

Issue Date:

December 17, 2024

December 17, 2024



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

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Effective Date:

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations. The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions					
in this permit are federally enforceable unless					
	<mark>ly Permit No: 15-00027</mark> Synthetic Minor				
	d - Plant Code: 23-0411710-3				
(	Owner Information				
Name: JOHNSON MATTHEY INC					
Mailing Address: 456 DEVON PARK DR					
WAYNE, PA 19087-1816					
	Plant Information				
Plant: JOHNSON MATTHEY/WAYNE PLT					
Location: 15 Chester County	15952 Tredyffrin Township				
SIC Code: 3714 Manufacturing - Motor Vehicle Parts A	nd Accessories				
R	esponsible Official				
Name: ZACHERY TAORMINA					
Title: PLANT MANAGER					
Phone: (484) 531 - 3567	Email: zachery.taormina@jmusa.com				
Pe	rmit Contact Person				
Name: DENIS BRODERICK Title: EH&S ENGINEER					
Phone: (610) 341 - 8337	Email: Denis.Broderick@jmusa.com				
[Signature]					
JAMES D. REBARCHAK, SOUTHEAST REGION AIR F	PROGRAMMANAGER				





# **SECTION A. Table of Contents**

#### Section A. Facility/Source Identification

Table of Contents Site Inventory List

#### Section B. General State Only Requirements

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

#### Section C. Site Level State Only Requirements

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

#### Section D. Source Level State Only Requirements

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

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

#### Section E. Source Group Restrictions

E-I: Restrictions

15-00027



- SECTION A. Table of Contents
  - E-II: Testing Requirements
  - E-III: Monitoring Requirements
  - E-IV: Recordkeeping Requirements
  - E-V: Reporting Requirements
  - E-VI: Work Practice Standards
  - E-VII: Additional Requirements

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

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

#### Section G. Emission Restriction Summary

Section H. Miscellaneous





**SECTION A.** Site Inventory List

Source ID Source Name		Capacity/Throughput		Fuel/Material	
103	DEVON I PRODUCTION AREA	1,000.000	Lbs/HR	COATINGS	
	-	120.000	Sq Ft/HR	AUTOCATALYSTS	
104	ENGINE TEST CELLS (6)	27.000	Gal/HR	Gasoline	
115	DEVON II QC LAB SAMPLE EQUIPMENT		N/A	AUTOCATALYSTS	
117	POWDER HANDLING EQUIPMENT (SYSTEM I)	300.000	Lbs/HR	AUTOCATALYSTS	
119	POWDER HANDLING EQUIPMENT (DEVON II)	300.000	Lbs/HR	AUTOCATALYSTS	
128	LINE 17 COATING PROCESS (DEVON III)		N/A	COATING	
129	LINE 10 COATING PROCESS (DEVON III)		N/A	PRECIOUS METALS/CER.	
130	LINE 11 COATING PROCESS (DEVON III)		N/A	PRECIOUS METALS/CER.	
136	LINE 14 2-STAGE DOSING STATION		N/A	WASHCOATS	
137	LINE 15 2-STAGE DOSING STATION		N/A	WASHCOATS	
140	WASHCOAT BATCH PROCESS	500.000	Lbs/HR	POWDER	
199	650-KW BACKUP DIESEL GENERATOR	45.800	Gal/HR	Diesel Fuel	
200A	400-KW DIESEL EMERGENCY GENERATOR	29.200	Gal/HR	Diesel Fuel	
203	LINE 14 DRYING & CALCINING		N/A	SUBSTRATE W/CATALYTI	
204	LINE 15 DRYING & CALCINING		N/A	SUBSTRATE W/CATALYTI	
302	WASHCOAT BLENDING TANKS	2,000.000	Lbs/HR	WASHCOAT	
732	EMERGENCY GENERATOR (DETROIT 650 KW)	46.300	Gal/HR	Diesel Fuel	
735A	GAS FIRED HEATERS	5.500	MCF/HR	Natural Gas	
997	GASOLINE STORAGE TANKS		N/A	GASOLINE	
C010A	DUST COLLECTOR III (POWDER HANDLING)				
C010B	DUST COLLECTOR IV (POWDER HANDLING)				
C012B	SCR SYSTEM (DEVON III)				
C012C	AMMONIA SCRUBBER (DEVON III)				
C013C	DEVON III AREA DUST COLLECTOR	4.000	Lbs/HR	POWDER	
C015A	BLENDING TANKS DUST COLLECTOR 3				
C017	LINE 14 OVENS NOX SCRUBBER				
C018	LINE 14 AMMONIA SCRUBBER				
C019	LINE 15 AMMONIA SCRUBBER				
C020	LINE 14 SCR SYSTEM				
C021	LINE 15 SCR SYSTEM				
C06	DUST COLLECTOR I (SAMPLE PREPARATION)				
C08A1	CAMFIL FARR DUST COLLECTOR FOR PROC 117				
C140	DUST COLLECTOR FOR WASHCOAT BATCH				
FML01	PROCESS DIESEL FUEL TANK, DEVON II EAST				
	DIESEL STORAGE TANK, DEVON II EAST				
FML02 FML04	DIESEL STORAGE TANK, DEVON III WEST				
FML05	NATURAL GAS SUPPLY				
FML07	GASOLINE STORAGE TANK A (6,000 GAL)				
FML08	DIESEL STORAGE TANK B				

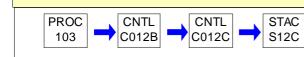




# SECTION A. Site Inventory List

Source ID Source Name		Capacity/Throughput	Fuel/Material
FML09	DIESEL STORAGE TANK C		
FML10	GASOLINE STORAGE TANK D (6,000 GALLONS)		
FML16	DIESEL STORAGE TANK F1		
FML17	DIESEL STORAGE TANK F2		
S03	TEST ENGINE STACK		
S08	GAS FIRED HEATERS STACK		
S10	DET. EMER GEN STACK		
S12C	AMMONIA SCRUBBER STACK (DEVON III)		
S13C	DEVON III DUST COLLECTOR STACK		
S140	STACK FOR WASHCOAT BATCH PROCESS		
S15	SAMPLE PREP STACK		
S17A	POWDER HANDLING STACK (SYSTEM I)		
S19	POWDER HANDLING STACK (DEVON II)		
S29	DIESEL EMER GEN STACK		
S30	LINE 14 POLLUTION CONTROL SYSTEM STACK		
S31	LINE 15 POLLUTION CONTROL SYSTEM STACK		
S34	LINE 14 STATIC OVENS EXHAUSTS		
S35	LINE 14 STATIC OVENS COOLDOWN STACK		
S36	LINE 14 DRYERS EXHAUSTS		
S37	LINE 14 DRYERS COOLDOWN STACKS		
S38	650-KW BACKUP DIESEL GENERATOR EXHAUST		
S39	LINE 15 STATIC OVEN EXHAUST		
S40	LINE 15 STATIC OVEN COOLDOWN EXHAUST		
S41	LINE 15 DRYERS EXHAUSTS		
S42	LINE 15 DRYER COOLDOWN EXHAUST		
S45	BLENDING TANKS/ORGANIC DUST COLLECTOR STACK		
Z136	FUGITIVE EMISSIONS (LINE 14 2-STAGE DOSING STATION)		
Z137	FUGITIVE EMISSIONS (LINE 15 2-STAGE DOSING STATION)		
Z997	FUGITIVE EMISSIONS FROM GASOLINE TANKS		

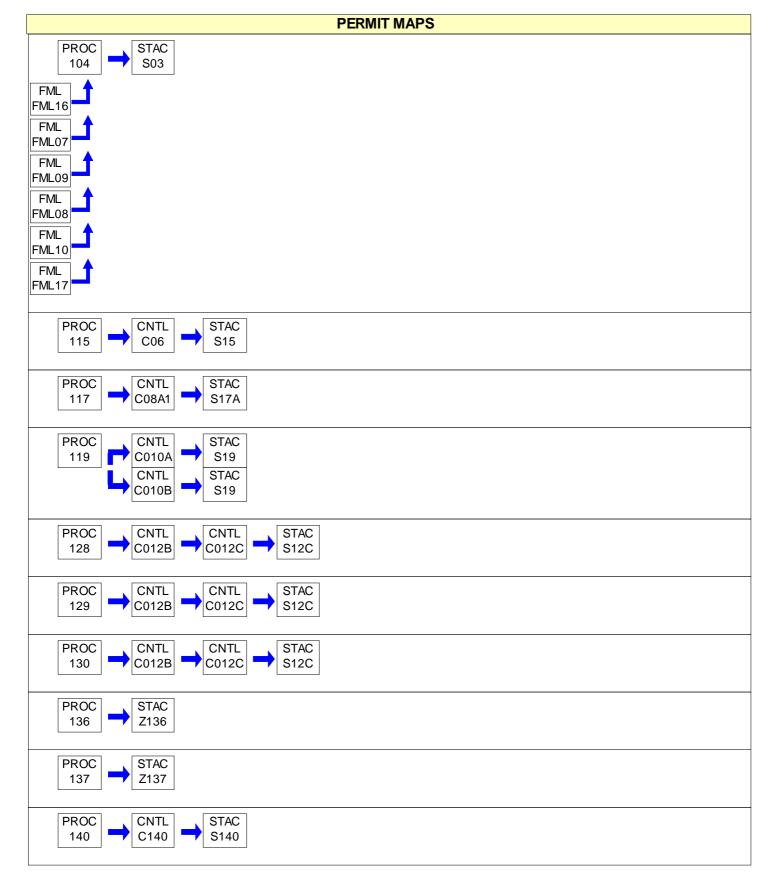
# PERMIT MAPS





15-00027

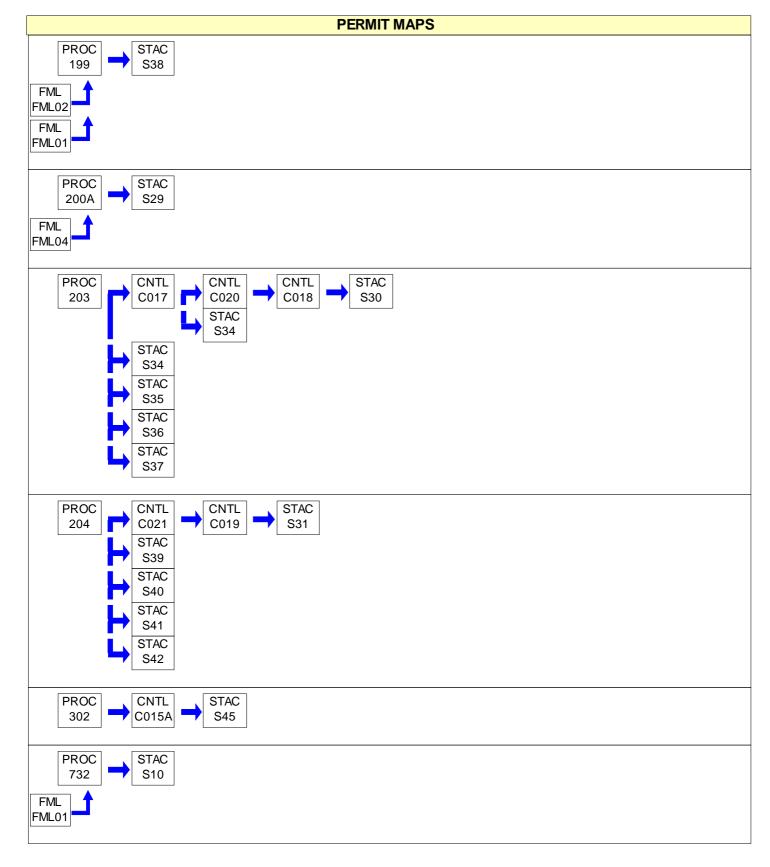






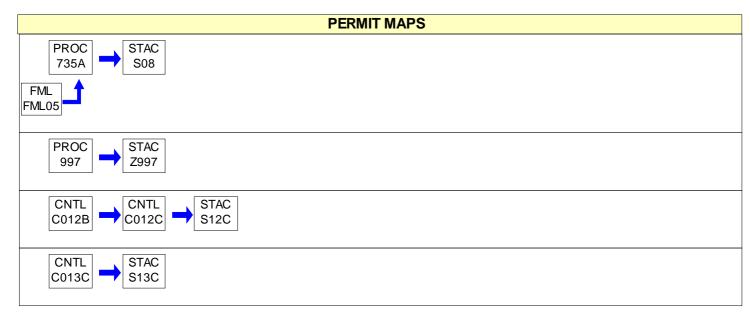
15-00027















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



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

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

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

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

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

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

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

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

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

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

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

#### Inspection and Entry.

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

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

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

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

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

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

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

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

**Compliance Requirements.** 

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





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

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

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

#### #008 [25 Pa. Code § 127.441]

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

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

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

#### Duty to Provide Information.

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

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

#### #010 [25 Pa. Code § 127.461]

#### Revising an Operating Permit for Cause.

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

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

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

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

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

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

#### **Operating Permit Modifications**

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





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

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

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

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

#### #012 [25 Pa. Code § 127.441]

Severability Clause.

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

#### #013 [25 Pa. Code § 127.449]

#### De Minimis Emission Increases.

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

#### #014 [25 Pa. Code § 127.3]

#### **Operational Flexibility.**

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

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





<b>SECTION B.</b>	<b>General State Only Requirements</b>
-------------------	--

	(6) Section 127.462 (relating to minor operating permit modifications)
	(7) Subchapter H (relating to general plan approvals and general operating permits)
#015	[25 Pa. Code § 127.11a] ation of Sources
Reactiva	ation of Sources
	(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
	(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).
#016	[25 Pa. Code § 127.36]
Health R	isk-based Emission Standards and Operating Practice Requirements.
	(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
	(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.
#017	[25 Pa. Code § 121.9]
Circum	rention.
	No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.
#018	[25 Pa. Code §§ 127.402(d) & 127.442]
Reportir	ng Requirements.
	(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
	(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
	(c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:
	Regional Air Program Manager PA Department of Environmental Protection (At the address given in the permit transmittal letter, or otherwise notified)
	(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and
	belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.





	ION B. General State Only Requirements
	records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.
#019	[25 Pa. Code §§ 127.441(c) & 135.5]
Samplin	ng, Testing and Monitoring Procedures.
	(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
	(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.
#020	[25 Pa. Code §§ 127.441(c) and 135.5]
Record	leeping.
	(a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
	(1) The date, place (as defined in the permit) and time of sampling or measurements.
	(2) The dates the analyses were performed.
	(3) The company or entity that performed the analyses.
	(4) The analytical techniques or methods used.
	(5) The results of the analyses.
	(6) The operating conditions as existing at the time of sampling or measurement.
	(b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
	(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.
#021	[25 Pa. Code § 127.441(a)]
Property	y Rights.
	This permit does not convey any property rights of any sort, or any exclusive privileges.
#022	[25 Pa. Code § 127.447]
Alternat	ive Operating Scenarios.
	The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.





#### #023 [25 Pa. Code §135.3]

#### Reporting

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

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

## #024 [25 Pa. Code §135.4]

#### **Report Format**

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





## I. RESTRICTIONS.

# **Emission Restriction(s).**

# # 001 [25 Pa. Code §121.7]

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

#### # 002 [25 Pa. Code §123.1]

#### Prohibition of certain fugitive emissions

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

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations, as specified in 25 Pa. Code § 129.14.

(7) N/A

(8) N/A

(9) Sources and classes of sources other than those identified in (1)-(8) of this condition, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(i) The emissions are of minor significance with respect to causing air pollution; and

(ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

# # 003 [25 Pa. Code §123.2]

#### Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

#### # 004 [25 Pa. Code §123.31]

#### Limitations

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

#### # 005 [25 Pa. Code §123.41]

#### Limitations

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

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

#### # 006 [25 Pa. Code §123.42]

#### Exceptions

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

(a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.(b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

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

#### # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Facility-wide emissions (emissions from all sources listed in Section A and Section H of this permit) shall meet the following limits:





(a) Hazardous Air Pollutants (HAPs) emissions of any individual HAP shall not exceed 9.9 ton/year, as a twelve (12) month rolling sum.

(b) Aggregated HAPs emissions shall not exceed 24.9 ton/year, as a twelve (12) month rolling sum.

(c) Volatile Organic Compounds (VOC) emissions shall not exceed 24.9 ton/year, as a twelve (12) month rolling sum.

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Facility-wide Nitrogen Oxides (NOx) emissions ((emissions from all sources listed in Section A and Section H of this permit)) shall not exceed 24.9 ton/year, as a twelve (12) month rolling sum.

# # 009 [25 Pa. Code §129.14]

#### Open burning operations

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

(a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.

(b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(c) A fire set for the prevention and control of disease or pests, when approved by the Department.

(d) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

(e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.

(f) A fire set solely for recreational or ceremonial purposes.

(g) A fire set solely for cooking food.

#### II. TESTING REQUIREMENTS.

#### # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

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

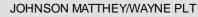
#### # 011 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

Southeast Region RA-EPSEstacktesting@pa.gov

Central Office RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.





# 15-00027

# SECTION C. Site Level Requirements

#### (1). Test Date(s)

a. For protocols, provide the proposed date on which testing will commence or "TBD"

b. For reports, provide the first and last day of testing

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

(3). Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

(4). Testing Requirements (all that apply):

a. Plan Approval number(s)

b. Operating permit number

c. Applicable federal subpart(s) (i.e. 40 CFR 66, Subpart ZZZZ)

d. Special purpose(s) (Consent Order, RFD, RACT, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

#### III. MONITORING REQUIREMENTS.

#### # 012 [25 Pa. Code §123.43]

#### Measuring techniques

Visible emissions may be measured using either of the following:

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

(b) Observers trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

#### # 013 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall monitor the facility, once per operating day, for the following:

(1) odors which may be objectionable (as per 25 Pa. Code §123.31);

- (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
- (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).

(b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:

- (1) be investigated;
- (2) be reported to the facility management, or individual(s) designated by the permittee;
- (3) have appropriate corrective action taken (for emissions that originate on-site); and
- (4) be recorded in a permanent written log.

(c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly.

(d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

(e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification (if applicable), complaints, monitoring results, and/or Department findings.





#### IV. RECORDKEEPING REQUIREMENTS.

#### # 014 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

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

# # 015 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

- (a) emissions increase of minor significance without notification to the Department.
- (b) de minimis increases with notification to the Department, via letter.
- (c) increases resulting from a Request for Determination (RFD) to the Department.
- (d) increases resulting from the issuance of a plan approval and subsequent operating permit.

# # 016 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall compile and keep records of the following facility-wide emissions monthly and as a 12-monthly rolling sum, using the Department approved method(s):

- (a) individual HAP emissions,
- (b) aggregated HAPs emissions, and
- (c) VOC emissions.

# # 017 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall calculate the total NOx emissions from the facility monthly and as a 12-month rolling sum, by compiling the emissions from the following sources:

- (1) Devin I Production Area(Source ID: 103)
- (2) Engine Test Cells (6) (Source ID: 104, including PM Generator)
- (3) Line 17 Coating Process (Devon III) (Source ID: 128)
- (4) Line 10 Coating Process (Devon III) (Source ID: 129)
- (5) Line 11 Coating Process (Devon III) (Source ID: 130)
- (6) 650-kW Backup Diesel Generator (Source ID: 199)
- (7) 400-kW Backup Diesel Generator (Source ID: 200A)
- (8) Line 14 Drying & Calcining (Source ID: 203)
- (9) Line 15 Drying & Calcining (Source ID: 204)
- (10) Emergency Generator (Detroit) (Source ID: 732)
- (11) Gas Fired Heaters (Source ID: 735A)
- (12) SCR System (Devon III) (Source ID: C012B)
- (13) Line 14 SCR System (Source ID: C020)
- (14) Line 15 SCR System (Source ID: C021)
- (15) A NOx Generator (under Source ID: 115 Devon II QC Lab Sample Equipment)
- (16) All insignificant sources, including NOx Emission Test Reactor

The facility-wide NOx emission calculations shall include emissions from startups, shutdowns, and malfunctions.

#### # 018 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall maintain records of NOx emissions from each emitting source, monthly.

(b) The permittee shall maintain records of facility-wide NOx emissions monthly, as a 12-month rolling sum.





#### V. REPORTING REQUIREMENTS.

#### # 019 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

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

(c) The report shall describe the following:

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

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

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

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

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

#### # 020 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

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

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

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





(i) Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or, (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d) If this facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

(1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,

(2) Certify that this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

(e) If this facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.

(f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to submit a compliance schedule or fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

#### VI. WORK PRACTICE REQUIREMENTS.

# # 021 [25 Pa. Code §123.1]

#### Prohibition of certain fugitive emissions

A person responsible for any source specified in 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following

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

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

(c) Paving and maintenance of roadways.

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

#### # 022 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

#### # 023 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall immediately, upon discovery, implement measures which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in this permit, is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to 25 Pa. Code Article III or any other applicable rule





promulgated under the Clean Air Act.

# # 024 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

#### # 025 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall reduce emissions of Class I and Class II refrigerants during the service, maintenance, repair and disposal of equipment in accordance with the requirements of 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

#### VII. ADDITIONAL REQUIREMENTS.

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

#### VIII. COMPLIANCE CERTIFICATION.

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

#### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

15-00027		JOH	INSON MATTHEY/WAYNE PLT	
SECTION D. Sour	ce Level Requirements			
Source ID: 103 Source Name: DEVON I PRODUCTION AREA				
	Source Capacity/Throughput:	1,000.000 Lbs/HR	COATINGS	
		120.000 Sq Ft/HR	AUTOCATALYSTS	
Conditions for this sou		OUP 1 OUP 4		
PROC 103 → CNT C012				

#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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

(a) Devon I Production Area (Source ID 103) consists of coating application and a single continuous oven (manufactured by FECO, with 5,000 scfm). This source is operated as operated as a research & development, or a sample size production line.

(b) Emissions from Source ID 103 are exhausted to an air pollution control system that includes a Selective Catalytic Reduction (SCR) system (Source ID C012B), and an ammonia scrubber (Source ID C012C) for removal of NOx, VOC, acid gases, and ammonia.

(c) Source ID 103 is subject to the applicable requirements of 25 Pa. Code §129.52d when coating metal parts.

15-00027			JOHNSON MATTHEY/WAYNE PLT	Ž
SECTION D. Source	Level Requirements			
Source ID: 104	Source Name: ENGINE TEST CE	LLS (6)		
	Source Capacity/Throughput:	27.000 Gal/HR	Gasoline	
PROC 104 STAC S03				
FML FML07				
FML FML08				
FML FML09				
FML FML10				
FML FML16				
FML FML17				

#### I. RESTRICTIONS.

#### Emission Restriction(s).

#### # 001 [25 Pa. Code §123.13]

#### Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this source at any time, in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

#### # 002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides (SOx), expressed as sulfur dioxide (SO2), in the effluent gas exceeds 500 parts per million, by volume, dry basis.

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

The permittee shall ensure:

(a) the total NOx emissions from Source ID 104 do not exceed 11.0 tons per year, as a 12-month rolling sum, and

(b) the VOC emissions from PM Generator do not exceed 3 pounds per hour, 15 pounds per day or 2.7 tons in any twelve (12) consecutive month period, whichever is most stringent.

#### II. TESTING REQUIREMENTS.

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





# SECTION D. Source Level Requirements

#### III. MONITORING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

For this source, the permittee shall monitor the amount and type (i.e., diesel fuel, gasoline) of fuel combusted, on a weekly basis.

#### IV. RECORDKEEPING REQUIREMENTS.

#### # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) For this source, the permittee shall keep records of the amount and type (i.e., diesel fuel, gasoline) of fuel combusted, on a weekly basis.

(b) For this source, the permittee shall keep records of the following monthly, as a 12-month rolling sum:

(i) NOx emissions (for Engine Test Cells and PM Generator)

- (ii) VOC emissions (for PM Generator only)
- (iii) PM emissions (for PM Generator only)

The permittee may use AP-42 emission factors or other Department approved methodology to calculate the pollutant emissions.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

This source shall be maintained and operated in accordance with manufacturer's specifications.

#### VII. ADDITIONAL REQUIREMENTS.

# # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

This source (Source ID 104) consists of:

(a) Six Engine Test Cells (3-gasoline fueled cells and 3-diesel fueled test cells)

(b) A Diesel PM Generator (installed under RFD No. 3202)

Originally, all six (6) of the engine test cells were fueled by gasoline. Under RFD Nos. 15-A01-974 and 15-A01-1126, the Department approved converting three (3) units of the engine test cells to diesel fueled units.



JOHNSON MATTHEY/WAYNE PLT



# SECTION D. Source Level Requirements

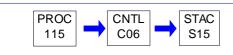
Source ID: 115

Source Name: DEVON II QC LAB SAMPLE EQUIPMENT

Source Capacity/Throughput:

N/A

AUTOCATALYSTS



# I. RESTRICTIONS.

# **Emission Restriction(s).**

#### # 001 [25 Pa. Code §123.13]

#### Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this source at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

#### II. TESTING REQUIREMENTS.

# # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall perform a source test for Source ID 115 using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(c) The stack test shall, at a minimum, test for the filterable Particulate Matter (FPM). Tests shall be conducted in accordance with the provisions of EPA Methods 5 and 201 or other Department approved methodology and 25 Pa. Code Chapter 139.

(d) At least thirty (30) calendar days prior to the test(s), the Department shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

(g) Documentation such as calculations or manufacturer specifications submitted to the Department may be used in lieu of a source test to demonstrate compliance with Condition #001 under this source, upon Department review and approval.

#### III. MONITORING REQUIREMENTS.

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

The permittee shall monitor the pressure drop across the Dust Collector I (Source ID C06) once per day, when Devon II QC Lab Sample Equipment (Source ID 115) is operating.





# SECTION D. Source Level Requirements

#### IV. RECORDKEEPING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall record the pressure drop across the Dust Collector (Source ID C06) once per day, when Source ID 115 is operating.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

The permittee shall ensure that,

(a) a sufficient quantity of spare cartridge filters are kept on hand in order to immediately replace any cartridge filter requiring replacement.

(b) the pressure drop across the Dust Collector I (Source ID: C06) is operated in the range of 0.25 to 6.0 inches (w.g.). A single daily reading in the range of 0.25 to 6.0 inches (w.g.) during production demonstrates compliance.

(c) the Dust Collector I (Source ID C06) is not bypassed when Source ID 115 is operating.

#### VII. ADDITIONAL REQUIREMENTS.

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

JOHNSON MATTHEY/WAYNE PLT



SECTION D. Source Level Requirements

Source ID: 117

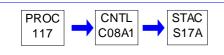
15-00027

Source Name: POWDER HANDLING EQUIPMENT (SYSTEM I)

Source Capacity/Throughput: 300.000 Lbs/HR

AUTOCATALYSTS

Conditions for this source occur in the following groups: GROUP 5



# I. RESTRICTIONS.

# Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

# Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this source at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

# II. TESTING REQUIREMENTS.

# # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall perform a source test for Source ID 117 using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(c) The stack test shall, at a minimum, test for the filterable Particulate Matter (FPM). Tests shall be conducted in accordance with the provisions of EPA Methods 5 and 201 or other Department approved methodology and 25 Pa. Code Chapter 139.

(d) At least thirty (30) calendar days prior to the test(s), the Department shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

(g) Documentation such as calculations or manufacturer specifications submitted to the Department may be used in lieu of a source test to demonstrate compliance with Condition #001 under this source, upon Department review and approval.

# III. MONITORING REQUIREMENTS.

# # 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the pressure drop across Source ID C08A1 once per day, when the Powder Handling



JOHNSON MATTHEY/WAYNE PLT

# Ž

# SECTION D. Source Level Requirements

Equipment (System I) (Source ID 117) is operating.

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

For Source ID 117, the permittee shall monitor the following monthly:

(a) the name and amount of powder materials processed; and

(b) the name and amount of materials containing HAP processed.

["Material containing HAP" is defined at 40 CFR §63.11607.]

#### IV. RECORDKEEPING REQUIREMENTS.

# 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall record the pressure drop across Source ID C08A1 once per day, when the Powder Handling Equipment (System I) (Source ID 117) is operating.

# 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

For Source ID 117, the permittee shall keep the following records:

- (a) the name and amount of powder materials processed, monthly;
- (b) the name and amount of materials containing HAP processed monthly; and
- (c) SDS or CPDS of each of processed materials.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall ensure that

(a) a sufficient quantity of spare cartridge filters (bags) are kept on hand in order to immediately replace any cartridge filter requiring replacement.

(b) the pressure drop across the Camfil Farr Dust Collector (Source ID C08A1) does not exceed 7.0 inches (w.g.). A single daily reading below 7 inches (w.g.) during production demonstrates compliance.

(c) the Camfil Farr Dust Collector (Source ID C08A1) is not bypassed when the Powder Handling Equipment (System I) ( Source ID 117) is operating.

#### VII. ADDITIONAL REQUIREMENTS.

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

(a) Source ID 117 and its associated control device (Source ID C08A1) are subject to 40 CFR Part 63 Subpart CCCCCCC —National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing, when processing, using, or generating materials containing HAP. "Material containing HAP" is defined at 40 CFR §63.11607:





# SECTION D. Source Level Requirements

"Material containing HAP means a material containing benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight for carcinogens, as defined by the Occupational Safety and Health Administration at 29 CFR 1910.1200(d)(4), or 1.0 percent by weight for non-carcinogens, as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material. Benzene and methylene chloride are volatile HAP. Compounds of cadmium, chromium, lead and/or nickel are metal HAP."

(b) Source ID C08A1 was installed in April 2016, under RFD No. 5534.



JOHNSON MATTHEY/WAYNE PLT



# SECTION D. Source Level Requirements

Source ID: 119

Source Name: POWDER HANDLING EQUIPMENT (DEVON II)

Source Capacity/Throughput: 300.000 Lbs/HR AUTO

AUTOCATALYSTS

Conditions for this source occur in the following groups: GROUP 5



#### I. RESTRICTIONS.

#### Emission Restriction(s).

#### # 001 [25 Pa. Code §123.13]

#### Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this source at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

#### II. TESTING REQUIREMENTS.

#### # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall perform a source test for Source ID 119 using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(c) The stack test shall, at a minimum, test for the filterable Particulate Matter (FPM) (post-control FPM by each of the control devices). Tests shall be conducted in accordance with the provisions of EPA Methods 5 and 201 or other Department approved methodology and 25 Pa. Code Chapter 139.

(d) At least thirty (30) calendar days prior to the test(s), the Department shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

(g) Documentation such as calculations or manufacturer specifications submitted to the Department may be used in lieu of a source test to demonstrate compliance with Condition #001 under this source, upon Department review and approval.





# SECTION D. Source Level Requirements

#### III. MONITORING REQUIREMENTS.

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

he permittee shall monitor the pressure drop across the two (2) Dust Collectors III and IV (Powder Handling) (Source IDs C010A and C010B) once per day, when the Powder Handling Equipment (Devon II) (Source ID 119) is operating.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For Source ID 119, the permittee shall monitor the following monthly:

(a) the name and amount of powder materials processed; and

(b) the name and amount of materials containing HAP processed.

["Material containing HAP" is defined at 40 CFR §63.11607.]

#### IV. RECORDKEEPING REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall record the pressure drop readings across Source IDs C010A and C010B once per day, when the Powder Handling Equipment (Devon II) (Source ID 119) is operating.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For Source ID 119, the permittee shall keep the following records:

(a) the name and amount of powder materials processed, monthly;

(b) the name and amount of materials containing HAP processed monthly; and

(c) SDS or CPDS of each of processed materials.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall ensure that,

(a) a sufficient quantity of spare cartridge filters (bags) are kept on hand in order to immediately replace any cartridge filter requiring replacement.

(b) Dust Collector III and Dust Collector IV (Source IDs C010A and C010B) are be operated in the following pressure drop ranges:

(1) Dust Collector III (Source ID C010A): 1.0 to 4.0 inches (w.g.)

(2) Dust Collector IV (Source ID C010B): 0.25 to 4.0 inches (w.g.)

(c) A single daily reading in the range of 1.0 to 4.0 inches (w.g.) for C010A and in the range of 0.25 to 4.0 inches (w.g.) for C010B during production demonstrates compliance.

(d) the two Dust Collectors are not bypassed when the Powder Handling Equipment (Devon II) (Source ID 119) is operating.





# SECTION D. Source Level Requirements

#### VII. ADDITIONAL REQUIREMENTS.

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

(a) Source ID 119 and its associated control devices (Source IDs C010A and C010B) are subject to 40 CFR Part 63 Subpart CCCCCCC —National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing, when processing, using, or generating materials containing HAP. "Material containing HAP" is defined at 40 CFR §63.11607:

"Material containing HAP means a material containing benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight for carcinogens, as defined by the Occupational Safety and Health Administration at 29 CFR 1910.1200(d)(4), or 1.0 percent by weight for non-carcinogens, as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material. Benzene and methylene chloride are volatile HAP. Compounds of cadmium, chromium, lead and/or nickel are metal HAP."

(b) The process exhaust shall be vented to Source ID C010B (flow: 5,000 cfm) when the processed material(s) contains nickel (and other HAP) compounds.

(c) The exhaust flow to Source ID C010A is 3,850 cfm.

15-00027		J(	OHNSON MATTHEY/WAYNE F	
SECTION D. Sour	ce Level Requirements			
Source ID: 128	Source Name: LINE 17 COATING PRO	OCESS (DEVON III	)	
	Source Capacity/Throughput:	N/A	COATING	
Conditions for this sour	rce occur in the following groups: GROUP 1 GROUP 4			
PROC 128				

#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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

(a) Line 17 Coating Process (Devon III) (Source ID 128) consists of a coating line for processing nitrate-containing materials, two (2) dryers that include microwave technology, and one (1) calcination oven.

b) Emissions from Source ID 128 are exhausted to an air pollution control system that includes a Selective Catalytic Reduction (SCR) system (Source ID C012B), and an ammonia scrubber (Source ID C012C) for removal of NOx, VOC, acid gases, and ammonia.

(c) Source ID 128 is subject to the applicable requirements of 25 Pa. Code §129.52d when coating metal parts.

15-00027		JC	OHNSON MATTHEY/WAYNE PLT	Ž
SECTION D. Source	Level Requirements			
Source ID: 129	Source Name: LINE 10 COATING PRO	OCESS (DEVON III)	)	
	Source Capacity/Throughput:	N/A	PRECIOUS METALS/CERAMICS	
Conditions for this source $\begin{array}{c} PROC\\ 129 \end{array} \phantom{aaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaa$	occur in the following groups: GROUP 1 GROUP 4 → CNTL C012C → STAC S12C			

#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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

(a) Line 10 Coating Process (Devon III) (Source ID 129) consists of two (2) coating lines for processing nitratecontaining materials, three (3) dryers and an oven manufactured by Feco Engineered Systems.

(b) Emissions from Source ID 129 are exhausted to an air pollution control system that includes a Selective Catalytic Reduction (SCR) system (Source ID C012B), and an ammonia scrubber (Source ID C012C) for removal of NOx, VOC, acid gases, and ammonia.

(c) Source ID 129 is subject to the applicable requirements of 25 Pa. Code §129.52d when coating metal parts.

15-00027		JC	OHNSON MATTHEY/WAYNE PLT
SECTION D. Source	Level Requirements		
Source ID: 130	Source Name: LINE 11 COATING PR	OCESS (DEVON III)	
	Source Capacity/Throughput:	N/A	PRECIOUS METALS/CERAMICS
Conditions for this source $\begin{array}{c} PROC\\ 130 \end{array}  CNTL\\ C012B \end{array}$	occur in the following groups: GROUP GROUP 4 → CNTL C012C → STAC S12C		

# I. RESTRICTIONS.

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

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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

(a) Line 11 Coating Process (Devon III) (Source ID 130) consists of two (2) coating lines for processing nitratecontaining materials, two (2) dryers and an oven manufactured by Feco Engineered Systems.

(b) Emissions from Source ID 130 are exhausted to an air pollution control system that includes a Selective Catalytic Reduction (SCR) system (Source ID C012B), and an ammonia scrubber (Source ID C012C) for removal of NOx, VOC, acid gases, and ammonia.

(c) Source ID 130 is subject to the applicable requirements of 25 Pa. Code §129.52d when coating metal parts.

JOHNSON MATTHEY/WAYNE PLT



15-00027 SECTION D. **Source Level Requirements** 

Source ID: 136

Source Name: LINE 14 2-STAGE DOSING STATION Source Capacity/Throughput:

WASHCOATS

N/A

Conditions for this source occur in the following groups: GROUP 4



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

# Emission Restriction(s).

#### # 001 [25 Pa. Code §123.13]

# **Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from this source in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

# II. TESTING REQUIREMENTS.

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

#### MONITORING REQUIREMENTS. Ш.

#### # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall monitor, using a Department-approved method, the nitrate content (as NO3) of the coating or slurry (in "Ib-nitrate per lb-coating slurry" unit) on a per-batch basis.

# IV. RECORDKEEPING REQUIREMENTS.

#### # 003 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall maintain records, using a Department-approved method, of the nitrate content (as NO3) of the coating or slurry (in "lb-nitrate per lb-coating slurry" unit) for each batch.

(b) The permittee shall ensure that the following data is recorded for each batch:

- (1) Coating type/ID number/product description.
- (2) Usage of each coating, thinner, and solvent.
- (3) Solids, VOC and HAP content, as applied.
- (4) Formulation parameters.
- (5) Method of verification, which must be an EPA and DEP approved method.

#### V. **REPORTING REQUIREMENTS.**

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

#### WORK PRACTICE REQUIREMENTS. VI.

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





# VII. ADDITIONAL REQUIREMENTS.

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

(a) Line 14 Process consists two parts:

(1) Source ID 136: a two-stage dosing station (coating process). This source is subject to 25 Pa. Code §129.52d when coating metal parts.

(2) Source ID 203: a Drying & Calcining process with two (2) indexing linear dryers (drying ovens) and twelve (12) calcining ovens.

(b) Source ID 136 is not equipped with any emission control device as it is an insignificant source for NOx and VOC emissions.

JOHNSON MATTHEY/WAYNE PLT



SECTION D. **Source Level Requirements** Source Name: LINE 15 2-STAGE DOSING STATION

Source ID: 137

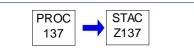
15-00027

Source Capacity/Throughput:

WASHCOATS

N/A

Conditions for this source occur in the following groups: GROUP 4



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

# Emission Restriction(s).

#### # 001 [25 Pa. Code §123.13]

# **Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from this source in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

# II. TESTING REQUIREMENTS.

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

#### MONITORING REQUIREMENTS. Ш.

#### # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall monitor, using a Department-approved method, the nitrate content (as NO3) of the coating or slurry (in "Ib-nitrate per lb-coating slurry" unit) on a per-batch basis.

# IV. RECORDKEEPING REQUIREMENTS.

#### # 003 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall maintain records, using a Department-approved method, of the nitrate content (as NO3) of the coating or slurry (in "lb-nitrate per lb-coating slurry" unit) for each batch.

(b) The permittee shall ensure that the following data is recorded for each batch:

- (1) Coating type/ID number/product Description.
- (2) Usage of each coating, thinner, and solvent.
- (3) Solids, VOC and HAP content, as applied.
- (4) Formulation parameters.
- (5) Method of verification, which must be an EPA and DEP approved method.

#### V. **REPORTING REQUIREMENTS.**

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

#### WORK PRACTICE REQUIREMENTS. VI.

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





# VII. ADDITIONAL REQUIREMENTS.

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

(a) Line 15 Process consists two parts:

(1) Source ID 137: a two-stage dosing station (coating process). This source is subject to 25 Pa. Code §129.52d when coating metal parts.

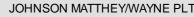
(2) Source ID 204: a Drying & Calcining process, including one (1) continuous electric drying oven, and one (1) electric drying and calcining oven.

(b) Source ID 137 is not equipped with any emission control device as it is an insignificant source for NOx and VOC emissions.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The AZ Solid Machine exhaust (sampling oven exhaust) is combined with Source ID 137 exhaust before venting to the atmosphere.



POWDER



15-00027

# SECTION D. Source Level Requirements

Source ID: 140

140

Source Name: WASHCOAT BATCH PROCESS

Source Capacity/Throughput: 500.000 Lbs/HR

PROC CNTL STAC

S140

C140

# I. RESTRICTIONS.

# Emission Restriction(s).

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

The filterable particulate matter emissions from Washcoat Batch Process (Source ID 140) shall not exceed 0.02 grains per dry standard cubic foot.

[Compliance with this permit condition assures compliance with 25 Pa. Code § 123.13 (c)(1)(i).]

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 123.31.]

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from this source in such a manner that the malodors are detectable outside the processing building.

# Control Device Efficiency Restriction(s).

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

(a) For Source ID 140, the process exhaust shall be treated by Dust Collector for Washcoat Batch Process (Source ID C140) for PM removal, before venting into the atmosphere.

(b) For Source ID C140, the pressure drop across this dust collector shall be maintained in a normal operating range of 1.0 to 5.0 inches (w.g.). The dust collector shall be equipped with a pressure drop monitoring device.

# II. TESTING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall perform a source test for Source ID 140 using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(c) The stack test shall, at a minimum, test for the filterable Particulate Matter (FPM). Tests shall be conducted in accordance with the provisions of EPA Methods 5 and 201 or other Department approved methodology and 25 Pa. Code Chapter 139.

(d) At least thirty (30) calendar days prior to the test(s), the Department shall be informed of the date and time of the test.





(e) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

(g) Documentation such as calculations or manufacturer specifications submitted to the Department may be used in lieu of a source test to demonstrate compliance with Condition #001 under this source, upon Department review and approval.

#### III. MONITORING REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) For Source ID 140, the permittee shall monitor the following monthly:

(1) name and usage of each raw material consumed; and

(2) name and amount of each product.

(b) For Source ID C140, the permittee shall monitor the static pressure drop reading across this dust collector daily, when the process (Source ID 140) is in operation.

#### IV. RECORDKEEPING REQUIREMENTS.

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

(a) For Source ID 140, the permittee shall record the following monthly:

(1) name and usage of each raw material consumed; and

(2) name and amount of each product.

(b) For Source ID C140, the permittee shall record the static pressure drop reading across this dust collector daily, when the process (Source ID 140) is in operation.

# # 007 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID C140, the permittee shall maintain records of all inspections, repairs, replacement, and maintenance performed on the dust collector and its monitoring equipment, including:

(a) date of inspection and inspection results,

(b) the repairs made to the baghouse(s) and associated equipment, and

(c) the items replaced in the baghouse(s).

# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

# # 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID C140, the permittee shall,

 (a) ensure that the dust collector is in good operating condition at all times while operating Washcoat Batch Process (Source ID 140);





- (b) install and maintain a device for monitoring pressure drop across the dust collector (Source ID C140);
- (c) keep sufficient spare parts/bags as necessary for routine on-site repairs; and
- (d) operate and maintain the dust collector in accordance with manufacturer's specifications.

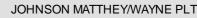
# VII. ADDITIONAL REQUIREMENTS.

# # 009 [25 Pa. Code §127.441] Operating permit terms and conditions.

(a) Source ID 140, Washcoat Batch Process, consists of the following processing tanks:

T-716 T-717 T-3203 T-3204 T-3205

(b) The permittee shall ensure that the hinged covers for the tanks are closed whenever a mixing operation is being conducted and no additional material is being added.





15-00027

#### SECTION D. **Source Level Requirements**

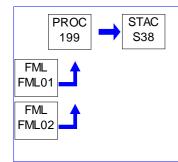
Source ID: 199

Source Name: 650-KW BACKUP DIESEL GENERATOR Source Capacity/Throughput:

45.800 Gal/HR

**Diesel Fuel** 

Conditions for this source occur in the following groups: GROUP 3



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

# **Emission Restriction(s).**

#### # 001 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The NOx and CO emissions from the 650-kW Backup Diesel Generator (Source ID 199) shall not exceed the following limits:

(a) Nitrogen Oxides (NOx): 11.34 lb/hr and 6.9 gm/hp-hr

(b) Carbon Monoxide (CO): 1.96 lb/hr

#### # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

Visible emissions from this diesel engine shall not exceed the following limitations:

(a) Equal to or greater than 10% for a period or periods aggregating more than three (3) minutes in any one (1) hour; and (b) Equal to or greater than 30% at any time.

[Compliance with the above emission limitations assures compliance with 25 Pa. Code §123.41.]

#### TESTING REQUIREMENTS. П.

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

#### Ш. MONITORING REQUIREMENTS.

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

#### IV. **RECORDKEEPING REQUIREMENTS.**

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





# V. REPORTING REQUIREMENTS.

15-00027

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

# VI. WORK PRACTICE REQUIREMENTS.

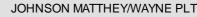
No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

# VII. ADDITIONAL REQUIREMENTS.

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

This emergency generator set was installed in 2006. The generator diesel engine is subject to the applicable requirements of §40 CFR 63, Subpart ZZZZ.

The permittee shall ensure that this emergency generator (Source ID 199) is only used in the event of primary power loss and for generator maintenance. It will allow the facility to continue operating the ovens, dryers and lighting, and the pollution control system until the oven equipment can be shut down safely.





15-00027

# SECTION D. Source Level Requirements

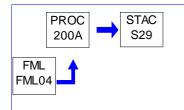
Source ID: 200A

Source Name: 400-KW DIESEL EMERGENCY GENERATOR

Source Capacity/Throughput: 29.200 Gal/HR

Diesel Fuel

Conditions for this source occur in the following groups: GROUP 3



# I. RESTRICTIONS.

# Emission Restriction(s).

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

The NOx emission from this source shall not exceed 6.9 gm/bp-hr.

# # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

Visible emissions from this diesel engine shall not exceed the following limitations:

(a) Equal to or greater than 10% for a period or periods aggregating more than three (3) minutes in any one (1) hour; and (b) Equal to or greater than 30% at any time.

[Compliance with the above emission limitations assures compliance with 25 Pa. Code §123.41.]

# Throughput Restriction(s).

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

The permittee shall ensure that the annual fuel consumption of this source does not exceed 1,464 gallons of fuel in a consecutive twelve (12) month period.

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

For this source, the permittee shall monitor the fuel consumption on a monthly basis.

# IV. RECORDKEEPING REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For this source, the permittee shall maintain records of the fuel consumption on a monthly basis.





# V. REPORTING REQUIREMENTS.

15-00027

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

# VI. WORK PRACTICE REQUIREMENTS.

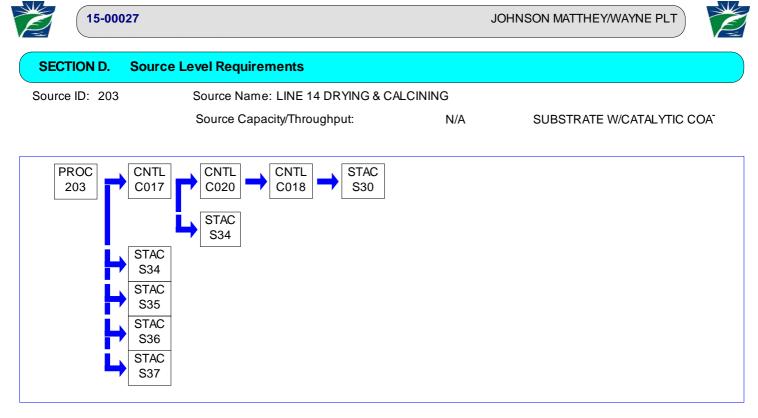
No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.

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

This emergency generator set was installed in 2001. The generator diesel engine is subject to the applicable requirements of 40 CFR 63 Subpart ZZZZ.

This source shall only be used during electrical failures or to perform preventive maintenance, including periodic testing.



This source occurs in alternate operation LINE14 EXHAUST VENTING TO L15 SYSTEM

# I. RESTRICTIONS.

# **Emission Restriction(s).**

# # 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The total aggregate post-control pollutant emissions from Source ID 203 shall not exceed the following limits:

Nitrogen Oxides (NOx): 13.4 lb/hr, as a 1-hour rolling average Nitrogen Oxides (NOx): 11.0 tons/yr, as a 12-month rolling sum

Volatile Organic Compounds (VOC): 1.1 lb/hr as methane Volatile Organic Compounds (VOC): 2.5 tons/yr, as a 12-month rolling sum as methane

Ammonia (NH3): 10.0 ppmv on a dry basis

Control Device Efficiency Restriction(s).

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

(a) The process exhausts from Source ID 203 shall be vented to the following emission control devices for NOx, VOC, acid gases, and ammonia removal:

- (1) Line 14 Ovens NOx Scrubber (Source ID C017),
- (2) Line 14 SCR System (Source ID C020), and
- (3) Line 14 Ammonia Scrubber (Source ID C018).

(b) The pollution control system for Source ID 203 (Source IDs C017, C018 and C020) shall achieve the following standards:

(1) overall NOx removal efficiency: equal to or greater than 90% (or, equal to or less than 13.4 lb/hr as NO2).
(2) overall VOC removal efficiency: equal to or greater than 90% (or, 20 ppmvd or less as methane).

Operation of Line 14 Drying and Calcining is not approved unless all required air pollution control devices are fully operational, except as specified in Condition #011(a), under this source.





# II. TESTING REQUIREMENTS.

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

(a) The permittee shall perform a stack test for Source ID 203 using Department-approved procedures once every five (5) calendar years, where five (5) calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five (5) years later. In accordance with 25 Pa. Code § 139.11(1), tests shall be conducted while the source(s) is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) The stack test shall, at a minimum, test for the following:

(1) overall NOx removal efficiency, and/or NOx emission rate at the stack discharging point,

(2) overall VOC removal efficiency, and/or VOC emission rate at the stack discharging point, and

(3) ammonia concentration at the stack discharging point.

Tests shall be conducted in accordance with the provisions of EPA stack testing method(s) or the Department approved methodology and 25 Pa. Code Chapter 139. Tests shall also be conducted in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance.

(c) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

# III. MONITORING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID 203, the permittee shall track the pre-control hourly NOx and VOC emissions from the operation of this source (using a Department-approved method), and shall monitor the following:

- (a) Coating and product ID for each coating and product.
- (b) Nitrate content of each coating or slurry used.
- (c) Amount of coating or slurry used per hour or per part, as applicable.
- (d) Amount of parts coated per hour or operating hours per day.

# # 005 [25 Pa. Code §127.441]

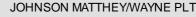
# Operating permit terms and conditions.

For Source ID C017 (Line 14 Ovens NOx Scrubber) and Source ID C018 (Line 14 Ammonia Scrubber), the permittee shall monitor the following once per day, when they are in service:

(a) the pH values of the scrubbing solutions,

(b) the pressure drop readings across the scrubbers, and

(c) the scrubbing solution flowrates.





# # 006 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID C020 (Line 14 SCR System), the permittee shall monitor the following on a daily basis, when it is in service:

(a) the inlet operating temperatures for the SCR oxidation and catalyst beds, and (b) the flow rate.

#### IV. RECORDKEEPING REQUIREMENTS.

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

(a) For Source ID 203,

(1) the permittee shall maintain records of the pre-control hourly NOx and VOC emissions (in lb/hr) for each batch used on Line 14 Drying and Calcining (Source ID: 203). The required records shall include the following:

(i) Coating and product ID for each coating and product.

(ii) Nitrate content of each coating or slurry used.

(iii) Amount of coating or slurry used per hour or per part, as applicable.

(iv) Amount of parts coated per hour or operating hours per day.

(2) the permittee shall maintain records of the post-control NOx and VOC emissions [in lb/hr and ton/yr], to demonstrate compliance with Condition #001 under this source.

(b) For Source ID 203 and its associated control devices, the permittee shall record of all inspections, repair and maintenance performed on the monitoring equipment and the control devices.

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

For Source ID C017 (Line 14 Ovens NOx Scrubber) and Source ID C018 (Line 14 Ammonia Scrubber), the permittee shall maintain records of the following once per day, when they are in service:

(a) the pH values of the scrubbing solutions,

(b) the pressure drop readings across the scrubbers, and

(c) the scrubbing solution flowrates.

# # 009 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID C020 (Line 14 SCR System), the permittee shall maintain records of the following on a daily basis, when it is in service:

(a) the inlet operating temperatures for the SCR oxidation and catalyst beds, and (b) the flow rate.

#### V. REPORTING REQUIREMENTS.

# # 010 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee, within two (2) hour of identification, shall notify the Department by telephone, at 484-250-5920, of any failure of the air pollution control system, including the events listed below, while processing nitrate containing solutions when NOx emissions are greater than 13.4 lb/hr and/or VOC emissions are greater than 1.1 lb/hr:

(1) The functional loss of the SCR system due to power failures, fire or other events within or beyond the control of the company.

(2) The loss of the aqueous ammonia injection system.

(3) The loss of any fan servicing the SCR control system.





- (4) Failure of the ductwork valves which would prohibit the oven gases from reaching the SCR system.
- (5) The loss of the control device monitoring system.

(6) Any fire in the drying ovens, ductwork, or emission control system.

(b) The permittee shall maintain records of emissions calculations during such reportable events and for any exceedances of the 13.4 lb/hr NOx emission limit for the Drying and Calcining line. The permittee shall submit a written report to the Department within two (2) working days following the reportable incident describing the malfunction, the corrective actions taken, the time, date and duration of the incident.

(c) For reportable power failures pursuant to paragraph (a)(1), the permittee shall monitor for any odor during or after the power failure and shall report any objectionable odor beyond the property line as pursuant 25 Pa. Code § 123.31.

# VI. WORK PRACTICE REQUIREMENTS.

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

For Source ID 203,

(a) emissions from an individual drying oven are not required to be treated in the Line 14 Ovens NOx Scrubber (Source ID C017) and Line 14 SCR System (Source ID C020), when Source ID 203 operates under the following conditions:

(1) during process upset conditions or malfunctions, to allow for the safe and systematic shutdown of equipment,

(2) power failures, or

(3) pre-control NOx emissions do not exceed 13.4 lb/hr and pre-control VOC emissions do not exceed 1.1 lb/hr.

(b) the permittee shall record the following for each event when the emissions are directly vented into atmosphere (without treatment):

(1) time, date, and duration,

(2) reasons, and

(3) NOx and VOC emission rate (lb/hr).

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

operating permit terms and conditions.

(a) For Source ID C017 (Line 14 Ovens NOx Scrubber), the permittee shall ensure that:

(1) the pH value of the scrubbing solution is maintained in the range of 8.0 to 14.0,

(2) the pressure drop across the scrubber does not exceed 12 inches (w.g.). A single daily reading below 12 inches (w.g.) during production demonstrates compliance, and

(3) the scrubbing solution flowrate is maintained in the range of 50 to 450 m

(3) the scrubbing solution flowrate is maintained in the range of 50 to 450 gallons per minute.

(b) For Source ID C018 (Line 14 Ammonia Scrubber), the permittee shall ensure that:

(1) the pH value of the scrubbing solution is maintained in the range of 1.0 to 5.0,

(2) the pressure drop across the scrubber does not exceed 7 inches (w.g.). A single daily reading below 7 inches (w.g.) during production demonstrates compliance, and

(3) the scrubbing solution flowrate is maintained in the range of 200 to 470 gallons per minute.

(c) For Source IDs C017 and C018, the permittee shall conduct:

(1) a daily visual inspection,

(2) an annual inspection of the scrubber nozzles and scrubber packing material(s), and

(3) back-flushing the scrubber demisters when the pressure drop readings exceed the limits, as specified in (a)(2) and
 (b)(2), under this condition.





The permittee shall maintain records for the inspections as specified in Condition #012 (c)(1) and (2), under this source.

(d) For Source ID C020 (Line 14 SCR System), the permittee shall ensure that the inlet temperatures for the SCR oxidation and catalyst beds are in the range of 575 °F to 752 °F. A single daily reading in the range of 575 °F to 752 °F during production demonstrates compliance.

# # 013 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID C020 (Line 14 SCR System), the permittee shall ensure that,

(a) it is equipped with,

(1) K-type thermocouples (or equivalent equipment) to monitor the inlet gas temperatures to assure proper operation,

(2) a control system to monitor the proper amount of aqueous ammonia reagent needed to reduce NOx emissions,

(3) a Heat Exchanger and a Reheater equipped with a Maxon Series LV Airflo Burner, with a rated capacity of 7.5 MMBTU/hr,

(4) a VOC oxidation bed containing a catalyst measuring 8' x 8' in cross-section and 4" in depth, and

(5) a NOx catalyst bed.

(b) it is equipped with emergency bypass dampers to allow the equipment to undergo a systematic shutdown in the event of a power failure.

# # 014 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID 203, the permittee shall ensure that the Line 14 dryers and ovens exhaust stacks are fitted with dampers with fail-open position. In the event of a control system malfunction and/or process upset, the dampers are programmed to be in open position allowing the hot process exhausts being discharged to the atmosphere directly, while the coating lines and ovens undergo a systematic shutdown.

# 015 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall ensure that at least 90% of the NOx monitoring data are accurately collected on a monthly basis.

(b) The permittee shall maintain all monitoring equipment (such as NOx monitor, flowmeter, pressure gauge, pH meter, etc.) and stock parts necessary for routine repairs onsite.

# VII. ADDITIONAL REQUIREMENTS.

# # 016 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) Line 14 Drying & Calcining (Source ID: 203) consists of the following equipment:

(1) Two (2) indexing linear dryers (two Drying Oven)

(2) Twelve (12) Calcining Ovens.

(b) Under normal operating conditions, the pollution control system flow diagram is as follows:

(1) the Calcining Oven exhaust is first treated in NOx Scrubber (C017), and then combined with the Drying Oven exhaust, (2) the combined exhaust flows to SCR System (C020), and then to Ammonia Scrubber (C018).

(c) The permittee may operate this source using the alternative operating schedule, as specified in Section F, of this permit.

15-00027		JC	OHNSON MATTHEY/WAYNE PLT
SECTION D. Source	e Level Requirements		
Source ID: 204	Source Name: LINE 15 DRYING & Co	ALCINING	
	Source Capacity/Throughput:	N/A	SUBSTRATE W/CATALYTIC COA
PROC 204 CNTL C021 STAC S39 STAC S40 STAC S41 STAC S41 STAC S42	$\xrightarrow{\text{CNTL}} \xrightarrow{\text{CO19}} \xrightarrow{\text{STAC}} \xrightarrow{\text{S31}}$		

# I. RESTRICTIONS.

# Emission Restriction(s).

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

The total aggregate post-control pollutant emissions from Source ID 204 shall not exceed the following limits:

Nitrogen Oxides (NOx): 13.4 lb/hr, as a 1-hour rolling average Nitrogen Oxides (NOx): 11.0 tons/yr, as a 12-month rolling sum

Volatile Organic Compounds (VOC): 1.1 lb/hr as methane Volatile Organic Compounds (VOC): 2.5 tons/yr, as a 12-month rolling sum as methane

Ammonia (NH3): 10.0 ppmv on a dry basis

# **Throughput Restriction(s).**

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

(a) The process exhausts from Source ID 204 shall be vented to the following emission control devices for NOx, VOC, acid gases, and ammonia removal:

(1) Line 15 SCR System (Source ID C021), and

(2) Line 15 Ammonia Scrubber (Source ID C019).

(b) The pollution control system for Source ID 204 shall achieve the following standards:

(1) overall NOx removal efficiency: equal to or greater than 90% (or, equal to or less than 13.4 lb/hr as NO2).
(2) overall VOC removal efficiency: equal to or greater than 90% (or, 20 ppmvd or less as methane).

Operation of Line 15 Drying and Calcining is not approved unless all required air pollution control devices are fully operational, except as specified in Condition #011(a), under this source.

# II. TESTING REQUIREMENTS.

# # 003 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall perform a stack test for Source ID 204 using Department-approved procedures once every five (5) calendar years, where five (5) calendar years is defined as beginning with the calendar year the latest stack test was





performed and ending on December 31, five (5) years later. In accordance with 25 Pa. Code § 139.11(1), tests shall be conducted while the source(s) is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) The stack test shall, at a minimum, test for the following:

- (1) overall NOx removal efficiency, and/or NOx emission rate at the stack discharging point,
- (2) overall VOC removal efficiency, and/or VOC emission rate at the stack discharging point, and
- (3) ammonia concentration at the stack discharging point,

Tests shall be conducted in accordance with the provisions of EPA stack testing method(s) or the Department approved methodology and 25 Pa. Code Chapter 139. Tests shall also be conducted in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance.

(c) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

# III. MONITORING REQUIREMENTS.

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

For Source ID 204, the permittee shall track the pre-control hourly NOx and VOC emissions from the operation of this source (using a Department-approved method), and shall monitor the following:

(a) Coating and product ID for each coating and product.

(b) Nitrate content of each coating or slurry used.

(c) Amount of coating or slurry used per hour or per part, as applicable.

(d) Amount of parts coated per hour or operating hours per day.

# 005 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID C021 (Line 15 SCR System), the permittee shall monitor the following once per day, when it is in service:

(a) the inlet operating temperatures for the SCR oxidation and catalyst beds, and

(b) the flow rate.

# 006 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID C019 (Line 15 Ammonia Scrubber), the permittee shall monitor the following once per day, when it is in service:





- (a) the pH values of the scrubbing solutions,
- (b) the pressure drop readings across the scrubbers, and

(c) the scrubbing solution flowrates.

# IV. RECORDKEEPING REQUIREMENTS.

# # 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For Source ID C021 (Line 15 SCR System), the permittee shall maintain records of the following on a daily basis, when it is in service:

(a) the inlet operating temperatures for the SCR oxidation and catalyst beds, and (b) the flow rate.

# 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID C019 (Line 15 Ammonia Scrubber), the permittee shall maintain records of the following once per day, when it is in service:

(a) the pH values of the scrubbing solutions,

(b) the pressure drop readings across the scrubbers, and

(c) the scrubbing solution flowrates.

# # 009 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) For Source ID 204,

(1) the permittee shall calculate and maintain records of the pre-control hourly NOx and VOC emissions (in lb/hr) for each batch used on Line 15 Drying and Calcining (Source ID: 204). The required records shall also include the following:

(i) Coating and product ID for each coating and product.

(ii) Nitrate content of each coating or slurry used.

- (iii) Amount of coating or slurry used per hour or per part, as applicable.
- (iv) Amount of parts coated per hour or operating hours per day.

(2) the permittee shall calculate and maintain records of the post-control NOx and VOC emissions [in lb/hr and ton/yr], to demonstrate compliance with Condition #001 under this source.

(b) For Source ID 204 and its associated control devices, the permittee shall record of all inspections, repair and maintenance performed on the monitoring equipment and the control devices.

# V. REPORTING REQUIREMENTS.

# # 010 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee, within two (2) hour of identification, shall notify the Department by telephone, at 484-250-5920, of any failure of the air pollution control system, including the events listed below, while processing nitrate containing solutions when NOx emissions are greater than 13.4 lb/hr and/or VOC emissions are greater than 1.1 lb/hr:

(1) The functional loss of the SCR system due to power failures, fire or other events within or beyond the control of the company.

(2) The loss of the aqueous ammonia injection system.

(3) The loss of any fan servicing the SCR control system.

- (4) Failure of the ductwork valves which would prohibit the oven gases from reaching the SCR system.
- (5) The loss of the control device monitoring system.

(6) Any fire in the drying ovens, ductwork, or emission control system.





(b) The permittee shall maintain records of emissions calculations during such reportable events and for any exceedances of the 13.4 lb/hr NOx emission limit for the Drying and Calcining line. The permittee shall submit a written report to the Department within two (2) working days following the reportable incident describing the malfunction, the corrective actions taken, the time, date and duration of the incident.

(c) For reportable power failures pursuant to paragraph (a)(1), the permittee shall monitor for any odor during or after the power failure and shall report any objectionable odor beyond the property line as pursuant 25 Pa. Code § 123.31.

# VI. WORK PRACTICE REQUIREMENTS.

# # 011 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID 204,

(a) emissions from an individual drying oven are not required to be treated in the Line 15 Ovens NOx Scrubber (Source ID C021) and Line 15 Ammonia Scrubber (Source ID C019), when Source ID 204 operates under the following conditions:

(1) during process upset conditions or malfunctions, to allow for the safe and systematic shutdown of equipment,

(2) power failures, or

(3) pre-control NOx emissions do not exceed 13.4 lb/hr and pre-control VOC emissions do not exceed 1.1 lb/hr.

(b) the permittee shall record the following for each event when the emissions are directly vented into atmosphere (without treatment):

(1) time, date, and duration,

(2) reasons, and

(3) NOx and VOC emission rate (lb/hr).

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

For Source ID 204, the permittee shall ensure that the Line 15 dryers and ovens exhaust stacks are fitted with dampers with fail-open position. In the event of a control system malfunction and/or process upset, the dampers are programmed to be in open position allowing the hot process exhausts being discharged to the atmosphere directly, while the coating lines and ovens undergo a systematic shutdown.

# # 013 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID C021 (Line 15 SCR System), the permittee shall ensure that,

(a) it is equipped with,

(1) K-type thermocouples or equivalent equipment to monitor the inlet gas temperatures,

(2) A control system to monitor the proper amount of aqueous ammonia reagent needed to oxidize NOx emissions from the catalyst bed.

(3) A Heat Exchanger and a Reheater equipped with a Maxon Series LV Airflo Burner, with a rated capacity of 7.5 MMBTU/hr.

- (4) A VOC oxidation bed containing a catalyst measuring 8' x 8' in cross-section and 4" in depth.
- (5) A NOx catalyst bed.

(b) it is equipped with emergency bypass dampers to allow the equipment to undergo a systematic shutdown in the event of a power failure.

# # 014 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall ensure that at least 90% of the NOx monitoring data are accurately collected on a monthly basis.

(b) The permittee shall maintain all monitoring equipment (such as NOx monitor, flowmeter, pressure gauge, pH meter, etc.) and stock parts necessary for routine repairs onsite.





# # 015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) For Source ID C021 (Line 15 SCR System), the permittee shall ensure that:

(1) the inlet temperatures for the SCR oxidation and catalyst beds are in the range of 575 °F to 752 °F. A single daily reading in the range of 575 °F to 752 °F during production demonstrates compliance, and

(2) the inlet flowrate to Source ID C021 does not exceed a daily average of 35,000 scfm (@ 70 °F).

(b) For Source ID C019 (Line 15 Ammonia Scrubber), the permittee shall ensure that:

(1) the pH value of the scrubbing solution is maintained in the range of 1.0 to 5.0,

(2) the pressure drop across the scrubber does not exceed 7 inches (w.g.). A single daily reading below 7 inches range (w.g.) during production demonstrates compliance, and

(3) the scrubbing solution flowrate is maintained in the range of 200 to 470 gallons per minute.

(c) For Source ID C019, the permittee shall conduct:

(1) a daily visual inspection,

(2) an annual inspection of the scrubber nozzles, demisters, and packing material(s), and

(3) back-flushing the scrubber demisters when the pressure drop readings exceed the limit, as specified in (b)(2) under this permit condition.

# VII. ADDITIONAL REQUIREMENTS.

# # 016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Line 15 Drying & Calcining (Source ID: 204) consists of the following equipment:

(a) Two (2) air knife stabilizers;

(b) One (1) continuous electric, drying oven; and

(c) One (1) electric, drying & calcining oven.



JOHNSON MATTHEY/WAYNE PLT



# SECTION D. Source Level Requirements

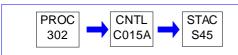
Source ID: 302

Source Name: WASHCOAT BLENDING TANKS

Source Capacity/Throughput: 2,00

2,000.000 Lbs/HR

WASHCOAT



# I. RESTRICTIONS.

# **Emission Restriction(s).**

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

No person may permit the emission into the outdoor atmosphere of particulate matter (filterable PM) from this source in excess of 0.02 gr/dscf.

[Compliance with this streamlined permit condition will assure compliance with 25 Pa. Code §123.13(c)(1)(i).]

# II. TESTING REQUIREMENTS.

# # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall perform a source test for Source ID 302 using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(c) The stack test shall, at a minimum, test for the filterable Particulate Matter (FPM). Tests shall be conducted in accordance with the provisions of EPA Methods 5 and 201 or other Department approved methodology and 25 Pa. Code Chapter 139.

(d) At least thirty (30) calendar days prior to the test(s), the Department shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

(g) Documentation such as calculations or manufacturer specifications submitted to the Department may be used in lieu of a source test to demonstrate compliance with Condition #001 under this source, upon Department review and approval.

# III. MONITORING REQUIREMENTS.

# # 003 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID 302, the permittee shall monitor the amount of powder and coating added (in pounds or gallons) to the Washcoat Blending Tanks on a monthly basis.





# # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

For Source ID C015A, the permittee shall monitor the pressure drop across the dust collector daily, when it is operating.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID 302, the permittee shall maintain records of the amount of powder and coating added (in pounds or gallons) to the Washcoat Blending Tanks on a monthly and annually basis.

# # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

For Source ID C015A, the permittee shall maintain records of the pressure drop across the dust collector daily, when it is operating.

#### V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

#### # 007 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall ensure that the hinged covers for the Washcoat Blending Tanks (Source ID 302) are closed whenever a mixing operation is being conducted and no additional material is being added.

#### # 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall ensure that,

(a) Source ID C015A is equipped with a device for monitoring the pressure differential across the control device.

(b) the single daily pressure drop range across Source ID C015A does not exceed five (5) inches (w.g.), when it is operating. A single daily reading below 5 inches (w.g.) during production demonstrates compliance.

(c) a sufficient quantity of spare fabric filters (bags) are kept on site, in order to immediately replace any bags requiring replacement.

(d) during powder addition, the process exhaust to the control device (Source ID C015A) shall not be bypassed at any time while the Washcoat Blending Tanks (Source ID 302) are being operated.

#### VII. ADDITIONAL REQUIREMENTS.

# # 009 [25 Pa. Code §127.441] Operating permit terms and conditions.

The Washcoat Blending Tanks (Source ID: 302) consist of the following equipment. The following tanks vent to C015A:

T-1409: 2000 gal T-1410: 1000 gal T-1411: 2000 gal T-1412: 2000 gal T-1413: 2000 gal T-1414: 1000 gal T-1415: 2000 gal



15-00027

JOHNSON MATTHEY/WAYNE PLT



# SECTION D. Source Level Requirements

T-1416: 2000 gal	
T-1417: 500 gal	
T-1418: 500 gal	
T-1419: 2000 gal	
T-1420: 1000 gal	
T-1505: 1000 gal	
T-1506: 2000 gal	
T-1507: 2000 gal	
T-1508: 2000 gal	
T-1509: 1000 gal	
T-1510: 1000 gal	
T-1511: 2000 gal	
T-1512: 2000 gal	
S101: 1000 gal	
S102: 1000 gal	
and two extractions trunks typically used for a scale and a portable vessel "MT" (250 gal).	
0	

JOHNSON MATTHEY/WAYNE PLT



SECTION D. Source Level Requirements

Source ID: 732

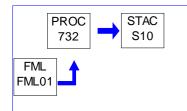
15-00027

Source Name: EMERGENCY GENERATOR (DETROIT 650 KW)

Source Capacity/Throughput: 46.300 Gal/HR Di

Diesel Fuel

Conditions for this source occur in the following groups: GROUP 3



# I. RESTRICTIONS.

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

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

# IV. RECORDKEEPING REQUIREMENTS.

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

# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

# VII. ADDITIONAL REQUIREMENTS.

# # 001 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

This emergency generator set was installed in 1993. The diesel engine is subject to the applicable requirements of 40 CFR 63 Subpart ZZZZ.

This source shall only be used during electrical failures or to perform preventive maintenance, including periodic testing.

15-00027		JOF	INSON MATTHEY/WAYNE P	
SECTION D. Sourc	e Level Requirements			
Source ID: 735A	Source Name: GAS FIRED HEATE	ERS		
	Source Capacity/Throughput:	5.500 MCF/HR	Natural Gas	
PROC 735A → STAC S08	]			

# I. RESTRICTIONS.

# Emission Restriction(s).

# # 001 [25 Pa. Code §123.21]

#### General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

# Fuel Restriction(s).

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

The permittee shall ensure that only natural gas is burned in the Gas Fired Heaters (Source ID: 735A).

# II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

The permittee shall monitor the total amount of natural gas combusted at the Gas Fired Heaters (Source ID: 735A) monthly using a Department approved method.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall record the total amount of natural gas combusted by the Gas Fired Heaters (Source ID: 735A) monthly using a Department approved method.

# V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the Gas Fired Heaters (Source ID: 735A) shall be maintained and operated in accordance





with the manufacturer's specifications.

# VII. ADDITIONAL REQUIREMENTS.

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

JOHNSON MATTHEY/WAYNE PLT
---------------------------



15-00027

 SECTION D.
 Source Level Requirements

 Source ID:
 997

 Source Capacity/Throughput:
 N/A

 GASOLINE

|--|--|

# I. RESTRICTIONS.

# **Throughput Restriction(s).**

# 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11111] Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities Am I subject to the requirements in this subpart?

(a) A gasoline dispensing facility is defined as any stationary facility which dispenses gasoline into the fuel tank of motor vehicle or nonroad vehicle engines, test engines, generators, pumps, and other gasoline-fueled engines and equipment.

(b) The affected source to which 40 CFR Part 63 Subpart CCCCCC applies is each gasoline dispensing facility (GDF) that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank.

(c) If a monthly throughput of gasoline is less than 10,000 gallons, the permittee shall comply with the requirements in 40 CFR § 63.11116.

(d) If a monthly throughput of 10,000 gallons of gasoline or more, the permittee shall comply with the requirements in 40 CFR § 63.11117.

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

# # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor gasoline throughput, monthly.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 003 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. §63.11116(b).]

The permittee shall compile and keep records of monthly gasoline throughput (in gallons per month), monthly.

Monthly throughput is calculated by summing the volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at a gasoline dispensing facility during a single day, plus the total volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at a gasoline dispensing facility during the previous 364 days, and then dividing that sum by 12.

# V. REPORTING REQUIREMENTS.

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





# VI. WORK PRACTICE REQUIREMENTS.

#### # 004 [25 Pa. Code §129.61]

#### Small gasoline storage tank control (Stage 1 control)

For each gasoline tank with a capacity of greater than 2,000 gallons, the permittee shall ensure that each gasoline storage tank is equipped with a submerged fill pipe(s), which extends from the filling orifice to within six (6) inches of the bottom of the tank.

#### VII. ADDITIONAL REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

This facility has the following gasoline storage tanks:

- Gasoline Storage Tank A (6,000 gallons, underground tank, FML07), and
- Gasoline Storage Tank D (6,000 gallons, underground tank, FML10).

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

40 CFR Part 63 Subpart CCCCCC

40 CFR §63.11112: Affected Sources

(a) The emission sources to which this subpart applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at new, reconstructed, or existing GDF that meet the criteria specified in 40 CFR § 63.11111. Pressure/Vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources. The equipment used for the refueling of motor vehicles is not covered by this subpart.

(b) An affected source is a new affected source if you commenced construction on the affected source after November 9, 2006, and you meet the applicability criteria in 40 CFR § 63.11111 at the time you commenced operation.

(c) An affected source is reconstructed if you meet the criteria for reconstruction as defined in 40 CFR § 63.2.

(d) An affected source is an existing affected source if it is not new or reconstructed.

40 CFR §63.11113: Compliance Demonstration

(a) For a new or reconstructed affected source, the permittee shall comply with the standards in this subpart upon startup of the affected source.

(b) For an existing affected source, the permittee shall comply with the standards in this subpart no later than January 10, 2011.

40 CFR §63.11115: Minimizing Emissions

The permittee shall, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

40 CFR §63.11116: Requirements

(a) The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:







- (1) Minimize gasoline spills;
- (2) Clean up spills as expeditiously as practicable;

(3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;

(4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

(b) The permittee shall keep monthly gasoline throughput records.

(c) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (a)(3).

# # 007 [25 Pa. Code §129.62]

# General standards for bulk gasoline terminals/plants, and small gasoline storage tanks

(a) Gasoline may not be spilled or discarded in sewers or stored in open containers or handled in a manner that would result in uncontrolled evaporation to the atmosphere.

(b) The permittee may not permit the transfer of gasoline between the tank truck or trailer and a stationary storage tank unless the following conditions are met:

(1) The vapor balance system is in good working order and is designed and operated in a manner that prevents:

(i) Gauge pressure from exceeding 18 inches of H2O (4500 pascals) and vacuum from exceeding 6 inches of water (1500 pascals) in the gasoline tank truck.

(ii) A reading equal to or greater than 100% of the lower explosive limit—LEL, measured as propane—at 1 inch from points on the perimeter of a potential leak source when measured by the method referenced in § 139.14 (relating to emissions of VOCs) during loading or unloading operations at small gasoline storage tanks, bulk plants and bulk terminals.

(iii) Avoidable liquid leaks during loading or unloading operations.

(2) A truck, vapor balance system or vapor disposal system, if applicable, that exceeds the limits in paragraph (1) is repaired and retested within 15 days.

(3) There are no visually- or audibly-detectable leaks in the tank truck's or trailer's pressure/vacuum relief valves and hatch covers, the truck tanks or storage tanks, or associated vapor and liquid lines during loading or unloading.

(4) The pressure and vacuum relief valves on storage vessels and tank trucks or trailers are set to release at no less than .7 psig (4.8 kilopascals) of pressure or .3 psig (2.1 kilopascals) of vacuum or the highest allowable pressure and vacuum as specified in State or local fire codes, the National Fire Prevention Association guidelines or other National consensus standards acceptable to the Department. Upon demonstration by the owner or operator of an underground small gasoline storage tank that the vapor balance system specified in paragraph (1) will achieve a 90% vapor recovery efficiency without a pressure and vacuum relief valve and that an interlock system, sufficient to ensure connection of the vapor recovery line prior to delivery of the gasoline, will be used—no pressure and vacuum relief valve is required. The vacuum setting on the pressure and vacuum relief valve on an underground storage tank may be set at the lowest vacuum setting which is sufficient to keep the vent closed at zero pressure and vacuum.

(c) A person may not allow a gasoline tank truck subject to § 129.59, § 129.60 or § 129.61 to be filled or emptied in a geographic area specified in § 129.61(a) unless the gasoline tank truck:

(1) Has been tested by the owner or operator within the immediately preceding 12 months in accordance with § 139.14.

(2) Sustains a pressure change of no more than 750 pascals (3 inches of H2O) in 5 minutes when pressurized to a gauge pressure of 18 inches of H2O (4,500 pascals) or evacuated to a gauge pressure of 6 inches of H2O (1,500 pascals) during the testing required in paragraph (1).

(3) Is repaired by the owner or operator and retested within 15 days of testing if it does not meet the criteria in paragraph (2).





(4) Displays a clear marking near the Department of Transportation Certification plate required by 49 CFR 178.340-10b (relating to certification), which shows the most recent date upon which the gasoline tank truck passed the test required in this subsection.

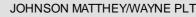
(d) Reporting and recordkeeping shall be as follows:

(1) The owner or operator of a source of VOCs subject to subsection (c) shall maintain records of certification testing and repairs. The records shall identify the gasoline tank truck, vapor collection system or vapor control system; the date of the test or repair; and, if applicable, the type of repair and the date of retest. The records shall be maintained in a legible, readily-available condition for 1 year after the date the testing or repair was completed.

- (2) The records of certification tests required by paragraph (1) shall contain:
- (i) The gasoline tank truck tank serial number.
- (ii) The initial test pressure and the time of the reading.
- (iii) The final test pressure and the time of the reading.
- (iv) The initial test vacuum and the time of the reading.
- (v) The final test vacuum and the time of the reading.
- (vi) At the top of each report page, the company name and the date and location of the tests on that page.
- (vii) The name and title of the person conducting the test.

(3) Copies of records and reports under this subsection shall be made available to the Department upon verbal or written request at any reasonable time. A copy of the test results for each gasoline tank shall be kept with the truck.

(e) Gasoline tank trucks with a rated capacity of less than 4,800 gallons are exempt from subsections (c) and (d).





15-00027

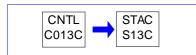
#### SECTION D. **Source Level Requirements**

Source ID: C013C

Source Name: DEVON III AREA DUST COLLECTOR Source Capacity/Throughput:

4.000 Lbs/HR

POWDER



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

# **Emission Restriction(s).**

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

No person may permit the emission into the outdoor atmosphere of particulate matter (filterable PM) from this source in excess of 0.02 grains per dry standard cubic foot.

[Compliance with this permit condition assures compliance with 25 Pa. Code § 123.13 (c)(1)(i).]

#### н. TESTING REQUIREMENTS.

#### # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall perform a stack test using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(c) The stack test shall, at a minimum, test for the filterable Particulate Matter (FPM). Tests shall be conducted in accordance with the provisions of EPA Methods 5 and 201 or other Department approved methodology and 25 Pa. Code Chapter 139.

(d) At least thirty (30) calendar days prior to the test(s), the Department shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

(g) Documentation such as calculations or manufacturer specifications submitted to the Department may be used in lieu of a source test to demonstrate compliance with Condition #001 under this source, upon Department review and approval.

# III. MONITORING REQUIREMENTS.

#### # 003 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall monitor the pressure drop across this dust collector daily, when it is operating.





# IV. RECORDKEEPING REQUIREMENTS.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the pressure drop across this dust collector daily, when it is operating.

#### V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

#### # 005 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The pressure drop readings across this dust collector shall be maintained in the range of 0.2 to 10.0 inches (w.g.). A single daily reading in the range of 0.2 to 10.0 inches (w.g.) during production demonstrates compliance.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For this source,

(a) a sufficient quantity of spare dust collector filters shall be kept on site in order to immediately replace anyone requiring replacement;

(b) the dust collector filters shall meet the manufacturer's specifications; and

(c) a pressure drop monitoring device shall be maintained according to the manufacturer's specifications.

#### VII. ADDITIONAL REQUIREMENTS.

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

(a) The following process exhausts are vented into this dust collector (C013C):

- (i) Group A in DEVON III
- (1) 1,000-gallon Mixing Tank (T-1010) (2) 2,000-gallon Mixing Tank (T-1011) (3) 2,000-gallon Mixing Tank (T-1012) (4) 2,000-gallon Mixing Tank (T-1013) (5) 1,200-gallon Mixing Tank (T-1014) (6) 2,000-gallon Mixing Tank (T-1015) (7) 2,000-gallon Mixing Tank (T-1016) (8) 2,000-gallon Mixing Tank (T-1017) (9) 1,200-gallon Mixing Tank (T-1018) (10) 2,000-gallon Mixing Tank (T-1019) (11) 2,000-gallon Mixing Tank (T-1020) (12) 2,000-gallon Mixing Tank (T-1021) (13) 2,000-gallon Mixing Tank (T-1033) (14) Extraction trunk (WS-1) (ii) Group B in DEVON III (1) 750-gallon Mixing Tank (T-1026) (2) 750-gallon Mixing Tank (T-1027) (3) 1,000-gallon Mixing Tank (T-1028) (4) 1,000-gallon Mixing Tank (T-1030)

(5) 750-gallon Mixing Tank (T-1031)





(6) 750-gallon Mixing Tank (T-1032)

- (iii) Group C in DEVON III
- (1) 300-gallon Mixing Tank (T-1001)
- (2) 300-gallon Mixing Tank (T-1002)
- (3) 300-gallon Mixing Tank (T-1003)
- (4) 1,000-gallon Mixing Tank (T-1004)
- (5) 1,000-gallon Mixing Tank (T-1005)
- (6) 300-gallon Mixing Tank (T-1006)

(b) No HAP compounds in dry form are added to the above tanks [the tanks are not subject to 40 CFR Part 63 Subpart CCCCCCC (7Cs)].



# 15-00027

# SECTION E. Source Group Restrictions.

# Group Name: GROUP 1

Group Description: Requirements for Source IDs 103, 128, 129, and 130

# Sources included in this group

ID	Name
103	DEVON I PRODUCTION AREA
128	LINE 17 COATING PROCESS (DEVON III)
129	LINE 10 COATING PROCESS (DEVON III)
130	LINE 11 COATING PROCESS (DEVON III)

# I. RESTRICTIONS.

# Emission Restriction(s).

# # 001 [25 Pa. Code §123.13]

# Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this source group in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

# # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The combined post-control emissions from Source IDs 103, 128, 129 and 130 shall not exceed the following limits:

Nitrogen Oxides (NOx):	2.6 lb/hr, as a 1-hour rolling average
(as NO2)	7.10 ton/yr, as a 12-month rolling sum

Volatile Organic Compounds (VOC): 1.29 lb/hr (as methane) 2.5 ton/yr, as a 12-month rolling sum

Ammonia (Anhydrous) concentration: 10.00 ppmv on a dry basis.

# Control Device Efficiency Restriction(s).

# # 003 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The process exhausts from Devon I Production Area and Coating Line Nos. 17, 10, 11 (Source IDs: 103, 128, 129 and 130) shall be vented to the following emission control system for NOx, VOC, acid gases, and ammonia removal:

- Source ID C012B SCR System (Devon III) [selective catalytic reduction (SCR) system for NOx and VOC removal], and then followed by,
- (2) Source ID C012C Ammonia Scrubber (Devon III)).
- (b) The process exhausts from Source IDs 103, 128, 129, and 130 may bypass the emission control system (Source IDs C012B and C012C) when their pre-control emissions are less than or equal to:
  - 2.6 lb/hr of NOx, and
  - 1.29 lb/hr of VOC.

(1) The permittee shall keep records of the pre-control NOx and VOC emissions (in lb/hr) when operating under this scenario [in paragraph (b) of this permit condition], based on usage of each coating, thinner and cleaning solvent, and NOx monitoring data.

(2) The permittee shall keep records of date and duration of each event that the process exhausts from Source IDs 103, 128, 129, and 130 bypass the associated emission control system.

# II. TESTING REQUIREMENTS.

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





#### III. MONITORING REQUIREMENTS.

15-00027

# # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source IDs 103, 128, 129, and 130, the permittee shall

- (a) monitor monthly usage for each coating, thinner, component and cleaning solvents.
- (b) track the total HAP, NOx and VOC emissions monthly, on a 12-month rolling sum basis.

#### IV. RECORDKEEPING REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

For Source IDs 103, 128, 129, and 130 (Source Group 1),

(a) the permittee shall keep monthly records of

- (1) usage for each coating, thinner, component and cleaning solvent.
- (2) VOC and HAP content for each coating, thinner, component and cleaning solvent.

(b) the permittee shall keep monthly records of the total combined NOx, and VOC emissions from this source group as a 12-month rolling sum, based on:

- (1) usage and VOC/HAP content of each coating, thinner, component and cleaning solvent.
- (2) control device removal efficiency (using the most recent stack testing results),
- (3) NOx monitoring date,
- (4) operating hours when process exhaust(s) bypasses the emission control system.

(c) the permittee shall keep monthly records of operating hours when the process exhausts bypasses the emission control system.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall ensure that at least 90% of the NOx monitoring data are accurately collected on a monthly basis.

(b) The permittee shall maintain the NOx monitoring equipment and stock parts necessary for routine repairs onsite.

#### VII. ADDITIONAL REQUIREMENTS.

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



# Group Name: GROUP 2

Group Description: Requirements for Source IDs C012B and C012C

# Sources included in this group

ID Name C012BSCR SYSTEM (DEVON III)

C012CAMMONIA SCRUBBER (DEVON III)

# I. RESTRICTIONS.

# Control Device Efficiency Restriction(s).

# # 001 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The emission control system (Source IDs C012B and C012C) shall achieve:
- (1) overall NOx removal efficiency: equal to or greater than 90% on a mass basis, or less than 2.6 lb/hr [measured at the discharging point (S12C)], and
- (2) overall VOC removal efficiency: equal to or greater than 90% on a mass basis, or less than 20 ppmvd VOC as methane [measured at the discharging point (S12C)].
- (b) The permittee shall operate the SCR System (Devon III) (Source ID C012B) and the Ammonia Scrubber (Source ID C012C) whenever Source IDs 103, 128, 129, and/or 130 are operating, with the following exception:

the process exhausts from Source IDs 103, 128, 129, and 130 may bypass their emission control system (Source IDs C012B and C012C) when the pre-control emissions are less than or equal to: - 2.6 lb/hr of NOx, and

- 1.29 lb/hr of VOC.

# # 002 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For the Ammonia Scrubber (Devon III) (Source ID C012C), the permittee shall adhere to the following approved ranges when the scrubber is in operation:

(a) scrubbing liquid pH value: not less than 1 and not greater than 5 (with an accuracy of 0.05% of span);

(b) scrubbing liquid flowrate value: not less than 425 gallons per minute; and

(c) pressure drop value: not greater than 5 inches of water, across the Ammonia Scrubber. A single daily reading which is not greater than 5 inches (w.g.) during production demonstrates compliance.

# # 003 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For the SCR System (Devon III) (Source ID C012B), the permittee shall adhere to the following approved ranges when the SCR System is in operation:

(a) the inlet temperature at the SCR System oxidation and catalyst beds shall be no less than 575 °F. A single daily reading which is no less than 575 °F during production demonstrates compliance;

(b) the process exhaust flowrate to the SCR System shall not exceed 35,000 standard cubic feet per minute @ 70°F; and

(c) the ammonia feed flowrate to the SCR System shall be adjusted, based on the NOx concentration data provided by a NOx analyzer.





# II. TESTING REQUIREMENTS.

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

(a) The permittee shall perform a source test for the coating lines (comprised of Source IDs: 103, 128, 129, and 130) using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while the sources are operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of this manual has been revised since approval, a new protocol must be submitted for approval.

(b) The stack test shall, at a minimum, test for overall NOx and VOC removal efficiency (by Source IDs C012B and C012C), and NOx, VOC and ammonia concentrations at the discharging point (S12C). Tests shall be conducted in accordance with the provisions of EPA Methods or other Department approved methodology and 25 Pa. Code Chapter 139.

(c) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

#### III. MONITORING REQUIREMENTS.

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

For the Ammonia Scrubber (Devon III) (Source ID C012C), the permittee shall monitor the following parameters daily, when operating:

- (a) the pH of the scrubbing liquid;
- (b) the flowrate of the scrubbing liquid; and

(c) the differential pressure drop across the scrubber.

#### # 006 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For the SCR System (Source ID C012B), the permittee shall monitor the following parameters daily, when operating:

(a) the air flowrate to the SCR gas stream; and

(b) the inlet temperature to the SCR oxidation and catalyst beds.

# IV. RECORDKEEPING REQUIREMENTS.

# # 007 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For Source ID C012C, the permittee shall keep records of the following parameters daily, when operating:

(a) the pH of the scrubbing liquid;





(b) the flowrate of the scrubbing liquid; and

(c) the differential pressure drop across the scrubber.

# 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For the SCR System (Devon III) (Source ID C012B), the permittee shall maintain records of the following parameters daily, when operating:

(a) the air flowrate to the SCR gas stream; and

(b) the inlet operating temperature to the SCR oxidation and catalyst beds.

# 009 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

(a) The permittee shall keep records of all inspections, repair and maintenance performed on the control devices and the monitoring equipment.

(b) The permittee shall keep a copy of the manufacturer's specifications for maintenance and operation.

# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

# # 010 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

For the SCR System (Source ID C012B), the permittee shall use the following approved means or devices to measure the applicable process parameters:

(a) the air flow rate to the SCR using a Kurtz Mass Flow element or equivalent. The minimum accuracy of the device is plus (+) or minus (-) 0.25% between -40° C to 125° C.

(b) the temperature measured at the inlet of the SCR oxidation and catalyst beds using a K-type thermocouple or equivalent. The minimum accuracy of the device is plus (+) or minus (-) 3.2° C @ 800° C.

#### VII. ADDITIONAL REQUIREMENTS.

# # 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID C012B, SCR System (Devon III), consists of the following components:

- A SCR system with a natural gas burner (a heat exchanger), an oxidation bed for VOC reduction.

- An ammonia mixing/injection system and a catalyst bed for NOx reduction.



# 15-00027

# SECTION E. Source Group Restrictions.

# Group Name: GROUP 3

Group Description: Requirements for Emergency Generator Engines

# Sources included in this group

ID	Name
199	650-KW BACKUP DIESEL GENERATOR
200A	400-KW DIESEL EMERGENCY GENERATOR

732 EMERGENCY GENERATOR (DETROIT 650 KW)

# I. RESTRICTIONS.

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

### # 001 [25 Pa. Code §123.13]

#### Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from any of the generator sets listed under this Source at any time, in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

# Fuel Restriction(s).

#### # 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6604]

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

#### What fuel requirements must I meet if I own or operate an existing stationary CI RICE?

The permittee shall use diesel fuel that meets the requirements of 40 CFR §1090.305 for nonroad diesel fuel:

(a) A sulfur content of 15 ppm maximum, and

(b) A minimum cetane index of 40; or maximum aromatic content of 35% volume.

[Compliance with this condition assures compliance with 25 Pa. Code §123.21.]

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

# 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.93(c)(5).]

Each emergency generator set engine shall operate less than 500 hours in any consecutive 12-month period.

# # 004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]

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

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

(a) Pursuant to 40 CFR 63.6640(f), for each emergency generator set engine,

- (1) maintenance checks and readiness testing hours shall not exceed 100 hours per calendar year.
- (2) any non-emergency operation hours shall not exceed 50 hours per calendar year,
- and are counted as part of the 100 hr/yr for maintenance and testing hours.

(b) The permittee shall operate the emergency generator engine according to the requirements in the most recent version of 40 CFR §63.6640(f).

(c) If the permittee does not operate the engine according to the requirements of 40 CFR §63.6640(f), the engine will not be considered an emergency engine under 40 CFR Part 63 Subpart ZZZZ and must meet all requirements for non-emergency engine.





# II. TESTING REQUIREMENTS.

# # 005 [25 Pa. Code §139.16]

# Sulfur in fuel oil.

(a) The following are applicable tests for the analysis of commercial fuel oil to demonstrate compliance with the sulfur limitation for the sources firing diesel fuel:

(1) the fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) test methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).

(3) results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

(b) The testing requirements in subpart (a), above, shall be waived in the event that a delivery receipt from the supplier, showing the percent sulfur in the fuel, is obtained each time a fuel oil delivery is made to demonstrate compliance with the sulfur limitation, specified under this Source Group.

(c) In lieu of fuel analysis or fuel receipts with each delivery, the permittee shall receive annually from the fuel supplier, a certification that all of the fuel oil delivered to the facility indicates the following minimum or maximum specifications, as applicable:

(1) sulfur content to not exceed 15 ppm; and

(2) cetane index or aromatic content as follows:

(A) cetane index – minimum of 40; or

(B) aromatic content - maximum of 35 volume%.

(3) If the permittee changes fuel oil supplier during the course of the calendar year, the above certifications shall be required from each new fuel oil supplier.

# III. MONITORING REQUIREMENTS.

# # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

For each emergency generator set, the permittee shall monitor the following when in operation:

(a) startup and shutdown time, operating status (such as maintenance and emergency), and (b) emergency operating hours and non-emergency operating hours for each operation.

# IV. RECORDKEEPING REQUIREMENTS.

# # 007 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR §63.6655(d) and (f)(2).]

For each emergency generator set, the permittee shall keep the following records when in operation:

(a) startup and shutdown time, duration of operation, operating status (such as maintenance and emergency),

(b) total operating hours, daily, monthly, annually, and as a 12-month rolling sum, and

(c) total non-emergency operating hours, daily, monthly, annually, and as a 12-month rolling sum.

# # 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall keep records of NOx emission from each generator set, using manufacturer's data or the emission factors specified below, on a monthly basis and as a 12-month rolling sum:

AP-42: Compilation of Air Emissions Factors from Stationary Sources,





Chapter 3.4: Large Stationary Diesel And All Stationary Dual-fuel Engines.

# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655] Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

# What records must I keep?

15-00027

Pursuant to 40 CFR §63.6655, the permittee shall keep the following records for each source:

(a) A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).

(b) Records of the occurrence and duration of each malfunction of operation.

(c) Records of all required maintenance performed.

(d) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning to its normal or usual manner of operation.

# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

# 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6603]

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

What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

Pursuant to 40 CFR §63.6603(a) [Item No. 4 in Table 2d], the permittee shall:

(a) change engine oil and filter every 500 hours of operation or annually, whichever comes first,

(b) inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and

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

Pursuant to 40 CFR §63.6625(i), the permittee may utilize an oil analysis program to reduce the oil replacement frequency, as specified in (a), above.

# 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]

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

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

For each generator set, the permittee shall:

(a) operate and maintain a non-resettable hour meter,

(b) operate and maintain this source, including associated monitoring equipment, according to the manufacturer's specifications, in a manner consistent with safety and good air pollution control practices for minimizing emissions, and

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





### VII. ADDITIONAL REQUIREMENTS.

15-00027

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



# Group Name: GROUP 4

Group Description: Requirements from 25 Pa. Code §129.52d Metal Surface Coating

#### Sources included in this group

ID	Name
103	DEVON I PRODUCTION AREA
128	LINE 17 COATING PROCESS (DEVON III)
129	LINE 10 COATING PROCESS (DEVON III)
130	LINE 11 COATING PROCESS (DEVON III)
136	LINE 14 2-STAGE DOSING STATION
137	LINE 15 2-STAGE DOSING STATION

#### I. RESTRICTIONS.

# Emission Restriction(s).

# # 001 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface

§129.52d(d) - Emission Limitations

#### §129.52d(d)(1)

The VOC content of each miscellaneous metal part coating or each miscellaneous plastic part coating, as applied, excluding water and exempt compounds, shall be equal to or less than the VOC content limit for the applicable coating category specified in the applicable table of VOC content limits in Tables I.

#### §129.52d(d)(4) - ) Least restrictive VOC limit

If more than one VOC content limit or VOC emission rate limit applies to a specific coating, then the least restrictive VOC content limit or VOC emission rate limit applies.

#### §129.52d(d)(5) - Coatings not listed in Table I

For a coating that does not meet the coating categories listed in Table I, the VOC content limit or VOC emission rate limit shall be determined by classifying the coating as a general one component coating or general multicomponent coating. The corresponding general one component coating or general multicomponent coating limit applies.

#### II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

#### # 002 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.

§129.52d(k) - Measurements and calculations.

To determine the properties of a coating or component used in a miscellaneous metal parts surface coating process, measurements and calculations shall be performed according to one or more of the following:

(1) EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, found at 40 CFR Part 60, Subpart D, Appendix A, including updates and revisions.

(2) Manufacturer's formulation data.

(3) Sampling and testing done in accordance with the procedures and test methods specified in Chapter 139.

(4) Other test method demonstrated to provide results that are acceptable for purposes of determining compliance with this section if prior approval is obtained in writing from the Department.





(5) Add-on air pollution control devices shall be equipped with the applicable monitoring equipment according to manufacturers' specifications. The monitoring equipment shall be installed, calibrated, operated and maintained according to manufacturers' specifications at all times the add-on air pollution control device is in use.

(6) EPA calculations information in the following:

(i) A Guideline for Surface Coating Calculations, EPA-340/1-86-016, including updates and revisions.

(ii) Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings, EPA-450/3-84-019, including updates and revisions.

# # 003 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.

§129.52d(e) - Compliance and monitoring requirements

The permittee shall comply with the applicable requirements as specified throughout §129.52d.

# IV. RECORDKEEPING REQUIREMENTS.

# 004 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.

§129.52d(f): Recordkeeping and reporting requirements.

(1) The permittee shall maintain monthly records sufficient to demonstrate compliance with this section. The records must include the following information:

(i) The following parameters for each coating, thinner, component and cleaning solvent as supplied:

(A) Name and identification number of the coating, thinner, other component or cleaning solvent.

- (B) Volume used.
- (C) Mix ratio.
- (D) Density or specific gravity.
- (E) Weight percent of total volatiles, water, solids and exempt solvents.
- (F) Volume percent of total volatiles, water and exempt solvents for the applicable table of limits in Tables I-V.
- (G) Volume percent of solids for the applicable table of limits in Tables VI--IX.

(ii) The VOC content of each coating, thinner, other component and cleaning solvent as supplied.

(iii) The VOC content of each as applied coating or cleaning solvent.

(iv) The calculations performed for each applicable requirement under subsections (d) and (e).

(v) The information required in a plan approval issued under subsection (e)(2).

(2) The records shall be submitted to the Department in an acceptable format upon receipt of a written request from the Department.

# V. REPORTING REQUIREMENTS.

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

## VI. WORK PRACTICE REQUIREMENTS.

#### # 005 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.

§129.52d(g) - Coating application methods.





(1) Electrostatic coating. (2) Flow coating. (3) Dip coating, including electrodeposition. (4) Roll coating. (5) High volume-low pressure (HVLP) spray coating. (6) Airless spray coating. (7) Air-assisted airless spray coating. (8) Other coating application method if approved in writing by the Department prior to use. [25 Pa. Code §129.52d] # 006 Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings. §129.52d(i) - Work practice requirements for coating-related activities. The permittee shall comply with the following work practices for coating-related activities: (1) Store all VOC-containing coatings, thinners or coating-related waste materials in closed containers. (2) Ensure that mixing and storage containers used for VOC-containing coatings, thinners or coating-related waste materials are kept closed at all times, except when depositing or removing these coatings, thinners or waste materials. (3) Minimize spills of VOC-containing coatings, thinners or coating-related waste materials and clean up spills immediately. (4) Convey VOC-containing coatings, thinners or coating-related waste materials from one location to another in closed containers or pipes. # 007 [25 Pa. Code §129.52d] Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings. §129.52d(j) - Work practice requirements for cleaning materials. The permittee shall comply with the following work practices for cleaning materials: (1) Store all VOC-containing cleaning materials and used shop towels in closed containers. (2) Ensure that mixing vessels and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials. (3) Minimize spills of VOC-containing cleaning materials and clean up spills immediately. (4) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes. (5) Minimize VOC emissions from cleaning of application, storage, mixing or conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from a miscellaneous metal part

coating unit, unless the coatings are applied using one or more of the following coating application methods:

#### VII. ADDITIONAL REQUIREMENTS.

containers.

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



# Ž

# SECTION E. Source Group Restrictions.

# Group Name: GROUP 5

Group Description: Requirements from 40 CFR Part 63 Subpart 7Cs

# Sources included in this group

ID	Name			
117	POWDER HANDLING EQUIPMENT (SYSTEM I)			
119	POWDER HANDLING EQUIPMENT (DEVON II)			
C010A	C010ADUST COLLECTOR III (POWDER HANDLING)			
C010B	C010BDUST COLLECTOR IV (POWDER HANDLING)			
C08A1	CAMFIL FARR DUST COLLECTOR FOR PROC 117			

# I. RESTRICTIONS.

# Emission Restriction(s).

# 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR Subpart CCCCCCC § 63.11601] SUBPART CCCCCCC - National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing

What are the standards for new and existing paints and allied products manufacturing facilities?

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall ensure that the visible emissions to the atmosphere shall not exceed 10-percent opacity.

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

# 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR Subpart CCCCCCC § 63.11602] SUBPART CCCCCCC - National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing

What are the performance test and compliance requirements for new and existing sources?

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall record the following for each inspection and testing activity.

- (1) The date, place, and time.
- (2) Person conducting the activity.
- (3) Technique or method used.
- (4) Operating conditions during the activity.
- (5) The results.
- (6) Description of correction actions taken.

# V. REPORTING REQUIREMENTS.

# 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR Subpart CCCCCCC § 63.11603] SUBPART CCCCCCC - National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing

# What are the notification, reporting, and recordkeeping requirements?

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall submit the notifications required in §40 CFR 63.11603.





(a) Notification of Compliance Status. If a source becomes an affected source in accordance with §40 CFR 63.11599(b)(3) after the applicable compliance date in §40 CFR 63.11600(a) or (b), the permittee shall submit a Notification of Compliance Status within 180 days of the date of processing, using, or generating materials containing HAP, as defined in §40 CFR 63.11607. The Notification of Compliance Status shall include the information as specified below:

(i) company's name and address.

(ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification, a description of the method of compliance and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.

(b) Annual Compliance Certification Report. The permittee shall prepare an annual compliance certification report according to the requirements in §40 CFR 63.11603(b)(1) through (b)(3) in paragraphs (i) through (iii). This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. When a deviation from the requirements of this subpart has occurred, the annual compliance certification report must be submitted along with the deviation report.

(i) The first annual compliance certification report must cover the first annual reporting period which begins the day of the compliance date and ends on December 31.

(ii) Each subsequent annual compliance certification report must cover the annual reporting period from January 1 through December 31.

(iii) Each annual compliance certification report must be prepared no later than January 31 and kept in a readily accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15.

(c) Deviation Report. If a deviation has occurred during the reporting period, the permittee shall include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with the annual compliance certification report.

(d) Records. The permittee shall maintain the records specified in 40 CFR 63.11603(c)(1) through (4) and in accordance with 40 CFR 63.11603(c)(5) through (6), for five years after the date of each recorded action.

# VI. WORK PRACTICE REQUIREMENTS.

# 004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR Subpart CCCCCCC § 63.11601] SUBPART CCCCCCC - National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing

What are the standards for new and existing paints and allied products manufacturing facilities?

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

Pursuant to §63.11601(a)(1), the permittee shall operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process.

Pursuant to §63.11601(a)(2), the permittee shall capture particulate emissions and route them to a particulate control device meeting the emission standard, specified in Condition #001 under this Group. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form.

# 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR Subpart CCCCCCC § 63.11602] SUBPART CCCCCCC - National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing

What are the performance test and compliance requirements for new and existing sources?

(a) Initial particulate control device inspections and tests [§63.11602(a)(1)]

For each new and existing affected source, the permittee shall demonstrate initial compliance by conducting an initial inspection and a visible emission test according to §63.11602(a)(1). The permittee shall conduct each inspection no later





15-00027

than 180 days after the permittee applicable compliance date for each control device which has been operated within 60 days following the compliance date.

(1) The permittee shall visually inspect the system ductwork and dry particulate control unit for leaks. The permittee shall also inspect the inside of each dry particulate control unit for structural integrity and condition.

(2) An initial inspection of the internal components of a particulate control system is not required if there is a record that an inspection meeting the requirements of this subsection has been performed within the past 12 months and any maintenance actions have been resolved.

(3) The permittee shall conduct a visible emission test consisting of three 1-minute test runs using Method 203C (40 CFR part 51, appendix M). The visible emission test runs shall be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If the average test results of the visible emissions test runs indicate an opacity greater than the applicable limitation in §63.11601(a), the permittee shall take corrective action and retest within 15 days.

(b) Ongoing particulate control device inspections and tests [§63.11602(a)(2)]

Following the initial compliance demonstration, the permittee shall perform periodic inspections according to the following requirements:

(1) The permittee shall inspect and maintain each particulate control unit:

(i) conducting weekly visual inspections of any flexible ductwork for leaks.

(ii) conducting inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.

(2) The permittee shall conduct a 5-minute visual determination of emissions from the particulate control device every 3 months using Method 22. The visible emission test shall be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, the permittee shall conduct a Method 203C test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and shall be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicates an opacity greater than the limitation in §63.11601(a)(5), the permittee shall comply with the following requirements:

(i) taking corrective action and retesting using Method 203C within 15 days. The Method 203C test consists of three 1minute test runs and shall be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. The permittee shall continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in §63.11601(a)(5).

(ii) Preparing a deviation report in accordance with §63.11603(b)(3) for each instance in which the Method 203C opacity results were greater than the limitation in §63.11601(a)(5).

(iii) Resuming the visible determinations of emissions from the particulate control device in accordance with paragraph (b)(2) 3 months after the previous visible determination.

#### VII. ADDITIONAL REQUIREMENTS.

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



# SECTION F. Alternative Operation Requirements.





Alternative Operation Name: LINE14 EXHAUST VENTING TO L15 SYSTEM

# #001 CHANGES FROM NORMAL OPERATION

- Line 14 exhaust may be treated in the following three steps:
- (1) in Line 14 Ovens NOx Scrubber (Source ID C017)
- (2) in Line 15 SCR System (Source ID C021)
- (3) in Line 15 Ammonia Scrubber (Source ID C019)

# Sources included in this Alternative Operation:

ID	Name	Source Type
203	LINE 14 DRYING & CALCINING	Process

#### RESTRICTIONS. .

# **Emission Restriction(s).**

15-00027

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

(a) When using this Alternative Operating Schedule, the permittee shall ensure that the total combined post-control pollutant emissions from Source IDs 203 and 204 shall not exceed the following limits:

Nitrogen Oxides (NOx): 13.4 lb/hr (calculated as a one-hour rolling average) Volatile Organic Compounds (VOC): 1.1 lb/hr, as methane Ammonia (NH3): 10.0 ppmvd

(b) Total combined NOx and VOC emissions from this operating scenario are counted towards Source ID 204 emissions. **Operation Hours Restriction(s).** 

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

This alternative operating schedule shall be limited to 800 hours per year, as a 12-month rolling sum.

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

The permittee may use this alternative operating schedule when:

(a) operating conditions:

- (1) the exhaust treatment system for Source ID 203 is under repair and/or maintenance, or
- (2) Source ID 203 Drying Ovens are in the process of shutting down.

(b) exhaust flow from Source ID 203:

(1) the exhaust from Calcining Ovens shall be first treated in Source ID C017 (Line 14 Ovens NOx Scrubber),

(2) the pre-treated Calcining Oven exhaust and Drying Oven exhaust shall then enter Source ID C021 (L15 SCR System) for further treatment system,

(3) total combined exhaust flow to Source ID C021 (Line 15 SCR System) shall no exceed a daily average of 35,000 scfm (@ 70 °F),

(4) the inlet operating temperature for Source ID C021 and catalyst beds shall be greater than 575 °F and less than 752°F. A single daily reading in the range of 575 °F to 752 °F during production demonstrates compliance.

(c) the continuous NOx concentration and flowrate monitoring and recording systems are operating properly.

# II. TESTING REQUIREMENTS.

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





# SECTION F. Alternative Operation Requirements.

#### III. MONITORING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

When in operation, the permittee shall

(a) continuously monitor NOx emission concentration and exhaust flowrate, and

(b) monitor hours of operation and operating status (such as, for shutdown period or maintenance).

#### IV. RECORDKEEPING REQUIREMENTS.

# # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) When in operation, the permittee shall continuously record NOx emission concentration and exhaust flowrate.

(b) The permittee shall calculate and keep records of total combined NOx and VOC emissions hourly and annually.

(c) The permittee shall keep records of date, duration of each event, and operating status (such as, shutdown and/or maintenance), when this alternative operation schedule is used.

[Hourly emissions are calculated as a 60-minute rolling sum; annually emissions are calculated as a 12-month rolling sum.]

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

# # 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The monitoring devices for NOx and flowrate shall be located between the downstream of L15 Ammonia Scrubber (Source ID C019) and the stack discharge point.

(b) The permittee shall operate and maintain the emission NOx, and flowrate monitoring system according to the manufacturer's specifications.

(c) The permittee shall comply with applicable permit conditions for Source IDs 203, 204, C017, C021 and C019, as specified in this permit.





SECTION G. Emission Restriction Summary.

Source Id	Source Descriptior		
103	DEVON I PRODUCTION AREA		
<b>Emission Limit</b>			Pollutant
10.000	PPMV	drybasis	Ammonia (Anhydrous)
2.600	Lbs/Hr	one-hour rolling sum from Source IDs 103,128,129,&130	NOX
7.100	Tons/Yr	12-month rolling sum from Source IDs 103,128,129,&130	NOX
0.040	gr/DRY FT3	particulate matter	PM_FILT
1.290	Lbs/Hr	one-hour rolling sum from Source IDs 103,128,129,&130	VOC
2.500	Tons/Yr	12-month rolling sum from Source IDs 103,128,129,&130	VOC
104	ENGINE TEST CELL	S (6)	
<b>Emission Limit</b>			Pollutant
11.000	Tons/Yr	as a 12-month rolling sum	NOX
0.040	gr/DRY FT3	particulate matter	PM_FILT
500.000	PPMV	drybasis	SOX
2.700	Tons/Yr	as a 12-month rolling sum	VOC
3.000	Lbs/Hr		VOC
15.000	Lbs/Day		VOC
115	DEVON II QC LAB SA		
<b>Emission Limit</b>			Pollutant
0.040	gr/DRY FT3	particulate matter	PM_FILT
117	POWDER HANDLING EQUIPMENT (SYSTEM I)		
<b>Emission Limit</b>			Pollutant
0.040	gr/DRY FT3	particulate matter	PM_FILT
119	POWDER HANDLING	G EQUIPMENT (DEVON II)	
<b>Emission Limit</b>			Pollutant
0.040	gr/DRY FT3	particulate matter	PM_FILT
128	LINE 17 COATING PROCESS (DEVON III)		
<b>Emission Limit</b>			Pollutant
10.000	PPMV	drybasis	Ammonia (Anhydrous)
2.600	Lbs/Hr	one-hour rolling sum from Source IDs 103,128,129,&130	NOX
7.100	Tons/Yr	12-month rolling sum from Source IDs 103,128,129,&130	NOX
0.040	gr/DRY FT3	particulate matter	PM_FILT
1.290	Lbs/Hr	one-hour rolling sum from Source IDs 103,128,129,&130	VOC
2.500	Tons/Yr	12-month rolling sum from Source IDs 103,128,129,&130	VOC



15-00027

JOHNSON MATTHEY/WAYNE PLT



SECTION G. Emission Restriction Summary.

Source Id	Source Description	r		
129	LINE 10 COATING PROCESS (DEVON III)			
Emission Limi	t		Pollutant	
10.000	PPMV	drybasis	Ammonia (Anhydrous)	
2.600	Lbs/Hr	one-hour rolling sum from Source IDs 103,128,129,&130	NOX	
7.100	Tons/Yr	12-month rolling sum from Source IDs 103,128,129,&130	NOX	
0.040	gr/DRY FT3	particulate matter	PM_FILT	
1.290	Lbs/Hr	one-hour rolling sum from Source IDs 103,128,129,&130	VOC	
2.500	Tons/Yr	12-month rolling sum from Source IDs 103,128,129,&130	VOC	
130	LINE 11 COATING	PROCESS (DEVON III)		
Emission Limit	t		Pollutant	
10.000	PPMV	dry basis	Ammonia (Anhydrous)	
2.600	Lbs/Hr	one-hour rolling sum from Source IDs 103,128,129,&130	NOX	
7.100	Tons/Yr	12-month rolling sum from Source IDs 103,128,129,&130	NOX	
0.040	gr/DRY FT3	particulate matter	PM_FILT	
1.290	Lbs/Hr	one-hour rolling sum from Source IDs 103,128,129,&130	VOC	
2.500	Tons/Yr	12-month rolling sum from Source IDs 103,128,129,&130	VOC	
136	LINE 14 2-STAGE DOSING STATION			
Emission Limit	t		Pollutant	
0.040	gr/DRY FT3	particulate matter	PM_FILT	
137	LINE 15 2-STAGE I	DOSING STATION		
<b>Emission Limi</b>	t		Pollutant	
0.040	gr/DRY FT3	particulate matter	PM_FILT	
140	WASHCOAT BATC	H PROCESS		
Emission Limit	t		Pollutant	
	gr/DRY FT3	particulate matter	PM_FILT	
199	650-KW BACKUP [	DIESEL GENERATOR		
Emission Limi	t		Pollutant	
	Lbs/Hr		СО	
6.900	GRAMS/HP-Hr		NOX	
11.340	Lbs/Hr		NOX	
	gr/DRY FT3	particulate matter	PM_FILT	
L				





# SECTION G. Emission Restriction Summary.

Source	ld	Source Description	r	
200A		400-KW DIESEL EMERGENCY GENERATOR		
Emiss	ion Limit			Pollutant
	6.900	gr/HP-Hr		NOX
	0.040	gr/DRY FT3	particulate matter	PM_FILT
203		LINE 14 DRYING 8	CALCINING	
Emiss	sion Limit			Pollutant
	10.000	PPMV	on a dry basis	Ammonia (Anhydrous)
	11.000	Tons/Yr	as 12-month rolling sum	NOX
	13.400	Lbs/Hr	as a 60-minute rolling sum	NOX
	1.100	Lbs/Hr		VOC
	2.500	Tons/Yr	as 12-month rolling sum	VOC
204		LINE 15 DRYING 8		
Emiss	sion Limit			Pollutant
	10.000	PPMV	on a dry basis	Ammonia (Anhydrous)
	11.000	Tons/Yr	as a 12-month rolling sum	NOX
	13.400	Lbs/Hr	as a 60-minute rolling sum	NOX
	1.100	Lbs/Hr		VOC
	2.500	Tons/Yr	as a 12-month rolling sum	VOC
302		WASHCOAT BLEN	DING TANKS	
Emiss	ion Limit			Pollutant
	0.020	gr/DRY FT3	particulate matter	PM_FILT
732		EMERGENCYGEN	IERATOR (DETROIT 650 KW)	
Emiss	ion Limit			Pollutant
		gr/DRY FT3	particulate matter	PM_FILT
735A		GAS FIRED HEATE	RS	
Emise	sion Limit			Pollutant
Linisa	500.000	PPMV	on a dry basis	SOX
C013C		DEVON III AREA D		
Emiss	sion Limit			Pollutant
	0.020	gr/DRY FT3	particulate matter	PM_FILT

# Site Emission Restriction Summary

Emission Limit		Pollutant
24.900 Tons/Yr	as a 12-month rolling sum	NOX
24.900 Tons/Yr	as a 12-month rolling sum, as CH4	VOC
9.900 Tons/Yr	any single HAP, as a 12-month rolling sum	Hazardous Air Pollutants
24.900 Tons/Yr	aggregated HAPs, as a 12-month rolling sum	Hazardous Air Pollutants



JOHNSON MATTHEY/WAYNE PLT



# SECTION G. Emission Restriction Summary.

# Alternative Operation Emission Restriction Summary

Source Id

Source Description





# SECTION H. Miscellaneous.

15-00027

(a) Title V Operating Permit 15-00027 is a compilation of applicable requirements including those addressed in the following previously issued permits:

- (1) Operating Permit: OP-15-309-010 SCR Catalyst Product System
- (2) Operating Permit: OP-15-399-038 Catalyst Precoat Facility
- (3) Operating Permit: OP-15-399-035  $\,$  Dust Collector #2
- (4) Operating Permit: OP-15-399-036 Rare Earth Coating Process
- (5) Operating Permit: OP-15-309-015 SCR Catalyst Product System
- (6) Operating Permit: OP-15-309-016 Four Catalyst Drying Ovens
- (7) Operating Permit: OP-15-323-008 Metal Support Buffing Operation
- (8) Operating Permit: OP-15-323-009 Chip Remover Machine
- (9) Operating Permit: OP-15-318-010D Prod. Scrubber System I (Mod.)
- (10) Operating Permit: OP-15-0027 Facility VOC/NOx RACT

The Department has determined that the emissions from the following activities, excluding those indicated as site level requirements, in Section C, of this permit, do not require additional limitations, monitoring, or recordkeeping:

- (1) Four Batching Mixer Stations (Devon II)
- (2) Two Process Ovens
- (3) Spray Dryer
- (4) Four Catalyst Drying Ovens (Devon II)
- (5) Two precious metals solution storage tank systems (Devon II)
- (6) Two blending solution storage tank systems (Devon II)
- (7) Two containment room ventilation systems (Devon II)
- (8) Four underground storage (gasoline) tanks (UST) (RFD #15-A01-844)
- (9) Spray Painting Operations

(10) All Pilot Plant and lab Equipment: One Stamper (packaging shipping, batching, coating, impregnation room, lab, oven, and other areas)

- (11) Bickley Static Oven
- (12) 300,000 BTU/hr Gas-Fired Water Heater in Batching Department
- (13) Automotive emissions testing operations (Engine Test Lab Emissions)
- (14) Emissions generated from drum labeling and catalyst sampling
- (15) Containment rooms associated with Devon II Process Lines
- (16) Parts Washers using non-VOC cleaners
- (17) Tech Center Exhaust #2 (RFD #15-328-328)
- (18) Nine (9) Space Heaters (RFD #15-A01-649)
- (19) Four Underground Gasoline Storage Tanks (RFD #15-A01-775)
- (20) Two Engine Test Cells (Diesel Fuel-Fired) (RFD #15-A01-974)
- (21) Natural Gas-Fired Space Heaters (RFD #15-A01-973, and #15-A01-976)
- (22) Devon II hoods
- (23) Trial microwave oven (RFD #259)
- (24) Wiped Film Evaporator (RFD #371)
- (25) Lanly Dryer (RFD #489)
- (26) Modify pH of C012A, Acid Gas Scrubber (RFD #550)
- (27) Microwave oven to partially dry parts manufactured in the pilot plant (RFD #559)
- (28) Trial to change in airflow to SCR system, C012B (RFD # 1118)
- (29) Another dryer cell on the Line 10 production (RFD #1687)
- (30) System to ventilate vapors from two 70-gallon line tanks and two 1,000-gallon reserve tanks used to supply washcoat to the Devon 2, Line 15 for coating solutions onto diesel catalysts (RFD #1948)
- (31) System to ventilate sample preparation equipment in Devon II and Devon III batching offices (RFD #1960)
- (32) Combination microwave and convection oven for product trials (RFD #2001)

(33) Reclassification of Source 118 powder handling equipment as de minimis due to limited emission and operating hours (RFD #2121) [its associated control device C08B].

(34) Reclassification of Source C013A and associated sources as de minimis per RFD #2125 (e.g., Powder and ammonia hood controlled by C013A. Exhaust stream filter and exhausted inside of building.).

(35) Rotary vane vacuum system for the coating of gasoline and diesel washcoat onto catalyst substrate on a prototype production line in Devon 2 (RFD #2140)

(36) Add sulfuric acid tank ventilation (RFD #2454 and 2455)

(37) Modified Line 7 dosing and drying: 2 dryer w/microwave technology and 1 calcination oven (RFD #2978)





# SECTION H. Miscellaneous.

(b) The Permit 15-00027 (APS ID: 345911, Auth ID: 519776) has been administratively amended to incorporate Plan Approval conditions from PA-15-0027D (Coating Lines) and PA-15-0027E (Diesel Emergency Generator).

(c) The Permit 15-00027 (APS ID: 341568, Auth ID: 573962) has been administratively amended to incorporate Plan Approval conditions from PA-15-0027F (Washcoat Batching System for Coating Lines 7, 10 and 11).

(d) The Permit 15-00027 (APS ID: 341568, Auth ID: 612325) has been modified to relocate some existing equipment to new locations within the facility.

(e) The Permit 15-00027 (APS ID: 341568, Auth ID: 636000) has been renewed and amended to incorporate conditions from Plan Approval No. 15-0027H (Three (3) Washcoat Batch Mixing Tanks).

(f) The Permit 15-00027 (APS ID: 341568, Auth ID: 706102) has been administratively amended to incorporate the changes.

(g) The Permit 15-00027 (APS ID: 341568, Auth ID: 758715) has been modified to change the pH operating range for the Acid Gas Scrubber (Source C012A) from 5.5 to 7.0 to 3.5 to 5.5.

(h) The Permit 15-00027 (APS ID: 341568, Auth ID: 760682) has been modified to have all air flow from Sources 103, 128, 129, and 130 bypass the Acid Gas Scrubber (Source C012A) and go directly to the SCR system (Source C012B) or the atmosphere under specific conditions.

(i) The Permit 15-00027 (APS ID: 341568, Auth ID: 824684) has been modified to revise the pH range for the Ammonia Scrubber (Source C012C) from 3.5 to 5 to 1 to 5.

(j) The Permit 15-00027 (APS ID: 341568, Auth ID: 886097) has been modified to allow the vacuum clearance blower exhaust of the dosing stations on Line 11 (Source 130) to be removed from the pollution control system and vented to the atmosphere.

(k) The Permit 15-00027 (APS ID: 341568, Auth ID: 913883) has been renewed.

(I) The Permit 15-00027 (APS ID: 341568, Auth ID: 988589) has been administratively amended to incorporate Plan Approval(s) 15-0027J and 15-0027K. Control device, C012A, is omitted from the permit.

(m) ASP ID: 341568, AUTH ID: 1109503, Date: 12/2016 - minor permit modification:

- add an alternative operating schedule for Source ID 203 (Line 14), for install a bypassing duct line from the L14 NOx Scrubber outlet to L15 SCR inlet and treating Line 14 exhaust in Line 15 control system.

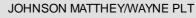
- modify Line 14 and Line 15 VOC emission reduction requirements into: (1) 90% removal efficiency, or (2) 20 ppmvd as methane, specified under Source IDs C020 and C021.

(n) ASP ID: 341568, AUTH ID: 1170940, Date: 9/2018 - Operating permit renewal, incorporating the following:

- RFD No. 5534: C08A1 baghouse replaced C08A baghouse.

- RFD No. 3527: C0A1 and Source ID 117 are subject to 40 CFR Part 63 Subpart 7Cs.

(o) The permit 15-00027 (ASP ID: 341568, AUTH ID: 1303310) has been administratively amended to incorporate Plan Approval 15-0027L.





# SECTION H. Miscellaneous.

15-00027

(p) The permit 15-00027 (ASP ID: 341568, AUTH ID: 1480697) This authorization is for an initial State Only Operating Permit No.15-00027.

- Upon issuance, this State Only Operating Permit No.15-00027 supersedes all requirements of the previous Title V Operating Permit No.15-00027.

- The facility-wide VOC emission limit of 24.9 tpy and the facility-wide NOx emission limit of 24.9 tpy have been established for this permit to ensure the facility maintains a Synthetic Minor status. The facility-wide HAP emission limits of 9.9 tpy (for individual HAPs) and 24.9 tpy (for total combined HAP) remain in effect.

- All previously established requirements under 25 Pa. Code § 127.218 for plantwide applicability limit (PAL) are no longer applicable.

- Plan Approval No. 15-0027M has been incorporated into this Synthetic Minor Operating Permit.

- On August 26, 2013, DEP received a documented request from the permittee to reduce the monitoring frequency for malodor, fugitive, and visible emissions. DEP consented to the request and approved once-a-week monitoring of malodor, fugitive, and visible emissions on September 5, 2013.





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