



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: September 5, 2024

Effective Date:

Revision Date: March 4, 2026

Expiration Date: December 31, 2026

Revision Type: Extension

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. 10-00298E

Federal Tax Id - Plant Code: 47-1002161-1

Owner Information

Name: LUXFER MAGTECH INC

Mailing Address: 955 SAXONBURG BLVD
SAXONBURG, PA 16056-2317

Plant Information

Plant: LUXFER MAGTECH SAXONBURG PLT

Location: 10 Butler County 10917 Clinton Township

SIC Code: 3299 Manufacturing - Nonmetallic Mineral Products, Nec

Responsible Official

Name: TIM ZENDRON

Title: PRODUCTION MANAGER

Phone: (724) 367 - 7654

Email: tim.zendron@luxfer.com

Plan Approval Contact Person

Name: VICTOR ZENDRON

Title: PROJECT MANAGER

Phone: (724) 367 - 7652

Email: vic.zendron@luxfer.com

[Signature] _____

LORI L. MCNABB, NORTHWEST REGION AIR PROGRAM MANAGER



Plan Approval Description

This plan approval authorizes the installation of four (4) wet scrubbers to capture and control filterable particulate matter (FPM) emissions originating from the #5 grinding line, now designated as sources 114A, 114B, 114C, and 114D. Previously, these emissions were attributed to a single source ID, 114.



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

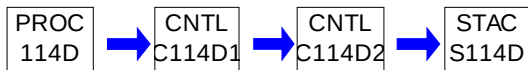
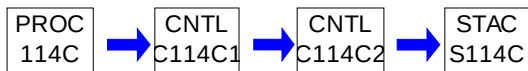
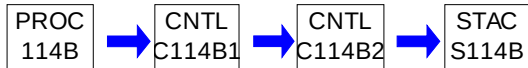
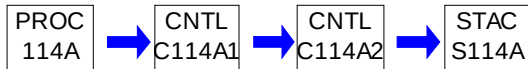
F-III: Monitoring Requirements
F-IV: Recordkeeping Requirements
F-V: Reporting Requirements
F-VI: Work Practice Standards
F-VII: Additional Requirements

Section G. Emission Restriction Summary

Section H. Miscellaneous

**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
114A	#5 GRINDING LINE HAMMERMILL CRUSHER 1		
114B	#5 GRINDING LINE HAMMERMILL CRUSHER 2		
114C	#5 GRINDING LINE HAMMERMILL CRUSHER 3		
114D	#5 GRINDING LINE HAMMERMILL CRUSHER 4		
C114A1	#5 GRINDING LINE CYCLONES 1		
C114A2	#5 GRINDING LINE WET SCRUBBER 1		
C114B1	#5 GRINDING LINE CYCLONES 2		
C114B2	#5 GRINDING LINE WET SCRUBBER 2		
C114C1	#5 GRINDING LINE CYCLONES 3		
C114C2	#5 GRINDING LINE WET SCRUBBER 3		
C114D1	#5 GRINDING LINE CYCLONES 4		
C114D2	#5 GRINDING LINE WET SCRUBBER 4		
S114A	STACK		
S114B	STACK		
S114C	STACK		
S114D	STACK		

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 §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) Not applicable.

(8) Not applicable.

(9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator 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.

(b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department 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 Department 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) See work practice standard requirements.

(d) Not applicable.

002 [25 Pa. Code §123.2]**Fugitive particulate matter**

(a) A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 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.

003 [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:

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

(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.

004 [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) Not applicable.

II. TESTING REQUIREMENTS.**# 005 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

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

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

The Department 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.**# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) All logs and required records shall be maintained on site for a minimum of five (5) years and shall be made available to the Department upon request.

008 [25 Pa. Code §135.5]**Recordkeeping**

Source owners or operators shall maintain and make available upon request by the Department 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 Department to be necessary for identification and quantification of

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

potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

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

(a) If, for any reason, the permittee does not comply or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide the Department with the following information as soon as possible but no later than five (5) days after such conditions become known to the permittee:

- 1) Description of non-compliance;
- 2) Cause of non-compliance;
- 3) Anticipated time the non-compliance is expected to continue or, if corrected, the actual duration of non-compliance;
- 4) Steps taken by the permittee to minimize or eliminate the non-compliance; and
- 5) Steps taken by the permittee to prevent recurrence of the non-compliance.

010 [25 Pa. Code §135.3]**Reporting**

(a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the proceeding calendar year and sources modified during the same period which were not previously reported.

(b) A person who receives initial notification by the Department that a source report is necessary shall submit an initial source report within 60 days after receiving the notification or by March 1 of the year following the year for which the report is required, whichever is later.

(c) A source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

011 [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.**# 012 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in Section C, Condition #001, above, 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.

[From: 25 Pa. Code § 123.21(c)]

**SECTION C. Site Level Plan Approval Requirements****# 013 [25 Pa. Code §129.14]****Open burning operations**

(a) Not applicable.

(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.

(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 Department and set by or under the supervision of a public officer.

(2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(3) A fire set for the prevention and control of disease or pests, when approved by the Department.

(4) Not applicable.

(5) Not applicable.

(6) A fire set solely for recreational or ceremonial purposes.

(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) Not applicable.

(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 Department that an air pollution problem exists, the Department 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

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

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.

014 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the act.

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.

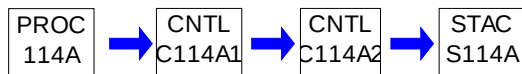
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 114A

Source Name: #5 GRINDING LINE HAMMERMILL CRUSHER 1

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 114

**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).

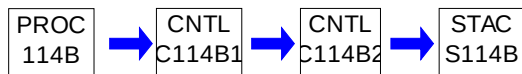
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 114B

Source Name: #5 GRINDING LINE HAMMERMILL CRUSHER 2

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 114

**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).

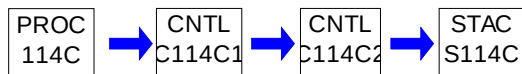
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 114C

Source Name: #5 GRINDING LINE HAMMERMILL CRUSHER 3

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 114

**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).

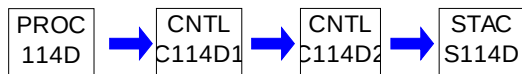
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 114D

Source Name: #5 GRINDING LINE HAMMERMILL CRUSHER 4

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 114

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

Group Name: 114

Group Description: #5 GRINDING LINE

Sources included in this group

ID	Name
114A	#5 GRINDING LINE HAMMERMILL CRUSHER 1
114B	#5 GRINDING LINE HAMMERMILL CRUSHER 2
114C	#5 GRINDING LINE HAMMERMILL CRUSHER 3
114D	#5 GRINDING LINE HAMMERMILL CRUSHER 4

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

(a) Emissions shall comply with 25 PA Code 123.1, 123.31, & 123.41 for fugitive, odor, and visible emissions respectively.

(b) No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter (filterable) in the effluent gas exceeds 0.02 grain per dry standard cubic foot.

[Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in 25 Pa. Code §123.13]

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

(a) For each source in the source group: within one hundred and eighty (180) days of the control device's installation, the permittee shall perform stack testing of the source/control device to determine the filterable particulate matter emission rate. Testing load conditions shall be representative to within 10% of maximum load design capacity or to within 10% of the maximum achievable operating load. Stack testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.

(b) One electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager.

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

CENTRAL OFFICE:
RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE:
RA-EPNWstacktesting@pa.gov

(c) At least 90 days prior to performing a stack test, a protocol shall be submitted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection. Submit the protocol via the instructions in (b). The protocol shall contain, at a minimum, location of sampling ports, planned production rates, and any other information applicable to the stack testing. Performing a stack test prior to Department approval of the protocol may invalidate the results.

(d) At least 2 weeks prior to the test, the Department shall be informed, in writing, of the date and time of the test.

(e) Within 60 days after completion of the test, the complete test report, including, but not limited to, production rates during testing, calculation methods and results, and any other applicable testing information that will allow for a complete review of the test and results, shall be submitted to the Department for approval. Submit the report via the instructions in (b).

**SECTION E. Source Group Plan Approval Restrictions.****(f) Actions Related to Noncompliance Demonstrated by a Stack Test:**

(1) When the results of a stack test performed in conformance with this Condition exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to the Department, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within thirty (30) days if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to the Department within thirty (30) days of receipt of the notice of deficiency. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(2) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to the Department that retesting in one hundred and twenty (120) days is not practicable, the Department may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

g) If, at any time, the Department has reason to believe that the air contaminant emissions from the source are, or may be, in excess of any applicable air contaminant emission limitation, the owner or operator shall conduct stack tests as are deemed necessary by the Department to determine the actual air contaminant emission rate. The owner or operator shall perform any such testing in accordance with the applicable provisions of 25 Pa. Code, Chapter 139 (relating to sampling and testing) as well as in accordance with any additional requirements or conditions established by the Department at the time the owner or operator is notified, in writing, of the need to conduct testing.

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

For each source in the source group:

- (a) The permittee shall monitor the pressure drop across the control device via the PLC on a continuous basis.
- (b) A minimum of once per day, during daylight hours, when the source(s) and control device are in operation, the permittee shall monitor the stack exhausting from the control device for the presence of visible emissions.

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

For each source in the source group:

- (a) All recordkeeping shall commence upon startup of the source/control device. All records shall be kept for a period of five (5) years and shall be made available to the Department upon request.
- (b) The permittee shall maintain a record of all preventive maintenance inspections of the control device. These records shall include, at a minimum, the dates of the inspections, the name of the person performing the inspection, any problems or defects identified, any actions taken to correct the problems or defects, and any routine maintenance performed.
- (c) The permittee shall record the following data from the scrubbers, when the source is in operation (these records may be done with strip charts recorders, data acquisition systems, or manual log entries):
 - 1. Pressure drop - daily defined as once per calendar day,
 - 2. Visible emission check - daily defined as once per calendar day,
 - 3. Production rate of this source - on an every two week basis,
 - 4. Hours of operation of the source on an every two week basis,

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

5. Emissions from the source on a monthly basis,

(d) Emissions shall be calculated as follows:

$(\text{lbs/hr of magnesium throughput}) * (1 - (\text{capture efficiency of the cyclone}))$.

Capture efficiency of the cyclone shall be 0.91 based on the most recent stack test unless otherwise approved by the Department.

Ex: 50 lb/hr throughput * (1 - 0.91 capture eff.) = 4.5 lb/hr PM emissions.

PM emission rate shall then be converted to gr/dscf using the following method: $((\text{lb/hr PM emission rate}) * (7000 \text{ gr/lb})) / ((\text{flow from the cyclone}) * (60 \text{ min/hr}))$.

Example from stack test data: $(4.5 \text{ lb/hr PM emission rate}) * (7000 \text{ gr/lb})$
$$\frac{\quad}{(2940 \text{ dscfm cyclone flow}) * (60 \text{ min/hr})} = 0.18 \text{ gr/dscf PM emission rate}$$

As long as the cyclone is in a fully fit operational condition the cyclone flow can be assumed to be 3000 dscfm. Otherwise, the permittee shall monitor the flow to ensure proper emission calculations.

(e) After the scrubber control device is installed on the process the PM emission rate can further be calculated for each source that has a scrubber installed as follows:

$(\text{PM emission rate from cyclone in gr/dscf}) * (1 - (\text{capture efficiency of the scrubber}))$.

Ex: 0.18 gr/dscf cyclone outlet * (1 - 0.94 capture eff.) = 0.0108 gr/dscf.

Records of all required values and data to make these calculations shall be kept on site for a period of 5 years and made available to the Department upon request.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

For each source in the source group:

(a) The permittee shall perform an every two week preventative maintenance and operational inspection of the source and control device for each two week period that the source is in operation. The facility shall also monitor the pressure drop across the control device and shall conduct one visible emissions (VE) observation per day that the source is in operation.

1. The VE observation shall be 60 seconds in length with readings every 15 seconds. If any visible emissions are observed, The facility shall perform one of the following:

- A Method 9 observation (60 minutes in duration) using a certified observer shall be conducted to determine compliance with the opacity limits, or
- The facility shall immediately commence shutdown of the source/control device in accordance with the Department approved shutdown procedure.

(b) The permittee shall install, operate, and maintain a manometer or similar device to measure pressure drop across the control device.

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

(c) The permittee shall operate the control device at all times the source is in operation.

(d) The permittee shall maintain and operate the source and control device in a manner consistent with good operating practices and in accordance with the manufacturer's specifications.

(e) Within 180 days of commencement of operation, or by the date of the initial operating permit inspection, whichever is sooner, the permittee shall submit a proposed pressure drop range across the control device to the Department for approval. The pressure drop range, as approved by the department, shall be incorporated into the facility's operating permit.

(f) Within 24-hours of discovery of a pressure drop, reading across the control device outside of the operational range the permittee shall perform a maintenance inspection on the control device and take corrective action.

(g) In the event of more than one documented excursions outside the approved pressure drop range in any calendar quarter the permittee shall submit a corrective measure plan to the Department within 60-days of the end of the calendar quarter. Corrective measures may include an increase of the frequency of required preventative maintenance inspections of the control device, a modification of the pressure differential range, or other appropriate action as approved by the Department on a case-by-case basis.

(h) Upon approval of the corrective measure plan by the Department the permittee shall implement the corrective measures in the timeframe approved by the Department.

(i) The permittee shall install, operate, and maintain the following alarm systems:

(1) Low/Hi pressure alarm.

(j) A copy of the control device manufacturer's operational and maintenance literature shall be maintained on site and shall be readily available.

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The permittee shall:

(1) Provide the Department with documentation regarding the purchase order of the four (4) control devices (wet scrubbers) within 30 days of the issuance of this plan approval.

(2) Provide the Department with monthly status updates of the four (4) control devices (wet scrubbers) until completion of the initial stack tests.

(3) Within 120 days of the issuance of this plan approval, the (4) control devices (wet scrubbers) shall be constructed, installed, and operating in accordance with the plan approval.

(4) The Permittee may request in writing that the compliance deadline contained in Paragraph (3), above, be extended for cause, if the supplier/manufacturer of the control devices encounters delays with the manufacturing of the control devices solely due to non-availability of material or components. All extensions under this condition must be approved by the Department in writing prior to the compliance deadline. The Department retains authority to approve or deny the extension request.

(5) Any information required to be submitted as part of this plan approval should be submitted to the attention of Regional Air Program Manager, PADEP, Northwest Regional Office, 230 Chestnut Street, Meadville, PA 16335.

(b) All conditions from the facility operating permit remain in effect unless modified in this plan approval.

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

(c) Any information required to be submitted as part of this plan approval should be submitted to the attention of Regional Air Program Manager, PADEP, Northwest Regional Office, 230 Chestnut Street, Meadville, PA 16335.

(d) Issuance of an Operating Permit is contingent upon satisfactory compliance with the plan approval conditions, upon the source and control device being installed and operated as stated within the application, and upon satisfactory demonstration that the emissions from the source will not be in violation of applicable Rules and Regulations of the Department.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
114A	#5 GRINDING LINE HAMMERMILL CRUSHER 1		
Emission Limit		Pollutant	
0.020	gr/DRY FT3	For each source in the source group	PM10
114B	#5 GRINDING LINE HAMMERMILL CRUSHER 2		
Emission Limit		Pollutant	
0.020	gr/DRY FT3	For each source in the source group	PM10
114C	#5 GRINDING LINE HAMMERMILL CRUSHER 3		
Emission Limit		Pollutant	
0.020	gr/DRY FT3	For each source in the source group	PM10
114D	#5 GRINDING LINE HAMMERMILL CRUSHER 4		
Emission Limit		Pollutant	
0.020	gr/DRY FT3	For each source in the source group	PM10

Site Emission Restriction Summary

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



SECTION H. Miscellaneous.



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