



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: July 17, 2025

Effective Date: July 17, 2025

Expiration Date: January 17, 2026

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

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

Plan Approval No. 23-0124

Federal Tax Id - Plant Code: 20-0890604-1

Owner Information

Name: WESTERN IND NORTH LLC DBA WESTERN FUMIGATION

Mailing Address: 800 CALCON HOOK RD
SHARON HILL, PA 19079-1831

Plant Information

Plant: WESTERN IND NORTH LLC/DBA WESTERN FUMIGATION

Location: 23 Delaware County 23821 Eddystone Borough

SIC Code: 7342 Services - Disinfecting And Pest Control Services

Responsible Official

Name: SHANNON SKED

Title: OWNER

Phone: (973) 873 - 5567

Email: ssked@westernpest.com

Plan Approval Contact Person

Name: SHANNON SKED

Title: OWNER

Phone: (973) 873 - 5567

Email: ssked@westernpest.com

[Signature] _____

JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



Plan Approval Description

This plan approval is for the expansion of Methyl Bromide and Sulfuryl Fluoride fumigation sources.



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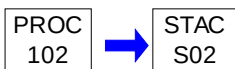
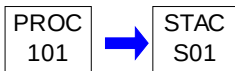
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	EMISSION UNIT ONE (BUILDING #1)		
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S01	STACK FOR EMISSION UNIT ONE		
S02	STACK FOR EMISSION UNIT TWO		

PERMIT MAPS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

- (a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.
- (b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (c) The permittee fails to submit a report required by this plan approval.
- (d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

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

- (a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

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

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

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given on the plan approval transmittal letter or otherwise notified)

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

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

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

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

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

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

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

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations, as specified in 25 Pa. Code § 129.14.
- (7) N/A
- (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) of this condition, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) The emissions are of minor significance with respect to causing air pollution; and
 - (ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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

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

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

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

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

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

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

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

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

**SECTION C. Site Level Plan Approval Requirements**

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions).

007 [25 Pa. Code §129.14]**Open burning operations**

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

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.**# 008 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurements; or
- (b) Observers trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

009 [25 Pa. Code §127.12b]**Plan approval 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;

**SECTION C. Site Level Plan Approval Requirements**

- (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 accompanied with six (6) months of monitoring records, the Department will review and determine the feasibility of decreasing the monitoring frequency to weekly.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request accompanied with six (6) months of monitoring records, the Department will review and 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.**# 010 [25 Pa. Code §127.12b]
Plan approval terms and conditions.**

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

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

**# 011 [25 Pa. Code §127.12b]
Plan approval 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.

V. REPORTING REQUIREMENTS.**# 012 [25 Pa. Code §127.12b]
Plan approval terms and conditions.**

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to DEP's 24-hour Emergency Hotline at 800.541.2050. 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

**SECTION C. Site Level Plan Approval Requirements**

or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

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

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

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

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

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

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

Within thirty (30) days after permit issuance the permittee shall submit, to the Department for approval, the proposed recordkeeping formats required in this operating permit.

014 [25 Pa. Code §135.3]
Reporting

If the permittee has been previously advised by the Department to submit a source report, the permittee 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.

015 [25 Pa. Code §123.1]
Prohibition of certain fugitive emissions

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

**SECTION C. Site Level Plan Approval Requirements**

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

**# 016 [25 Pa. Code §127.12b]
Plan approval terms and conditions.**

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

**# 017 [25 Pa. Code §127.12b]
Plan approval 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 plan approval, 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.

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

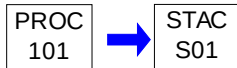
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 101

Source Name: EMISSION UNIT ONE (BUILDING #1)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: FUMIGATION SOURCES

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

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

This source is composed of a Methyl Bromide and Sulfuryl Fluoride fumigation operation in Building #1.

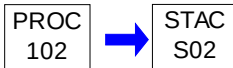
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 102

Source Name: EMISSION UNIT TWO (BUILDING #4)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: FUMIGATION SOURCES

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

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

This source is composed of a Methyl Bromide and Sulfuryl Fluoride fumigation operation in Building #4.

**SECTION E. Source Group Plan Approval Restrictions.**

Group Name: FUMIGATION SOURCES

Group Description: Source IDs 101 and 102

Sources included in this group

ID	Name
101	EMISSION UNIT ONE (BUILDING #1)
102	EMISSION UNIT TWO (BUILDING #4)

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

The permittee shall limit facility-wide (Combined Building #1 and #4) Methyl Bromide and Sulfuryl Fluoride emissions as follows:

Methyl Bromide:

- a) Not greater than 150 pounds per hour
- b) Not greater than 9.9 tons per year, based on a 12-month rolling sum,

Sulfuryl Fluoride:

- a) Not greater than 150 pounds per hour
- b) Not greater than 1.5 tons per year sulfuryl fluoride, based on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

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

For each fumigation event the permittee shall monitor:

- 1) the date and daily operating hours,
- 2) the volume of area to be fumigated,
- 3) the amount of Methyl Bromide or Sulfuryl Fluoride used and
- 4) the time of aeration initiation and completion.

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

(a) For each fumigation event the permittee shall record:

- 1) the date and daily operating hours,
- 2) the volume of area to be fumigated,
- 3) the amount of Methyl Bromide or Sulfuryl Fluoride used and
- 4) the time of aeration initiation and completion.
- 5) the hourly Methyl Bromide and Sulfuryl Fluoride emissions assuming:
 - i) all the Methyl Bromide and Sulfuryl Fluoride used is aerated into the atmosphere and
 - ii) all the fumigant is emitted during the first hour of aeration.

(b) Monthly, the permittee shall record the Methyl Bromide and Sulfuryl Fluoride emissions on a 12-month rolling sum basis.

**SECTION E. Source Group Plan Approval Restrictions.****# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall maintain the following records for each pesticide technician License:

- 1) the name,
- 2) certification number license issuance date,
- 3) expiration date, and
- 4) the fumigant type

V. REPORTING REQUIREMENTS.

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

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

All fumigation events shall be conducted in an enclosed area (within building #1 or #4) with all emissions vented to a stack that complies with the following:

- a) The stack shall be located adjacent to the building in which fumigation is performed
- b) The stack diameter shall be a minimum of 24 inches
- c) The exhaust volumetric flow rate shall be a minimum of 5,000 cfm
- d) The stack height shall be 5 feet above the roof of adjacent buildings
 - 1) The building #1 stack height shall be 24 feet
 - 2) The building #4 stack height shall be 25 feet.
- e) Building #1 stack may be fixed or portable; Building #4 stack will be fixed or portable.

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

Fumigation will be performed in accordance with the following work practices:

- 1) Fumigation will be performed using portable equipment, including a fumigant injection device, circulation fans, tarps, aeration blowers, flexible ductwork, a discharge stack, and portable fumigant monitors.
- 2) Methyl bromide from pressurized cylinders (typically 100-pound or 200-pounds) will be piped through a "volatizer," a heat exchange unit that heats the methyl bromide to maintain it in the gaseous phase (i.e., above its boiling point), as required by the current USDA APHIS Treatment Manual (including updates and revisions); at the time of this permit issuance the temperature requirement is 140°F.
- 3) At the end of the exposure period, the stack will be aerated using one or more portable exhaust aeration fans.
- 4) Fumigation and subsequent aeration phases shall be performed during the late evening and night and completed before the day shift begins the following day.
- 5) Aeration will be performed as required by the current version of the USDA Treatment Manual (including updates and revisions); at the time of permit issuance the treatment manual requires active fan aeration for two hours, followed by at least two hours of passive aeration. The area will not be cleared for re-entry until the concentration of methyl bromide inside the building is below the limit required by the current version of the US EPA FIFRA product label (including updates and revisions); at the time of permit issuance this concentration was 1 ppm ~ 3.89 mg/m³.
- 6) Fumigants will not be stored at the facility. The permittee shall transfer fumigants to the facility each evening and unused quantities will be removed from the site at the end of a night's fumigation events.

**SECTION E. Source Group Plan Approval Restrictions.****# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Fumigation will be performed in accordance with the following regulatory programs and requirements:

- 1) Current USEPA FIFRA Label (including updates and revisions) for methyl bromide and buffer zone program and current USEPA FIFRA Label (including updates and revisions) for Sulfuryl Fluoride ProFume®.
- 2) Current USDA APHIS Treatment Manual (including updates and revisions) and associated treatment schedules for fumigation of commodities with Methyl Bromide and Sulfuryl Fluoride.
- 3) Current Applicator Manual (including updates and revisions) for ProFume® Gas Fumigant (Douglas Products).
- 4) Site-Specific Fumigant Management Plan for the Penn Terminals facility.
- 5) The licensing and certification requirements of the Pennsylvania Pesticide Control Act, as administered by the Pennsylvania Department of Agriculture.
- 6) Pennsylvania Certified Pesticide Applicators and Registered Technicians licenses to perform fumigation operations.

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
101	EMISSION UNIT ONE (BUILDING #1)		
Emission Limit		Pollutant	
1.500	Tons/Yr	Sulfuryl Fluoride-Combined Emission for Sources 101 & 102	Hazardous Air Pollutants
150.000	Lbs/Hr	Sulfuryl Fluoride-Combined Emission for Sources 101 & 102	Hazardous Air Pollutants
9.900	Tons/Yr	Combined Emission for Sources 101 & 102	Methyl Bromide (Bromomethane)
150.000	Lbs/Hr	Combined Emission for Sources 101 & 102	Methyl Bromide (Bromomethane)
102	EMISSION UNIT TWO (BUILDING #4)		
Emission Limit		Pollutant	
1.500	Tons/Yr	Sulfuryl Fluoride-Combined Emission for Sources 101 & 102	Hazardous Air Pollutants
150.000	Lbs/Hr	Sulfuryl Fluoride-Combined Emission for Sources 101 & 102	Hazardous Air Pollutants
9.900	Tons/Yr	Combined Emission for Sources 101 & 102	Methyl Bromide (Bromomethane)
150.000	Lbs/Hr	Combined Emission for Sources 101 & 102	Methyl Bromide (Bromomethane)

Site Emission Restriction Summary

Emission Limit	Pollutant
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SECTION H. Miscellaneous.



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