), and (c) to the extent practicable.

(c) (1) Except as provided in paragraph (d) of this section, the owner or operator shall submit control device (and process and capture system, if applicable) operating parameter data obtained during the conduct of the applicable compliance or performance test conducted under conditions specified by the applicable rule. If the applicable rule does not specify testing conditions or only partially specifies test conditions, the performance test generally shall be conducted under conditions representative of maximum emissions potential under anticipated operating conditions at the pollutant-specific emissions unit. Such data may be supplemented, if desired, by engineering assessments and manufacturer's recommendations to justify the indicator ranges (or, if applicable, the procedures for establishing such indicator ranges). Emission testing is not required to be conducted over the entire indicator range or range of potential emissions.

(2) The owner or operator must document that no changes to the pollutant-specific emissions unit, including the control device and capture system, have taken place that could result in a significant change in the control system performance or

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the selected ranges or designated conditions for the indicators to be monitored since the performance or compliance tests were conducted.

(d) If existing data from unit-specific compliance or performance testing specified in paragraph (c) of this section are not available, the owner or operator:

(1) Shall submit a test plan and schedule for obtaining such data in accordance with paragraph (e) of this section; or

(2) May submit indicator ranges (or procedures for establishing indicator ranges) that rely on engineering assessments and other data, provided that the owner or operator demonstrates that factors specific to the type of monitoring, control device, or pollutant-specific emissions unit make compliance or performance testing unnecessary to establish indicator ranges at levels that satisfy the criteria in §64.3(a).

(e) If the monitoring submitted by the owner or operator requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of this part, the owner or operator shall include an implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring. The implementation plan and schedule shall provide for use of the monitoring as expeditiously as practicable after approval of the monitoring in the part 70 or 71 permit pursuant to §64.6, but in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit.

(f) If a control device is common to more than one pollutant-specific emissions unit, the owner or operator may submit monitoring for the control device and identify the pollutant-specific emissions units affected and any process or associated capture device conditions that must be maintained or monitored in accordance with § 4.3(a) rather than submit separate monitoring for each pollutant-specific emissions unit.

(g) If a single pollutant-specific emissions unit is controlled by more than one control device similar in design and operation, the owner or operator may submit monitoring that applies to all the control devices and identify the control devices affected and any process or associated capture device conditions that must be maintained or monitored in accordance with §64.3(a) rather than submit a separate description of monitoring for each control device.

011 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.5]**Sections of PART 64****Deadlines for submittals**

(a) Large pollutant-specific emissions units. For all pollutant-specific emissions units with the potential to emit (taking into account control devices to the extent appropriate under the definition of this term in §64.1) the applicable regulated air pollutant in an amount equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source, the owner or operator shall submit the information required under §64.4 at the following times:

(1) On or after April 20, 1998, the owner or operator shall submit information as part of an application for an initial part 70 or 71 permit if, by that date, the application either:

- (i) Has not been filed; or
- (ii) Has not yet been determined to be complete by the permitting authority.

(2) On or after April 20, 1998, the owner or operator shall submit information as part of an application for a significant permit revision under part 70 or 71 of this chapter, but only with respect to those pollutant-specific emissions units for which the proposed permit revision is applicable.

(3) The owner or operator shall submit any information not submitted under the deadlines set forth in paragraphs (a)(1) and (2) of this section as part of the application for the renewal of a part 70 or 71 permit.

(b) Other pollutant-specific emissions units. For all other pollutant-specific emissions units subject to this part and not subject to §64.5(a), the owner or operator shall submit the information required under §64.4 as part of an application for a renewal of a part 70 or 71 permit.

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(c) The effective date for the requirement to submit information under §64.4 shall be as specified pursuant to paragraphs (a)-(b) of this section and a permit reopening to require the submittal of information under this section shall not be required pursuant to §70.7(f)(1)(i) of this chapter, provided, however, that, if a part 70 or 71 permit is reopened for cause by EPA or the permitting authority pursuant to §70.7(f)(1)(iii) or (iv), or §71.7(f) or (g), the applicable agency may require the submittal of information under this section for those pollutant-specific emissions units that are subject to this part and that are affected by the permit reopening.

(d) Prior to approval of monitoring that satisfies this part, the owner or operator is subject to the requirements of §70.6(a)(3)(i)(B).

012 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.6]**Sections of PART 64****Approval of monitoring**

(a) Based on an application that includes the information submitted in accordance with §64.5, the permitting authority shall act to approve the monitoring submitted by the owner or operator by confirming that the monitoring satisfies the requirements in §64.3.

(b) In approving monitoring under this section, the permitting authority may condition the approval on the owner or operator collecting additional data on the indicators to be monitored for a pollutant-specific emissions unit, including required compliance or performance testing, to confirm the ability of the monitoring to provide data that are sufficient to satisfy the requirements of this part and to confirm the appropriateness of an indicator range(s) or designated condition(s) proposed to satisfy §64.3(a)(2) and (3) and consistent with the schedule in §64.4(e).

(c) If the permitting authority approves the proposed monitoring, the permitting authority shall establish one or more permit terms or conditions that specify the required monitoring in accordance with §70.6(a)(3)(i) of this chapter. At a minimum, the permit shall specify:

(1) The approved monitoring approach that includes all of the following:

- (i) The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);
- (ii) The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and
- (iii) The performance requirements established to satisfy §64.3(b) or (d), as applicable.

(2) The means by which the owner or operator will define an exceedance or excursion for purposes of responding to and reporting exceedances or excursions under §§64.7 and 64.8 of this part. The permit shall specify the level at which an excursion or exceedance will be deemed to occur, including the appropriate averaging period associated with such exceedance or excursion. For defining an excursion from an indicator range or designated condition, the permit may either include the specific value(s) or condition(s) at which an excursion shall occur, or the specific procedures that will be used to establish that value or condition. If the latter, the permit shall specify appropriate notice procedures for the owner or operator to notify the permitting authority upon any establishment or reestablishment of the value.

(3) The obligation to conduct the monitoring and fulfill the other obligations specified in §§64.7 through 64.9 of this part.

(4) If appropriate, a minimum data availability requirement for valid data collection for each averaging period, and, if appropriate, a minimum data availability requirement for the averaging periods in a reporting period.

(d) If the monitoring proposed by the owner or operator requires installation, testing or final verification of operational status, the part 70 or 71 permit shall include an enforceable schedule with appropriate milestones for completing such installation, testing, or final verification consistent with the requirements in §64.4(e).

(e) If the permitting authority disapproves the proposed monitoring, the following applies:

- (1) The draft or final permit shall include, at a minimum, monitoring that satisfies the requirements of §70.6(a)(3)(i)(B);

**SECTION D. Source Level Plan Approval Requirements**

(2) The permitting authority shall include in the draft or final permit a compliance schedule for the source owner to submit monitoring that satisfies §§64.3 and 64.4, but in no case shall the owner or operator submit revised monitoring more than 180 days from the date of issuance of the draft or final permit; and

(3) If the source owner or operator does not submit the monitoring in accordance with the compliance schedule as required in paragraph (e)(2) of this section or if the permitting authority disapproves the monitoring submitted, the source owner or operator shall be deemed not in compliance with part 64, unless the source owner or operator successfully challenges the disapproval.

013 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.7]**Sections of PART 64****Operation of approved monitoring**

(a) Commencement of operation. The owner or operator shall conduct the monitoring required under this part upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to §64.6(d).

(b) Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(d) Response to excursions or exceedances.

(1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(e) Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

**SECTION D. Source Level Plan Approval Requirements****# 014 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.8]****Sections of PART 64****Quality improvement plan (QIP) requirements**

(a) Based on the results of a determination made under §64.7(d)(2), the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with §64.6(c)(3), the part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

(b) Elements of a QIP:

(1) The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

(2) The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(i) Improved preventive maintenance practices.

(ii) Process operation changes.

(iii) Appropriate improvements to control methods.

(iv) Other steps appropriate to correct control performance.

(v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (b)(2)(i) through (iv) of this section).

(c) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(d) Following implementation of a QIP, upon any subsequent determination pursuant to §64.7(d)(2) the Administrator or the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(e) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

015 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.9]**Sections of PART 64****Reporting and recordkeeping requirements**

(a) General reporting requirements.

(1) On and after the date specified in §64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with §70.6(a)(3)(iii) of this chapter.

(2) A report for monitoring under this part shall include, at a minimum, the information required under §70.6(a)(3)(iii) of this chapter and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and



SECTION D. Source Level Plan Approval Requirements

(iii) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(b) General recordkeeping requirements.

(1) The owner or operator shall comply with the recordkeeping requirements specified in §70.6(a)(3)(ii) of this chapter. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

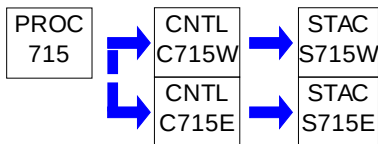
(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 715

Source Name: MACHINING OPERATIONS

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- a) No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of total particulate matter (TPM) (filterable only) in the effluent gas exceeds 0.02 grain per dry standard cubic foot.
- b) PM10 emissions (filterable) emitted from C715E and C715W combined shall not exceed:
- (1) 6.17 lbs/hr
 - (2) 27.03 tpy (calculated as a 12-month rolling total)

II. TESTING REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- a) Within 180 days after initial startup of the source, a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The stack test shall be performed while the source is operating at its maximum achievable or normal production rate as stated in the application. The stack test shall determine the PM10 emission rate (filterable only, lb/hr and tpy) and the TSP emission rates (filterable only, gr/dscf) over three 1-hour segments (averaged).
- b) One electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager.
- Electronic copies shall be sent to the following e-mail addresses:
CENTRAL OFFICE:
RA-EPstacktesting@pa.gov
- NORTHWEST REGIONAL OFFICE:
RA-EPNWstacktesting@pa.gov
- c) At least 90 days prior to performing a stack test, a protocol shall be submitted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. Submit the protocol via the instructions in b). The protocol shall contain, at a minimum, location of sampling ports, planned production rates, and any other information applicable to the stack testing. Performing a stack test prior to Department approval of the protocol may invalidate the results.
- d) At least 2 weeks prior to the test, the Department shall be informed, in writing, of the date and time of the test.
- e) Within 60 days after completion of the test, the complete test report, including, but not limited to, production rates during testing, calculation methods and results, and any other applicable testing information that will allow for a complete review of the test and results, shall be submitted to the Department for approval. Submit the report via the instructions in b).
- f) Actions Related to Noncompliance Demonstrated by a Stack Test:
- (1) When the results of a stack test performed in conformance with this Condition exceed the level specified in any condition

**SECTION D. Source Level Plan Approval Requirements**

of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to the Department, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to the Department within thirty (30) days of receipt of the notice of deficiency. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(2) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to the Department that retesting in one hundred and twenty (120) days is not practicable, the Department may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

g) If, at any time, the Department has reason to believe that the air contaminant emissions from the source are, or may be, in excess of any applicable air contaminant emission limitation, the owner or operator shall conduct stack tests as are deemed necessary by the Department to determine the actual air contaminant emission rate. The owner or operator shall perform any such testing in accordance with the applicable provisions of 25 Pa. Code, Chapter 139 (relating to sampling and testing) as well as in accordance with any additional requirements or conditions established by the Department at the time the owner or operator is notified, in writing, of the need to conduct testing.

III. MONITORING REQUIREMENTS.**# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The following are CAM related requirements for particulate matter:

(a) The permittee shall use the following approved process parameters or indicators to obtain data and monitor the emission control equipments performance:

- (1) Baghouses differential pressure;
- (2) Visible emission following EPA Method 22-like procedure.

(b) The permittee shall use the following approved means or devices to measure the applicable indicators:

- (1) Differential pressure gauges (Magnehelic gauges);
- (2) Visible emission following EPA, Method 22-like procedure.

(c) The permittee shall use the following approved frequencies for conducting monitoring of indicators:

- (1) Baghouses differential pressure - daily;
- (2) Visible emission following EPA, Method-22 like procedure - daily.

(d) The permittee shall use the approved period over which discrete data points for approved indicators will be collected and averaged for the purpose of determining an excursion:

(1) The pressure drop across the baghouses is monitored at the baghouses inlet and outlet. The safe ranges of pressure drop 0.2" to 5" of water column;

Any deviation of above restriction of pressure drop will be considered as excursion.

(2) Observation of visible emission from the stack will be performed by a designated employee and logged daily. Observer will write "Yes" for emission presence of any visible emission and write "No" if there was no visible emission observed.

**SECTION D. Source Level Plan Approval Requirements****# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The following are CAM related requirements:

- (a) The permittee shall record all inspections, repair and maintenance performed on the monitoring equipments.
- (b) The permittee shall record all excursions and corrective actions taken in response to an excursion and the time elapsed until corrective actions have been taken.
- (c) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, possible causes and corrective actions taken for the incidents.
- (d) The permittee shall keep all records for a period of five (5) years and make the records available to the Department upon request.

[Additional authority for the above permit conditions are also derived from 40 CFR §64.9]

005 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The following are CAM related requirements:

- (a) The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the devices:
 - (1) The permittee shall, for an approved device(s), install detectors or sensors at a location approved by the Department for obtaining data that are representative of the monitored indicator;
 - (2) The permittee shall develop verification procedures to confirm the operational status of new or modified monitoring equipment prior to commencement of the monitoring process.

[Additional authority for the following permit conditions are also derived from 40 CFR §64.3]

- (b) The permittee shall maintain all monitoring equipment and stock parts necessary for routine repairs onsite.
- (c) The permittee shall ensure that at least 90% of the monitoring data has been properly and accurately collected.
- (d) The permittee shall submit an implementation plan and schedule if the approved monitoring requires the installation, testing or other necessary activities. The schedule for completing installation and beginning operation on monitoring may not exceed 180 days after the issuance date of the permit.

[Additional authority for this permit condition is also derived from 40 CFR §64.4]

IV. RECORDKEEPING REQUIREMENTS.**# 006 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- a) The permittee shall maintain a record of all preventative maintenance inspections of the control devices. These records shall, at a minimum, contain the dates of the inspections, any problems or defects, the actions taken to correct the problem or defects, and any routine maintenance performed.

007 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) The permittee shall keep a record the pressure drop of both control devices every day.

**SECTION D. Source Level Plan Approval Requirements**

(b) The permittee shall observe and keep a record of visible emission from the stack of both control devices

V. REPORTING REQUIREMENTS.

008 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The following conditions are related to CAM Rule:

(a) The permittee shall report all excursions and corrective actions taken, the dates, times, durations and possible causes, every six (6) months.

[Additional authority for this permit condition is also derived from 40 CFR §64.9 & §70.6(a)(3)(iii)(A)]

(b) The permittee shall report all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable), their dates, times and durations, possible causes and corrective actions taken, every six (6) months.

[Additional authority for this permit condition is also derived from 40 CFR §64.9]

VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The permittee shall perform a daily operational inspection of the control devices. The operational inspection shall include, at a minimum, recording the pressure drop across the control devices and a visual inspection of the system for leaks, etc. In the event that the pressure drop is out of specification, the baghouse will be inspected by the use of a black light and all defective filters replaced. The operating range for pressure drop across the baghouses shall be maintained between 0.2" and 5.0" w.c.

(b) The permittee shall maintain manometers or similar devices to measure the pressure drop across the control devices.

(c) The permittee shall operate the control devices at all times that the source is operation.

(d) The permittee shall maintain and operate the source and control devices in accordance with the manufacturers' specifications and in accordance with good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

010 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The following conditions are related to CAM rule:

(a) The permittee shall develop and implement a quality improvement plan (QIP) as expeditiously as practicable if any of the following occurs:

(1) Six excursions occur in a six-month reporting period;

(2) The Department determines after review of all reported information that the permittee has not responded acceptably to an excursion.

[Additional authority for the following permit conditions are also derived from 40 CFR §64.8]

(b) In general, the QIP plan should be developed within 60 days and the permittee shall provide a copy of QIP to the

**SECTION D. Source Level Plan Approval Requirements**

Department. Furthermore the permittee shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

(c) The permittee shall record actions taken to implement a QIP during a reporting period and all related actions including, but not limited to inspections, repairs and maintenance performed on the monitoring equipment.

[Additional authority for this permit condition is also derived from 40 CFR § 64.9]

(d) In accordance with 40 CFR § 64.8, the QIP shall include procedures for evaluating the control performance problems. Based on the results of the evaluation procedures, the permittee shall modify the QIP, and provide a copy to the Department, to include procedures for conducting more frequent or improved monitoring in connection with one or more of the following:

- (1) Improved preventive maintenance practices;
- (2) Process operation changes;
- (3) Appropriate improvements to control methods;
- (4) Other steps appropriate to correct performances.

[Additional authority for this permit condition is also derived from 40 CFR § 64.9]

(e) Following implementation of a QIP, the Department will require reasonable revisions to the QIP if the plan has failed to either:

- (1) Address the cause of the control devices performance problem;
- (2) Provide adequate procedures for correcting control devices performance problems in as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

(f) Implementation of a QIP, shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under any federal, state, or local laws or any other applicable requirements under the Clean Air Act.

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 716

Source Name: COLUMN BUILD END MILL

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- a) No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of total particulate matter (TPM) (filterable only) in the effluent gas exceeds 0.005 grain per dry standard cubic foot.
- b) PM10 emissions (filterable) emitted from the control device's stack shall not exceed:
- (1) 0.21 lbs/hr
 - (2) 0.94 tpy (calculated as a 12-month rolling total)

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- a) A magnehelic gauge or equivalent shall be maintained and operated to monitor the pressure differential across the filter media.

IV. RECORDKEEPING REQUIREMENTS.**# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- a) The permittee shall maintain a record of all preventive maintenance and inspections of the control device. The records shall include, at a minimum:
- i. the dates of the inspections/maintenance,
 - ii. the name of the person performing the inspection/maintenance,
 - iii. the initials of the person performing the inspection/maintenance,
 - iv. any problems or defects identified,
 - v. any actions taken to correct the problems or defects,
 - vi. any routine maintenance performed,
 - vii. visual inspections of the control device's interior for dislodged bags/cartridges, bag/cartridge wear, and dust build-up inside the control device,
 - viii. and weekly visible inspections of the control device effluent for the presence of visible emissions.
- b) The permittee shall record the following operational data from the control device (these records may be done with strip charts recorders, data acquisition systems, or manual log entries):
1. Pressure differential - daily defined as once per calendar day, when the source is in operation.
- c) The permittee shall maintain a quarterly inventory of the number of spare bags/cartridges.

**SECTION D. Source Level Plan Approval Requirements****V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

All gauges employed must be capable of measuring the appropriate parameter over a range that extends at least 20 percent beyond the normal expected operating range of values for that parameter. shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (+/- 2%) of full scale reading. The permittee shall maintain, calibrate, and operate the following:

- (1) A magnehelic gauge or equivalent to measure the pressure differential across the filter media.
- b) The permittee shall operate the control device at all times that the source is in operation.
- c) The permittee shall maintain and operate the source and control device in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.
- d) The permittee shall adhere to the recommended indicator range for the control device from the manufacturer.
- e) The permittee shall perform preventative maintenance inspections of the control device including, but not limited to, the following:
 - (1) A visual inspection of the control device's interior for dislodged bags/cartridges, filter media wear, and dust build-up inside the control device. The visual inspection is to occur once every 6 months at a minimum.
 - (2) A weekly visible inspection of the control device's effluent for the presence of visible emissions.
 - (3) All other maintenance activities which shall be performed on the control device at the frequency recommended by the manufacturer.
- f) The owner/operator shall retain on site a number of spare bags/cartridges equal to 10% the bags/cartridges in use or a number of spare bags/cartridges as recommended by the manufacturer of the control device, whichever is greater.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 717

Source Name: INSPECTION CORING & PIN LINE MACHINING

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

a) No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of total particulate matter (TPM) (filterable only) in the effluent gas exceeds 0.005 grain per dry standard cubic foot.

b) PM₁₀ emissions (filterable) emitted from the control device's stack shall not exceed:

(1) 1.68 lbs/hr

(2) 7.36 tpy (calculated as a 12-month rolling total)

II. TESTING REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

a) Within 180 days after initial startup of the source, a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The stack test shall be performed while the source is operating at its maximum achievable or normal production rate as stated in the application. The stack test shall determine the PM₁₀ emission rate (filterable only, lb/hr and tpy) and the TSP emission rates (filterable only, gr/dscf) over three 1-hour segments (averaged).

b) One electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager.

Electronic copies shall be sent to the following e-mail addresses:

CENTRAL OFFICE:

RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE:

RA-EPNWstacktesting@pa.gov

c) At least 90 days prior to performing a stack test, a protocol shall be submitted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. Submit the protocol via the instructions in b). The protocol shall contain, at a minimum, location of sampling ports, planned production rates, and any other information applicable to the stack testing. Performing a stack test prior to Department approval of the protocol may invalidate the results.

d) At least 2 weeks prior to the test, the Department shall be informed, in writing, of the date and time of the test.

e) Within 60 days after completion of the test, the complete test report, including, but not limited to, production rates during testing, calculation methods and results, and any other applicable testing information that will allow for a complete review of the test and results, shall be submitted to the Department for approval. Submit the report via the instructions in b).

f) Actions Related to Noncompliance Demonstrated by a Stack Test:

**SECTION D. Source Level Plan Approval Requirements**

(1) When the results of a stack test performed in conformance with this Condition exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to the Department, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to the Department within thirty (30) days of receipt of the notice of deficiency. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(2) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to the Department that retesting in one hundred and twenty (120) days is not practicable, the Department may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

g) If, at any time, the Department has reason to believe that the air contaminant emissions from the source are, or may be, in excess of any applicable air contaminant emission limitation, the owner or operator shall conduct stack tests as are deemed necessary by the Department to determine the actual air contaminant emission rate. The owner or operator shall perform any such testing in accordance with the applicable provisions of 25 Pa. Code, Chapter 139 (relating to sampling and testing) as well as in accordance with any additional requirements or conditions established by the Department at the time the owner or operator is notified, in writing, of the need to conduct testing.

h) Within twelve (12) to eighteen (18) months prior to the expiration of the facility operating permit, a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection and Conditions (a)-(g) above.

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

a) A magnehelic gauge or equivalent shall be maintained and operated to monitor the pressure differential across the filter media.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

a) The permittee shall maintain a record of all preventive maintenance and inspections of the control device. The records shall include, at a minimum:

- i. the dates of the inspections/maintenance,
- ii. the name of the person performing the inspection/maintenance,
- iii. the initials of the person performing the inspection/maintenance,
- iv. any problems or defects identified,
- v. any actions taken to correct the problems or defects,
- vi. any routine maintenance performed,
- vii. monthly visual inspections of the control device's interior for dislodged bags/cartridges, bag/cartridge wear, and dust build-up inside the control device,
- viii. and weekly visible inspections of the control device effluent for the presence of visible emissions.

b) The permittee shall record the following operational data from the control device (these records may be done with strip charts recorders, data acquisition systems, or manual log entries):

1. Pressure differential - daily defined as once per calendar day, when the source is in operation.

c) The permittee shall maintain a quarterly inventory of the number of spare bags/cartridges.

**SECTION D. Source Level Plan Approval Requirements****V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- a) All gauges employed must be capable of measuring the appropriate parameter over a range that extends at least 20 percent beyond the normal expected operating range of values for that parameter. shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (+/- 2%) of full scale reading. The permittee shall maintain, calibrate, and operate the following:
- (1) A magnehelic gauge or equivalent to measure the pressure differential across the filter media.
- b) The permittee shall operate the control device at all times that the source is in operation.
- c) The permittee shall maintain and operate the source and control device in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.
- d) The permittee shall adhere to the approved indicator range for the control device so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion. The approved indicator range for the following shall be determined during the initial performance test or any subsequently approved performance tests unless otherwise stated:
- (1) Pressure differential determined during initial stack testing
- e) The permittee, with prior Departmental approval, may conduct additional performance tests to determine a new pressure differential range.
- f) Within 24-hours of discovery of a reading outside of the prescribed range the permittee shall perform a maintenance inspection on the control device and take corrective action. Records of all maintenance inspections on the control device, excursions, and corrective actions taken, shall be maintained on site for a minimum period of five years and made available to the Department upon request.
- g) The permittee shall perform preventative maintenance inspections of the control device including, but not limited to, the following:
- (1) A visual inspection of the control device's interior for dislodged bags/cartridges, filter media wear, and dust build-up inside the control device. The visual inspection is to occur once every 6 months at a minimum.
 - (2) A weekly visible inspection of the control device's effluent for the presence of visible emissions.
 - (3) All other maintenance activities which shall be performed on the control device at the frequency recommended by the manufacturer.
- h) The owner/operator shall retain on site a number of spare bags/cartridges equal to 10% the bags/cartridges in use or a number of spare bags/cartridges as recommended by the manufacturer of the control device, whichever is greater.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).



SECTION E. Source Group Plan Approval Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
158	L.G. COKE SCREENING		
Emission Limit			Pollutant
2.780	Lbs/Hr	Filterable	PM10
12.170	Tons/Yr	Filterable	PM10
0.020	gr/DRY FT3	Filterable	TSP
187	LONGITUDINAL GRAPHITIZERS (20) BLDG 800		
Emission Limit			Pollutant
544.800	Lbs/Hr	Roof Monitor	CO
614.530	Lbs/Hr	Stack	CO
2,705.000	Tons/Yr	Stack	CO
0.030	Lbs/Hr	Stack	Hydrogen Sulfide
0.130	Tons/Yr	Stack	Hydrogen Sulfide
6.330	Lbs/Hr	Stack	PM10
27.740	Tons/Yr	Stack	PM10
4.800	Lbs/Hr	Stack	PM2.5
21.010	Tons/Yr	Stack	PM2.5
19.600	Lbs/Hr	Stack	SOX
30.510	Lbs/Hr	Roof Monitor	SOX
85.900	Tons/Yr	Stack	SOX
145.400	Tons/Yr	Stack	SOX
18.300	Lbs/Hr	Roof Monitor	TSP
4.500	Lbs/Hr	Stack	VOC
19.730	Tons/Yr	Stack	VOC
715	MACHINING OPERATIONS		
Emission Limit			Pollutant
6.170	Lbs/Hr	Filterable	PM10_FILT
27.030	Tons/Yr	Filterable	PM10_FILT
0.020	gr/DRY FT3	Filterable	TSP
716	COLUMN BUILD END MILL		
Emission Limit			Pollutant
0.210	Lbs/Hr	Filterable	PM10
0.940	Tons/Yr	Filterable	PM10
0.005	gr/DRY FT3	Filterable	TSP
717	INSPECTION CORING & PIN LINE MACHINING		
Emission Limit			Pollutant
1.680	Lbs/Hr	Filterable	PM10
7.360	Tons/Yr	Filterable	PM10
0.005	gr/DRY FT3	Filterable	TSP

**SECTION G. Emission Restriction Summary.****Site Emission Restriction Summary**

Emission Limit	Pollutant
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**SECTION H. Miscellaneous.**

Stack testing used to comply with plan approval 24-00012K may be used to comply with this plan approval if changes have not been made to the source, control device, or method of operation since the stack testing occurred.

Miscellaneous Source(s)

1. Spacer Saw & Cleaning Machine

- controlled by a dust collector less than 2,000 dscfm in size
- vented indoors



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