



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: August 8, 2025

Effective Date: August 8, 2025

Expiration Date: February 28, 2027

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

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

Plan Approval No. 24-00167E

Federal Tax Id - Plant Code: 26-3856193-1

Owner Information

Name: SPEER CARBON CO LLC
Mailing Address: 806 THERESIA ST
SAINT MARYS, PA 15857-1831

Plant Information

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

Responsible Official

Name: JEFFREY A STRUBLE
Title: MANAGING DIR
Phone: (814) 834 - 7777 Ext.112 Email: jeff.struble@speercarbon.com

Plan Approval Contact Person

Name: JEFFREY A STRUBLE
Title: MANAGING DIR
Phone: (814) 834 - 7777 Ext.112 Email: jeff.struble@speercarbon.com

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



Plan Approval Description

Installation of Carbottom furnace and associated thermal oxidizer



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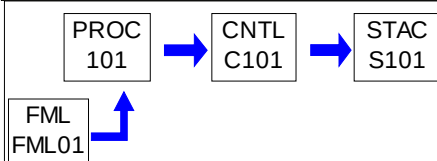
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**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	BAKING KILNS		
104	ELECTRIC PUSHER FURNACE		
7150	CAR BOTTOM FURNACE	5,500.000 CF/HR	Natural Gas
C101	FLAME GRID FUME DESTRUCTORS		
C104	ELECTRIC PUSHER FURNACE THERMAL OXIDIZER		
C7150	THERMAL OXIDIZER		
FML01	NATURAL GAS PIPELINE		
S101	FLAME GRID STACKS		
S104	ELECTRIC PUSHER FURNACE THERMAL OXIDIZER STACK		
S7150	STACK FOR CAR BOTTOM FURNACE		

PERMIT MAPS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

Regional Air Program Manager

PA Department of Environmental Protection

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

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

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

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

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



SECTION C. Site Level Plan Approval Requirements

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

All applicable additional conditions as specified in State Only operating permit 24-00167 shall remain in effect unless superseded or amend by a condition contained herein. If there is a conflict between a condition contained in the State Only operating permit 24-00167 and a condition contained herein, the permittee shall comply with the condition contained herein rather than the conflicting condition contained in the State Only operating permit 24-00167.

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

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

Source ID: 101

Source Name: BAKING KILNS

Source Capacity/Throughput:

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

Operating permit 24-00167 Section D, Condition # 003 for Source 101 currently states [(a) VOC emissions from this source shall not exceed 62.8 lbs/ton of product averaged over a 12-month rolling period and 70.4 lbs/ton of product at any time.] This condition shall be replaced by the following condition. VOC emissions from this source and source 104 shall not exceed 62.8 lbs/ton of product averaged over a 12-month rolling period and 70.4 lbs/ton of product at any time

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

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

Operating permit 24-00167 Section D, Condition # 006 for Source 101 currently states [The permittee shall maintain records of the quantity of parts (in pounds) charged into the kilns and the percent by weight of potential VOC chemicals contained in the parts. This information will be used to calculate the VOC emissions from this source on a 12-month rolling basis. The VOC emissions shall be calculated based on the following equation:

$$\text{Lbs of VOC consumed} / \text{Tons of product produced} = \text{Lbs VOC per ton product.}]$$

This condition shall be superseded by the following condition.

The permittee shall maintain records of the quantity of parts (in pounds) charged into the kilns and the percent by weight of potential VOC chemicals contained in the parts. This information will be used to calculate the VOC emissions from this source on a 12-month rolling basis. The VOC emissions shall be calculated based on the following equation:

$$\text{Lbs of VOC emitted} / \text{Tons of product produced} = \text{Lbs VOC per ton product.}$$

V. REPORTING REQUIREMENTS.

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

**SECTION D. Source Level Plan Approval Requirements****VI. WORK PRACTICE REQUIREMENTS.**

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

VII. ADDITIONAL REQUIREMENTS.

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

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

Source ID: 104

Source Name: ELECTRIC PUSHER FURNACE

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.**# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Operating permit 24-00167 Section D, Condition # 005 for Source 104 currently states [The permittee shall maintain records of the quantity of parts (in pounds) charged into the kilns and the percent by weight of potential VOC chemicals contained in the parts. This information will be used to calculate the VOC emissions from this source on a 12-month rolling basis. The VOC emissions shall be calculated based on the following equation:

$$\text{Lbs of VOC consumed} / \text{Tons of product produced} = \text{Lbs VOC per ton product.}]$$

This condition shall be superseded by the following condition.

The permittee shall maintain records of the quantity of parts (in pounds) charged into the kilns and the percent by weight of potential VOC chemicals contained in the parts. This information will be used to calculate the VOC emissions from this source on a 12-month rolling basis. The VOC emissions shall be calculated based on the following equation:

$$\text{Lbs of VOC emitted} / \text{Tons of product produced} = \text{Lbs VOC per ton product}$$

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

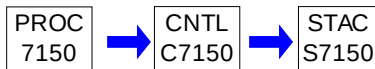
Source ID: 7150

Source Name: CAR BOTTOM FURNACE

Source Capacity/Throughput:

5,500.000 CF/HR

Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from any process in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

002 [25 Pa. Code §123.21]**General**

(b) 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.

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

(a) The VOC emissions from this source shall not exceed 6.0 tpy based on a consecutive 12-month rolling period.

(b) VOC emissions from this source shall not exceed 31 lbs/ton of product averaged over a 12-month rolling period.

Fuel Restriction(s).**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

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

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

(a) The company shall perform an initial stack test within 180 days of the start-up of the car bottom furnace to determine the control device efficiency by measuring inlet and outlet VOC concentration of the thermal oxidizer. The stack test shall be performed while the aforementioned source is operating within 90% of the maximum routine operating capacity. The stack test shall be performed while the source is between the temperatures of 600F and 1400F. The stack test shall be performed while the thermal oxidizer is at a minimum temperature of 1410F. The company may apply to the Department for extension of the time to conduct the initial stack test if there is cause.

(1) Pursuant to 25 Pa. Code § 139.53(a)(3), at least 120 calendar days prior to commencing an emissions testing program, a test protocol shall be submitted to the Department for review and approval in accordance with paragraph (8) of this condition. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

i) When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval;

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

thereafter, a letter, submitted at least 90 calendar days prior to commencing an emission testing program, referencing the previously approved procedural protocol is sufficient if the letter is approved by the Department. The letter shall be submitted as required in part (1). If modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack test manual has been revised since the approval, a new protocol shall be submitted.

2) Pursuant to 25 Pa. Code § 139.53(a)(3), at least 15 calendar days prior to commencing an emission testing program, notification as to the date and time of testing shall be given to the Department in accordance with paragraph (8) of this condition. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.

3) Pursuant to 25 Pa. Code § 139.53(a)(3), if the proposed testing did not occur per the required notification in paragraph (2) above, an electronic mail notification shall be sent within 15 calendar days after the expected completion date of the onsite testing to the Department, in accordance with paragraph (8) of this condition, indicating why the proposed completion date of the on-site testing was not adhered to.

4) Pursuant to 25 Pa. Code § 139.53(a)(3), a complete test report shall be submitted to the Department no later than 60 calendar days after completion of the onsite testing portion of an emission test program.

5) Pursuant to 25 Pa. Code Section 139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or noncompliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:

- i) A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
- ii) Permit number(s) and condition(s) which are the basis for the evaluation.
- iii) Summary of results with respect to each applicable permit condition.
- iv) Statement of compliance or non-compliance with each applicable permit condition.

6) Pursuant to 25 Pa. Code § 139.3 all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

7) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.

8) Pursuant to 25 Pa. Code §§ 139.53(a)(1) and 139.53(a)(3):

i) All submittals, besides notifications (protocols & reports only), shall be accomplished through PSIMS*Online, available through: <https://www.depgreenport.state.pa.us/ecommm/Login.jsp>, when it becomes available. If internet submittal cannot be accomplished, one electronic copy of all source test submissions (protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager.

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

CENTRAL OFFICE:

RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE:

RA-EPNWstacktesting@pa.gov

Notifications shall be sent via OnBase: <https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx>

9) The permittee shall ensure all federal reporting requirements contained in the applicable subpart of 40 CFR are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between state and the federal, the most stringent provision, term, condition, method or rule shall be used by default.

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

- i) If the results of a stack test, performed as required by this approval, exceed the level specified in any condition of this

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

approval, the Permittee shall take appropriate corrective actions. Within 30 days of the Permittee receiving the stack test results, a written description of the corrective actions shall be submitted to the Department. 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 30 days, if the corrective actions taken are deficient. Within 30 days of receipt of the notice of deficiency, the Permittee shall submit a description of additional corrective actions to the Department. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

ii) If the results of the required stack test exceed any limit defined in this plan approval, the test was not performed in accordance with the stack test protocol or the source and/or air cleaning device was not operated in accordance with the plan approval, then another stack test shall be performed to determine compliance. Within 120 days of the Permittee receiving the original stack test results, a retest shall be performed. The Department may extend the retesting deadline if the Permittee demonstrates, to the Department's satisfaction, that retesting within 120 days is not practicable. Failure of the second test to demonstrate compliance with the limits in the plan approval, not performing the test in accordance with the stack test protocol or not operating the source and/or air cleaning device in accordance with the plan approval may be grounds for immediate revocation of the plan approval to operate the affected source.

In addition to the stack testing required by this condition, the facility shall conduct subsequent performance testing within six (6) to twelve (12) months prior to the expiration date of the operating permit, for VOC destruction efficiency in accordance with the provisions of Chapter 139 (relating to sampling and testing).

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) All recordkeeping shall commence upon startup of the source

(b) The company shall maintain a log of all preventative maintenance inspections of the source and control device(s). The inspection logs, at a minimum, shall contain the dates of the inspections, the name of the person performing the inspection, any mechanical repairs and/or adjustments, any potential problems or defects that were encountered, and the steps taken to correct them.

(c) The permittee shall record the following operational data from the control device(s):

1. Thermal oxidizer operating temperature
2. The times that the thermal oxidizer is turned on and off
3. The temperature of the kiln at time when thermal oxidizer is turned on and off

(d) The permittee shall maintain records of the quantity of parts (in pounds) charged into the furnace and the percent by weight of potential VOC chemicals contained in the parts. This information will be used to calculate the VOC emissions from this source on a quarterly basis. The VOC emissions shall be calculated based on the following equation:
$$\text{Lbs of VOC emitted} / \text{Tons of product produced} = \text{Lbs VOC per ton product}$$

(e) All records shall be kept for a period of five (5) years and shall be made available to the Department upon request.

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

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

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) The permittee shall perform a daily operational inspection of the source(s) and control device(s).
- (b) A thermocouple or equivalent shall be permanently installed and maintained at a conveniently readable location to indicate the thermal oxidizer operating temperature.
- (c) 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. All monitored gauges shall be mounted in accessible areas, and shall be maintained in good operating conditions at all times.
- (e) The permittee shall operate the thermal oxidizer control device while the kiln space is between 600F and 1400F. Once the kiln space temperature reaches below 600F or above 1400F, the thermal oxidizer can be turned off.
- (f) The minimum thermal oxidizer combustion temperature is 1410F
- (g) The control device shall maintain a minimum destruction efficiency of 95%.
- (h) The permittee shall maintain and operate the source and control device(s) in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

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



SECTION E. Source Group Plan Approval Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
101	BAKING KILNS		
Emission Limit			Pollutant
62.800	Lbs/Tons	of product averaged over a 12-month rolling period	VOC
70.040	Lbs/Tons	of product at any time	VOC
7150	CAR BOTTOM FURNACE		
Emission Limit			Pollutant
500.000	PPMV	Dry Basis	SOX
0.040	gr/DRY FT3		TSP
6.000	Tons/Yr	baed on a consecutiv 12-month rolling period.	VOC
31.000	Lbs/Tons	averaged over a 12-month rolling period	VOC

Site Emission Restriction Summary

Emission Limit	Pollutant
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SECTION H. Miscellaneous.



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