

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date:	September 10, 2021	Effective Date:	October 7, 2024
Revision Date:	October 7, 2024	Expiration Date:	August 31, 2026
Revision Type:	Amendment		

24-00012

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

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 24-00012

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

	Owner Information
Name: GRAFTECH USA LLC	
Mailing Address: 800 THERESIA ST	
SAINT MARYS, PA 15857-1831	I
	Plant Information
	Plant information
Plant: GRAFTECH USA LLC/ST MARYS	
Location: 24 Elk County	24814 Saint Marys City
SIC Code: 3624 Manufacturing - Carbon And Grap	ohite Products
	Responsible Official
Name: TRAVIS M REED	
Title: GENERAL MANAGER	
Phone: (814) 781 - 2393	Email: Travis.Reed@graftech.com
	Permit Contact Person
Name: RACHEL KRIEG	
Title: HSEP MANAGER	
Phone: (814) 781 - 2221	Email: rachel.krieg@graftech.com
[Signature]	
LORI L. MCNABB, NORTHWEST REGION AIR PRO	DGRAMMANAGER





SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents Site Inventory List

Section B. General Title V Requirements

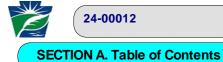
- #001 Definitions
- #002 Prohibition of Air Pollution
- #003 Property Rights
- #004 Permit Expiration
- #005 Permit Renewal
- #006 Transfer of Ownership or Operational Control
- #007 Inspection and Entry
- #008 Compliance Requirements
- #009 Need to Halt or Reduce Activity Not a Defense
- #010 Duty to Provide Information
- #011 Reopening and Revising the Title V Permit for Cause
- #012 Reopening a Title V Permit for Cause by EPA
- #013 Operating Permit Application Review by the EPA
- #014 Significant Operating Permit Modifications
- #015 Minor Operating Permit Modifications
- #016 Administrative Operating Permit Amendments
- #017 Severability Clause
- #018 Fee Payment
- #019 Authorization for De Minimis Emission Increases
- #020 Reactivation of Sources
- #021 Circumvention
- #022 Submissions
- #023 Sampling, Testing and Monitoring Procedures
- #024 Recordkeeping Requirements
- #025 Reporting Requirements
- #026 Compliance Certification
- #027 Operational Flexibility
- #028 Risk Management
- #029 Approved Economic Incentives and Emission Trading Programs
- #030 Permit Shield
- #031 Reporting
- #032 Report Format

Section C. Site Level Title V 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 Title V 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
- 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

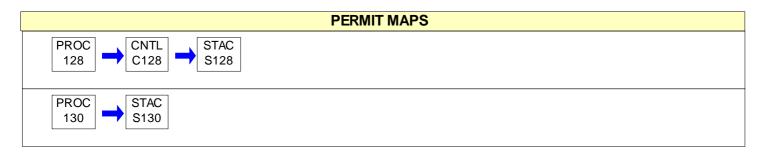




SECTION A. Site Inventory List

24-00012

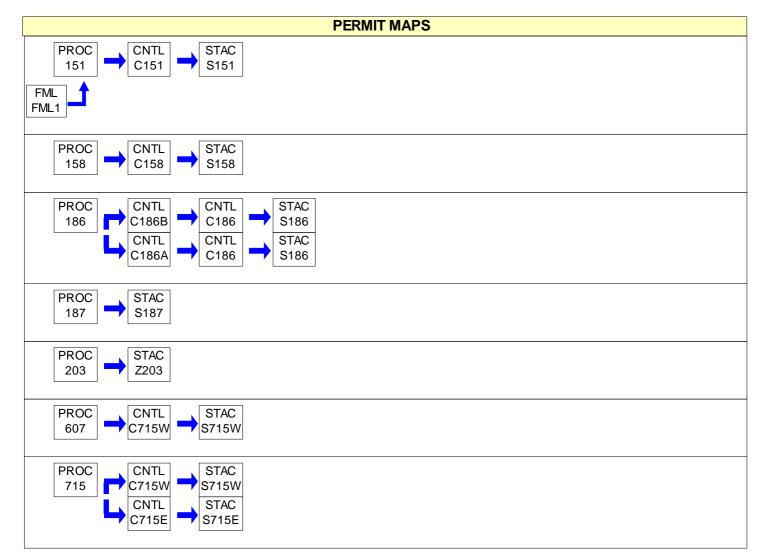
Source	D Source Name	Capacity	/Throughput	Fuel/Material
128	153 HP CUMMINS NATURAL GAS EMERGENCY ENGINE	370.000	CF/HR	Natural Gas
130	154 HP DIESEL-FUELED EMERGENCY ENGINE FOR	1.200	MMBTU/HR	
	FIRE PUMP	8.768	Gal/HR	Diesel Fuel
151	BURN-OFF OVEN	1.296	MCF/HR	Natural Gas
158	L.G. COKE SCREENING	20.000	Tons/HR	COKE
186	CARBOTTOMS (16)	50.000	Tons/HR	
		10.000	MMCF/HR	Natural Gas
187	LONGITUDINAL GRAPHITIZERS (20) BLDG 800	5.000	Tons/HR	
203	PARTS CLEANERS (3)		N/A	STODDARD SOLVENT
607	GRAPHITE BAGGING SYS	20.000	Tons/HR	CARBON
715	MACHINING OPERATIONS	9,000.000	Lbs/HR	GRAPHITE ELECTRODES
C128	NON SELECTIVE CATALYTIC REDUCTION (NSCR)	L		
C151	ONEX AFTERBURNER			
C158	LG COKE SCREENING BAGHOUSE			
C186	LIMESTONE SLURRY SCRUBBER			
C186A	CARBOTTOM THERMAL OXIDIZER #1			
C186B	CARBOTTOM THERMAL OXIDIZER #2			
C715E	BAGHOUSE			
C715W	BAGHOUSE			
FML1	NATURAL GAS PIPELINE			
S128	STACK FROM 153 HP EMERGENCY ENGINE'S CONTROL DEVICE			
S130	STACK FROM 154 HP DIESEL ENGINE FOR FIRE PUMP			
S151	P.I. BASKET BURNER			
S158	LG COKE SCREENING BAGHOUSE STACK			
S186	CARBOTTOM FURNACES STACK			
S187	LONGITUDINAL GRAPHITIZERS			
S715E	STACK			
S715W	STACK			
Z203	PARTS CLEANING			





24-00012









#001 [25 Pa. Code § 121.1]
Definitions
Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.
#002 [25 Pa. Code § 121.7]
Prohibition of Air Pollution
No person may permit air pollution as that term is defined in the act.
#003 [25 Pa. Code § 127.512(c)(4)]
Property Rights This permit does not convey property rights of any sort, or any exclusive privileges.
#004 [25 Pa. Code § 127.446(a) and (c)]
Permit Expiration
This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e), 127.503 & 127.704(b)]
Permit Renewal
(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.
(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.
(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).
(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.
#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]
Transfer of Ownership or Operational Control (a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:
(1) The Department determines that no other change in the permit is necessary;
(2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
(3) A compliance review form has been submitted to the Department and the permit transfer has been approved by





the Department.

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

Inspection and Entry

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

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

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

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

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

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

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

#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

Compliance Requirements

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

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

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

#009 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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





Ž

SECTION B. General Title V Requirements

#010	[25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]
	Provide Information
	(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, o to determine compliance with the permit.
	(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.
#011	[25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]
Reopeni	ng and Revising the Title V Permit for Cause (a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.
	(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:
	(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.
	(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.
	(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
	(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
	(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.
	(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.
#012	[25 Pa. Code § 127.543]
Reopeni	ng a Title V Permit for Cause by EPA
	As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.
#013	[25 Pa. Code § 127.522(a)]
Operatin	g Permit Application Review by the EPA
	The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:
	R3_Air_Apps_and_Notices@epa.gov
	Please place the following in the subject line: TV [permit number], [Facility Name].





#014 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#015 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#016 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

#017 [25 Pa. Code § 127.512(b)]

Severability Clause

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

#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

Fee Payment

(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). 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.

(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.

(c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.





(d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

(e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.

(1) Eight thousand dollars (\$8,000) for calendar years 2021-2025.

(2) Ten thousand dollars (\$10,000) for calendar years 2026-2030.

(3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

#019 [25 Pa. Code §§ 127.14(b) & 127.449]

Authorization for De Minimis Emission Increases

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

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

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

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

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

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

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

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

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

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

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

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

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





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

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

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

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

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

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

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

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

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).

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

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

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

#020 [25 Pa. Code §§ 127.11a & 127.215]

Reactivation of Sources

(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#021 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the





phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application. (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors. [25 Pa. Code §§ 127.402(d) & 127.513(1)] (a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the: Regional Air Program Manager PA Department of Environmental Protection (At the address given on the permit transmittal letter, or otherwise notified) (b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to: Enforcement & Compliance Assurance Division Air, RCRA and Toxics Branch (3ED21)

Submissions

#022

Four Penn Center 1600 John F. Kennedy Boulevard Philadelphia, PA 19103-2852

The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

Sampling, Testing and Monitoring Procedures

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

[25 Pa. Code §§ 127.511 & Chapter 135] #024

Recordkeeping Requirements

(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.





(5) The results of the analyses.

(6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#026 [25 Pa. Code § 127.513]

Compliance Certification

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

(1) The identification of each term or condition of the permit that is the basis of the certification.

(2) The compliance status.

(3) The methods used for determining the compliance status of the source, currently and over the reporting period.

(4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.





#027 [25 Pa. Code § 127.3]

Operational Flexibility

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

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

#028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

Risk Management

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

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

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

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

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

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

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

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

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

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





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

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

(1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

Permit Shield

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.
- (4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

#031 [25 Pa. Code §135.3]

Reporting

(a) 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 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.

#032 [25 Pa. Code §135.4]

Report Format

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 §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.

(7) - (8) [Do not apply]

(9) Sources and classes of sources other than those identified in paragraphs (1)—(8), for which the operator 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.

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

(b) An application form for requesting a determination under either subsection (a)(9) or § 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, charac-teristics of emissions, quantity of emissions and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant is required to demonstrate that the requirements of subsections (a)(9) and (c) and § 123.2 [Condition #002, below] (relating to fugitive particulate matter) or of the requirements of § 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) [Printed under Work Practice Requirements in this section of permit.]

(d) [Does not apply]

002 [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 § 123.1(a)(1)—(9) [Condition #001, above] (relating to prohibition of certain fugitive emissions) if the emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

(a) [Printed under Work Practice Requirements in this section of permit.]

(b) 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.





(c) [Does not apply]

004 [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:

(1) Equal to or greater than 20% for a period or periods aggregating more than 3 minutes in any 1 hour.

(2) Equal to or greater than 60% at any time.

005 [25 Pa. Code §123.42] Exceptions

The limitations of § 123.41 [Condition #004, above] (relating to limitations) shall not apply to a visible emission in any of the following instances:

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

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

(3) When the emission results from sources specified in § 123.1 (a)(1)-(9) [Condition #001, above] (relating to prohibition of certain fugitive emissions).

(4) [Does not apply]

П. TESTING REQUIREMENTS.

006 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The Department reserves the right to require exhaust stack testing of any source as necessary to verify emissions for purposes including determining the correct emission fee, malfunctions, or determining compliance with any applicable requirement.

III. MONITORING REQUIREMENTS.

[25 Pa. Code §123.43] # 007

Measuring techniques

Visible emissions may be measured using either of the following:

(1) A device approved by the Department and maintained to provide accurate opacity measurements.

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

008 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

(a) The permittee shall conduct monthly monitoring of the facility property, while the plant is in operation, to observe for the presence of fugitive emissions and visible emissions being emitted into the outdoor atmosphere.

(b) All detected fugitive and visible emissions shall be reported to the Environmental Engineer.





IV. RECORDKEEPING REQUIREMENTS.

009 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

(a) The permittee shall maintain a record of the monitoring conducted to determine the presence of fugitive and visible emissions.

(b) The recordkeeping shall contain a listing or notation of any and all sources of fugitive and visible emissions; the cause of the fugitive or visible emissions; duration of the emission; and the corrective action taken to abate the deviation and prevent future occurrences.

010 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The permittee can modify the mixture of pollutants regulated under Section 112 of the Clean Air Act (42 U.S.C.A. Section7412) which are VOC or PM10 so long as the emission limitations of this permit are not violated. The permittee shall keep a log which identifies the mixture of pollutants regulated under section 112 and report the changes in the mixture of pollutants regulated under section 112 and report the Department.

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.512]

Operating permit terms and conditions.

(a) If, for any reason, the permittee does not comply or will not be able to comply with the emission limitations or other conditions specified in this permit, the permittee shall provide EPA with the following information as soon as possible but no later than five (5) days after such conditions become know to the permittee:

(1) Description of noncompliance;

(2) Cause of noncompliance;

(3) Anticipated time the noncompliance is exempted to continue or, if corrected, the actual duration of noncompliance;

(4) Steps taken by the permittee to minimize or eliminate the noncompliance; and,

(5) Steps taken by the permittee to prevent recurrence of the noncompliance.

Submittal of this report does not constitute a waiver of the emission limitations or other conditions of this permit nor does it in any way restrict EPA's authority to enforce the permit conditions pursuant to Section 113 of the Clean Air Act.

(b) In the event of any change in control of ownership of the permitted source, the permittee shall notify the succeeding owner of the existence of this permit by letter and send a copy of that letter to EPA.

[Authority for this permit condition is also derived from PSD Permit #79-PA-26 (8-15-1980), Part II, Conditions #7 and 10.]

012 [25 Pa. Code §135.21] Emission statements

(a) Except as provided in subsection (d), this section applies to stationary sources or facilities:

(1) [Does not apply]

(2) Not located in an area described in paragraph (1) and included in the Northeast Ozone Transport Region which emit or have the potential to emit 100 tons or more of oxides of nitrogen or 50 tons or more of VOC per year.

(b) The owner or operator of each stationary source emitting oxides of nitrogen or VOCs shall provide the Department with a statement, in a form as the Department may prescribe, for classes or categories of sources, showing the actual emissions of oxides of nitrogen and VOCs from that source for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based. The statement shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.





(c) Annual emission statements are due by March 1 for the preceding calendar year beginning with March 1, 1993, for calendar year 1992 and shall provide data consistent with requirements and guidance developed by the EPA. The guidance document is available from: United States Environmental Protection Agency, 401 M Street, S.W., Washington, D.C. 20460. The Department may require more frequent submittals if the Department determines that one or more of the following applies:

(1) A more frequent submission is required by the EPA.

(2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the act.

(d) [Does not apply]

VI. WORK PRACTICE REQUIREMENTS.

013 [25 Pa. Code §123.1] Prohibition of certain fugitive emissions

[25 Pa. Code § 123.1(c):]

(c) A person responsible for any source specified in subsections (a)(1)—(7) or (9) [Condition #001, above] shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions include, but not be limited to, the following:

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

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

(3) Paving and maintenance of roadways.

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

014 [25 Pa. Code §123.31] Limitations

25 Pa. Code § 123.31(a):]

(a) Limitations are as follows:

(1) If control of malodorous air contaminants is required under subsection (b) [Condition #003, above], emissions shall be incinerated at a minimum of 1200°F for at least 0.3 second prior to their emission into the outdoor atmosphere.

(2) Techniques other than incineration may be used to control malodorous air contaminants if such techniques are equivalent to or better than the required incineration in terms of control of the odor emissions and are approved in writing by the Department.

015 [25 Pa. Code §129.14] Open burning operations

(a) [Does not apply]

(b) Outside of air basins. No person may permit the open burning of material in an area outside of air basins in a manner that:

(1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.

(2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land



the open burning is being conducted.

- (3) The emissions interfere with the reasonable enjoyment of life or property.
- (4) The emissions cause damage to vegetation or property.
- (5) The emissions are or may be deleterious to human or animal health.

(c) Exceptions. The requirements of subsections (a) and (b) do not apply where the open burning operations result from:

(1) 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.

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

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

(4) - (5) [Do not apply]

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

(7) A fire set solely for cooking food.

(d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:

(1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor—A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes—Trees, shrubs and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

(2) [Does not apply]

(3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:

(i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b).

(ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.

(4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in that chapter.

[This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act.]

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.





The permittee shall submit within thirty days of 06/01/2016 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #026 of section B of this permit, and semi-annually thereafter.

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Effect ***

24-00012 GRAFTECH USA LLC/ST MARYS SECTION D. **Source Level Requirements** Source ID: 128 Source Name: 153 HP CUMMINS NATURAL GAS EMERGENCY ENGINE Source Capacity/Throughput: 370.000 CF/HR Natural Gas Conditions for this source occur in the following groups: PM RESTRICTION SOX RESTRICTION SUBPART JJJJ PROC CNTL STAC C128 S128 128

I. RESTRICTIONS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

The permittee shall maintain a record of all preventive maintenance inspections of the control device. These records shall at a minimum contain the dates of the inspections, any problems or defects, the actions taken to correct the problem or defects, any routine maintenance performed, and the pressure drop across the control device.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall perform a weekly preventive maintenance inspection of the control device.

(b) The permittee shall operate the control device at all times that this is in operation.

(c) The permittee shall maintain and operate this source and the control device accordance with the manufacturers' specifications.

VII. ADDITIONAL REQUIREMENTS.

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



GRAFTECH USA LLC/ST MARYS



SECTION D. Source Level Requirements

*** Permit Shield in Effect. ***

24-00012 GRAFTECH USA LLC/ST MARYS SECTION D. **Source Level Requirements** Source ID: 130 Source Name: 154 HP DIESEL-FUELED EMERGENCY ENGINE FOR FIRE PUMP Source Capacity/Throughput: 1.200 MMBTU/HR 8.768 Gal/HR Diesel Fuel Conditions for this source occur in the following groups: PM RESTRICTION SUBPART ZZZZ PROC STAC 130 S130

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.

II. TESTING REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***





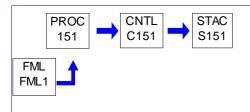
Source ID: 151

Source Name: BURN-OFF OVEN Source Capacity/Throughput:

1.296 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: SOX RESTRICTION



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b] Plan approval terms and conditions.

(a) The permittee shall maintain the emission of Nitrogen Oxide (N0x) not exceed 29.8 Pounds per hour or 59.6 Tons per year based on consecutive 12-month period.

(b) The permittee shall maintain the emission of Carbon Monoxide (CO) not exceed 22.2 pounds per hour or 44.4 tons per year based consecutive 12 month period.

(c) The permittee shall maintain the emission of Sulfur Oxides (SOx) 23.4 pounds per hour or 46.8 Tons per year based on consecutive 12 month perid.

(d) The permittee shall maintain the emission of Volatile Organic Compounds (VOC) 0.5 pounds per hour or 1 ton per year based on consecutive 12-month perieod.

(e) The permittee shall maintain the emission of particulate matter not exceed 1.3 pounds per hour or 2.6 Tons per year based on consecutive 12 month period from this source.

[Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in 25 Pa Code Section 123.13.]

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain a record of all preventive maintenance inspections of the control device. These records shall, at a minimum, contain the dates of the inspections, any problems or defects, the actions taken to correct the problem or defects, any routine maintenance performed, and monitoring and recordkeeping of afterburner temperature (1600 degree F).

II. TESTING REQUIREMENTS.

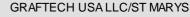
No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.511] Monitoring and related recordkeeping and reporting requirements.

The following are CAM related requirements:

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





(1) Temperature of the afterburner;

(2) Visible emission observation following EPA, Method-22 like procedure.

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

(1) Temperature measuring system;

(2) Visible emission following EPA Method 22-like procedure..

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

(1) After burner temperature measurement- Daily;

(2) The visible emission observed, using EPA, Method-22 like procedure - Daily.

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

(1) The normal operating temperature of the after burner temperature shall be maintained in between 1590°F to 1700°F. Any fluctuation of this range indicated as excursion;

(2) The visible emission from the oven stack shall be logged to detect excursion.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain a record of emission for Sulfur Oxides (SOx) Nitrogen Oxides (NOx), Carbon Monoxide (CO), Volatile Organic Compound (VOC), Particulate Matter(P000) in tons per year based on a consecutive 12-month period. The present month emissions will be added with the previous 11-month period to get the consecutive 12-month period.

005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The following are CAM related requirements:

(a) The permittee shall keep a record of temperature of afterburner every day;

(b) The permittee shall maintain a record of visible emissions every day.

006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The following are CAM related requirements:

(a) The permittee shall record all inspections, repair and maintenance performed on the monitoring equipment.

(b) The permittee shall record all excursions and corrective actions taken in response to an excursion and the time elapsed until corrective actions have been taken.

(c) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, possible causes and corrective actions taken for the incidents.

(d) The permittee shall keep all records for a period of five (5) years and make the records available to the Department upon request.





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

V. REPORTING REQUIREMENTS.

007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The following conditions are related to CAM Rule:

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

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

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

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

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

(a) The permittee shall perform a weekly preventive maintenance inspection of the control device.

(b) The permittee shall keep a record and monitor the afterburner temperature.

(c) The permittee shall operate the afterburner at all times that this source is in operation.

(d) The permittee shall maintain and operate this source and the fume destructor in accordance with the manufacturers' specifications.

009 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The following are CAM related requirements:

(a) The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the device.

(1) The permittee shall, for an approved device(s), install detectors or sensors at a location approved by the Department for obtaining data that are representative of the monitored indicator.

(2) The permittee shall develop verification procedures to confirm the operational status of new or modified monitoring equipment prior to commencement of the monitoring process.

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

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

(c) The permittee shall ensure that at least 90% of the monitoring data has been properly and accurately collected.

(d) The permittee shall submit an implementation plan and schedule if the approved monitoring requires the installation, testing or other necessary activities. The schedule for completing installation and beginning operation on monitoring may not exceed 180 days after the issuance date of the permit.





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

010 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

(a) The permittee shall adhere to approved ranges for the selected indicators so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion:

(1) The temperature of afterburner shall be maintained within 1575°F - 1700°F;

(2) Presence of any visible emissions observed using EPA Method-22 like procedure.

(b) For QA/QC purposes, the permittee shall calibrate and check the accuracy of monitoring equipment taking into account the manufacturer's specifications at approved time intervals:

(1) The accuracy of temperature indicator shall be checked and calibrated annually;

(2) The visible emission observation following EPA Method-22 like procedure has been reviewed in every six months.

VII. ADDITIONAL REQUIREMENTS.

011 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The following conditions are related to CAM rule:

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

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

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

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

(b) In general, the QIP plan should be developed within 60 days and the permittee shall provide a copy of QIP to the Department. Furthermore the permittee shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

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

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

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

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

(1) Improved preventive maintenance practices;

(2) Process operation changes;





(3) Appropriate improvements to control methods;

(4) Other steps appropriate to correct performances.

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

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

(1) Address the cause of the control device performance problem;

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

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

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

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

*** Permit Shield in Effect. ***

GRAFTECH USA LLC/ST MARYS



24-00012

SECTION D. Source Level Requirements

Source ID: 158

Source Name: L.G. COKE SCREENING

Source Capacity/Throughput: 20.000 Tons/HR

COKE

Conditions for this source occur in the following groups: PLAN APPROVAL 24-012K



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b] Plan approval terms and conditions.

No person may permit the emission into the outdoor atmosphere of filterable particulate matter in a manner that the concentration of filterable particulate matter (FPM) in the effluent gas exceeds 0.02 grain per dry standard cubic foot.

[Plan Approval 24-012H, Section D, Condition #001(b).]

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) Within 60 days after achieving the normal production rate at which the affected source will be operated, but not later than 180 days after initial start-up of the source/control device, a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The stack test shall be performed while the aforementioned source is operating at the maximum or normal rated capacity as stated on the application. The stack test shall be conducted for FPM using Method 5 or another Department approved method at the outlet of the control device.

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

Paper copies shall be sent using the following mailing addresses:

CENTRAL OFFICE: Pennsylvania Department of Environmental Protection Attn: PSIMS Administrator P.O. Box 8468 Harrisburg, PA 17105-8468

NORTHWEST REGIONAL OFFICE: Pennsylvania Department of Environmental Protection Attn: Air Quality Program Manager 230 Chestnut St. Meadville, PA 16335

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

CENTRAL OFFICE: RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE: RA-EPNWstacktesting@pa.gov





2. At least 90 days prior to performing a stack test, a protocol shall be submitted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. Submit the protocol via the instructions in (1). The protocol shall contain, at a minimum, location of sampling ports, planned production rates, and any other information applicable to the stack testing. Performing a stack test prior to Department approval of the protocol may invalidate the results.

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

4. Within 60 days after completion of the test, the complete test report, including, but not limited to, production rates during testing, calculation methods and results, and any other applicable testing information that will allow for a complete review of the test and results, shall be submitted to the Department for approval. Submit the report via the instructions in (1).

4. Actions Related to Noncompliance Demonstrated by a Stack Test:

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

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

(b) Within 12 to 18 months prior to the Title V operating permit expiring, a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The stack test shall be performed while the aforementioned source is operating at the maximum or normal rated capacity as stated on the application. The stack test shall be conducted for FPM using Method 5 or another Department approved method at the outlet of the control device. The testing shall be conducted in accordance with part (a) above.

[Plan Approval 24-012H, Section D, Condition #002.]

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.12b] Plan approval terms and conditions.

(a) The permittee shall maintain a record of all preventive maintenance inspections of the control device(s). The records of the maintenance inspections shall include, at a minimum, the dates of the inspections, the name of the person performing the inspection, any problems or defects identified, any actions taken to correct the problems or defects, and any routine maintenance performed.

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

1. Pressure drop across control device - daily, defined as at least once every calendar day.

[Plan Approval 24-012H, Section D, Condition #003.]





V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.12b] Plan approval terms and conditions.

(a) The permittee shall perform a daily operational inspection of the control device.

(b) All gauges employed by the permittee to monitor the required control device operating parameters shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (+/- 2%) of full scale reading.

(c) Control device operating parameters, including pressure drop, shall be operated in a range defined by the manufacturer or in a range developed during compliant stack testing. The operating range shall be determined within 90 days after startup of the control device and shall be indicated to the Department in writing prior to administratively amending into the facility operating permit. The operating range shall be made part of the facility operating permit. The control device shall be operated between 0.5" to 6" of water column.

(d) The permittee shall operate the control device associated with this source at all times that the source is in operation.

(e) The source and control device shall be operated in accordance with the manufacturers specifications and in accordance with good air pollution control practices.

[Plan Approval 24-012H, Section D, Condition #004.]

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

SECTION D. Sour	ce Level Requirements		
Source ID: 186	Source Name: CARBOTTOMS (16))	
	Source Capacity/Throughput:	50.000 Tons/HR	
		10.000 MMCF/HR	Natural Gas
PROC			
186 🔂 C186			
	CNTL STAC		
C186	A C186 S186		

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.11a]

Reactivation of sources.

[Note: This source was deactivated on May 5, 2016. It may not be operated without complying with the following:]

(a) Except as provided by § 127.215 [Section B, Condition #020] (relating to reactivation), a source which has been out of operation or production for at least 1 year but less than or equal to 5 years may be reactivated and will not be considered a new source if the following conditions are satisfied:

(1) The owner or operator shall, within 1 year of the deactivation submit to the Department and implement a maintenance plan which includes the measures to be taken, including maintenance, upkeep, repair or rehabilitation procedures, which will enable the source to be reactivated in accordance with the terms of the permit issued to the source.

(2) The owner or operator shall submit a reactivation plan to the Department for approval at least 60 days prior to the proposed date of reactivation. The reactivation plan shall include sufficient measures to ensure that the source will be reactivated in compliance with the permit requirements. The permittee may submit a reactivation plan to the Department at any time during the term of its operating permit. The reactivation plan may also be submitted to and reviewed by the Department as part of the plan approval or permit application or renewal process.

(3) The owner or operator of the source shall submit a notice to the Department within 1 year of deactivation requesting preservation of emissions in the inventory and indicating the intent to reactivate the source.

(4) The owner or operator of the source shall comply with the terms and conditions of the maintenance plan while the source is deactivated, and shall comply with the terms of the reactivation plan and operating permit upon reactivation.

(5) The owner or operator of the source with an approved reactivation plan and operating permit shall notify the Department in writing at least 30 days prior to reactivation of the source.

(b) A source which has been out of operation or production for more than 5 years but less than 10 years may be reactivated and will not be considered a new source if the following conditions are satisfied:

(1) The owner or operator of the source complies with the requirements of subsection (a).

(2) The owner or operator of the source obtains a plan approval and operating permit which requires that the emission of air contaminants from the source will be controlled to the maximum extent, consistent with the best available technology as determined by the Department as of the date of reactivation.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The permittee shall not exceed 1.49 lbs of VOC per ton of carbon baked in the furnace or 89.6 tpy based on a consecutive 12-month period from Source 186, Source 1001, Source 1002, Source 1003, Source 1004, Source 1005, & Source 1006.

[Fulfills the alternative RACT requirement of 129.99(c)]





[Plan Approval 24-012G]

(b) The permittee shall not allow emissions of carbon monoxide in excess of 0.40 lbs/hr or 0.43 tpy based on a consecutive 12-month period from Source 186, Source 1001, Source 1002, Source 1003, Source 1004, Source 1005, & Source 1006.

[Plan Approval 24-012G]

(c) The permittee shall not allow emissions of particulate matter in excess of 8.70 lbs/hr or 16.8 tpy based on a consecutive 12-month period from Source 186, Source 1001, Source 1002, Source 1003, Source 1004, Source 1005, & Source 1006. [Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in 25 Pa Code Section 123.13]

[Plan Approval 24-012G]

(d) The following SO2 emission limits shall not be exceeded during all periods of operation of the (16) carbottom kilns (Source 186, Source 1001, Source 1002, Source 1003, Source 1004, Source 1005, & Source 1006):

One-hour average: 18.7 lbs/hr or 71 ppm(v) on a dry basis Full Cycle average: 6.3 lbs/hour or 30 ppm(v) on a dry basis Annual SO2 Emissions: 16 tons per year based on a consecutive 12-month period

[Plan Approval 24-012G]

(e) Compliance with SO2 emission limits defined above, shall be demonstrated through the installation of a Department approved SO2 continuous emission monitor (CEM). One-hour and full cycle average concentrations shall be used in conjunction with the CEMs to determine compliance. Full cycle emission limit compliance shall be based on a 30-day average of data, rolled daily. Lb/hour and annual emission limit compliance shall be determined through CEM data and airflow measured. CEM parameters for data collection and resolution shall be as defined the most current revision of the Department's Continuous Source Monitoring Manual. Recordkeeping and reporting of CEM data shall be done in accordance with the most current revision of the Department's Continuous Source Monitoring Manual. Compliance calculations for lbs/hr and annual emission limits shall be included in the recordkeeping and reporting requirements.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §129.100]

Compliance demonstration and recordkeeping requirements.

(a) Within twelve (12) to eighteen (18) months prior to the expiration of the facility's current operating permit (non-reoccurring), a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The stack test shall be performed while the aforementioned source is operating at its maximum achievable production rate. The stack test shall determine the overall VOC control efficiency (using EPA Method 25A as appropriate) at the outlet of the RTO.

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

Paper copies shall be sent using the following mailing addresses: CENTRAL OFFICE: Pennsylvania Department of Environmental Protection Attn: PSIMS Administrator P.O. Box 8468 Harrisburg, PA 17105-8468

NORTHWEST REGIONAL OFFICE: Pennsylvania Department of Environmental Protection Attn: Air Quality Program Manager 230 Chestnut St. Meadville, PA 16335

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





RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE: RA-EPNWstacktesting@pa.gov

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

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

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

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

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

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

[RACT II Review]

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.12b] Plan approval terms and conditions.

[Plan Approval 24-012G]

(a) The permittee shall maintain a continuous recording of the thermal oxidizer's inlet and outlet gas temperature and retain these records for at least five years.

[Fulfills the RACT II requirements of 129.100]

[Plan Approval 24-012G]

(b) A SO2 continuous emission monitor (CEM), and flow monitor to continuously monitor airflow of the effluent gas, shall be installed in the effluent stack of the source. The CEMs shall be installed in accordance with 25 Pa Code Chapter 139, and the latest version of the Continuous Source Monitoring Manual, published by the Department. Department approval of Phase I of the SO2 CEM requirement, as defined in the source monitoring manual, shall be implemented within six (6) months of the issue date of this Plan Approval, or a Department approved revised date based upon the expected completion of construction of the source. Phase II shall be completed within 180 days of Phase I approval. Phase III shall be submitted to the Department within 60 days of completion of Phase II.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following are CAM related requirements:





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

(1) The inside temperature of Thermal Oxidizer.

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

(1) Temperature indicator system.

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

(1) Inside temperature of thermal oxidizer measured daily.

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

(1) The inside temperature of thermal oxidizer shall be maintained 1500°F. Any deviation from this set point is considered as an excursion.

006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain a continuous recording of the incinerator's inlet and outlet gas temperature and retain these records for at least five years.

[Authority for this condition is also derived from PSD Permit 79-PA-26, Conditions No. 2A and 2B.]

[Fulfills the RACT II requirements of 129.100]

IV. RECORDKEEPING REQUIREMENTS.

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

The following are CAM related requirements.

(a) The permittee shall record the inside temperature of thermal oxidizer continuously on a strip chart.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following are CAM related requirements:

(a) The permittee shall record all inspections, repair and maintenance performed on the monitoring equipment.

(b) The permittee shall record all excursions and corrective actions taken in response to an excursion and the time elapsed until corrective actions have been taken.

(c) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, possible causes and corrective actions taken for the incidents.

(d) The permittee shall keep all records for a period of five (5) years and make the records available to the Department upon request.

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

009 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

(a) The permittee shall maintain a record of all preventive maintenance inspections of the control device. These records





shall, at a minimum, contain the dates of the inspections, any problems or defects, the actions taken to correct the problem or defects, any routine maintainance performed and the pressure drop across the control device.

(b) The permittee shall calculate from material balance the amount of carbon monoxide generated from this source in terms of pounds per hour.

(c) The permittee shall maintain a record of pounds of VOC emitted per tons of carbon baked in the furnace.

[Fulfills the RACT II requirements of 129.100]

010 [25 Pa. Code §129.100]

Compliance demonstration and recordkeeping requirements.

The permittee shall calculate the twelve-month rolling total of actual VOC emissions from the source. The total calculated shall be maintained in a log and updated monthly.

[RACT II Review]

V. REPORTING REQUIREMENTS.

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

The following conditions are related to CAM Rule:

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

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

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

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

VI. WORK PRACTICE REQUIREMENTS.

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

(a) The permittee shall adhere to approved ranges for the selected indicators so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion:

(1) The inside temperature of thermal oxidizer will be 1500°F

(b) For QA/QC purposes, the permittee shall calibrate and check the accuracy of monitoring equipment taking into account the manufacturer's specifications at approved time intervals.

(1) The accuracy of temperature indicator shall be checked and calibrated annually.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following are CAM related requirements:

(a) The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the device.

(1) The permittee shall, for an approved device(s), install detectors or sensors at a location approved by the Department





for obtaining data that are representative of the monitored indicator.

(2) The permittee shall develop verification procedures to confirm the operational status of new or modified monitoring equipment prior to commencement of the monitoring process.

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

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

(c) The permittee shall ensure that at least 90% of the monitoring data has been properly and accurately collected.

(d) The permittee shall submit an implementation plan and schedule if the approved monitoring requires the installation, testing or other necessary activities. The schedule for completing installation and beginning operation on monitoring may not exceed 180 days after the issuance date of the permit.

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

014 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

(a) The permittee shall perform a weekly preventive maintenance inspection of control device.

(b) The permittee shall monitor and keep a record of the exhaust temperature of the thermal oxidizer.

(c) The permittee shall operate the control device at all times that this source in operation.

(d) The permittee shall maintain and operate this source and the control devices in accordance with the manufacturer's specifications and good air pollution control practice.

(e) The permittee shall install, operate, and maintain the low NOx burners (for car bottom kilns 491, 492, 493, 494, 495, and 496) in accordance with the manufacturer's specifications and good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

015 [25 Pa. Code §127.441] Operating permit terms and conditions.

The following conditions are related to CAM rule:

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

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

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

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

(b) In general, the QIP plan should be developed within 60 days and the permittee shall provide a copy of QIP to the Department. Furthermore the permittee shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

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

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





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

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

(1) Improved preventive maintenance practices.

(2) Process operation changes.

(3) Appropriate improvements to control methods

(4) Other steps appropriate to correct performances.

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

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

(1) Address the cause of the control device performance problem.

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

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

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

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

GRAFTECH USA LLC/ST MARYS



SECTION D. Source Level Requirements

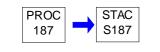
Source ID: 187

Source Name: LONGITUDINAL GRAPHITIZERS (20) BLDG 800

Source Capacity/Throughput:

5.000 Tons/HR

Conditions for this source occur in the following groups: PLAN APPROVAL 24-012K



24-00012

This source occurs in alternate operation SIMULTANEOUS USE OF TWO RECTIFYING TRANS

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b] Plan approval terms and conditions.

(1) The sulfur content of petroleum coke, as received, shall not exceed 0.73% (by weight). The sulfur content of metallurgical coke, as received, shall not exceed 1.0% (by weight). The sulfur content of metallurgical coke, when placed on the furnace as packing material, shall not exceed 0.75% (by weight).

(2) Each shipment of coke shall be accompanied by a certificate demonstrating that ASTM Methods for sulfur sampling of coke (ASTM Method C816-85 and/or Method D4294) have been performed, and that coke sulfur levels are in compliance with levels defined in this condition.

[Plan Approval 24-012B, Conditions #6 & 7]

002 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall not exceed 18.3 lbs/hr particulate matter emission from the building 800 monitor (internal resistance graphitizer) source.

[Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in 25 Pa Code Section 123.13]

003 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall not emit SOx exceeding 30.51 lbs/hr on a 24-hour average basis from the building 800 monitor (internal resistance graphitizer) source.

[Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in 25 Pa Code Section 123.21]

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall not emit Carbon Monoxide exceeding 544.8 lbs/hr from the building 800 monitor (internal resistance graphitizer) source.

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

The permittee shall not emit Sulfur Dioxide exceeding 60.3 lbs/hr on a 24-hour average basis from the Building 800 stack (Graphitizer hoods) source.

006 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall not emit Carbon Monoxide exceeding 889.0 lbs/hr from the Building 800 stack (Graphitizer hoods) source.







007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not exceed 24.49 lbs of VOC per tons of carbon graphitized in the graphitizer.

[Authority for this condition is also derived from 25 Pa. Code Section 129.91]

008 [25 Pa. Code §129.99]

Alternative RACT proposal and petition for alternative compliance schedule.

(a) VOC emissions from Source 187 shall not exceed 94 tons in any 12 consecutive month period.

(b) The permittee shall calculate the twelve-month rolling total of actual VOC emissions from the source. The total calculated shall be maintained in a log and updated monthly.

[RACT II Review]

II. TESTING REQUIREMENTS.

009 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall conduct a stack test to determine the rate of SO2 emissions from the building 800 stack at least six months prior to the expiration date of this permit. All stack tests shall consist of a minimum of three (3) eight-hour test runs utilizing Department approved methods. The results of all valid test runs shall be averaged and the arithmetic mean compared with the emission limitation in Condition #005 above to determine compliance.

[Plan Approval 24-012B, Condition #9]

010 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall conduct a stack test to determine the rate of Carbon Monoxide emissions from this source at least six months prior to the expiration date of this permit.

011 [25 Pa. Code §129.100]

Compliance demonstration and recordkeeping requirements.

(a) Within twelve (12) to eighteen (18) months prior to the expiration of the facility's current operating permit (non-reoccurring), a stack test shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. The stack test shall be performed while the aforementioned source is operating at its maximum achievable production rate. The stack test shall determine the VOC emission rate per ton of carbon graphitized (using EPA Method 25A as appropriate).

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

Paper copies shall be sent using the following mailing addresses: CENTRAL OFFICE: Pennsylvania Department of Environmental Protection Attn: PSIMS Administrator P.O. Box 8468 Harrisburg, PA 17105-8468

NORTHWEST REGIONAL OFFICE: Pennsylvania Department of Environmental Protection Attn: Air Quality Program Manager 230 Chestnut St. Meadville, PA 16335

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





CENTRAL OFFICE: RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE: RA-EPNWstacktesting@pa.gov

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

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

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

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

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

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

[RACT II Review]

III. MONITORING REQUIREMENTS.

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

(1) For the internal resistance graphitizer (800 monitor) and graphitizer hoods (800 stack) the following is required:

A. Properly install and maintain, in good operating condition, a hood over each of the twenty graphitizing furnaces within three or less hours after terminating the flow of electrical heat to the furnace. Generally, the graphitizing operation involves an 18-hour heat cycle and 36-hour cooling cycle. Good operating condition includes proper connection between hood and duct work to ensure effective capture and minimum fugitive emissions. The fan in the duct work leading to the stack shall be operated properly at all times when hoods are in place.

B. During hood operation fugitive emissions from these hoods shall not exceed 5 percent (%) opacity.

C. The coke supplier will provide a coke analysis report to the facility at the time of each batch shipment of truckload of coke.

D. The permittee shall make visual observations of the roof monitors at least four times daily. Observations shall be made by the method described in Appendix A of the permit.

There shall be no visible fugitive emissions discharged from the roof monitors.





[Authority for this permit condition is also derived from Conditions No. 3A through 3F and 7 from PSD permit No. 79-PA-26.]

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.12b] Plan approval terms and conditions.

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

[Plan Approval 24-012B, Condition #8]

014 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain a record of pounds of VOC emitted per tons of carbon baked in the furnace.

015 [25 Pa. Code §129.100]

Compliance demonstration and recordkeeping requirements.

The permittee shall maintain a Certificate of Analysis for each shipment of Coke.

[RACT II Review]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

016 [25 Pa. Code §129.100]

Compliance demonstration and recordkeeping requirements.

Coke with VOC content exceeding 3% shall not be brought on site.

[RACT II Review]

VII. ADDITIONAL REQUIREMENTS.

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

24-000	12		GRAFTECH USA LLC/ST MARYS	Ž
SECTION D.	Source Level Requirements			
Source ID: 203	Source Name: PARTS CLEANERS (3)			
	Source Capacity/Throughput:	N/A	STODDARD SOLVENT	
PROC 203	STAC Z203			

I. RESTRICTIONS.

Emission Restriction(s).

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

The permittee shall not exceed the emission of VOC more than 10.14 ton per year based on consecutive 12-month period from this source.

[Authority for this condition is also derived from 25 Pa. Code Section 129.91]

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall keep a record of the VOC emissions each month added with the previous eleven months to get the twelve month rolling total.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §129.63] Degreasing operations

(a) Cold cleaning machines. Except for those subject to the Federal National emissions standards for hazardous air pollutants (NESHAP) for halogenated solvent cleaners under 40 CFR Part 63 (relating to National emission standards for hazardous air pollutants for source categories), this subsection applies to cold cleaning machines that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.

(1) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.

(2) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:

(i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (3). In addition, the label shall include the following discretionary good operating practices:





(A) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.

(B) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.

(C) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.

(ii) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.

(3) Cold cleaning machines shall be operated in accordance with the following procedures:

(i) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

(ii) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.

(iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.

(iv) Air agitated solvent baths may not be used.

(v) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

(4) After December 22, 2002, a person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.

(5) On and after December 22, 2002, a person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:

(i) The name and address of the solvent supplier.

(ii) The type of solvent including the product or vendor identification number.

(iii) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).

(6) A person who operates a cold cleaning machine shall maintain for at least 2 years and shall provide to the Department, on request, the information specified in paragraph (5). An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

(7) Paragraph (4) does not apply:

(i) To cold cleaning machines used in extreme cleaning service.

(ii) If the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with paragraph (4) will result in unsafe operating conditions.

(iii) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

(b) - (e) [Do not apply]





VII. ADDITIONAL REQUIREMENTS.

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



GRAFTECH USA LLC/ST MARYS



SECTION D. Source Level Requirements

Source ID: 607

Source Name: GRAPHITE BAGGING SYS

Source Capacity/Throughput: 20.000 Tons/HR CAF

CARBON

Conditions for this source occur in the following groups: BAGHOUSE REQUIREMENTS



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The permittee shall not exceed 0.54 lbs/hr particulate matter emission from this source.

[Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in PSD Permit #79-PA-26 and 25 Pa Code Section 123.13]

II. TESTING REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

GRAFTECH USA LLC/ST MARYS



SECTION D. Source Level Requirements

Source ID: 715

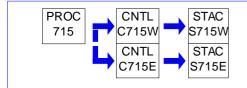
24-00012

Source Name: MACHINING OPERATIONS

Source Capacity/Throughput: 9,000.000 Lbs/HR

GRAPHITE ELECTRODES

Conditions for this source occur in the following groups: PLAN APPROVAL 24-012K PM RESTRICTION



I. RESTRICTIONS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following are CAM related requirements for particulate matter:

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

(1) Baghouses differential pressure;

(2) Visible emission following EPA Method 22-like procedure.

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

(1) Differential pressure gauges (Magnehelic gauges);

(2) Visible emission following EPA, Method 22-like procedure.

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

(1) Baghouses differential pressure - daily;

(2) Visible emission following EPA, Method-22 like procedure - daily.

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

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

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

(2) Observation of visible emission from the stack will be performed by a designated employee and logged daily. Observer





will write "Yes" for emission presence of any visible emission and write "No" if there was no visible emission observed.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.12b] Plan approval terms and conditions.

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

[Plan Approval 24-012C, Condition #9.]

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following are CAM related requirements:

(a) The permittee shall record all inspections, repair and maintenance performed on the monitoring equipments.

(b) The permittee shall record all excursions and corrective actions taken in response to an excursion and the time elapsed until corrective actions have been taken.

(c) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, possible causes and corrective actions taken for the incidents.

(d) The permittee shall keep all records for a period of five (5) years and make the records available to the Department upon request.

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

V. REPORTING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following conditions are related to CAM Rule:

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

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

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

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



Ž

SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The permittee shall perform a daily operational inspection of the control devices. The operational inspection shall include, at a minimum, recording the pressure drop across the control devices and a visual inspection of the system for leaks, etc. In the event that the pressure drop is out of specification, the baghouse will be inspected by the use of a black light and all defective filters replaced. The operating range for pressure drop across the baghouses shall be maintained between 1.5" and 6.0" w.c.

[Plan Approval 24-012C, Condition #5, and letter from permittee dated 10/15/2003.]

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

[Plan Approval 24-012C, Condition #6.]

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

[Plan Approval 24-012C, Condition #7.]

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

[Plan Approval 24-012C, Condition #8.]

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following are CAM related requirements:

(a) The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the devices:

(1) The permittee shall, for an approved device(s), install detectors or sensors at a location approved by the Department for obtaining data that are representative of the monitored indicator;

(2) The permittee shall develop verification procedures to confirm the operational status of new or modified monitoring equipment prior to commencement of the monitoring process.

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

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

(c) The permittee shall ensure that at least 90% of the monitoring data has been properly and accurately collected.

(d) The permittee shall submit an implementation plan and schedule if the approved monitoring requires the installation, testing or other necessary activities. The schedule for completing installation and beginning operation on monitoring may not exceed 180 days after the issuance date of the permit.

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

VII. ADDITIONAL REQUIREMENTS.

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

The following conditions are related to CAM rule:

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





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

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

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

(b) In general, the QIP plan should be developed within 60 days and the permittee shall provide a copy of QIP to the Department. Furthermore the permittee shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

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

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

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

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

(1) Improved preventive maintenance practices;

(2) Process operation changes;

(3) Appropriate improvements to control methods;

(4) Other steps appropriate to correct performances.

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

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

(1) Address the cause of the control devices performance problem;

(2) Provide adequate procedures for correcting control devices performance problems in as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

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

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

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







Group Name: BAGHOUSE REQUIREMENTS

Group Description: Sources with a baghouse

Sources included in this group

ID Name 607 GRAPHITE BAGGING SYS

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain a record of all preventive maintenance inspections of the control device. These records shall, at a minimum, contain the dates of inspections, any problems or defects, the actions taken to correct the problem or defects, any routine maintenance performed and the pressure drop across the control device.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

(a) The permittee shall perform weekly preventive maintenance inspection of control device.

(b) The permittee shall maintain a manometer or similar device to measure the pressure drop across the control device.

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

(d) The permittee shall maintain and operate this source and the control device 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 (Title V General Requirements).





SECTION E. Source Group Restrictions.

Group Name: PLAN APPROVAL 24-012K

Group Description: General language for issuance of the new plan approval

Sources included in this group

ID	Name
158	L.G. COKE SCREENING
187	LONGITUDINAL GRAPHITIZERS (20) BLDG 800
715	MACHINING OPERATIONS

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) This source is subject to the provisions of Plan Approval 24-012K, the conditions of which are incorporated into this Title V permit. This plan approval 24-012K will expire August 10, 2022. Any violation of the plan approval would also be deemed a violation of this Title V Operating Permit.

(b) This incorporation of this plan approval into this Title V Operating Permit shall not be construed to require the permittee to implement the project that is the subject of the plan approval, unless an enforcement action, regulation or statute independently requires otherwise.

(c) This Title V permit shall not be construed to provide any independent, ongoing authority for the construction or operation of the project that is the subject of Plan Approval 24-012K, unless and until the permittee applies for, and is granted, a future administrative amendment to this Title V permit for that project, once it has been determined by the Department to have completed its respective temporary operation phase under the authority of that plan approval.



SECTION E. Source Group Restrictions.

Group Name: PM RESTRICTION

Group Description: Particulate matter process emission restriction

Sources included in this group

ID	Name
128	153 HP CUMMINS NATURAL GAS EMERGENCY ENGINE
130	154 HP DIESEL-FUELED EMERGENCY ENGINE FOR FIRE PUMP
715	MACHINING OPERATIONS

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 process in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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





SECTION E. Source Group Restrictions.

Group Name: SOX RESTRICTION

Group Description: SOx general emission restriction

Sources included in this group

IDName128153 HP CUMMINS NATURAL GAS EMERGENCY ENGINE151BURN-OFF OVEN

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 §127.512]

Operating permit terms and conditions.

The permittee shall use only natural gas as a fuel for this source.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



Group Name: SUBPART JJJJ

Group Description: 40 CFR Part 60 Subpart JJJJ for emergency generator engines

Sources included in this group

ID Name

128 153 HP CUMMINS NATURAL GAS EMERGENCY ENGINE

RESTRICTIONS. 1

Emission Restriction(s).

001 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4233]

Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?

(a) - (d) [Do not apply]

(e) Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE. [Non-applicable text omitted.]

[Table 1 to Subpart JJJJ of Part 60]

Engine type	Maximum	Emission standards*					
and fuel	engine power	g/HP-hr		ppmvd at 15% O2			
		NOx	CO	VOC**	NOx	CO	VOC**
Emergency	HP>=130	2.0	4.0	1.0	160	540	86

*[Owners and operators of stationary non-certified SI engines may choose to comply with the emission standards in units of either g/HP-hr or ppmvd at 15 percent O2.]

**[For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.]

[76 FR 37975, June 28, 2011]

_____ (f) - (h) [Do not apply]

[73 FR 3591, Jan. 18, 2008, as amended at 76 FR 37973, June 28, 2011]

Fuel Restriction(s).

002 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]

Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine? [40 CFR §60.4243(e):]

(e) Owners and operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of §60.4233.

Operation Hours Restriction(s).

003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]

Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine? [40 CFR §60.4243(d):]





(d) If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (d)(1) through (3) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (d)(1) through (3) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (d)(1) through (3) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (d)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (d)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (d)(2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(ii) - (iii) [Paragraphs 60.4243(d)(2)(ii)-(iii) were vacated by the U.S. Court of Appeals on May 1, 2015.]

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (d)(2) of this section. Except as provided in paragraph (d)(3)(i) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) [Does not apply]

(ii) [Reserved]

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4245]
 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?

Owners or operators of stationary SI ICE must meet the following notification, reporting and recordkeeping requirements.

(a) Owners and operators of all stationary SI ICE must keep records of the information in paragraphs (a)(1) through (4) of this section.

(1) All notifications submitted to comply with this subpart and all documentation supporting any notification.





(2) Maintenance conducted on the engine.

(3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

(4) [Does not apply]

(b) For all stationary SI emergency ICE greater than or equal to 130 HP and less than 500 HP manufactured on or after July 1, 2011 that do not meet the standards applicable to non-emergency engines, the owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [Non-applicable text omitted.]

(c) - (e) [Do not apply]

[73 FR 3591, Jan. 18, 2008, as amended at 73 FR 59177, Oct. 8, 2008; 78 FR 6697, Jan. 30, 2013; 81 FR 59809, Aug. 30, 2016]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4234]
 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
 How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?

Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in §60.4233 over the entire life of the engine.

006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4237] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?

(a) [Does not apply]

(b) Starting on January 1, 2011, if the emergency stationary SI internal combustion engine that is greater than or equal to 130 HP and less than 500 HP that was built on or after January 1, 2011, does not meet the standards applicable to non-emergency engines, the owner or operator must install a non-resettable hour meter.

(c) [Does not apply]

007 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]
 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
 What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

(a) [Does not apply]

(1) If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required if you are an owner or operator. You must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions, your stationary SI internal combustion engine will not be considered out of compliance.

(2) [Does not apply]





(b) If you are an owner or operator of a stationary SI internal combustion engine and must comply with the emission standards specified in §60.4233(d) or (e), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) and (2) of this section.

(1) Purchasing an engine certified according to procedures specified in this subpart, for the same model year and demonstrating compliance according to one of the methods specified in paragraph (a) of this section.

(2) [Does not apply]

(c) [Does not apply]

(d) - (e) [Printed under Restrictions in this section of permit.]

(f) [Does not apply]

(g) It is expected that air-to-fuel ratio controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

(h) - (i) [Do not apply]

[73 FR 3591, Jan. 18, 2008, as amended at 76 FR 37974, June 28, 2011; 78 FR 6697, Jan. 30, 2013]

VII. ADDITIONAL REQUIREMENTS.

008 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4230] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines Am I subject to this subpart?

(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (6) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

(1) - (3) [Do not apply]

(4) Owners and operators of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured:

(i) - (iii) [Do not apply]

(iv) on or after January 1, 2009, for emergency engines with a maximum engine power greater than 19 KW (25 HP).

(5) - (6) [Do not apply]

(b) - (f) [Do not apply]

[73 FR 3591, Jan. 18, 2008, as amended at 76 FR 37972, June 28, 2011]

009 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4246] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What parts of the General Provisions apply to me?

Table 3 to this subpart shows which parts of the General Provisions in §§60.1 through 60.19 apply to you.

[Refer to Table 3 to Subpart JJJJ of Part 63.]

010 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4248] Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines What definitions apply to this subpart?

[Refer to 40 CFR §60.4248 for definitions applicable to Subpart JJJJ.]



GRAFTECH USA LLC/ST MARYS

Ž

SECTION E. Source Group Restrictions.



SECTION E.

Group Name: SUBPART ZZZZ Group Description: 40 CFR Part 63 Subpart ZZZZ for emergency generator engines

Source Group Restrictions.

Sources included in this group

ID Name

130 154 HP DIESEL-FUELED EMERGENCY ENGINE FOR FIRE PUMP

I. RESTRICTIONS.

Operation Hours Restriction(s).

001 [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 [40 CFR §63.6640(f):]

(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii) - (iii) [Paragraphs 63.6640(f)(2)(ii)-(iii) were vacated by the U.S. Court of Appeals on May 1, 2015.]

(3) [Does not apply]

(4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) - (ii) [Do not apply]

II. TESTING REQUIREMENTS.

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





III. MONITORING REQUIREMENTS.

002 [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?

(a) - (d) [Do not apply]

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and aftertreatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

(1) - (2) [Do not apply]

(3) An existing emergency or black start stationary RICE located at an area source of HAP emissions;

(4) - (10) [Do not apply]

(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

(g) [Does not apply]

(h) If you operate a new, reconstructed, or existing stationary engine, you must 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, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

(i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

(j) [Does not apply]

[69 FR 33506, June 15, 2004, as amended at 73 FR 3606, Jan. 18, 2008; 75 FR 9676, Mar. 3, 2010; 75 FR 51589, Aug. 20, 2010; 76 FR 12866, Mar. 9, 2011; 78 FR 6703, Jan. 30, 2013]

IV. RECORDKEEPING REQUIREMENTS.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655] Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

What records must I keep?

(a) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.





(1) A copy of each notification and report that you 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).

(2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

(3) [Does not apply]

(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.

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

(b) - (c) [Do not apply]

(d) You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

- (1) [Does not apply]
- (2) An existing stationary emergency RICE.
- (3) [Does not apply]

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) through (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

(1) [Does not apply]

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

[69 FR 33506, June 15, 2004, as amended at 75 FR 9678, Mar. 3, 2010; 75 FR 51592, Aug. 20, 2010; 78 FR 6706, Jan. 30, 2013]

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6660]

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

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

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

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

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





[69 FR 33506, June 15, 2004, as amended at 75 FR 9678, Mar. 3, 2010]

V. REPORTING REQUIREMENTS.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640] Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

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

[40 CFR §63.6640(e):]

(e) You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you. [Non-applicable text omitted.]

VI. WORK PRACTICE REQUIREMENTS.

006 [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?

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 2b to this subpart that apply to you.

[Table 2d to Subpart ZZZZ of Part 63]

4. For each emergency stationary CI RICE and black start stationary CI RICE**, you must meet the following requirement, except during periods of startup:

a. Change 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 replace as necessary; and

c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

During periods of startup you must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

*[Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.]

**[If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.]

[78 FR 6709, Jan. 30, 2013]

(b) - (f) [Do not apply]

[75 FR 9675, Mar. 3, 2010, as amended at 75 FR 51589, Aug. 20, 2010; 76 FR 12866, Mar. 9, 2011; 78 FR 6701, Jan. 30, 2013]





007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6605]

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

What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to you at all times.

(b) At all times you must 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. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[75 FR 9675, Mar. 3, 2010, as amended at 78 FR 6702, Jan. 30, 2013]

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]

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

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

(a) You must demonstrate continuous compliance with each other requirements in Table 2d to this subpart that subpart that apply to you according to methods specified in Table 6 to this subpart. [Non-applicable text omitted.]

[Table 6 to Subpart ZZZZ of Part 63]

9. For each existing emergency and black start stationary RICE located at an area source of HAP, complying with work or managment practices, you must demonstrate continuous compliance by:

i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or

ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[78 FR 6715, Jan. 30, 2013]

(b) - (d) [Do not apply]

(e) [Printed under Reporting Requirements in this section of permit.]

(f) [Printed under Restrictions in this section of permit.]

[69 FR 33506, June 15, 2004, as amended at 71 FR 20467, Apr. 20, 2006; 73 FR 3606, Jan. 18, 2008; 75 FR 9676, Mar. 3, 2010; 75 FR 51591, Aug. 20, 2010; 78 FR 6704, Jan. 30, 2013]

VII. ADDITIONAL REQUIREMENTS.

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6580]

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

What is the purpose of subpart ZZZ?

Subpart ZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.





[73 FR 3603, Jan. 18, 2008]

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6585] Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Am I subject to this subpart?

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(b) [Does not apply]

(c) An area source of HAP emissions is a source that is not a major source.

(d) - (f) [Do not apply]

[69 FR 33506, June 15, 2004, as amended at 73 FR 3603, Jan. 18, 2008; 78 FR 6700, Jan. 30, 2013]

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6590]

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

What parts of my plant does this subpart cover?

This subpart applies to each affected source.

(a) Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

(1) Existing stationary RICE.

(i) - (ii) [Do not apply]

(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

(iv) A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

(2) - (3) [Do not apply]

(b) - (c) [Do not apply]

[69 FR 33506, June 15, 2004, as amended at 73 FR 3604, Jan. 18, 2008; 75 FR 9674, Mar. 3, 2010; 75 FR 37733, June 30, 2010; 75 FR 51588, Aug. 20, 2010; 78 FR 6700, Jan. 30, 2013]

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6595]

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

When do I have to comply with this subpart?

(a)(1) If you have an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than May 3, 2013. [Non-applicable text omitted.]





(2) - (7) [Do not apply]

(b) - (c) [Do not apply]

[69 FR 33506, June 15, 2004, as amended at 73 FR 3604, Jan. 18, 2008; 75 FR 9675, Mar. 3, 2010; 75 FR 51589, Aug. 20, 2010; 78 FR 6701, Jan. 30, 2013]

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6665]

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

What parts of the General Provisions apply to me?

Table 8 to this subpart shows which parts of the General Provisions in §§ 63.1 through 63.15 apply to you. [Non-applicable text omitted.]

[Refer to Table 8 to Subpart ZZZZ of Part 63.]

[75 FR 9678, Mar. 3, 2010]

014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6670] Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Who implements and enforces this subpart?

(a) This subpart is implemented and enforced by the U.S. EPA, or a delegated authority such as your State, local, or tribal agency. If the U.S. EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the U.S. EPA) has the authority to implement and enforce this subpart. You should contact your U.S. EPA Regional Office to find out whether this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the Administrator of the U.S. EPA and are not transferred to the State, local, or tribal agency.

(c) The authorities that will not be delegated to State, local, or tribal agencies are:

(1) Approval of alternatives to the non-opacity emission limitations and operating limitations in § 63.6600 under § 63.6(g).

(2) Approval of major alternatives to test methods under § 63.7(e)(2)(ii) and (f) and as defined in § 63.90.

(3) Approval of major alternatives to monitoring under § 63.8(f) and as defined in § 63.90.

(4) Approval of major alternatives to recordkeeping and reporting under § 63.10(f) and as defined in § 63.90.

(5) Approval of a performance test which was conducted prior to the effective date of the rule, as specified in § 63.6610(b). # 015 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6675]

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

What definitions apply to this subpart?

[Refer to 40 CFR §63.6675 for definitions applicable to Subpart ZZZZ.]





SECTION F. Alternative Operation Requirements.

Alternative Operation Name: SIMULTANEOUS USE OF TWO RECTIFYING TRANS

#001 CHANGES FROM NORMAL OPERATION

This AOS will allow for the simultaneous use of two rectifying transformers, thus allowing two furnaces to be on power at the same time. This will allow Graftech USA to take advantage of off-peak electrical power usage (during hours from 10 PM to 7 AM). High tap electrical usage will continue to be staggered, so that hourly emissions will not exceed current limitations. This AOS will only be used during the present economic depressed time period. When production rates return to normal the company will revert back to the use of only one rectifier at a time. "Normal" is defines as a production rate of 125 furnaces per month or greater.

Sources included in this Alternative Operation:

ID	Name	Source Type
187	LONGITUDINAL GRAPHITIZERS (20) BLDG 800	Process

I. RESTRICTIONS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The facility shall maintain sufficient records to show that the production rate is below 90 furnaces per month.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

During periods of reduced production, defined as a production rate under 90 furnaces per month, the permittee may run two rectifying transformers simultaneously during off-peak electrical hours to take advantage of lower electrical costs.

VII. ADDITIONAL REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All conditions listed in Section D of this operating permit for Source 187 shall remain in effect during this alternate operating scenario.





SECTION G. Emission Restriction Summary.

Source Id	Source Descriptior				
128	153 HP CUMMINS N	ATURAL GAS EMERGENCY ENGINE			
Emission Limit			Pollutant		
4.000	GRAMS/HP-Hr		СО		
540.000	PPMV	Dry basis, at 15% O2	СО		
2.000	GRAMS/HP-Hr		NOX		
160.000	PPMV	Dry basis, at 15% O2	NOX		
500.000	PPMV	Drybasis	SOX		
0.040	gr/DRY FT3		TSP		
1.000	GRAMS/HP-Hr	Excluding formaldehyde	VOC		
86.000	PPMV	Excluding formaldehyde, dry basis, at 15% O2	VOC		
130	154 HP DIESEL-FUE	LED EMERGENCY ENGINE FOR FIRE PUMP			
Emission Limit			Pollutant		
500.000	PPMV/DRY FT3	Drybasis	SOX		
0.040	gr/DRY FT3		TSP		
151	BURN-OFF OVEN				
Emission Limit			Pollutant		
44.400	Tons/Yr	Based on 12-month rolling total.	СО		
59.600	Tons/Yr	Based on 12-month rolling total.	NOX		
46.800	Tons/Yr	Based on 12-month rolling total.	SOX		
500.000	PPMV	Drybasis	SOX		
2.600	Tons/Yr	Based on 12-month rolling total.	TSP		
1.000	Tons/Yr	Based on 12-month rolling total.	VOC		
158	L.G. COKE SCREENING				
Emission Limit			Pollutant		
0.020	gr/DRY FT3		TSP		
186	CARBOTTOMS (16)				
Emission Limit			Pollutant		
0.400	Lbs/Hr		СО		
0.430	Tons/Yr	based on a consecutive 12-month period	СО		
6.300	Lbs/Hr	full cycle average	SOX		
16.000	Tons/Yr	based on a consecutive 12-month period	SOX		
18.700	Lbs/Hr	one-hour average	SOX		
30.000	PPMV	full cycle average dry basis	SOX		
71.000		one-hour average dry basis	SOX		
	Lbs/Hr		TSP		
	Tons/Yr	based on a consecutive 12-month period	TSP		
	Lbs/Tons	carbon baked in furnance	VOC		
89.600	Tons/Yr	based on a consecutive 12-month period	VOC		



GRAFTECH USA LLC/ST MARYS

Pollutant



SECTION G. Emission Restriction Summary.

Source Id	Source Descriptior		
187	LONGITUDINAL GR	APHITIZERS (20) BLDG 800	
Emission Limit			Pollutant
544.880	Lbs/Hr	From Building 800 monitor.	CO
889.000	Lbs/Hr	From Building 800 stack.	CO
30.510	Lbs/Hr	From Building 800 monitor on a 24-hour average basis.	SOX
60.300	Lbs/Hr	From Building 800 stack on a 24-hour average basis	SOX
18.300	Lbs/Hr	From Bldg. 800 monitor	TSP
24.490	Lbs/Tons	of carbon graphitized in the graphitizer.	VOC
94.000	Tons/Yr	12-month rolling basis.	VOC
203	PARTS CLEANERS	(3)	
Emission Limit			Pollutant
10.140	Tons/Yr	Based on consecutive 12-month period.	VOC
607	GRAPHITE BAGGIN		
Emission Limit			Pollutant
0.540	Lbs/Hr		TSP
715	MACHINING OPERA	TIONS	
Emission Limit			Pollutant
0.040	gr/DRY FT3		TSP

Site Emission Restriction Summary

Emission Limit

Alternative Operation Emission Restriction Summary

Source Id

Source Description





SECTION H. Miscellaneous.

(a) The emission limitations contained in Section G of this permit are provided for informational purposes only and are not to be considered as enforceable limits. All enforceable limitations are listed in Section C and/ or D of this permit.

(b) There are no applicable emission, testing, monitoring, recordkeeping, reporting, or work practice requirements for the following sources:

- (1) Propane Storage Tanks
- (2) Gasoline Storage Tank
- (3) Maintenance
- (4) Space Heaters (natural gas; less than 2.5 mmBtu/hr sitewide)
- (5) Side Block Manufacturing facility
- (6) Pitch Unloading
- (7) Pallet Manufacturing Facility
- (8) Roadways

(c) Source 203 consists of the following individual sources:

- (1) Maintenance shop-1, One Safety-Kleen parts washer;
- (2) Maintenance shop-2. One Safety-Kleen parts washer;
- (3) Mobile maintenance garage, One Safety-Kleen parts washer.

(d) This permit was administratively amended on July 15, 2003 to incorporate the newly applicable requirements from Plan Approval No. 24012B and change the name of the facility from "The Carbide/Graphite Group" to "CG Electrodes Acquisition LLC."

(e) On August 31, 2005 this permit was amended to incorporate the on going conditions of plan approval # 24-012D in Source ID # 194: 25 inch press.

(f) On July 19, 2007 this permit was amended to incorporate the conditions of plan approval #24-012E and #24-012F for carbottom kilns 491, 492, 493, and 494 (Sources 1001, 1002, 1003, and 1004). The conditions were combined in (Source 186 Carbottoms 10) which now reflects 14 Carbottoms.

(g) On October 7, 2008 this permit was modified to change the operating ranges of some control devices related to the CAM plan.

(h) On March 5, 2009, this permit was amended to incorporate the conditions of plan approval # 24-012H.

(i) On May 7, 2009 this operating permit was modified through the Minor operating permit modification in 25 PA Code 127.462. This was for an Alternate Operating Scenario (AOS) for Source 187.

(j) On November 10, 2009 this operating permit was amended to incorporate the conditions of plan approval #24-012I.

(k) On January 29, 2010 this permit was amended to incorporate the conditions of plan approval #24-012G for carbottom kilns 495, and 496 (Sources 1005, and 1006). The conditions were combined in (Source 186 Carbottoms 14) which now reflects 16 Carbottoms.

(I) This permit was renewed on June 20, 2011.

(m) A minor operating permit modification was issued on March 21, 2012 to incorporate changes to Source 187 to reflect the SO2 emission rates are based on a 24 hour average and that compliance is based on averaging the three 8-hour runs from the most recent emission test.

(n) The permit was administratively amended on October 1, 2013 to incorporate the change in the Responsible Official to William A. McFadden.

(o) This permit was renewed on July 13, 2016.

(p) On May 1, 2019, this permit was modified to incorporate RACT II case-by-case requirements for Sources 186 and 187.

(q) This permit was renewed on September 10, 2021, with an effective date of September 10, 2021. This includes the removal of several sources and control devices from the permit that have been inactive for greater than 5 years in accordance with 25 Pa.



6 6



SECTION H. Miscellaneous.

24-00012

Code 127.11a. The list of inactive sources (letter dated February 9, 2017) with date of deactivation are as follows. Source 187 is currently active and therefore not included in the list; Source 186 and its control devices are included in the list; however, they currently remain in the operating permit.

105Coal UnloadingFebruary 26, 20C105ABaghouse for Coke Handling PlantFebruary 26, 20106Storage, Preheaters, Screening, & CrushingFebruary 26, 20C106Baghouse for Storage, Preheaters, Screening, & CrushingFebruary 26, 20107Petroleum Coke Flour MillFebruary 26, 20C107Baghouse for Petroleum Coke Flour MillFebruary 26, 20108Pitch Impregnation (PI)April 29, 2016C108PI EFB, Single State EPApril 29, 2016109Mixer, Feeder, ScaleFebruary 26, 20C109Regenerative Thermal OxidizerFebruary 26, 20C109AMill Mix Bayless Wet Scrubber (8,200 ACFM)February 26, 20	
106Storage, Preheaters, Screening, & CrushingFebruary 26, 20C106Baghouse for Storage, Preheaters, Screening, & CrushingFebruary 26, 20107Petroleum Coke Flour MillFebruary 26, 20C107Baghouse for Petroleum Coke Flour MillFebruary 26, 20108Pitch Impregnation (PI)April 29, 2016C108PI EFB, Single State EPApril 29, 2016109Mixer, Feeder, ScaleFebruary 26, 20C109Regenerative Thermal OxidizerFebruary 26, 20	016
C106Baghouse for Storage, Preheaters, Screening, & CrushingFebruary 26, 20107Petroleum Coke Flour MillFebruary 26, 20C107Baghouse for Petroleum Coke Flour MillFebruary 26, 20108Pitch Impregnation (PI)April 29, 2016C108PI EFB, Single State EPApril 29, 2016109Mixer, Feeder, ScaleFebruary 26, 20C109Regenerative Thermal OxidizerFebruary 26, 20	016
107Petroleum Coke Flour MillFebruary 26, 20C107Baghouse for Petroleum Coke Flour MillFebruary 26, 20108Pitch Impregnation (PI)April 29, 2016C108PI EFB, Single State EPApril 29, 2016109Mixer, Feeder, ScaleFebruary 26, 20C109Regenerative Thermal OxidizerFebruary 26, 20	016
C107Baghouse for Petroleum Coke Flour MillFebruary 26, 20108Pitch Impregnation (PI)April 29, 2016C108PI EFB, Single State EPApril 29, 2016109Mixer, Feeder, ScaleFebruary 26, 20C109Regenerative Thermal OxidizerFebruary 26, 20	016
108Pitch Impregnation (PI)April 29, 2016C108PI EFB, Single State EPApril 29, 2016109Mixer, Feeder, ScaleFebruary 26, 20C109Regenerative Thermal OxidizerFebruary 26, 20	016
C108PI EFB, Single State EPApril 29, 2016109Mixer, Feeder, ScaleFebruary 26, 20C109Regenerative Thermal OxidizerFebruary 26, 20	016
109Mixer, Feeder, ScaleFebruary 26, 20C109Regenerative Thermal OxidizerFebruary 26, 20	
C109 Regenerative Thermal Oxidizer February 26, 20	
	016
C109A Mill Mix Bayless Wet Scrubber (8,200 ACFM) February 26, 20	016
	016
138 48" Extrusion Press System February 26, 20	016
C138 48" Extrusion Press System Baghouse February 26, 20	016
151 Burn-Off Oven December 22, 2	2016
C151 Onex Afterburner December 22, 2	2016
158 L.G. Coke Screening May 26, 2016	
C158 LG Coke Screening Baghouse May 26, 2016	
162 Liquid Pitch Storage (P.I.) & Dist. April 29, 2016	
163Air/Vegetable Oil Quench SystemApril 29, 2016	
165Pitch Storage (2): Plant 3February 26, 20	016
179 Coke Handling: Plant 3 February 26, 20	016
C179A Baghouse for Coke Handling February 26, 24	2016
C179B Baghouse for Coke Handling February 26, 2	2016
186 Carbottoms (16) May 5, 2016	
C186 Limestone Slurry Scrubber May 5, 2016	
C186A Carbottom Thermal Oxidizer #1 May 5, 2016	
C186B Carbottom Thermal Oxidizer #2 May 5, 2016	
197Sagger Sand Handling SystemMay 6, 2016	
C197A Sagger Baghouse May 6, 2016	

(r) This permit was adminstratively amended on October 24, 2022 to incorporate the change of responsible official (RO) and permit contact.

(s) This permit was administratively amended on October 7, 2024 to change the RO to Travis Reed and the permit contact to Rachel Krieg.





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