



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date: September 19, 2025

Effective Date: October 16, 2025

Expiration Date: October 15, 2030

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: 46-00157

Synthetic Minor

Federal Tax Id - Plant Code: 26-1346815-1

Owner Information

Name: DANA HOLDING CORP  
Mailing Address: 1040 CENTER AVE  
POTTSTOWN, PA 19464-5802

Plant Information

Plant: DANA DRIVESHAFT PROD LLC/POTTSTOWN  
Location: 46 Montgomery County 46005 Pottstown Borough  
SIC Code: 3714 Manufacturing - Motor Vehicle Parts And Accessories

Responsible Official

Name: AUSTIN STEPHENS  
Title: EHSS MGR  
Phone: (610) 427 - 9244 Email: Austin.Stephens@dana.com

Permit Contact Person

Name: LAILANI HAWK  
Title: EHS COORDINATOR  
Phone: (610) 850 - 5397 Email: lailani.hawk@dana.com

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



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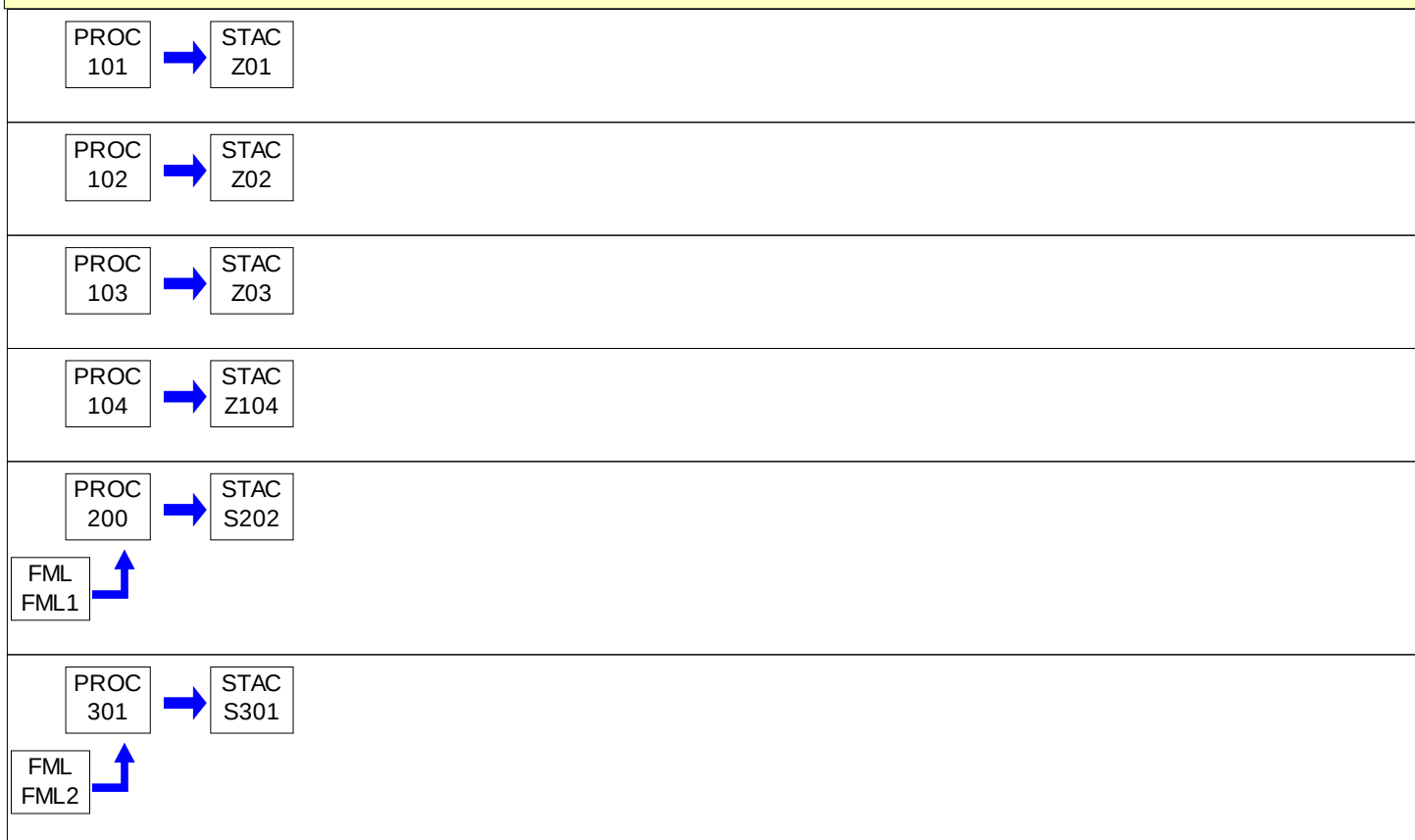
F-I: Restrictions  
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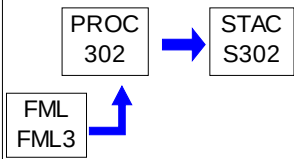
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| Source ID | Source Name                        | Capacity/Throughput | Fuel/Material |
|-----------|------------------------------------|---------------------|---------------|
| 101       | RUST INHIBITOR                     | N/A                 | RUST VETO     |
| 102       | MILL COOLANT                       | N/A                 | ATO GUARD     |
| 103       | PARTS WASHERS                      | N/A                 | SOLVENT       |
| 104       | LUBRICATION/CLEANING               | N/A                 | SOLVENT       |
| 200       | MISC. NATURAL GAS FIRED PROCESSES  | N/A                 | Natural Gas   |
| 301       | FIRE PUMP                          | 0.850 MMBTU/HR      |               |
|           |                                    | 6.000 Gal/HR        | Diesel Fuel   |
| 302       | EMERGENCY GENERATOR - PROPANE      | 544.900 CF/HR       | PROPANE       |
| FML1      | NATURAL GAS LINE                   |                     |               |
| FML2      | NO.2 FUEL OIL                      |                     |               |
| FML3      | SOURCE 302 PROPANE TANK            |                     |               |
| S202      | MISC. FURNACE STACK                |                     |               |
| S301      | FIRE PUMP STACK                    |                     |               |
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| Z104      | SAFETY KLEEN LUBRICATION FUGITIVES |                     |               |

**PERMIT MAPS**

**PERMIT MAPS**

**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:



**SECTION B. General State Only Requirements**

(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)(1)-(9) (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 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 §127.441]****Operating permit terms and conditions.**

Facility-wide volatile organic compound (VOC) emissions shall not exceed 24.9 tons per year, based on a twelve (12) month rolling sum basis.

**# 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.
- (g) A fire set solely for cooking food.

**Throughput Restriction(s).****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) Total annual throughput of natural gas shall not exceed 350 million cubic feet in any 12 consecutive month period.
- (b) No. 2 fuel oil shall only be used for operating of the emergency fire pump.

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

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, the most current version of the DEP Source Testing Manual, and the EPA Clean Air Act National Stack Testing Guidance, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

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

**SECTION C. Site Level Requirements**

the Department.

**# 012 [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.

[Note: On March 31, 2010, the Department approved the permittee's request to reduce the monitoring frequency of odors, visible emissions, and fugitive particulate matter to a monthly basis.]

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

The permittee shall monitor the amount of natural gas used for the facility on a monthly and 12-month rolling sum basis.

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

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

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

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

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

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



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

The permittee shall maintain records of the amount of natural gas used for the facility on a monthly and 12-month rolling sum basis.

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

The permittee shall calculate and maintain records of facility-wide VOC emissions on a monthly and 12-month rolling sum basis.

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

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

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

(c) The report shall describe the following:

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

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

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

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

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

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

[Additional authority for this condition is also derived from 40 C.F.R. Part 68.]

**SECTION C. Site Level Requirements**

- (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 C.F.R. 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 C.F.R. Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 C.F.R. § 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 C.F.R. § 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 C.F.R. § 68.190.
  - (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 C.F.R. 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 C.F.R. § 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 C.F.R. 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 C.F.R. Part 68 by the date specified in 40 C.F.R. § 68.10(a); or,
  - (2) Certify that this facility is in compliance with all requirements of 40 C.F.R. Part 68 including the registration and submission of the RMP.
- (e) If this facility is subject to 40 C.F.R. Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 C.F.R. § 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 C.F.R. Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to submit a compliance schedule or fails to register and submit the RMP or a revised plan pursuant to 40 C.F.R. Part 68.

**VI. WORK PRACTICE REQUIREMENTS.****# 020 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

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

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

**SECTION C. Site Level Requirements****# 021 [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.

**# 022 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

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

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

**VII. ADDITIONAL REQUIREMENTS.**

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

**VIII. COMPLIANCE CERTIFICATION.**

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

**IX. COMPLIANCE SCHEDULE.**

No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 101

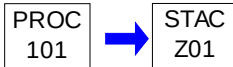
Source Name: RUST INHIBITOR

Source Capacity/Throughput:

N/A

RUST VETO

Conditions for this source occur in the following groups: GR.3

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

All records of the VOC content of the rust inhibitor shall be kept for a minimum of five (5) years.

**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.**

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).

**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: MILL COOLANT

Source Capacity/Throughput:

N/A

ATOGUARD

Conditions for this source occur in the following groups: GR.3

PROC  
102STAC  
Z02**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.**

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

All records of the VOC contents of mill coolant materials shall be kept for a minimum of five (5) years.

**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.**

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).

**SECTION D. Source Level Requirements**

Source ID: 103

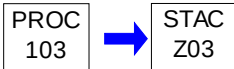
Source Name: PARTS WASHERS

Source Capacity/Throughput:

N/A

SOLVENT

Conditions for this source occur in the following groups: GR.3

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §129.63]****Degreasing operations**

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.

**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.****# 002 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall keep records of the following:

- (a) An invoice, bill of sale, certificate that corresponds to a number of sales;
- (b) Safety Data Sheet (SDS); or
- (c) Other appropriate documentation acceptable to the Department may be used to comply with 25 Pa. Code § 129.63(a).

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

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

- (a) 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;
- (b) 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;
- (c) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning

**SECTION D. Source Level Requirements**

machine;

(d) Air agitated solvent baths may not be used; and

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

**# 004 [25 Pa. Code §129.63]**

**Degreasing operations**

The permittee shall receive from the seller the following written information:

(a) The name and address of the solvent supplier;

(b) The type of solvent including the product or vendor identification number; and

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

**VII. ADDITIONAL REQUIREMENTS.**

**# 005 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

This source consists of four (4) Safety-Kleen cold solvent parts washers. These are utilized to clean tools and parts that are used for upkeep and maintenance activities.

**SECTION D. Source Level Requirements**

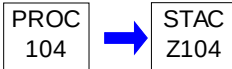
Source ID: 104

Source Name: LUBRICATION/CLEANING

Source Capacity/Throughput:

N/A

SOLVENT

**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.**

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

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

The permittee shall calculate and record the following on a monthly and 12-consecutive month basis:

- (a) amount of solvent (in gallons) used in this source; and
- (b) amount of VOC emissions (in pounds or tons).

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

The permittee shall retain a copy of the Safety Data Sheet (SDS) on site.

**# 003 [25 Pa. Code §129.63a]****Control of VOC emissions from industrial cleaning solvents.**

The permittee shall keep records of all of the following parameters for each cleaning unit operation industrial cleaning solvent:

- (a) The name and identification number;
- (b) The weight percent of total volatiles, water and exempt solvents, as supplied;
- (c) The VOC content or composite vapor pressure, as supplied. The composite vapor pressure as supplied shall be determined in accordance with 25 Pa. Code § 129.63a subsections (i) and (j);
- (d) The VOC content or composite vapor pressure, as applied. The composite vapor pressure as applied shall be determined in accordance with 25 Pa. Code § 129.63a subsections (i) and (j);
- (e) The volume used or applied on a monthly basis;

[Compliance with (c) and (d) may be demonstrated providing documentation from the manufacturer of the industrial cleaning solvent that indicates the composite vapor pressure. The documentation may include an SDS, CPDS or other data certified by the manufacturer.]



**SECTION D. Source Level Requirements****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 lid to the 55-gallon drums of solvent shall be kept closed at all times except when dispensing into the individual spray bottles or into containers for cleaning the extrude tanks on the cold formers.

Any spills shall be cleaned up immediately and solvent laden rags shall be stored in non-absorbant, non-leaking containers. These containers shall be kept closed at all times, except when emptying or filling.

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

The use of solvent in this source shall be limited to the following three (3) production areas:

- (a) in-feed hoppers and conveyors using spray bottles;
- (b) bearing pin loaders and rails using spray bottles; and
- (c) sludge build-up in the extrude oil tanks of the cold formers, using hand/brush cleaning.

**# 006 [25 Pa. Code §129.63a]****Control of VOC emissions from industrial cleaning solvents.**

The permittee shall comply with all of the following work practices for industrial cleaning solvents and shop towels used in the cleaning unit operation cleaning activity:

- (a) Store all VOC-containing industrial cleaning solvents, used shop towels and related waste materials in closed containers;
- (b) Ensure that mixing and storage containers used for VOC-containing industrial cleaning solvents and related waste materials are kept closed at all times except when depositing or removing these materials;
- (c) Minimize spills of VOC-containing industrial cleaning solvents and related waste materials and clean up spills immediately;
- (d) Convey VOC-containing industrial cleaning solvents and related waste materials from one location to another in closed containers or pipes;
- (e) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment;
- (f) Minimize air circulation around cleaning unit operations.

**# 007 [25 Pa. Code §129.63a]****Control of VOC emissions from industrial cleaning solvents.**

The owner or operator shall not cause or permit the emission into the outdoor atmosphere of VOCs from an industrial cleaning solvent used or applied in a cleaning unit operation subject to this section at the facility, unless one of the following limitations is met:

- (a) Compliant solvents. The industrial cleaning solvent meets one of the following VOC limits:
  - (i) A VOC content less than or equal to 0.42 lb VOC/gal (50 g VOC/l) as applied;
  - (ii) A VOC composite vapor pressure less than or equal to 8 mm mercury at 68°F (20°C) as applied.
- (b) VOC emissions capture system and add-on air pollution control device.

**SECTION D. Source Level Requirements**

[Compliance with this condition is met through the use of compliant solvent with composite vapor pressure less than 8 mm mercury at 68°F (20°C)]

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

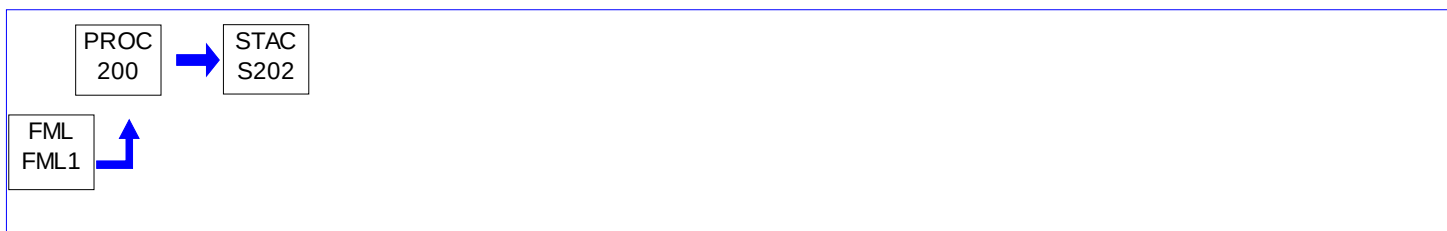
Source ID: 200

Source Name: MISC. NATURAL GAS FIRED PROCESSES

Source Capacity/Throughput:

N/A

Natural Gas

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

# 001 [25 Pa. Code §123.21]

**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from each unit identified under this source in a manner that the concentration of the sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

**Fuel Restriction(s).**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

Only natural gas shall be used for the sources identified under this Source ID.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall monitor the amount of natural gas usage for this source on a monthly and 12-month rolling basis.

**IV. RECORDKEEPING REQUIREMENTS.**

# 004 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall record the amount of natural gas usage for this source on a monthly and 12-month rolling basis.

**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 operate and maintain this source in accordance with manufacturer's specifications.

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

This source consists of:

- (a) AIMS Source 201: Heat Treating Furnaces (HTF) 1-4 (Dept 601/ 5-88-3, 5-88-4, 5-88-5, 5-88-6) with a total rated heat input capacity of 15.6 MMBtu/hr.
- (b) AIMS Source 202: Heat Treating Furnaces (HTF) 5-8 (Dept. 39/ 4-79-1, 4-79-4, 4-79-6, 4-79-7) with a total rated heat input capacity of 15.9 MMBtu/hr.
- (c) Air Make-up Units (AMU) 1-9 with a total rated heat input capacity of 5.0 MMBtu/hr.
- (d) Steam Jet Washer with a total rated heat input capacity of 8.5 MMBtu/hr.

The above sources emit to General Ventilation Units, GV1 thru GV 114.

**SECTION D. Source Level Requirements**

Source ID: 301

Source Name: FIRE PUMP

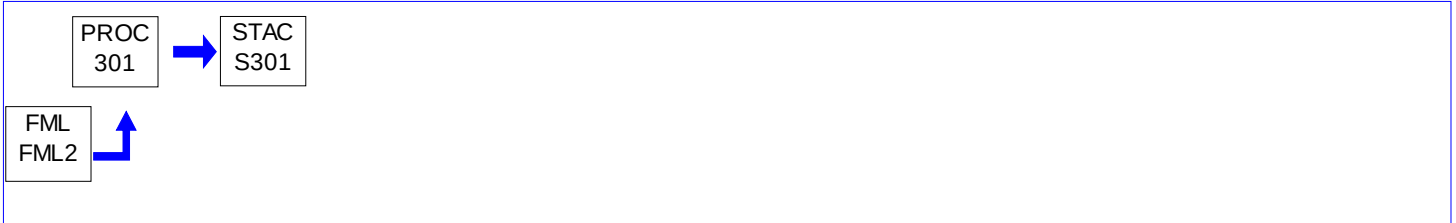
Source Capacity/Throughput:

0.850 MMBTU/HR

6.000 Gal/HR

Diesel Fuel

Conditions for this source occur in the following groups: EXEMPT ENGINES

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

# 001 [25 Pa. Code §123.21]

**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 ppmvd.

**Operation Hours Restriction(s).**

# 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]

**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?**

Operation of this fire pump shall be in accordance with the following:

- (a) there is no time limit on the use of this fire pump in emergency situations;
- (b) the permittee may operate this fire pump for any combination of the purposes below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations counts as part of the 100 hours per calendar year;
- (c) the fire pump may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of fire pump beyond 100 hours per calendar year; and
- (d) the fire pump may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing.

**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.**

# 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6603]

**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441 and 40 C.F.R. Part 63, Subpart ZZZZ, Table 2d, Item 4.]

The permittee shall:

**SECTION D. Source Level Requirements**

- (a) change oil and filter every 500 hours of operation or annually, whichever comes first;
- (b) inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- (c) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

**# 004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]**

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

**What are my monitoring, installation, operation, and maintenance requirements?**

Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441 and 40 C.F.R. § 63.6655(f).]

The operating time for this engine shall be monitored using a non-resettable time totalizing meter.

**IV. RECORDKEEPING REQUIREMENTS.**

**# 005 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The operating time shall be recorded on a monthly and 12-month rolling sum basis.

**# 006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]**

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

**What records must I keep?**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441 and 40 C.F.R. § 63.6660.]

The permittee shall keep records of the date and operating hours for each oil and filter change, air cleaner change, and hose and belt inspections for a period of five (5) years from the date of each occurrence.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

**# 007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]**

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

**What are my monitoring, installation, operation, and maintenance requirements?**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441 and 40 C.F.R. § 63.6655(d).]

The permittee shall:

- (a) operate and maintain this stationary RICE according to the manufacturer's emission-related written instructions; or
- (b) develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

**# 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]**

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

**What are my monitoring, installation, operation, and maintenance requirements?**

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

The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

**SECTION D. Source Level Requirements**

**# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]**

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

**What are my monitoring, installation, operation, and maintenance requirements?**

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

The permittee may opt to utilize an oil analysis program in order to extend the specified oil change requirements found in 40 C.F.R. § 63.6625(i).

**VII. ADDITIONAL REQUIREMENTS.**

**# 010 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

This source consists of an emergency diesel fire pump engine, manufactured by Caterpillar, Model 3208 DINA, installed in 1987, rated at 121 horsepower, with a fuel throughput of 6.0 gallons per hour.

**SECTION D. Source Level Requirements**

Source ID: 302

Source Name: EMERGENCY GENERATOR - PROPANE

Source Capacity/Throughput:

544.900 CF/HR

PROPANE

Conditions for this source occur in the following groups: EXEMPT ENGINES

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

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

**# 002 [25 Pa. Code §123.21]****General**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 123.21(b).]

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 ppmvd.

**Operation Hours Restriction(s).****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.6640(f)(2)–(3), 60.4243(d), 25 Pa. Code §§ 127.35(b) and 127.443(b).]

This emergency generator engine shall be operated in accordance with the following operating hour restrictions:

- (a) A total operating time of less than 500 hrs/yr, calculated monthly as a 12-month rolling sum.
- (b) Less than or equal to a total of 50 hours per calendar year for non-emergency situations, except that the following operations are prohibited:
  - (1) Peak shaving.
  - (2) Non-emergency demand response.
  - (3) Supplying power to an electric grid to generate income.
  - (4) Supplying power as part of a financial arrangement with another entity.
- (c) Less than or equal to a total of 100 hours per calendar year for the following purposes:
  - (1) Any maintenance.
  - (2) Emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2.
  - (3) When there is a deviation in voltage or frequency of 5% or greater below the standard level(s).
  - (4) The non-emergency situations indicated in (b), above.



**SECTION D. Source Level 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) and/or Section E (Source Group Restrictions).

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

The permittee shall monitor the following operating parameters for this source:

- (a) The type(s) of operation, on an operating day basis.
- (b) The following hours of operation, on an operating day basis:
  - (1) The hours of operation for each type of operation.
  - (2) The total hours of operation.

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

The permittee shall calculate the total NO<sub>x</sub> emissions (either actual or worst-case) from the engines of Source ID Nos. 301 and 302 on a monthly, ozone season, and 12-month rolling basis, using a Department-approved method(s).

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

The permittee shall maintain records of the following parameters for this emergency generator engine:

- (a) The type(s) of operation, on an operating day basis.
- (b) The following hours of operation:
  - (1) The hours of operation for each type of operation, on an operating day, monthly, and annual basis.
  - (2) The total hours of operation, on an operating day, monthly, and 12-month rolling basis.

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

The permittee shall keep records of the manufacturer's specifications and emissions test results for the family of engines with the same model year.

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

- (a) The permittee shall keep records of any malfunctions for this generator set. The records shall include the occurrence date, duration and corrective action taken.
- (b) The permittee shall keep records of all maintenance conducted on this generator set.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.6655(a)(2), § 63.6655(e), and § 60.4243(a)(1)]

**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.****# 009 [25 Pa. Code §122.3]****Adoption of standards.**

[Additional authority for this permit condition is also derived from 40 C.F.R. § 60.4237(c).]

This emergency generator engine shall be equipped with a non-resettable hour meter.

**# 010 [25 Pa. Code §122.3]****Adoption of standards.**

[Additional authority for this permit condition is also derived from 40 C.F.R. § 60.4233]

The permittee shall comply with the following emission standards at maximum engine power:

- (a) Nitrogen Oxides (NO<sub>x</sub>) and Non-methane Hydrocarbons (NMHC) shall be less than 13.6 g/KW-hr (10.0 g/hp-hr).
- (b) Carbon Monoxide (CO) shall be less than 526.2 g/KW-hr (387 g/hp-hr).

[Compliance with this condition is demonstrated by purchasing an engine certified to the emission standards above, for the same engine class and maximum engine power.]

**VII. ADDITIONAL REQUIREMENTS.****# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source consists of an 80 kW propane-fired emergency electric generator engine, manufactured by Generac, Model SG080.

**SECTION E. Source Group Restrictions.**

Group Name: EXEMPT ENGINES

Group Description: Fire Pump & Propane EGEN

Sources included in this group

| ID  | Name                          |
|-----|-------------------------------|
| 301 | FIRE PUMP                     |
| 302 | EMERGENCY GENERATOR - PROPANE |

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

**# 001 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall limit the combined emissions of nitrogen oxides (NOx) from Source ID Nos. 301 and 302 to less than:

- (a) 100 pounds per hour,
- (b) 1,000 pounds per day,
- (c) 2.75 tons per ozone season (May 1 to September 30 each year), and
- (d) 6.6 tons per year on a 12-month rolling sum basis.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

**# 002 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall calculate and maintain records of combined NOx emissions (either actual or worst-case) from the plan approval-exempt engines of Source ID Nos. 301 and 302 on a monthly, ozone season, and 12-month rolling basis, using a Department-approved method(s).

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION E. Source Group Restrictions.**

Group Name: GR.3

Group Description: Application

**Sources included in this group**

| ID  | Name           |
|-----|----------------|
| 101 | RUST INHIBITOR |
| 102 | MILL COOLANT   |
| 103 | PARTS WASHERS  |

**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 following, monthly:

- (1) the VOC content of the solvent/solution; and
- (2) the amount of solvent/solution used.

(b) The permittee shall calculate the VOC emissions on a monthly and 12 consecutive month basis using Department approved methods.

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

The permittee shall keep monthly records of the following:

- (a) the VOC content of the solvent/solution;
- (b) the amount of solvent/solution used; and
- (c) the VOC emissions.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.

**SECTION G. Emission Restriction Summary.**

| Source Id      | Source Description                |                                |     |  |
|----------------|-----------------------------------|--------------------------------|-----|--|
| 200            | MISC. NATURAL GAS FIRED PROCESSES |                                |     |  |
| Emission Limit |                                   | Pollutant                      |     |  |
| 500.000        | PPMV                              | SOX                            |     |  |
| 301            | FIRE PUMP                         |                                |     |  |
| Emission Limit |                                   | Pollutant                      |     |  |
| 2.720          | Tons/OZNESEAS                     | Combined (May 1 thru Sept 30)  | NOX |  |
| 6.600          | Tons/Yr                           | Combined, 12-month rolling sum | NOX |  |
| 100.000        | Lbs/Hr                            | Combined                       | NOX |  |
| 1,000.000      | Lbs/Day                           | Combined                       | NOX |  |
| 500.000        | PPMV                              | dry basis                      | SO2 |  |
| 302            | EMERGENCY GENERATOR - PROPANE     |                                |     |  |
| Emission Limit |                                   | Pollutant                      |     |  |
| 2.720          | Tons/OZNESEAS                     | Combined (May 1 thru Sept 30)  | NOX |  |
| 6.600          | Tons/Yr                           | Combined, 12-month rolling sum | NOX |  |
| 100.000        | Lbs/Hr                            | Combined                       | NOX |  |
| 1,000.000      | Lbs/Day                           | Combined                       | NOX |  |
| 500.000        | PPMV                              | dry, standard conditions       | SOX |  |
| 0.040          | gr/CF                             | dry, standard conditions       | TSP |  |

**Site Emission Restriction Summary**

| Emission Limit |         | Pollutant        |     |
|----------------|---------|------------------|-----|
| 24.900         | Tons/Yr | 12 month-rolling | VOC |

**SECTION H. Miscellaneous.**

The Department has determined that the emissions from the following activities, excluding those indicated as site level requirements, in Section C, of this permit, do not require additional limitations, monitoring, or recordkeeping:

- (a) Glidecote Equipment/Corvel Nylon Reducer (0.365 TPY VOCs);
- (b) Three dust collectors: Cutter Grind Area, Tool and Die Machining;
- (c) Aqueous-based process parts washers (5-83-22, 5-83-24, 5-83-16, 5-83-21, 5-83-28, 5-83-27, 5-83-30, 5-83-20, 5-83-25, 5-83-26, 5-83-15);
- (d) Water recovery system equipment (S-1 & S-2);
- (e) Induction Hardening Equipment (H-1 through H-3);
- (f) Equipment Heat Ventilation (D18V);
- (g) Rx Converter-Atmospheric Gas generator (RX-1 & RX-2 or E-2367, E2765);
- (h) Cold Forming Equipment (CF-1 through CF-3), exhaust outside;
- (i) Office Areas HVAC Units (OV-1 through OV-7);
- (j) Hand and process tool protective coating application hood - peel coat thermoplastic rubber;
- (k) Blasting Machines with dust collectors, exhausted inside the building;
- (l) Internal exhausting oil mist eliminators - these control oil and coolant mists from various machining operations and exhaust inside the building;
- (m) Laboratory/Quality Assurance Fume Hoods (2);
- (n) Chip Dock Pit Steam Jet Washer (0.456 MMBtu/hr);
- (o) Natural Gas fired Temper Furnaces (Dept. 601: 1-85-4, 1-85-6, 1-85-14, 1-85-16 (0.39 MMBtu/hr each); Dept. 39 - (4) furnaces (2.38 MMBtu/hr each));
- (p) Two manual parts welders and one automatic weld cell (exhausts indoors).

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May 2008. APS: 642741, AUTH: 721140. Permit amendment to address a change of ownership from Torque Traction Mfg. Tech., Inc federal tax id (34-1938661-1) to Dana Driveshaft Prod, LLC federal tax ID (26-1346816-1), a subsidiary of the Dana Holding Corp.

September 2010. APS: 642741, Auth: 833704. Permit renewal, no new sources, no new regulations, and no sources removed.

September 2015. APS: 642741, AUTH: 1071431. Permit renewal. Several new sources were added as listed below.

- Deisel-driven fire pump subject to NESHAP ZZZZ.
- The installation of a 2.2 MMBtu/hr natural gas heat treating furnace took place in 2011 under RFD number 2429, added to Source 200.
- On March 31, 2010, the Department approved the permittee's request to reduce the monitoring frequency of odors, visible emissions, and fugitive particulate matter to a monthly basis.

October 2017. APS: 642741, AUTH: 1197895. The Department opened the permit for cause to address the use of Safety Kleen Solvent being used for general lubrication of the conveyor system as the parts traverse to the various machines (Source 104). This process has always been in place, but was never considered as a permitted source.

April 2020

APS #642741, AUTH #1305374. This Operating Permit is being renewed with the following modification (further information is available in the review memo for this renewal):

- Source ID 302 (Emergency Generator), was added to this SOOP;
- New requirements from 25 Pa. Code § 129.63a were applied to source ID 104;
- Propane was removed as secondary fuel for souce ID 200;
- The list of miscellaneous sources was updated.

2025

APS #642741, AUTH #1517755. This Operating Permit is being renewed. Source ID 200 has been renamed to "Misc. Natural Gas Fired Processes", to account for the various heat treating furnaces, air make-up units, and steam jet washer, which all use natural gas. The list of insignificant sources identified in this section (above) have been updated.



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

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