



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

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date:	October 1, 2024	Effective Date:	April 16, 2026
Revision Date:	April 16, 2026	Expiration Date:	September 30, 2029
Revision Type:	Amendment		

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

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

State Only Permit No: 23-00095

Synthetic Minor

Federal Tax Id - Plant Code: 41-2329996-1

Owner Information

Name: CHESTER SPECIALTY CHEM LLC
Mailing Address: 800 W FRONT ST
CHESTER, PA 19013-3654

Plant Information

Plant: CHESTER SPECIALTY CHEM / CHESTER CITY
Location: 23 Delaware County 23001 Chester City
SIC Code: 2899 Manufacturing - Chemical Preparations, Nec

Responsible Official

Name: LAUREN CELANO
Title: PRESIDENT
Phone: (262) 758 - 9036 Email: lauren@chesterchemical.com

Permit Contact Person

Name: LAUREN CELANO
Title: PRESIDENT
Phone: (262) 758 - 9036 Email: lauren@chesterchemical.com

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



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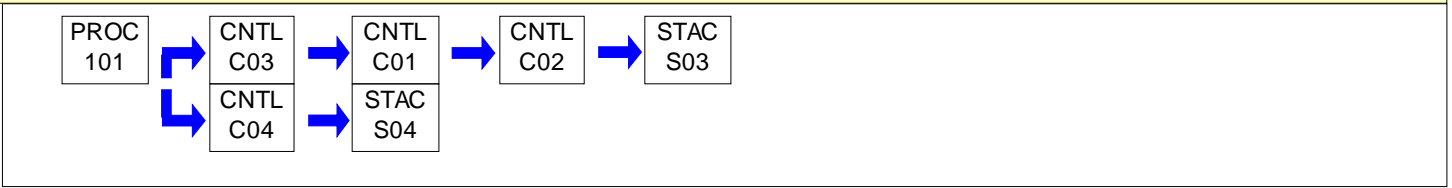
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	PROCESS AREA	N/A	
C01	VENTURI SCRUBBER		
C02	PACKED TOWER		
C03	SECONDARY CONDENSERS	N/A	
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PERMIT MAPS



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (1) Enforcement action

**SECTION B. General State Only Requirements**

(2) Permit termination, revocation and reissuance or modification

(3) Denial of a permit renewal application

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

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

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

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

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

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

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

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

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

(1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.

(2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.

(4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

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

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

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

**SECTION B. General State Only Requirements**

precluded by the Clean Air Act or its regulations.

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

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

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

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

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

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

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

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

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

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

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

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

(2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

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

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

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

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

**SECTION B. General State Only Requirements**

- (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
 - (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
 - (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
 - (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

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

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

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit modifications)
- (7) Subchapter H (relating to general plan approvals and general operating permits)

**SECTION B. General State Only Requirements****#015 [25 Pa. Code § 127.11a]****Reactivation of Sources**

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

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

- (a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
- (b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

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

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

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

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:
- Regional Air Program Manager
PA Department of Environmental Protection
(At the address given in the permit transmittal letter, or otherwise notified)
- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

**SECTION B. General State Only Requirements****#019 [25 Pa. Code §§ 127.441(c) & 135.5]****Sampling, Testing and Monitoring Procedures.**

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

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

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

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

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

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

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

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

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

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

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

#023 [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).

**SECTION B. General State Only Requirements****#024 [25 Pa. Code §135.3]****Reporting**

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

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

#025 [25 Pa. Code §135.4]**Report Format**

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

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §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, as specified in 25 Pa. Code § 129.14.
- (7) N/A
- (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) of this condition, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) The emissions are of minor significance with respect to causing air pollution; and
 - (ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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

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

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

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

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:

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

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

The opacity limitations shall not apply to a visible emission in any of the following instances:

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

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

- 1) The permittee shall limit facility-wide volatile organic compound emissions to less than 25 tons per year, calculated on a 12-month rolling sum basis.

**SECTION C. Site Level Requirements**

2) The permittee shall limit facility-wide hazardous air pollutants emissions to less than 10 tons per year for any single HAP and 25 tons per year all HAPs combined, calculated on a 12-month rolling sum basis.

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

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

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

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

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

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

III. MONITORING REQUIREMENTS.**# 009 [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.

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

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

- (1) Odors which may be objectionable (as per 25 Pa. Code § 123.31).
- (2) Visible Emissions (as per 25 Pa. Code §§ 123.41 and 123.42).
- (3) Fugitive Particulate Matter (as per 25 Pa. Code §§ 123.1 and 123.2).

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

**SECTION C. Site Level Requirements**

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

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

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

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

011 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- 1) The permittee shall calculate the facility-wide total volatile organic compound emissions monthly, and on a 12-month rolling sum basis.
- 2) The permittee shall calculate the facility-wide hazardous air pollutants emissions (total and individual) monthly, and on a 12-month rolling sum basis.

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

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

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

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

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

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

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

The permittee shall record the facility-wide total volatile organic compound emissions monthly, and on a 12-month rolling sum basis.

The permittee shall record the facility-wide hazardous air pollutants emissions monthly, and on a 12-month rolling sum basis.

**SECTION C. Site Level Requirements****V. REPORTING REQUIREMENTS.****# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

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

(c) The report shall describe the following:

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

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

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

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

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

016 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

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

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

**SECTION C. Site Level Requirements**

- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
- (i) Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or,
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If this facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
 - (2) Certify that this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If this facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

VI. WORK PRACTICE REQUIREMENTS.**# 017 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

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

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

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

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

**SECTION C. Site Level Requirements****# 019 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The following work practice standard shall be followed:

- (a) All VOC-containing materials shall be stored in closed, nonabsorbent, non-leaking containers when not being mixed or transferred to another container.
- (b) Cloth and paper, or other absorbent applicators, moistened with coatings, solvents or cleaning solvents, shall be stored in closed, nonabsorbent, non-leaking containers.
- (c) All spills shall be cleaned up as soon as possible.

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

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

021 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

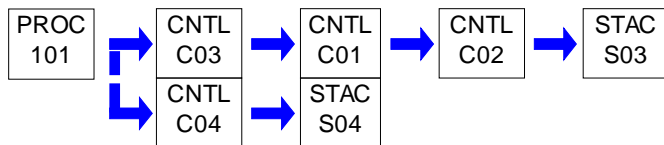
**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: PROCESS AREA

Source Capacity/Throughput:

N/A

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

- (a) Total VOC emissions from the process area shall not exceed 11.0 tons per year on a 12-month rolling basis.
- (b) Total HAP emissions from the process area shall not exceed 4.0 tons per year on a 12-month rolling basis.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11496]**Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources
What are the standards and compliance requirements for process vents?**

- (a) Organic HAP emissions from batch process vents from a CMPU containing organic HAP from Table 1 to 40 C.F.R. Part 63 Subpart VVVVV shall be equal to or less than 10,000 lbs/yr.
- (b) Metal HAP emissions from all batch process vents from a CMPU containing metal HAP from Table 1 to 40 C.F.R. Part 63 Subpart VVVVV shall be equal to or less than 400 lbs/yr.

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

- (a) The venturi scrubber, associated with the process area, shall have an operating pressure drop of at least three (3) inches w.g. and a pH greater than 9 when the reactors are generating acid gases.
- (b) The packed tower, associated with the process area, shall have a pressure drop of 5 inches w.g. or less.

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

- (a) The permittee shall perform a stack test using the Department-approved procedures, to establish the removal efficiency for the existing packed tower and scrubber system used to control emissions from the process (Source IDs C01 and C02). The Source testing shall be performed within 180 days of final issuance of Synthetic Minor Operating Permit 23-00095, AUTH ID 1396238. Source testing shall be performed for the following pollutants: HCL DRE. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.
- (b) The stack test shall, at a minimum, test for the HCL DRE. Tests shall be conducted in accordance with the provisions of US EPA Method M26A or other Department approved methodology and 25 Pa. Code Chapter 139. Tests shall also be conducted in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance.
- (c) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

**SECTION D. Source Level Requirements**

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s) an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

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

Within 60 days of the first batch production of the new acid-producing batch containing trivalent chromium, or the next scheduled acid producing batch operation or by December 31, 2025, whichever comes first, and approved under this modified operating permit SMOP 23-00095: Auth ID 1506623, a stack test shall be performed. The permittee shall conduct the stack test in accordance with Condition #004, Section D, Source 101, SMOP 23-00095 and the stack testing protocol submitted to DEP on January 21, 2025, and approved February 21, 2025.

[Note the stack testing schedule of this permit condition supersedes the stack testing requirement of Condition #004, Section D, Source 101.]

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

(a) The permittee shall monitor daily, when in operation, the following:

- (1) the pressure drop across the venturi scrubber,
- (2) the pH of the scrubber liquid, and
- (3) the pressure drop across the packed tower.

(b) The permittee shall calculate VOC and HAP emissions on a monthly, and 12-month rolling basis.

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

The permittee shall maintain a log of any inspections or actions performed according to the facility-derived standard operating procedure (SOP), including any deficiencies noted and corrective actions taken.

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

(a) The permittee shall keep daily records of which control equipment is being used and the air contaminants emitted.

(b) The permittee shall keep daily records of the following, when in operation:

- (1) the pressure drop across the venturi scrubber,
- (2) the pH of the scrubber liquid,
- (3) the pressure drop across the packed tower, and
- (4) the monthly calculations of VOC and HAP emissions.

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11501]**Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources
What are the notification, recordkeeping, and reporting requirements, and how may I assert an affirmative defense for violation of emission standards during malfunction?**

[Additional authority for this condition is also derived from 40 CF § 63.10 (b)(1)]

**SECTION D. Source Level Requirements**

The permittee shall maintain files of all information (including all reports and notifications) required by this 40 C.F.R Part 63 Subpart VVVVV recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11501]

Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources
What are the notification, recordkeeping, and reporting requirements, and how may I assert an affirmative defense for violation of emission standards during malfunction?

[Additional authority for this condition is also derived from 40 CF §§ 63.11495(a) and (b), 63.11496(a) and (f)]

The permittee shall keep records of the following parameters for each CMPU affected by 40 C.F.R Part 63 Subpart VVVVV:

(1) Records of management practice inspections of all process vessels and equipment for each CMPU in organic HAP service or metal HAP service, repairs, and reasons for any delay of repair.

Records of small heat exchange system inspections, demonstrations of indications of leaks that do not constitute leaks, repairs, and reasons for any delay in repair.

(2) Records for the calculations performed to determine actual organic HAP emissions from all batch process vents in each CMPU.

If the worst-case process is used to estimate emissions, records of the information and procedures used to identify the worst-case process.

(3) If batch process vent emissions are less than 10,000 lb/yr, records the number of batches operated on a monthly basis. If organic HAP usage is used to demonstrate HAP emissions are below 10,000 lb/yr, records of the amount of HAP used on a monthly basis.

(4) Records of any updated emissions calculations performed because of process changes.

(5) Records of the calculations performed to determine metal HAP emissions from all batch process vents in each CMPU, on a monthly basis. If the calculated is less 400 lbs/yr. records of the number of batches or operating hours, monthly basis.

(6) Records of the date, time, and duration of each malfunction of operation of process equipment used to comply with this subpart that causes a failure to meet a standard. The record must include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over the standard, and a description of the method used to estimate the emissions.

(7) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 C.F.R. § 63.11495(d), including corrective actions to restore malfunctioning process equipment to its normal or usual manner of operation.

V. REPORTING REQUIREMENTS.**# 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11501]**

Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources
What are the notification, recordkeeping, and reporting requirements, and how may I assert an affirmative defense for violation of emission standards during malfunction?

[Additional authority for this condition is also derived from 40 CF § 63.9]

**SECTION D. Source Level Requirements**

In accordance with 40 C.F.R. § 63.11501(a), the permittee shall meet the requirements of the General Provisions in 40 C.F.R. Part 63, Subpart A, as shown in Table 9 of 40 C.F.R. Part 63, Subpart VVVV. The General Provisions in other parts do not apply except when a requirement in an overlapping standard, which you determined is at least as stringent as 40 C.F.R. Part 63, Subpart VVVV and with which you have opted to comply, requires compliance with general provisions in another part.

(a) Initial notification requirements of this paragraph apply to the owner or operator of an affected source when such source becomes subject to a relevant standard.

(1) If an area source subsequently becomes a major source that is subject to the emission standard or other requirement, such source shall be subject to the notification requirements of this section. Area sources previously subject to major source requirements that become major sources again are also subject to the notification requirements of this paragraph and must submit the notification according to the requirements of 40 C.F.R. § 63.9(k).

(2) Affected sources that are required under this paragraph to submit an initial notification may use the application for approval of construction or reconstruction under 40 C.F.R. § 63.5(d), if relevant, to fulfill the initial notification requirements of this paragraph.

(b) The owner or operator of an affected source that has an initial startup before the effective date of a relevant standard under this part shall notify the Administrator in writing that the source is subject to the relevant standard. The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information:

(1) The name and address of the owner or operator;

(2) The address (i.e., physical location) of the affected source;

(3) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;

(4) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and

(5) A statement of whether the affected source is a major source or an area source.

(c) The owner or operator of a new or reconstructed major affected source for which an application for approval of construction or reconstruction is required under 40 C.F.R. § 63.5(d) must provide the following information in writing to the Administrator:

(1) A notification of intention to construct a new major-emitting affected source, reconstruct a major-emitting affected source, or reconstruct a major source such that the source becomes a major-emitting affected source with the application for approval of construction or reconstruction as specified in 40 C.F.R. § 63.5(d)(1)(i); and

(2) A notification of the actual date of startup of the source, delivered or postmarked within 15 calendar days after that date.

(d) The owner or operator of a new or reconstructed affected source for which an application for approval of construction or reconstruction is not required under 40 C.F.R. § 63.5(d) must provide the following information in writing to the Administrator:

(1) A notification of intention to construct a new affected source, reconstruct an affected source, or reconstruct a source such that the source becomes an affected source, and

(2) A notification of the actual date of startup of the source, delivered or postmarked within 15 calendar days after that date.

(3) Unless the owner or operator has requested and received prior permission from the Administrator to submit less than

**SECTION D. Source Level Requirements**

the information in 40 C.F.R. § 63.5(d), the notification must include the information required on the application for approval of construction or reconstruction as specified in 40 C.F.R. § 63.5(d)(1)(i).

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11501]**Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources**
What are the notification, recordkeeping, and reporting requirements, and how may I assert an affirmative defense for violation of emission standards during malfunction?

In accordance with 40 C.F.R. §§ 63.11501(d)(1), (3), (4) and (8), the permittee shall submit semiannual compliance reports that contain the information specified in paragraphs (a) through (d) below. Reports are required only for semiannual periods during which you experienced any of the events described in paragraphs (a) through (d).

(a) The permittee shall clearly identify any deviation from the requirements of this subpart.

(b) The permittee shall provide the following information for each delay of leak repair beyond 15 days for any process equipment and beyond 45 days for heat exchangers with cooling water flow less than 8,000 gal/min : information on the date the leak was identified, the reason for the delay in repair, and the date the leak was repaired.

(c) The permittee shall report each process change that affects a compliance determination and submit a new certification of compliance with the applicable requirements in accordance with the procedures specified in 40 C.F.R. § 63.11501(b) (Condition #010, Section D, Source ID 101).

(d) If a malfunction occurred during the reporting period, the report must include the number of instances of malfunctions that caused emissions in excess of a standard. For each malfunction that caused emissions in excess of a standard, the report must include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over the standard, and a description of the method used to estimate the emissions. The report must also include a description of actions you took during a malfunction of an affected source to minimize emissions, in accordance with 40 C.F.R. § 63.11495(d) (Condition #018, Section D, Source ID 101), including actions taken to correct a malfunction.

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11501]**Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources**
What are the notification, recordkeeping, and reporting requirements, and how may I assert an affirmative defense for violation of emission standards during malfunction?

Affirmative defense for violation of emission standards during malfunction. In accordance with 40 C.F.R. § 63.11501(e), in response to an action to enforce the standards set forth in 40 C.F.R. §§ 63.11495 through 63.11499, the permittee may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction, as defined at 40 C.F.R. § 63.2. Appropriate penalties may be assessed if the permittee fails to meet its burden of proving all of the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.

(a) To establish the affirmative defense in any action to enforce such a standard, the permittee shall timely meet the notification requirements in paragraph (b), and must prove by a preponderance of evidence that:

(1) The violation:

(i) Was caused by a sudden, infrequent, and unavoidable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner; and

(ii) Could not have been prevented through careful planning, proper design, or better operation and maintenance practices; and

(iii) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and

(iv) Was not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and

(2) Repairs were made as expeditiously as possible when a violation occurred. Off-shift and overtime labor were used, to

**SECTION D. Source Level Requirements**

the extent practicable to make these repairs; and

(3) The frequency, amount, and duration of the violation (including any bypass) were minimized to the maximum extent practicable; and

(4) If the violation resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and

(5) All possible steps were taken to minimize the impact of the violation on ambient air quality, the environment and human health; and

(6) All emissions monitoring and control systems were kept in operation, if at all possible, consistent with safety and good air pollution control practices; and

(7) All of the actions in response to the violation were documented by properly signed, contemporaneous operating logs; and

(8) At all times, the affected CMPU was operated in a manner consistent with good practices for minimizing emissions; and

(9) A written root cause analysis has been prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the violation resulting from the malfunction event at issue. The analysis must also specify, using best monitoring methods and engineering judgment, the amount of any emissions that were the result of the malfunction.

(b) If the permittee seeks to assert an affirmative defense, the permittee shall submit a written report to the Administrator, with all necessary supporting documentation, that you have met the requirements set forth in paragraph (a). This affirmative defense report must be included in the first periodic compliance report, deviation report, or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance report, deviation report, or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance report, deviation report, or excess emission report due after the initial occurrence of the violation of the relevant standard.

014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11501]

Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources
What are the notification, recordkeeping, and reporting requirements, and how may I assert an affirmative defense for violation of emission standards during malfunction?

(a) In accordance with 40 C.F.R. § 63.11501(b), the permittee shall submit a Notification of Compliance Status (NOCS) report as required by 40 C.F.R. § 63.9(h). The NOCS shall include the following information:

This certification of compliance, signed by a responsible official:

(1) "This facility complies with the management practices in 40 C.F.R. § 63.11495."

(2) "This facility complies with the requirements in 40 C.F.R. § 63.11496 for HAP emissions from process vents."

(b) Notification of compliance status: The requirements of paragraph (b)(1) through (4) apply when an affected source becomes subject to a relevant standard.

(i) Before a operating permit has been issued to the owner or operator of an affected source, and each time a notification of compliance status is required under this part, the owner or operator of such source shall submit to the Administrator a notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied with the relevant standard. The notification shall list the following parameters:

(A) The methods that were used to determine compliance;

**SECTION D. Source Level Requirements**

(B) The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

(C) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

(D) The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard;

(E) If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification);

(F) A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and

(G) A statement by the owner or operator of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements.

(ii) The notification must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard (unless a different reporting period is specified in the standard, in which case the letter must be sent before the close of business on the day the report of the relevant testing or monitoring results is required to be delivered or postmarked). For example, the notification shall be sent before close of business on the 60th (or other required) day following completion of the initial performance test and again before the close of business on the 60th (or other required) day following the completion of any subsequent required performance test. If no performance test is required but opacity or visible emission observations are required to demonstrate compliance with an opacity or visible emission standard under this part, the notification of compliance status shall be sent before close of business on the 30th day following the completion of opacity or visible emission observations. Notifications may be combined as long as the due date requirement for each notification is met.

(iii) After a operating permit has been issued to the owner or operator of an affected source, the owner or operator of such source shall comply with all requirements for compliance status reports contained in the source's operating permit, including reports required under this part. After a operating permit has been issued to the owner or operator of an affected source, and each time a notification of compliance status is required under this part, the owner or operator of such source shall submit the notification of compliance status to the appropriate permitting authority following completion of the relevant compliance demonstration activity specified in the relevant standard.

(iv) If an owner or operator of an affected source submits estimates or preliminary information in the application for approval of construction or reconstruction required in 40 C.F.R. § 63.5(d) in place of the actual emissions data or control efficiencies required in paragraphs (d)(1)(ii)(H) and (d)(2) of 40 C.F.R. § 63.5, the owner or operator shall submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status required in this section.

(v) Advice on a notification of compliance status may be obtained from the Administrator.

VI. WORK PRACTICE REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall implement a standard operating procedure (SOP) for each emission control device associated with this process (C01 Venturi Scrubber and C02 Packed Tower).

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the condensers whenever the reactors are generating Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) emissions.

**SECTION D. Source Level Requirements****# 017 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11495]****Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources**
What are the management practices and other requirements?

- a) The permittee shall ensure that the batch reactors are equipped with tight-fitting lids that are kept closed during batch operations, except for manual operations that require access, such as material addition and removal, inspection, sampling and cleaning.
- b) The permittee shall conduct inspections of each reactor vessel and associated equipment including the heat exchange system when operating in organic HAP service to demonstrate that the process vessels and equipment are sound and free of leaks.
- c) Inspections must be conducted at least quarterly.
- d) For these inspections, detection methods incorporating sight, sound, or smell are acceptable. Indications of a leak identified using such methods constitute a leak unless you demonstrate that the indications of a leak are due to a condition other than loss of HAP. If indications of a leak are determined not to be HAP in one quarterly monitoring period, you must still perform the inspection and demonstration in the next quarterly monitoring period.
- e) As an alternative to conducting inspections, as specified in paragraph (ii) of this section, you may use Method 21 of 40 C.F.R. Part 60, appendix A-7, with a leak definition of 500 ppmv to detect leaks. You may also use Method 21 with a leak definition of 500 ppmv to determine if indications of a leak identified during an inspection conducted in accordance with paragraph (2) are due to a condition other than loss of HAP.
- f) Inspections must be conducted while the subject CMPU is operating.
- g) No inspection is required in a calendar quarter during which the subject CMPU does not operate for the entire calendar quarter and is not in organic HAP service. If the CMPU operates at all during a calendar quarter, an inspection is required.
- h) The permittee shall repair any leak within 15 calendar days after detection of the leak or document the reason for any delay of repair. A leak shall be considered "repaired" if any of the following parameters are met:
- (a) The visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated, or
- (b) No bubbles are observed at potential leak sites during a leak check using soap solution, or
- (c) The system will hold a test pressure.

018 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11495]**Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources**
What are the management practices and other requirements?

In accordance with the requirements in 40 C.F.R. §§ 63.11495(b), for all small heat exchangers, with cooling water flow less than 8,000 gal/min the permittee shall:

- (1) Develop and operate in accordance with a heat exchange system inspection plan. The plan must describe the inspections to be performed that will provide evidence of hydrocarbons in the cooling water. Among other things, inspections may include checks for visible floating hydrocarbon on the water, hydrocarbon odor, discolored water, and/or chemical addition rates.
- (2) Inspections shall be conducted at least once per quarter, even if the previous inspection determined that the indications of a leak did not constitute a leak as defined by § 63.104(b)(6).
- (3) Perform repairs to eliminate the leak and any indications of a leak or demonstrate that the HAP concentration in the cooling water does not constitute a leak, as defined by § 63.104(b)(6), within 45 calendar days after indications of the leak are identified, or you must document the reason for any delay of repair in your next semiannual compliance report.

**SECTION D. Source Level Requirements****# 019 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11495]****Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources****What are the management practices and other requirements?**

At all times, the permittee shall operate and maintain any affected CMPU, to include all affected batch reactor vessels and associated heat exchangers, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the CMPU.

020 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11496]**Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources****What are the standards and compliance requirements for process vents?**

(a) In accordance with 40 C.F.R. § 63.11496(a), the permittee shall comply with the requirements in paragraphs (a)(1) through (4) for organic HAP emissions from batch process vents for each CMPU using any organic HAP identified in Table 1 to 40 C.F.R. Part 63, Subpart VVVVV.

(1) The permittee shall determine the sum of actual organic HAP emissions from batch process vents within a CMPU subject to this subpart using process knowledge, engineering assessment, or test data. Emissions for a standard batch in a process may be used to represent actual emissions from each batch in that process. The permittee shall maintain records of the calculations.

(2) As an alternative to calculating actual emissions for each affected CMPU at the facility, the permittee may elect to estimate emissions for each CMPU based on the emissions for the worst-case CMPU. The worst-case CMPU means the CMPU at the affected source with the highest organic HAP emissions per batch. The worst-case emissions per batch are used with the number of batches run for other affected CMPU. Process knowledge, engineering assessment, or test data may be used to identify the worst-case process. The permittee shall keep records of the information and procedures used to identify the worst-case process.

(3) If the current estimate is that emissions from batch process vents from a CMPU are less than 10,000 pounds per year (lb/yr), then the permittee shall keep a record of the number of batches of each process operated per month. Also, the permittee shall reevaluate the total emissions from batch process vents prior to making any process changes that affect emission calculations in paragraphs (1) and (2) above. If projected emissions increase to 10,000 lb/yr or more, the permittee shall comply with options for batch process vents in Table 2 to 40 C.F.R. Part 63, Subpart VVVVV upon initiating operation under the new operating conditions. The permittee shall maintain records documenting the results of all updated emissions calculations.

(4) As an alternative to determining the HAP emissions, the permittee may elect to demonstrate that the amount of organic HAP used in the process is less than 10,000 lb/yr. The permittee shall keep monthly records of the organic HAP usage.

(b) In accordance with 40 C.F.R. § 63.11496(f), the permittee shall comply with the requirements in paragraphs (b)(1) and (2) for metal HAP emissions from batch process vents for each CMPU using any metal HAP identified in Table 1 to 40 C.F.R. Part 63, Subpart VVVVV.

(1) The permittee shall determine the sum of metal HAP emissions from all metal HAP process vents within a CMPU subject to this subpart. Annual determination of metal HAPs is not required if the total metal HAP usage in the process unit is less than 400 lb/yr. To determine the mass emission rate, the permittee may use process knowledge, engineering assessment, or test data. The permittee shall keep records of the emissions calculations.

(2) If the current estimate is that total uncontrolled metal HAP emissions from a CMPU subject to this subpart are less than 400 lb/yr, then the permittee shall keep records of the number of batches operated per month (batch vents). Prior to making any process or operational change (s) that affects emissions of metal HAP, the permittee shall reevaluate the total emissions. If projected emissions increase to 400 lb/yr or more, then you must be in compliance with one of the options for metal HAP process vents listed in Table 4 to 40 C.F.R. 63 Subpart VVVVV upon initiating operation under the new operating conditions. You must keep records of all recalculated emissions determinations.

**SECTION D. Source Level Requirements**

[Compliance with this condition assures compliance with the streamlined condition under 40 C.F.R. § 63.11496(d).]

VII. ADDITIONAL REQUIREMENTS.**# 021 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The Process area, Source 101, consists of twelve (12) reactors, each with an associated primary and secondary condenser, plus dryers with associated condensers. The primary condenser for each reactor is used primarily as a recovery stream and such identified as a part of the process unit. The secondary condensers are identified as Control unit C03 and is to control VOC emissions

Reactor Room (Bottom Floor)	Volume (gallons)
R-108	500
R-114	1000
R-116	1500
R-117	750
R-118	350
R-119	100
R-125	750
T301 - receiving tank	100
T302 - receiving tank	100

(2) filter dryers

(1) pilot centrifuge and its associated tank and condenser

Reactor Room (Top Floor)	Volume (gallons)
R-105	500
R-107	500
R-120	250
R-123	1000
R-126	23

T303 - receiving tank

(b) Acid gas emissions from the Process Area (Source ID 101) shall be vented to the Venturi Scrubber (C01), the Packed Tower (C02) and Condensers (C03).

The Process Area (Source ID 101) also includes the following dryers venting to Condensers (C04)

Double cone dryer

Tray dryer - hot water jacketed w/vacuum

FKM dryer-horizontal

022 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11502]**Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources****What definitions apply to this subpart?**

For the purposes of 40 C.F.R. Part 63 Subpart VVVVV, chemical manufacturing process unit (CMPU) means all equipment which collectively functions to produce a product or isolated intermediate. A process includes, but is not limited to any, all, or a combination of reaction, recovery, separation, purification, or other activity, operation, manufacture, or treatment which are used to produce a product or isolated intermediate. A process is also defined by the following:

(1) All cleaning operations;

(2) Each nondedicated solvent recovery operation is considered a single process;

(3) Each nondedicated formulation operation is considered a single process;

**SECTION D. Source Level Requirements**

- (4) Quality assurance/quality control laboratories are not considered part of any process;
- (5) Ancillary activities are not considered a process or part of any process; and
- (6) The end of a process that produces a solid material is either up to and including the dryer or extruder. If the dryer, is followed by an operation that is designed and operated to remove HAP solvent, then the solvent removal operation is the last step in the process. If the dried solid is diluted or mixed with a HAP-based solvent, then the solvent removal operation is the last step in the process.

**SECTION D. Source Level Requirements**

Source ID: C03

Source Name: SECONDARY CONDENSERS

Source Capacity/Throughput:

N/A

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that Source C03 vapor effluent temperatures when operating, is 20 degrees Celsius or below.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use a DEP approved method to monitor the temperature of exit stream of each secondary condenser associated with the reactors listed in Source ID 101.

Following the final sale and transfer of ownership of the facility from Chester Specialty Chemicals, the new permittee shall, within six (6) months of reactivating the sources listed in this operating permit, submit for DEP approval the proposed methods for demonstrating the effectiveness of the VOC control. If Chester Specialty Chemicals reactivates the sources listed in this operating permit, they shall, within six (6) months of reactivating the sources, submit for DEP approval the proposed methods for demonstrating the effectiveness of the VOC control.

In the event that the above deadline cannot be met, the new permittee may request an extension for the due date in writing and include a justification for the extension. DEP may grant an extension for a reasonable cause.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records for the secondary condenser temperature of the vapor effluent, for each batch processed.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



SECTION E. Source Group Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.



SECTION G. Emission Restriction Summary.

Source Id	Source Description		
101	PROCESS AREA		
Emission Limit		Pollutant	
4.000	Tons/Yr	12-month rolling	Hazardous Air Pollutants
11.000	Tons/Yr	12-month rolling	VOC

Site Emission Restriction Summary

Emission Limit	Pollutant
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**SECTION H. Miscellaneous.**

NOVEMBER 2002

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

- (1) Five unit heaters, steam fired
- (2) Bench labs
- (3) Lab-scale distillation units
- (4) Cleaver Brooks boiler rated @ 4 MMBTU/h firing natural gas
- (5) York Shipley boiler rated @ 1.5 MMBTU/h firing natural gas

(b) Operating Permit No. 23-313-046 serves as the basis for certain terms and conditions set forth in this permit:

SEPTEMBER 2012

(a) This permit is being renewed under APS ID 457806; AUTH ID 924683. The facility has been re-classified as a natural minor facility.

(b) The following RFDs are incorporated with this renewal: #1187, #1229, and #2696.

(c) RFD #2736 for the R-120 Process was previously approved by the Department, however, since it has not yet been installed at the time of this renewal, it is not being incorporated at this time.

SEPTEMBER 2017

(a) This permit is being renewed under APS 457806; AUTH ID 1177693. The following items are addressed with this renewal permit:

(b) Facility-wide potential to emit VOC and HAP emission restrictions previously listed in Section C have been removed from the permit because the facility is a Natural Minor; VOC PTE is less than 25 tons per year and HAP PTE is less than 25 tons per year any combination HAP and less than 10 tons per year any individual HAP.

(c) The following RFDs have been reviewed since the last permit action:

- (1) RFD No. 2736: Process R-120 has been installed and is now incorporated into Source ID 101.
- (2) RFD No. 3579: One 15-cubic foot centrifuge and one 20-cubic foot centrifuge associated with Source ID 101.
- (3) RFD No. 4134: 100-gallon Reactor (R-112) replaced with similar unit; no change in emissions or process.
- (4) RFD No. 4459: 1,000-gallon Reactor (R-114) replaced with similar unit; no change in emissions or process.
- (5) RFD No. 6208: Tray dryer with two (2) condensers and Filter dryer with a glycol condenser.

(d) As of September 2017, the facility is currently on a weekly monitoring frequency for visible emissions, fugitive emissions, and odors.

(e) A standard operating procedure requirement has been added to the control devices associated with Source ID 101 (Venturi Scrubber C01 and Packed Tower Scrubber C02).

FEBRUARY 2018

The permit is amended to address a change of ownership from Norquay Technology, Inc. (Tax ID 23-2478944) to Norquay, LLC (Tax ID 37-1871469) - AUTH ID 1216083. The primary responsible official is Peter Litak (General Manager), secondary responsible official is Carrington Smith (CEO).

**SECTION H. Miscellaneous.**

 October 2024

This permit is being renewed under APS 1063374; AUTH ID 1396238. The following items are addressed with this renewal permit action;

- (a) Facility-wide limit of 24.9 tons of VOC per year limit added to Section C of the permit.
- (b) Change of ownership from Norquay LLC: Tax ID 37-1871469; Client ID 339545 to Entergris Inc.: Tax ID 41-1941551 Client ID 361274.
- (c) Peter Litak, Site Leader, will be identified as the responsible office.
- (d) The following RFDS have been reviewed since the last permit action:
 - 1) RFD 6780: Installation a new 1000-gallon reactor (R-123). Reactor has been incorporated into Source ID 101
 - 2) RFD 6734: Installation of a new dust collector to replace an existing dust collector used to control emission from (4) dryers and one (1) grinder in the Process Area (Source ID 101).
 - 3) RFD 8109: Reactor (R-115) has been replaced with the installation of a 750-gallon reactor (R-125). New reactor has been incorporated into Source ID 101.
 - 4) RFD 8707: Installation of a new 23-gallon reactor (R-126). Reactor has been incorporated into Source ID 101.
 - 5) RFD 9546: Modification to reactor R-123.

(e) Process 9139 (Source ID 102) was removed from the permit.

(d) The updated list of insignificant sources are as follows:

Dryer pump room
 Pump series 1 - double cone dryer
 Pump series 2 - tray dryer - dry claw
 vacuum pump (mechanical seal)
 R&D and QC Lab Area
 (6) Batch stills
 (1) semi-continuous Still
 Warehouse Area
 (1) Boiler - Cleaver-Brooks Model No. CB 700-100 4.185 MMBtu/hr
 (5) Steam Heaters (fed by boiler)
 Bench labs with (5) Hoods
 Lab-scale distillation units

The following conditions were added to Section D, Source C03

The permittee shall ensure that Source C03 vapor effluent temperatures when operating, is 20° C or below.

The permittee shall use a DEP approved method to monitor the temperature of exit stream of each secondary condenser associated with the reactors listed in Source ID 101.

The permittee shall submit the method(s) for demonstration of compliance with the exit temperature of vapor stream from the secondary condensers, for approval within 30 days of final issuance of Synthetic Minor Operating Permit 23-00095, AUTH ID 1396238

The permittee shall maintain records for the secondary condenser temperature of the vapor effluent, for each batch processed.

The following conditions were added to Section D, Source 101:

(a) The permittee shall perform a stack test using the Department-approved procedures, to establish the removal efficiency for Source IDs C01 and C02. The Source testing shall be performed within 180 days of final issuance of Synthetic Minor Operating Permit 23-00095, AUTH ID 1396238. Source testing shall be performed for the following pollutant: HCL. Performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the

**SECTION H. Miscellaneous.**

capacity of the equipment, as may be requested by the Department.

(b) The stack test shall, at a minimum, test for the HCL DRE. Tests shall be conducted in accordance with the provisions of US EPA Method M26A or other Department approved methodology and 25 Pa. Code Chapter 139. Tests shall also be conducted in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance.

(c) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s) an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

April 2025

This permit is being modified under AUTH ID 1506623, APS ID 1063374, to incorporate the applicable requirements of 40 C.F.R. Part 63 Subpart WWWW.

The following conditions have been added to the permit with this action:

Section D, Source ID 101, Conditions #002, to add address the applicable throughput restrictions of the subpart.

Recordkeeping Requirements: Section D, Source ID 101, Conditions #006 through #008.

Reporting Requirements: Section D, Source ID 101, Conditions #009 through #012.

Work Practice Requirements: Section D, Source ID 101, Conditions #015 through #018.

Additional Requirement (Definition of a CMPU): Section D, Source ID 101, Condition #020.

February 2026

AUTH ID 1554993; APS 1153885: This is an Administrative Amendment to address the following actions:

A Change of Ownership from Entegris, Inc. (Tax ID: 41-1941551; Client ID: 361274) to Chester Specialty Chemical, LLC (Tax ID 41-2329996; Client ID: 396833).

The Responsible Official has been updated from Peter Litak, Site Manager to Lauren Celano, President.

The Permit Contact has been updated from Brian Tulay, EHS Manager to Lauren Celano, President.

Section C, Condition # 001 pertaining to 25 Pa. Code § 121.7 - Prohibition of air pollution was removed. This condition is now under Condition #023 of Section B.

April 2026

AUTH ID 1554993, APS ID 1153885: This is an Administrative Amendment to the resolution of the Entegris vs. The Commonwealth of Pennsylvania Department of Environmental Protection Appeal EHB Docket No. 2024-175-BP. The following language has been added to the permit under Condition #001, Section D, Source ID C03:

Following the final sale and transfer of ownership of the facility from Chester Specialty Chemicals, the new permittee shall, within

**SECTION H. Miscellaneous.**

six (6) months of reactivating the sources listed in this operating permit, submit for DEP approval the proposed methods for demonstrating the effectiveness of the VOC condenser.

In the event that the above deadline cannot be met, the new permittee may request an extension for the due date in writing and include a justification for the extension. DEP may grant an extension for a reasonable cause.



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