



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

**STATE ONLY SYNTHETIC MINOR OPERATING PERMIT**

|                |               |                  |               |
|----------------|---------------|------------------|---------------|
| Issue Date:    | June 21, 2024 | Effective Date:  | March 6, 2025 |
| Revision Date: | March 6, 2025 | Expiration Date: | June 23, 2029 |
| Revision Type: | Amendment     |                  |               |

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

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

**State Only Permit No: 46-00147**

Synthetic Minor

Federal Tax Id - Plant Code: 45-4290080-1

Owner Information

Name: NMZ HOLDINGS  
Mailing Address: 1301 CONSHOHOCKEN RD  
CONSHOHOCKEN, PA 19428-1032

Plant Information

Plant: CHEMALLOY COMPANY LLC/ CONSHOHOCKEN  
Location: 46 Montgomery County 46944 Plymouth Township  
SIC Code: 3399 Manufacturing - Primary Metal Products, Nec

Responsible Official

Name: LUIZ SPIEZIO  
Title: VP OF OPERATIONS  
Phone: (610) 909 - 8803 Email: Luiz.Spiezio@metalpowdergroup.com

Permit Contact Person

Name: COLIN HUDSON  
Title: EHS MGR  
Phone: (610) 277 - 7352 Email: colin.hudson@metalpowdergroup.com

[Signature] \_\_\_\_\_  
JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



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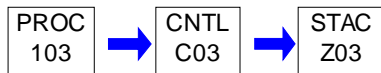
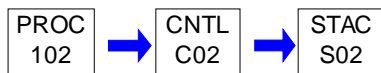
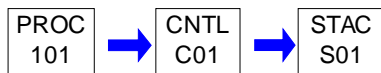
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| Source ID | Source Name                                 | Capacity/Throughput | Fuel/Material           |
|-----------|---|---------------------|-------------------------|
| 101       | BAR MILL 4A-1                               | 4,000.000 Lbs/HR    | VARIOUS ALLOYS          |
| 102       | BALL MILL 4C-1                              | 8,000.000 Lbs/HR    | MINERAL PRODUCT         |
| 103       | BALL MILL 3A-1                              | N/A                 | CHROMIUM MATERIALS      |
| 104       | BALL MILL 3B-1                              | N/A                 | CHROMIUM MATERIALS      |
| 105       | PLANT 2 WRINGER                             | 2,640.000 Lbs/HR    | VARIOUS MATERIALS       |
| 106       | PLANT 2A LIBERTY BELL                       | 12,000.000 Lbs/HR   | VARIOUS MATERIALS       |
| 107       | PLANT 2 RAW MATERIAL SCREENS                | 4,950.000 Lbs/HR    | MANGANESE MATERIALS     |
| 108       | PLANT 2A WRINGER                            | 2,640.000 Lbs/HR    | VARIOUS MATERIALS       |
| 109       | PARTS WASHER                                | 0.007 Gal/HR        | LIGHT ALIPHATIC NAPHTH. |
| 110       | MISCELLANEOUS PM SOURCES                    |                     |                         |
| 111       | BLDG 7 MISCELLANEOUS PM SOURCES             |                     |                         |
| C01       | 4A-1 CYCLONE & TORIT                        |                     |                         |
| C02       | 4C-1 CYCLONE & TORIT                        |                     |                         |
| C03       | 3A-1 DUST COLLECTOR                         |                     |                         |
| C04       | 3B-1 DUST COLLECTOR                         |                     |                         |
| C05       | PLANT 2 WRINGER SCRUBBER                    |                     |                         |
| C06       | PLANT 2A LIBERTY BELL SCRUBBER              |                     |                         |
| C07       | PLANT 2 RAW MATERIAL SCREENS CONTROL DEVICE |                     |                         |
| C08       | PLANT 2A WRINGER CONTROL DEVICE             |                     |                         |
| S01       | 4A-1 STACK                                  |                     |                         |
| S02       | 4C-1 STACK                                  |                     |                         |
| S05       | PLANT 2 WRINGER STACK                       |                     |                         |
| S06       | PLANT 2A LIBERTY BELL STACK                 |                     |                         |
| S07       | PLANT 2 RAW MATERIAL SCREENS STACK          |                     |                         |
| S08       | PLANT 2A WRINGER STACK                      |                     |                         |
| Z03       | FUGITIVE EMISSIONS 103/C03                  |                     |                         |
| Z04       | FUGITIVE EMISSIONS 104/C04                  |                     |                         |
| Z10       | FUGITIVE EMISSIONS FROM SOURCES 110         |                     |                         |
| Z109      | PARTS WASHER                                |                     |                         |
| Z11       | BLDG 7 PM SOURCE STACK                      |                     |                         |

**PERMIT MAPS**

**PERMIT MAPS**

PROC 104 → CNTL C04 → STAC Z04

PROC 105 → CNTL C05 → STAC S05

PROC 106 → CNTL C06 → STAC S06

PROC 107 → CNTL C07 → STAC S07

PROC 108 → CNTL C08 → STAC S08

PROC 109 → STAC Z109

PROC 110 → STAC Z10

PROC 111 → STAC Z11

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

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

**#002 [25 Pa. Code § 127.446]****Operating Permit Duration.**

(a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.

(b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

**#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)]****Permit Renewal.**

(a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.

(b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

(c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.

(d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.

(e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).

(f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

**#004 [25 Pa. Code § 127.703]****Operating Permit Fees under Subchapter I.**

(a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.

(1) For a synthetic minor facility, a fee equal to:

(i) Four thousand dollars (\$4,000) for calendar years 2021—2025.

(ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.

(iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.

**SECTION B. General State Only Requirements**

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

- (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
- (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
- (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.

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

**#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]****Transfer of Operating Permits.**

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

**#008 [25 Pa. Code § 127.441]****Need to Halt or Reduce Activity Not a Defense.**

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

**#009 [25 Pa. Code §§ 127.442(a) & 127.461]****Duty to Provide Information.**

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

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

**#010 [25 Pa. Code § 127.461]****Revising an Operating Permit for Cause.**

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

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

**#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]****Operating Permit Modifications**

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



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

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

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

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

**#012 [25 Pa. Code § 127.441]****Severability Clause.**

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

**#013 [25 Pa. Code § 127.449]****De Minimis Emission Increases.**

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

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

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

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

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

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

(2) One ton of NO<sub>x</sub> from a single source during the term of the permit and 5 tons of NO<sub>x</sub> 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 PM<sub>10</sub> from a single source during the term of the permit and 3.0 tons of PM<sub>10</sub> at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

**#014 [25 Pa. Code § 127.3]****Operational Flexibility.**

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

(1) Section 127.14 (relating to exemptions)

(2) Section 127.447 (relating to alternative operating scenarios)

(3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)

(4) Section 127.449 (relating to de minimis emission increases)

(5) Section 127.450 (relating to administrative operating permit amendments)

**SECTION B. General State Only Requirements**

(6) Section 127.462 (relating to minor operating permit modifications)

(7) Subchapter H (relating to general plan approvals and general operating permits)

**#015 [25 Pa. Code § 127.11a]****Reactivation of Sources**

(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).

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

**#016 [25 Pa. Code § 127.36]****Health Risk-based Emission Standards and Operating Practice Requirements.**

(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].

(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

**#017 [25 Pa. Code § 121.9]****Circumvention.**

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

**#018 [25 Pa. Code §§ 127.402(d) & 127.442]****Reporting Requirements.**

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

(c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager  
PA Department of Environmental Protection  
(At the address given in the permit transmittal letter, or otherwise notified)

(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

(e) Any records, reports or information submitted to the Department shall be available to the public except for such

**SECTION B. General State Only Requirements**

records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

**#019 [25 Pa. Code §§ 127.441(c) & 135.5]****Sampling, Testing and Monitoring Procedures.**

(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.

(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

**#020 [25 Pa. Code §§ 127.441(c) and 135.5]****Recordkeeping.**

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

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

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

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

**#021 [25 Pa. Code § 127.441(a)]****Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privileges.

**#022 [25 Pa. Code § 127.447]****Alternative Operating Scenarios.**

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.

**SECTION B. General State Only Requirements****#023 [25 Pa. Code §135.3]****Reporting**

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

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

**#024 [25 Pa. Code §135.4]****Report Format**

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

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

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

**# 002 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations, as specified in 25 Pa. Code § 129.14.
- (7) N/A
- (8) N/A

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

- (i) The emissions are of minor significance with respect to causing air pollution; and
- (ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

**# 003 [25 Pa. Code §123.2]****Fugitive particulate matter**

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

**# 004 [25 Pa. Code §123.31]****Limitations**

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

**# 005 [25 Pa. Code §123.41]****Limitations**

The following opacity limitations apply to air contaminant sources at the facility, unless there is a more stringent limitation applicable to a specific source.

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

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

**# 006 [25 Pa. Code §123.42]****Exceptions**

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

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

**SECTION C. Site Level Requirements**

opacity of visible emissions.

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

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

Facility-wide emissions include emissions from the source(s) listed in this operating permit, all sources listed in Section A of the facility-wide operating permit No. 46-00147, as well as miscellaneous sources exempt from plan approval requirements which are listed in Section H of the facility-wide operating permit No. 46-00147.

**# 008 [25 Pa. Code §129.14]****Open burning operations**

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

- (a) a fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer;
- (b) any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department;
- (c) a fire set for the prevention and control of disease or pests, when approved by the Department;
- (d) a fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation;
- (e) a fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure;
- (f) a fire set solely for recreational or ceremonial purposes; or
- (g) a fire set solely for cooking food.

**II. TESTING REQUIREMENTS.****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

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

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

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

**III. MONITORING REQUIREMENTS.****# 011 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

**SECTION C. Site Level Requirements**

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

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

The permittee shall monitor the site-wide monthly and 12-month rolling single Hazardous Air Pollutant (HAP) and aggregate combination of total HAPs emissions.

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

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

- (1) odors which may be objectionable (as per 25 Pa. Code §123.31);
- (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
- (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).

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

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

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

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

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

The permittee shall maintain a record of the site-wide monthly and 12-month rolling single Hazardous Air Pollutant (HAP) and aggregate combination of total HAPs emissions.

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

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

- 1) Date, time, and location of the incident(s).
- 2) The cause of the event.
- 3) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

b) The permittee shall keep records of the actual emissions from the facility in order to ensure compliance with this Operating Permit.



**SECTION C. Site Level Requirements****# 016 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

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

**# 017 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Records of the monitoring data and supporting information required in all Sections of this State Only Permit shall be maintained for a minimum of five (5) years in the format approved by the Department. These records shall be made available to the Department upon request.

**# 018 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain onsite SDS for all products processed at this facility.

**V. REPORTING REQUIREMENTS.****# 019 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- (b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.
- (c) The report shall describe the following:
  - (1) Name, permit or authorization number, and location of the facility;
  - (2) Nature and cause of the malfunction, emergency or incident;
  - (3) Date and time when the malfunction, emergency or incident was first observed;
  - (4) Expected duration of excess emissions;
  - (5) Estimated rate of emissions; and
  - (6) Corrective actions or preventative measures taken.
- (d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.
- (e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit

**SECTION C. Site Level Requirements**

justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.

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

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

**# 020 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

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

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

- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
  - (i) Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or,
  - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

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

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

- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

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

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

**# 021 [25 Pa. Code §135.3]****Reporting**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

**SECTION C. Site Level Requirements**

The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from all previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported, including those sources listed in the Miscellaneous Section of this permit.

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

**VI. WORK PRACTICE REQUIREMENTS.****# 022 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

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

- (a) use, where possible, of water or suitable chemicals, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land;
- (b) application of asphalt, water, or other suitable chemicals, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts;
- (c) paving and maintenance of roadways; and
- (d) prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.

**# 023 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

**# 024 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

**# 025 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

**VIII. COMPLIANCE CERTIFICATION.**

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

**IX. COMPLIANCE SCHEDULE.**



**SECTION C. Site Level Requirements**

No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: BAR MILL 4A-1

Source Capacity/Throughput: 4,000.000 Lbs/HR VARIOUS ALLOYS

Conditions for this source occur in the following groups: GROUP 1

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

This source consists of one (1) Bar Mill 4A-1 installed: 10/06/1992. Emissions are controlled by C01 a 4A-1 Cyclone & Torit.

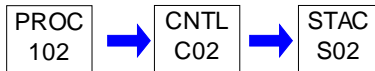
**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: BALL MILL 4C-1

Source Capacity/Throughput: 8,000.000 Lbs/HR MINERAL PRODUCT

Conditions for this source occur in the following groups: GROUP 1

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

This source consists of one (1) Bar Mill 4C-1. Emissions are controlled by C02 a 4C-1 Cyclone & Torit.

**SECTION D. Source Level Requirements**

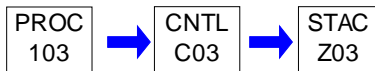
Source ID: 103

Source Name: BALL MILL 3A-1

Source Capacity/Throughput:

N/A

CHROMIUM MATERIALS

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a). The permittee shall limit the emissions of elemental Chromium from the two metal grinding and milling lines, BALL MILL 3A-1 and 3B-1 (Source Id Nos. 103 and 104) to 0.71 pounds per hour and 3.10 tons per year, calculated as 12-month rolling sum.

(b). The permittee shall limit the Particulate Matter (PM/PM10/PM2.5) emissions from this metal grinding and milling line, BALL MILL 3A-1 (Source Id No 103) to 0.02 grains per dry standard cubic foot (gr/dscf).

**Throughput Restriction(s).****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the raw material throughputs for this processing line, Ball Mill 3A-1 (Source Id No 103), to 1,200 pounds per hour.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a). The permittee shall monitor the weight of raw material processed, on a daily basis.

(b). The permittee shall monitor the hours of operation, on a daily basis.

(c). The permittee shall continuously monitor the pressure drop across the dust collector (Source Id No C03).

(d). The permittee shall calculate chromium emissions on a monthly and twelve month rolling sum.

**IV. RECORDKEEPING REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a). The permittee shall record the weight of raw material processed, on a daily basis.

(b). The permittee shall record the hours of operation, on a daily basis.

(c). The permittee shall record, once per week, the pressure drop across the dust collector (Source Id No C03).

**SECTION D. Source Level Requirements**

(d). The permittee shall maintain a log of any malfunction and/or maintenance done on the dust control system that includes the cause, date, time and the corrective action taken.

(e). The permittee shall keep a record of the Chromium emissions, calculated as a 12-month rolling sum.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a). The permittee shall operate and maintain the 3A-1 dust collector (Source Id No C03) at 99 percent, or higher, control efficiency to control Particulate Matter emissions from its metal grinding and milling line, Ball Mill 3A-1, (Source Id No 103).
- (b). The permittee shall install ductwork that directs the exhaust from the dust collector stack inside the building in order to recirculate filtered air for further cleaning.
- (c). The dust collector (Source Id No C03) shall be equipped with a device for monitoring the pressure differential across the dust collector.
- (d). The permittee shall maintain the pressure drop across the dust collector (Source Id No C03) within the range of 2 to 4 inches of water gauge at all times.
- (e). The permittee shall keep on hand sufficient quantity of spare fabric filters for replacement of any deteriorated filters without delay.
- (f). The permittee shall maintain the hopper that collects dust from the dust collector (Source Id No C03) that is equipped with slide gate, drum cover, and connecting hose to control fugitive emissions during collection and emptying.

**VII. ADDITIONAL REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source consists of one (1) Bar Mill 3A-1 and is powered by electricity only. Emissions are controlled by C03 a Donaldson Torit baghouse, Model: 4DF16, installed: 05/01/1992.



**SECTION D. Source Level Requirements**

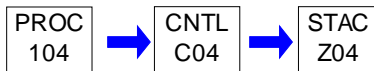
Source ID: 104

Source Name: BALL MILL 3B-1

Source Capacity/Throughput:

N/A

CHROMIUM MATERIALS

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a). The permittee shall limit the emissions of elemental Chromium from the two metal grinding and milling lines, BALL MILL 3A-1 and 3B-1 (Source Id Nos. 103 and 104) to 0.71 pounds per hour and 3.10 tons per year, calculated as 12-month rolling sum.

(b). The permittee shall limit the Particulate Matter (PM/PM10/PM2.5) emissions from this metal grinding and milling line, BALL MILL 3B-1 (Source Id No 104) to 0.02 grains per dry standard cubic foot (gr/dscf).

**Throughput Restriction(s).****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the raw material throughputs for this processing line, Ball Mill 3B-1 (Source Id No 104), to 1,200 pounds per hour.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a). The permittee shall monitor the weight of raw material processed, on a daily basis.

(b). The permittee shall monitor the hours of operation, on a daily basis.

(c). The permittee shall continuously monitor the pressure drop across the dust collector (Source Id No C04).

(d). The permittee shall calculate chromium emissions on a monthly and twelve month rolling sum.

**IV. RECORDKEEPING REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a). The permittee shall record the weight of raw material processed, on a daily basis.

(b). The permittee shall record the hours of operation, on a daily basis.

(c). The permittee shall record, once per week, the pressure drop across the dust collector (Source Id No C04).

**SECTION D. Source Level Requirements**

(d). The permittee shall maintain a log of any malfunction and/or maintenance done on the dust control system that includes the cause, date, time and the corrective action taken.

(e). The permittee shall keep a record of the Chromium emissions, calculated as a 12-month rolling sum.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a). The permittee shall operate and maintain the 3B-1 dust collector (Source Id No C04) at 99 percent, or higher, control efficiency to control Particulate Matter emissions from its metal grinding and milling line, Ball Mill 3B-1, (Source Id No 104).

(b). The permittee shall install ductwork that directs the exhaust from the dust collector stack inside the building in order to recirculate filtered air for further cleaning.

(c). The dust collector (Source Id No C04) shall be equipped with a device for monitoring the pressure differential across the dust collector.

(d). The permittee shall maintain the pressure drop across the dust collector (Source Id No C04) within the range of 2 to 4 inches of water gauge at all times.

(e). The permittee shall keep on hand sufficient quantity of spare fabric filters for replacement of any deteriorated filters without delay.

(f). The permittee shall maintain the hopper that collects dust from the dust collector (Source Id No C04) that is equipped with slide gate, drum cover, and connecting hose to control fugitive emissions during collection and emptying.

**VII. ADDITIONAL REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source consists of one (1) Bar Mill 3B-1 and is powered by electricity only. Emissions are controlled by C04 a Donaldson Torit baghouse, Model: 3DF12, installed: 08/01/1991.

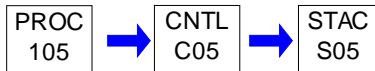
**SECTION D. Source Level Requirements**

Source ID: 105

Source Name: PLANT 2 WRINGER

Source Capacity/Throughput: 2,640.000 Lbs/HR VARIOUS MATERIALS

Conditions for this source occur in the following groups: GRP1

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The particulate matter (PM<sub>10</sub>/PM<sub>2.5</sub>) emissions of all elemental manganese and all other non-HAP containing compounds processed on this line shall be limited to 0.02 gr/dscf, 0.42 lbs/hr and 1.85 tons/yr, based on a 12-month rolling sum.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The Ceilcote Multi-Throat Venturi Scrubber shall control all particulate matter emissions generated from this process line. This source processes non-HAP containing compounds and elemental manganese.

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

(1) The permittee shall maintain the pressure differential across the scrubber within the range of 7 to 12 inches of water gauge (w.g.) during the operation.

**SECTION D. Source Level Requirements**

- (2) The permittee shall maintain the water recirculation flow rate at the venturi nozzle within the range of 30 to 36 gallons per minute (GPM) during operation.
- (3) The wet scrubber shall be operational at all times when material is processed and shall not be bypassed. The scrubber shall be designed, installed and maintained to achieve 99% control efficiency and shall include a chevron-type mist eliminator.
- (4) The source shall not be operated if the scrubber system or any of its components is not functioning.

**VII. ADDITIONAL REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This Plant 2 Wringer is powered by electricity only. Emissions are controlled by C05 a Ceilcote Venturi Scrubber, Model: MTV-50, installed: 12/16/2002.

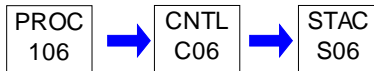
**SECTION D. Source Level Requirements**

Source ID: 106

Source Name: PLANT 2A LIBERTY BELL

Source Capacity/Throughput: 12,000.000 Lbs/HR VARIOUS MATERIALS

Conditions for this source occur in the following groups: GRP1

**I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

(a) The particulate matter (PM/PM-10/PM-2.5) emissions of all elemental manganese and elemental chromium processed on this line shall be limited to 0.02 gr/dscf, 0.55 lbs/hr and 2.39 tons/yr, based on a 12-month rolling sum.

(b) The chromium containing materials processed on this line shall only have a chromium content ranging from 69% to 71%, and shall be composed of metallic, or zero-valent, chromium (Cr 0), and shall not contain trivalent (Cr III) or hexavalent (Cr VI) chromium.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall monitor the percentage of the elemental chromium and the composition of the chromium materials processed by this source. The percentage of the elemental chromium and the composition of the chromium materials shall be monitored for each delivery of raw material received.

**IV. RECORDKEEPING REQUIREMENTS.**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall maintain a record of the percentage of the elemental chromium and the composition of the chromium materials processed by this source.

**V. REPORTING REQUIREMENTS.**

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

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (1) The permittee shall maintain the pressure differential across the scrubber within the range of 7 to 12 inches of water gauge (w.g.) during the operation.
- (2) The permittee shall maintain the water recirculation flow rate at the venturi nozzle within the range of 41 to 46 gallons per minute (GPM) during operation.
- (3) The wet scrubber shall be operational at all times when material is processed and shall not be bypassed. The scrubber shall be designed, installed and maintained to achieve 99% control efficiency and shall include a chevron-type mist eliminator.
- (4) The source shall not be operated if the scrubber system or any of its components is not functioning.

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

The Ceilcote Multi-Throat Venturi Scrubber shall control all particulate matter emissions generated from this process line. This source processes manganese containing materials and chromium containing materials.

**VII. ADDITIONAL REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This Plant 2A Liberty Bell is powered by electricity only. Emissions are controlled by C06 a Ceilcote Venturi Scrubber, Model: MTV-50, installed: 12/16/2002.

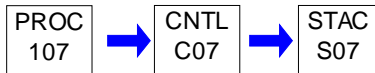
**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: PLANT 2 RAW MATERIAL SCREENS

Source Capacity/Throughput: 4,950.000 Lbs/HR MANGANESE MATERIALS

Conditions for this source occur in the following groups: GRP1

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The particulate matter (PM/PM-10/PM-2.5) emissions of all elemental manganese and all other non-HAP containing compounds processed on this line shall be limited to 0.02 gr/dscf, 0.0044 lbs/hr and 0.016 tons/yr, based on a 12-month rolling sum.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The Ceilcote Multi-Throat Venturi Scrubber shall control all particulate matter emissions generated from this process line. This source processes elemental manganese containing material.

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

(1) The permittee shall maintain the pressure differential across the scrubber within the range of 7 to 12 inches of water gauge (w.g.) during the operation.

**SECTION D. Source Level Requirements**

- (2) The permittee shall maintain the water recirculation flow rate at the venturi nozzle within the range of 15 to 40 gallons per minute (GPM) during operation.
- (3) The wet scrubber shall be operational at all times when material is processed and shall not be bypassed. The scrubber shall be designed, installed and maintained to achieve 99% control efficiency and shall include a chevron-type mist eliminator.
- (4) The source shall not be operated if the scrubber system or any of its components is not functioning.

**VII. ADDITIONAL REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

These Plant 2 Raw Material Screens are powered by electricity only. Emissions are controlled by C07 a Ceilcote Venturi Scrubber, Model: MTV-20.



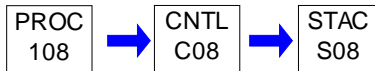
**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: PLANT 2A WRINGER

Source Capacity/Throughput: 2,640.000 Lbs/HR VARIOUS MATERIALS

Conditions for this source occur in the following groups: GRP1

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The particulate matter (PM<sub>10</sub>/PM<sub>2.5</sub>) emissions of all elemental manganese and all other non-HAP containing compounds processed on this line shall be limited to 0.02 gr/dscf, 0.42 lbs/hr and 1.85 tons/yr, based on a 12-month rolling sum.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The Ceilcote Multi-Throat Venturi Scrubber shall control all particulate matter emissions generated from this process line. This source processes non-HAP containing compounds and elemental manganese containing material.

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

(1) The permittee shall maintain the pressure differential across the scrubber within the range of 7 to 12 inches of water gauge (w.g.) during the operation.

**SECTION D. Source Level Requirements**

- (2) The permittee shall maintain the water recirculation flow rate at the venturi nozzle within the range of 15 to 40 gallons per minute (GPM) during operation.
- (3) The wet scrubber shall be operational at all times when material is processed and shall not be bypassed. The scrubber shall be designed, installed and maintained to achieve 99% control efficiency and shall include a chevron-type mist eliminator.
- (4) The source shall not be operated if the scrubber system or any of its components is not functioning.

**VII. ADDITIONAL REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This Plant 2A Wringer is powered by electricity only. Emissions are controlled by C08 a Ceilcote Venturi Scrubber, Model: MTV-20.

**SECTION D. Source Level Requirements**

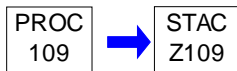
Source ID: 109

Source Name: PARTS WASHER

Source Capacity/Throughput:

0.007 Gal/HR

LIGHT ALIPHATIC NAPHTHA

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the amount of solvent used whenever added or removed from this source.

**IV. RECORDKEEPING REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain records of the amount of solvent used whenever added or removed from this source.

**# 003 [25 Pa. Code §129.63]****Degreasing operations**

(1) 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).

(2) 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 (1). 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.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that this source is operated and maintained in accordance with manufacturer's specifications.

**SECTION D. Source Level Requirements****# 005 [25 Pa. Code §129.63]****Degreasing operations**

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) 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.

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

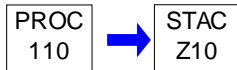
This Zep Manufacturing Co. Parts Washer, Model: Dyna 143, was installed on 04/01/2003.

**SECTION D. Source Level Requirements**

Source ID: 110

Source Name: MISCELLANEOUS PM SOURCES

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the hours of operation, on a daily basis, when operating and as a 12-month rolling sum.

**IV. RECORDKEEPING REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall record the hours of operation, on a daily basis, when operating, and as a 12-month rolling sum.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the hours of operation, of this source, to the following, on a 12-month rolling basis:

| Source                 | Operating Time Limit<br>(hours/year) |
|------------------------|--------------------------------------|
| 4B-4                   | 2080                                 |
| 4B-6A                  | 1040                                 |
| 4B-6                   | 4160                                 |
| 6C-1 & 6b-1 (combined) | 2080                                 |
| 6A-1                   | 6240                                 |
| 6-6                    | 6240                                 |
| 6-7                    | 6240                                 |
| 7-3                    | 400                                  |
| 7-3A                   | 4160                                 |
| 7B-4 & 7D-4 (combined) | 6240                                 |

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The following sources installed under RFD No: 46-A01-2556, Source Ids 110, shall not emit HAPs and their associated control devices shall be directed indoors.

Wringer, 4B-4, controlled by Verantis Multi-Throat venturi scrubber, Model MTV-20 (2,000 ACFM), This source is powered by electricity only.

Fused mineral grinder, 4B-6A, feed tank controlled by a baghouse, Torit 3DF12 (5,000 ACFM). This source is powered by electricity only.

Fused mineral grinder, 4B-6, bar mill controlled by a baghouse, Torit 3DF12 (5,000 ACFM). This source is powered by electricity only.

Calcining of mineral product, 6C-1 and 6B-1 controlled by a baghouse, Mikro Pulsair (2,800 ACFM). This source is powered by electricity and natural gas.

Calcining of mineral product, 6A-1, controlled by a baghouse, Torit 3DF6 (2,400 ACFM). This source is powered by electricity and natural gas.

Screening and packing minerals, 6-6, controlled by a baghouse, Toit 2DF8 (3,500 ACFM). This source is powered by electricity only.

Grinding of metal alloy, 6-7, controlled by a baghouse, Torit DFT2-4 (750 ACFM). This source is powered by electricity only.

Grinding of minerals, 7-3, controlled by a baghouse Torit 35F12 (3,500 ACFM). This source is powered by electricity only. 7-3 and 7-3A are controlled by the same baghouse.

Grinding of minerals, 7-3A, controlled by a baghouse Torit 35F12 (3,500 ACFM). This source is powered by electricity only. 7-3 and 7-3A are controlled by the same baghouse.

Calcining of mineral products, 7B-4 and 7D-4 controlled by cartridge collector, 2M2F8 (2,400 ACFM). This source is powered by electricity and natural gas.

The heat input rating for the below natural gas-powered sources is identical since the units are all identical. Each system has 12 burners / each burner is rated for 100,000 Btu/hr = 1.2 million Btu/hr per system.

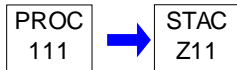
- 6C-1 -1.2 million Btu/hr
- 6B-1 -1.2 million Btu/hr
- 6A-1 -1.2 million Btu/hr
- 7B-4 -1.2 million Btu/hr
- 7D-4 -1.2 million Btu/hr

**SECTION D. Source Level Requirements**

Source ID: 111

Source Name: BLDG 7 MISCELLANEOUS PM SOURCES

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

For the 8-Screeners, Small Blender and Large Blender the permittee shall:

- 1) Monitor the weight of raw material processed on a monthly basis.
- 2) Monitor the days of operation on a monthly basis.
- 3) Monitor the hours of operation on a monthly basis and as a 12-month rolling sum.

**IV. RECORDKEEPING REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

For the 8-Screeners, Small Blender and Large Blender the permittee shall:

- 1) Record the weight of raw material processed on a monthly basis.
- 2) Record the days of operation on a monthly basis.
- 3) Record the hours of operation on a monthly basis and as a 12-month rolling sum.

For the 8-Screeners and Small Blender the permittee shall:

- 4) Record the daily average of material processed on a monthly basis.

Note: The daily average material processing amount shall be calculated as the total material processed in a given month divided by the total operating days in that month.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that this source is operated and maintained in accordance with manufacturer's specifications.



**SECTION D. Source Level Requirements****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the hours of operation and the amount of material processed to the following: the operating hours shall be calculated on a 12-month rolling basis:

| Source        | Operating Time Limit<br>(hours/year) | Material Processed                             |
|---------------|--------------------------------------|--|
| 8-Screeners   | 4,000                                | 24,000 lb per day for each screener (2 shifts) |
| Small Blender | 416                                  | 88,000 lb/month                                |
| Large Blender | 4,000                                | 120,000 lb/month                               |

**VII. ADDITIONAL REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The following exempt sources, installed under paper RFD issued May 8, 2018, shall not emit HAPs and their associated control devices shall be directed indoors. One baghouse controls both the Large Blender and the 8-Screeners. Each of these sources are powered by electricity only.

Small Blender uncontrolled.

Large Blender controlled by baghouse Torit 3DF12 (4,000ACFM).

8-Screeners controlled by baghouse Torit 3DF12 (4,000ACFM).

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 1

Group Description: Bar Mill 4A-1 and Ball Mill 4C-1 from OP-46-310-039A

**Sources included in this group**

| ID  | Name           |
|-----|----------------|
| 101 | BAR MILL 4A-1  |
| 102 | BALL MILL 4C-1 |

**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 a process in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the pressure drop(s) of the control device(s) associated with this source on a weekly basis.

**IV. RECORDKEEPING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain weekly records of the pressure drop(s) of the control device(s) associated with this source.

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

The permittee shall maintain records of any inspections or maintenance performed on the control device(s) associated with this source, any deficiencies noted, and any corrective action taken.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure this source is vented to the associated control device(s).

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

The permittee shall maintain a pressure drop range between 2 to 4 inches water gauge for the control device(s) associated with this source.

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

The permittee shall implement an inspection and maintenance program for the control device(s) associated with this source.

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

**SECTION E. Source Group Restrictions.**

The permittee shall keep on hand a sufficient quantity of spare cartridges for the fabric collector associated with this source in order to be able to immediately replace any cartridges requiring replacement due to deterioration resulting from routine operation of the source and fabric collector.

**VII. ADDITIONAL REQUIREMENTS.**

**# 009 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

This source is powered by electricity only.

**SECTION E. Source Group Restrictions.**

Group Name: GRP1

Group Description: Grinding and Milling Processes

Sources included in this group

| ID  | Name                         |
|-----|------------------------------|
| 105 | PLANT 2 WRINGER              |
| 106 | PLANT 2A LIBERTY BELL        |
| 107 | PLANT 2 RAW MATERIAL SCREENS |
| 108 | PLANT 2A WRINGER             |

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall monitor the pressure drop of the wet scrubber associated with this source on a continuous basis. The scrubber shall be equipped with a magnahelic differential pressure gauge to continuously monitor the pressure drop across the scrubber.

(b) The permittee shall monitor the water recirculation flow rate at the venturi nozzle, the hours of operation of the line, and process data pertaining to the amount of raw material processed.

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

The permittee shall monitor the quantity, by weight, of raw material processed per month.

**IV. RECORDKEEPING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall collect and record the applicable information in a method approved by the Department, as specified in this condition.

A. The permittee shall record and keep records of:

- (1) The pressure drop across the scrubber associated with this source on a weekly basis.
- (2) The recirculation flow rates at the venturi nozzle on a weekly basis.
- (3) Any inspections or maintenance performed on this process and/or associated control equipment, including any deficiencies noted and any corrective actions taken.

B. The permittee shall record the following production data for this process:

- (1) The actual hours of operation per month.
- (2) The quantity, by weight, of raw material processed per month.
- (3) The type of material processed.
- (4) An estimate of maximum hourly and 12-month rolling sum post-control particulate matter (PM<sub>10</sub>/PM<sub>2.5</sub>) emissions, assuming a control efficiency of 99 percent. Emission estimates shall be maintained for each HAP pollutant and collectively for all non-HAP pollutants.

**SECTION E. Source Group Restrictions.****V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall implement an inspection and maintenance program for the process equipment and wet scrubber according to the manufacturer's specifications and good air pollution control practices.

**VII. ADDITIONAL REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source is powered by electricity only.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.

**SECTION G. Emission Restriction Summary.**

| Source Id             | Source Description           |                    |                  |
|-----------------------|------------------------------|--------------------|------------------|
| 101                   | BAR MILL 4A-1                |                    |                  |
| <b>Emission Limit</b> |                              |                    | <b>Pollutant</b> |
| 0.040                 | gr/DRY FT3                   |                    | PM10             |
| 102                   | BALL MILL 4C-1               |                    |                  |
| <b>Emission Limit</b> |                              |                    | <b>Pollutant</b> |
| 0.040                 | gr/DRY FT3                   |                    | PM10             |
| 103                   | BALL MILL 3A-1               |                    |                  |
| <b>Emission Limit</b> |                              |                    | <b>Pollutant</b> |
| 0.710                 | Lbs/Hr                       | Source 103 and 104 | Chromium         |
| 3.100                 | Tons/Yr                      | Source 103 and 104 | Chromium         |
| 0.020                 | gr/DRY FT3                   |                    | TSP              |
| 104                   | BALL MILL 3B-1               |                    |                  |
| <b>Emission Limit</b> |                              |                    | <b>Pollutant</b> |
| 0.710                 | Lbs/Hr                       | Source 103 and 104 | Chromium         |
| 3.100                 | Tons/Yr                      | Source 103 and 104 | Chromium         |
| 0.020                 | gr/DRY FT3                   |                    | TSP              |
| 105                   | PLANT 2 WRINGER              |                    |                  |
| <b>Emission Limit</b> |                              |                    | <b>Pollutant</b> |
| 0.020                 | gr/DRY FT3                   |                    | PM10             |
| 0.420                 | Lbs/Hr                       |                    | PM10             |
| 1.850                 | Tons/Yr                      |                    | PM10             |
| 0.020                 | gr/DRY FT3                   |                    | PM2.5            |
| 0.420                 | Lbs/Hr                       |                    | PM2.5            |
| 1.850                 | Tons/Yr                      |                    | PM2.5            |
| 106                   | PLANT 2A LIBERTY BELL        |                    |                  |
| <b>Emission Limit</b> |                              |                    | <b>Pollutant</b> |
| 0.020                 | gr/DRY FT3                   |                    | PM10             |
| 0.550                 | Lbs/Hr                       |                    | PM10             |
| 2.390                 | Tons/Yr                      |                    | PM10             |
| 0.020                 | gr/DRY FT3                   |                    | PM2.5            |
| 0.550                 | Lbs/Hr                       |                    | PM2.5            |
| 2.390                 | Tons/Yr                      |                    | PM2.5            |
| 107                   | PLANT 2 RAW MATERIAL SCREENS |                    |                  |
| <b>Emission Limit</b> |                              |                    | <b>Pollutant</b> |
| 0.004                 | Lbs/Hr                       |                    | PM10             |
| 0.016                 | Tons/Yr                      |                    | PM10             |
| 0.020                 | gr/DRY FT3                   |                    | PM10             |
| 0.004                 | Lbs/Hr                       |                    | PM2.5            |
| 0.016                 | Tons/Yr                      |                    | PM2.5            |
| 0.020                 | gr/DRY FT3                   |                    | PM2.5            |

**SECTION G. Emission Restriction Summary.**

| Source Id | Source Description |
|-----------|--------------------|
| 108       | PLANT 2A WRINGER   |

| Emission Limit   | Pollutant |
|------------------|-----------|
| 0.020 gr/DRY FT3 | PM10      |
| 0.420 Lbs/Hr     | PM10      |
| 1.850 Tons/Yr    | PM10      |
| 0.020 gr/DRY FT3 | PM2.5     |
| 0.420 Lbs/Hr     | PM2.5     |
| 1.850 Tons/Yr    | PM2.5     |

**Site Emission Restriction Summary**

| Emission Limit | Pollutant |
|----------------|-----------|
|----------------|-----------|



**SECTION H. Miscellaneous.**

#001. Certain terms and conditions for this permit have been derived from the previously issued operating permit 46-310-039A.

#002. The permittee shall operate and maintain each source of particulate matter and each associated control device at the facility in accordance with manufacturer's specifications and good air pollution practices.

#003. An Administrative Amendment is being processed under APS No. 346065 and AUTH No. 787056, to incorporate the sources and requirements of plan approval 46-0147B. These sources include 3A-1 and 3B-1 in Plant 3.

#004. An Administrative Amendment is being processed under APS No. 735921 and AUTH No. 858095, to incorporate the sources and requirements of plan approval 46-0147C. These sources include Plant 2 Wringer, Plant 2A Liberty Bell, Plant 2 Raw Material Screens, and Plant 2A Wringer in Plant 2/2A.

#005. Operating Permit renewal, APS No. 735921 and AUTH No. 932777. Conditions of the previously issued (December 13, 2007) Natural Minor Operating Permit are being incorporated with additional Miscellaneous PM Sources (Id 110) installed under RfD No. 46-A01-2556 (issued on February 19, 2008). June 26, 2013.

#006. Operating permit APS 869020 and AUTH No. 1070308. Administrative amendment to change ownership from Chemalloy Company Inc. (Tax ID 23-1615403-1) to Conshohocken Real Property LLC (Tax ID 32-0453494). Chemalloy will continue to be the facility operator. The responsible official has been changed from Mr. John Way to Mr. Dan Kremin.

\*\*\*\*\* June 2019 \*\*\*\*\*

#007. Operating Permit renewal, APS No. 735921 and AUTH No. 1213747. The following updates have been made in this renewal:

1) Added operating hours limits, and associated monitoring and recordkeeping requirements, for Source ID 110 base upon paper RfD 46-A01-2556 issued on February 19, 2008.

2) Renamed Source ID 110, sub-sources 4B-6 and 7-3 based upon additional information from facility (4B-6 became: 4B-6A & 4B-6 and 7-3 became 7-3 & 7-3a).

3) Paper RfD issued on May 8, 2018 found the following to be exempt:

i) The addition of the following sources: Small Blender, Large Blender and 8-Screeners (these became Source ID 111 in this renewal).

ii) The movement of baghouse-Torit 3 DF12, from Source ID 110, sub-source 7-3, "Grinding of Minerals", to new source ID 111, controlling the Large Blender and 8-Screeners.

iii) The replacement of the scrubber that controls Source ID 110 sub-source 4B-4, "Wringer" (the name and specifications for the scrubber have been updated in this renewal).

4) Sources of power defined for all Source IDs in the permit.

5) Added monthly and 12-month rolling monitoring and recordkeeping requirements for site-wide single and combination HAP emissions.

6) Added monitoring and recordkeeping requirements for the chromium content (%) and composition of the chromium compound processed by Source ID 106.

7) Change Responsible Official from Dan Kremin to Wayde Yeoman.

Note: In a letter dated January 26, 2005, the facility has been approved for reduced monitoring frequency of malodors, fugitive emissions, and visible emissions to a monthly basis.

\*\*\*\*\* June 2024 \*\*\*\*\*

#8 Operating Permit renewal, APS No. 735921 and AUTH No. 1213747. The following updates have been made in this renewal:

1) Change of ownership from Chemalloy Company LLC to NMZ Holdings

2) Facility status changed from Natural Minor to Synthetic Minor

3) Removed Sitewide HAP limit (Site emits no HAPs)

4) Heat Input values added to Source ID 110 for each subsource powered by natural gas.



**SECTION H. Miscellaneous.**

- 5) Add manufacturer, model number and installation date C03, C04, C05, C06, C07, and C08.
- 6) Updated Source 111, Conditions #001, #002 and #004 to align the monitoring and recordkeeping requirements more closely to the operating hours and material processing requirements in Condition #004.

\*\*\*\*\* March 2025 \*\*\*\*\*

9) Administrative Amendment, APS No. 1111885 and AUTH No. 1512805. The following updates have been made in this Administrative Amendment for Source ID 111:

- i) 8-Screeners: throughput limit increased to 24,000 lbs/day for each screener.
- ii) Small Blender: throughput limit increased to 88,000 lbs/month
- iii) Large Blender: throughput limit increased to 120,000 lbs/month.



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

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