



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: July 28, 2026

Effective Date: July 28, 2026

Expiration Date: January 31, 2028

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. 33-00016A

Federal Tax Id - Plant Code: 25-1523295-1

Owner Information

Name: MERSEN USA GS-NAC CORP
Mailing Address: 314 ELK RUN AVE
PUNXSUTAWNEY, PA 15767-1622

Plant Information

Plant: MERSEN USA GS-NAC CORP/PUNXSUTAWNEY
Location: 33 Jefferson County 33803 Punxsutawney Borough
SIC Code: 3624 Manufacturing - Carbon And Graphite Products

Responsible Official

Name: DAVID BENNETT
Title: GENERAL MANAGER
Phone: (814) 938 - 7450 Email: david.bennett@naccarbon.com

Plan Approval Contact Person

Name: DAVID BENNETT
Title: GENERAL MANAGER
Phone: (814) 938 - 7450 Email: david.bennett@naccarbon.com

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



Plan Approval Description

The Plan Approval authorizes the addition of elemental sulfur to the carbon/graphite mixes processed in the Carbon Baking Shuttle Kiln (Source ID 105), Graphite Induction Furnaces (Source ID 109), and Box Kilns (Source ID 111).



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Plan Approval Inventory List

Section B. General Plan Approval Requirements

- #001 Definitions
- #002 Future Adoption of Requirements
- #003 Plan Approval Temporary Operation
- #004 Content of Applications
- #005 Public Records and Confidential Information
- #006 Plan Approval Terms and Conditions
- #007 Transfer of Plan Approvals
- #008 Inspection and Entry
- #009 Plan Approval Changes for Cause
- #010 Circumvention
- #011 Submissions
- #012 Risk Management
- #013 Prohibition of Air Pollution
- #014 Compliance Requirement

Section C. Site Level Plan Approval Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

Section D. Source Level Plan Approval Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

Section E. Source Group Restrictions

- E-I: Restrictions
- E-II: Testing Requirements
- E-III: Monitoring Requirements
- E-IV: Recordkeeping Requirements
- E-V: Reporting Requirements
- E-VI: Work Practice Standards
- E-VII: Additional Requirements

Section F. Alternative Operating Scenario(s)

- F-I: Restrictions
- F-II: Testing Requirements



SECTION A. Table of Contents

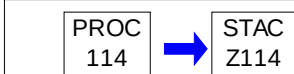
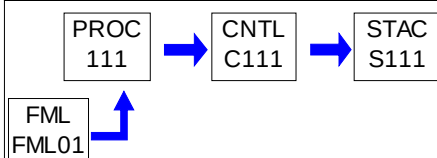
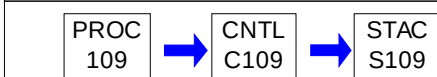
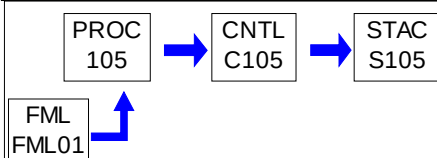
F-III: Monitoring Requirements
F-IV: Recordkeeping Requirements
F-V: Reporting Requirements
F-VI: Work Practice Standards
F-VII: Additional Requirements

Section G. Emission Restriction Summary

Section H. Miscellaneous

**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
105	CARBON BAKING SHUTTLE KILN	13.000 MMBTU/HR	
		750.000 Lbs/HR	CARBON / SULFUR MIX
109	(4) GRAPHITE INDUCTION FURNACES		
111	(18) BOX KILNS	8.427 MMBTU/HR	
		1,657.500 Lbs/HR	CARBON / SULFUR MIX
114	MIXING		
C105	THERMAL AFTERBURNER		
C109	DUST COLLECTOR - INDUCTION FURNACES		
C111	FLAME GRID FUME DESTRUC.		
FML01	NATURAL GAS PIPELINE		
S105	STACK - (C105)		
S109	STACK - INDUCTION FURNACES		
S111	STACK - CARBON BAKING KILNS		
Z114	FUGITIVES FROM MIXING		

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 § 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. §§ 4001-4015).

#014 [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 act.

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

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

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations.

(7) - (8) NA

(9) Sources and classes of sources other than those identified in paragraphs (1)-(6), for which the operator has obtained a determination from the DEP 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.

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

(c) A person responsible for any source specified in subsections (a)(1) -- (6) or (9) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

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

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

(3) Paving and maintenance of roadways.

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

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

(d) NA

003 [25 Pa. Code §123.31]**Limitations**

(a) Limitations are as follows:

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

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

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

004 [25 Pa. Code §123.41]**Limitations**

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

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

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

005 [25 Pa. Code §123.42]**Exceptions**

The limitations of 123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:

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

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

(3) When the emission results from sources specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).

(4) NA

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

The facility-wide emission of Sulfur Oxides (SO_x) shall not exceed 99.0 tons in any 12-consecutive month period.

II. TESTING REQUIREMENTS.**# 007 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

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

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

008 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The DEP shall reserve the right to require exhaust stack testing of any source(s) as deemed necessary to verify source emissions for purposes of determining malfunctions and/or compliance with any applicable requirements.

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.**# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The permittee shall calculate and record the facility-wide SO_x emissions on a monthly and 12-month rolling basis to demonstrate compliance with the site-wide Synthetic Minor limit.

(b) All records, reports, and analysis results generated in compliance with the requirements of any section of this permit shall be maintained on-site for a minimum of five (5) years and shall be made available to the DEP upon written or verbal request.

010 [25 Pa. Code §135.5]**Recordkeeping**

(a) The facility shall maintain and make available upon request by the DEP records including computerized records that may be necessary to comply with §§ 135.3 and 135.21 (relating to reporting; and emission statements). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the DEP to be necessary for identification and quantification of potential and actual air contaminant emissions.

(b) All records generated pursuant to this condition shall be retained for a minimum of five years and be made available to the DEP upon request.

V. REPORTING REQUIREMENTS.**# 011 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Malfunction reporting shall be conducted as follows:

(a) The owner or operator shall report each malfunction that occurs at this facility that poses an imminent and substantial danger to the public health and safety or the environment. Malfunction reports are only required by this permit where such malfunctions would affect air emissions from the facility.

For purpose of this condition, a malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or source to operate in a normal or usual manner that may result in an increase in the emission of air contaminants. Examples of malfunctions include, but are not limited to, large dust plumes, heavy smoke, or a spill or release that may result in an odor detectable outside the property of the person on whose land the source is being operated.

(b) When the malfunction poses an imminent and substantial danger to the public health and safety or the environment, the incident shall be reported by telephone to the County Emergency Management Agency (911 Center), and to the 24-hour DEP Emergency Hotline (800-541-2050) no later than 1 hour after the incident.

(c) All other malfunctions that must be reported under subsection (a) shall be reported to the DEP at the Regional Office listed below no later than the next business day.

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

Pennsylvania Department of Environmental Protection
Northwest Regional Office
814-332-6945
Office Hours 8 a.m. - 4 p.m.

(d) The report shall describe the:

- (i) Name and location of the facility;
- (ii) Nature and cause of the malfunction or breakdown;
- (iii) Time when the malfunction or breakdown was first observed;
- (iv) Expected duration of excess emissions; and
- (v) Estimated rate of emissions.

(e) The owner or operator shall notify the DEP immediately when containment measures and corrective actions have been completed.

(f) Subsequent to the malfunction, the owner/operator shall submit a full written report to the DEP including the items identified in (d) and including containment measures and corrective actions taken on the malfunction within 15 days of the incident.

(g) Written Malfunction Reports shall be submitted to the DEP electronically via the following web address.
<https://greenport.pa.gov/ePermitPublicAccess/PublicSubmission/Home>

012 [25 Pa. Code §135.3]**Reporting**

In accordance with 25 Pa. Code § 135.3, the owner or operator of a facility shall submit to the DEP via AESOnline or AESXML at <https://greenport.pa.gov> by March 1st of each year, a facility inventory report for the preceding calendar year for all sources regulated under this permit. The inventory report shall include all emissions information for all sources operated during the preceding calendar year following the applicable procedures specified in the AES Online Instructions available at Instructions for Emission Inventory Reports.

013 [25 Pa. Code §135.4]**Report format**

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

VI. WORK PRACTICE REQUIREMENTS.**# 014 [25 Pa. Code §129.14]****Open burning operations**

(a) Air basins. No person may permit the open burning of material in an air basin.

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

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

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

(3) The emissions interfere with the reasonable enjoyment of life or property.

(4) The emissions cause damage to vegetation or property.

(5) The emissions are or may be deleterious to human or animal health.

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

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

- (1) A fire set to prevent or abate a fire hazard, when approved by the DEP and set by or under the supervision of a public officer.
- (2) A fire set for the purpose of instructing personnel in firefighting, when approved by the DEP.
- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (5) - (6) NA
- (7) A fire set solely for cooking food.

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

(1) As used in this subsection the following terms shall have the following meanings:
Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased, and smoke and other particulate matter are contained.
Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

(2) NA

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

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

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

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

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

VII. ADDITIONAL REQUIREMENTS.

015 [25 Pa. Code §127.12b]
Plan approval terms and conditions.

All terms and conditions of State Only Operating Permit No. 33-00016 shall remain in full force and effect unless modified or superseded by the conditions of this Plan Approval.

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: 105

Source Name: CARBON BAKING SHUTTLE KILN

Source Capacity/Throughput:

13.000 MMBTU/HR

750.000 Lbs/HR

CARBON / SULFUR MIX

Conditions for this source occur in the following groups: SULFUR ADDITION PROCESSES

**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.

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).

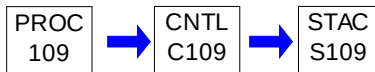
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 109

Source Name: (4) GRAPHITE INDUCTION FURNACES

Source Capacity/Throughput:

Conditions for this source occur in the following groups: SULFUR ADDITION PROCESSES

**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.

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).

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

Source ID: 111

Source Name: (18) BOX KILNS

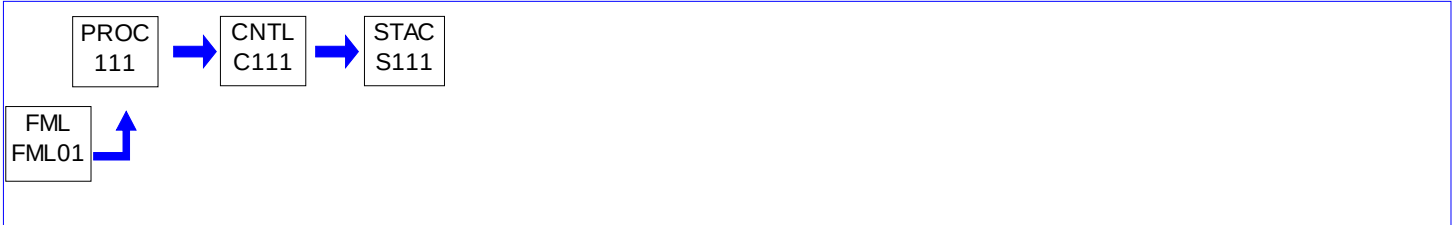
Source Capacity/Throughput:

8.427 MMBTU/HR

1,657.500 Lbs/HR

CARBON / SULFUR MIX

Conditions for this source occur in the following groups: SULFUR ADDITION PROCESSES

**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.

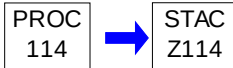
No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

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

Source ID: 114

Source Name: MIXING

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

Group Name: SULFUR ADDITION PROCESSES

Group Description: Extrusion, Baking, and Kiln operations processing sulfur-impregnated carbon.

Sources included in this group

ID	Name
105	CARBON BAKING SHUTTLE KILN
109	(4) GRAPHITE INDUCTION FURNACES
111	(18) BOX KILNS

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

The total aggregate emissions of Sulfur Oxides (SOx) from Sources 105, 109, and 111 combined shall not exceed 90.0 tons in any 12-consecutive month period.

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

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

(b) If testing is required, it shall be performed in accordance with the provisions of 25 Pa. Code Chapter 139 (relating to sampling and testing).

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

The permittee shall monitor the following parameters on a monthly basis for the sources in this group:

(a) The total mass (in pounds) of green mix prepared.

(b) The total mass (in pounds) of green rods produced and routed to the baking/kiln processes.

(c) The sulfur content (percentage by weight) of the green mix formulation utilized.

IV. RECORDKEEPING REQUIREMENTS.**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The permittee shall calculate and record the monthly SOx emissions from this source group using the following mass-balance methodology:

(1) Determine the mass of sulfur introduced into the baking/kiln processes by multiplying the weight of the green rods produced by the sulfur percentage of the mix. (This inherently deducts the unbaked scrap percentage).

(2) Multiply the mass of sulfur processed by 2.0 (the stoichiometric conversion factor of Sulfur to SO₂).

(3) Multiply the result by 0.995 (accounting for the 99.5% conversion rate of elemental sulfur to SOx during the baking process).

(4) Divide the final total by 2,000 to convert pounds to tons of SOx.

(b) The permittee shall calculate and record the 12-month rolling total of SOx emissions at the end of each calendar month to verify compliance with the 90.0 TPY limit.

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

(c) All records shall be retained on-site for a minimum of five (5) years and made available to the DEP upon request.

V. REPORTING REQUIREMENTS.

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The permittee shall submit an annual comprehensive emissions report to the DEP no later than March 1st of each year for the preceding calendar year.

(b) The report shall include the monthly mass-balance calculations, the monthly SO_x emission totals, and the 12-month rolling SO_x emission totals for this source group.

(c) The permittee shall immediately notify the DEP in the event that the 12-month rolling SO_x emissions exceed the 90.0 TPY limit.

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall operate and maintain Sources 105, 109, and 111, as well as all associated control devices, in accordance with the manufacturer's specifications and good air pollution control practices at all times.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

This source group establishes conditions related to the sulfur addition project. All other requirements (for each source in the source group) established in State Only Operating Permit No. 33-00016 remain in effect.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.



SECTION H. Miscellaneous.



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