



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: April 28, 2023 Effective Date: April 28, 2026
Revision Date: April 23, 2026 Expiration Date: October 28, 2026
Revision Type: Extension

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

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

Plan Approval No. 04-00755

Federal Tax Id - Plant Code: 23-2916040-4

Owner Information

Name: CRONIMET CORP
Mailing Address: 1 PILARSKY WAY
ALIQUIPPA, PA 15001-5421

Plant Information

Plant: CRONIMET CORP/CRONIMET CORP PILARSKY WAY
Location: 04 Beaver County 04001 Aliquippa City
SIC Code: 5093 Wholesale Trade - Scrap And Waste Materials

Responsible Official

Name: DAVID PORCO
Title: VP QUALITY & ADMIN
Phone: (724) 375 - 5004 Email: dporco@cronimet.com

Plan Approval Contact Person

Name: DAVID PORCO
Title: VP QUALITY & ADMIN
Phone: (724) 375 - 5004 Email: dporco@cronimet.com

[Signature] _____

MARK R. GOROG, P.E., ENVIRONMENTAL PROGRAM MANAGER, SOUTHWEST REGION



Plan Approval Description

This Plan Approval No. PA-04-00755 is for the installation and temporary operation of a Torch Cutting Operation (Source 101) controlled by a new Airex Dust Collector, Model No. P135-361275, rated at 64,000 SCFM at Cronimet Terminal located at 1 Pilarsky Way in Aliquippa City in Aliquippa Borough, Beaver County.



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Plan Approval Inventory List

Section B. General Plan Approval Requirements

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

Section C. Site Level Plan Approval Requirements

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

Section D. Source Level Plan Approval Requirements

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

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

Section E. Source Group Restrictions

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

Section F. Alternative Operating Scenario(s)

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



SECTION A. Table of Contents

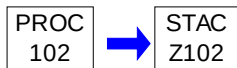
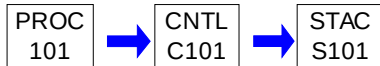
F-III: Monitoring Requirements
F-IV: Recordkeeping Requirements
F-V: Reporting Requirements
F-VI: Work Practice Standards
F-VII: Additional Requirements

Section G. Emission Restriction Summary

Section H. Miscellaneous

**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	TORCH CUTTING OPERATIONS		
102	EMERGENCY CUMMINS DIESEL GENERATOR RATED AT 121 BHP		
C101	BAGHOUSE RATED AT 64,000 CFM		
S101	BAGHOUSE STACK		
Z102	ENGINE FUGITIVES		

PERMIT MAPS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

#006 [25 Pa. Code § 127.12b]**Plan Approval Terms and Conditions**

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

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

#013 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. §§ 4001-4015).

#014 [25 Pa. Code § 127.25]**Compliance Requirement**

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

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

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

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

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) N/A (Air Basin)
- (7) N/A
- (8) N/A
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

- (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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

(c) A person responsible for any source specified in subsections (a)(1) -- (7) or (9) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

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

(d) N/A

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

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

**SECTION C. Site Level Plan Approval Requirements****# 004 [25 Pa. Code §123.31]****Limitations**

The permittee shall 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 of the property of the facility.

005 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

006 [25 Pa. Code §129.14]**Open burning operations**

The facility is located in an air basin and subject to the following open burning conditions:

- (a) Air basins. No person may permit the open burning of material in an air basin.
- (b) Not applicable
- (c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:

- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (2) A fire set for the purpose of instructing personnel in firefighting, when approved by the Department.
- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) N/A
- (5) N/A
- (6) N/A
- (7) N/A

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

- (1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased, and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

- (2) Subsection (a) notwithstanding, clearing and grubbing wastes may be burned in a basin subject to the following requirements:

- (i) Air curtain destructors shall be used when burning clearing and grubbing wastes.
- (ii) Each proposed use of air curtain destructors shall be reviewed and approved by the Department in writing with respect to equipment arrangement, design and existing environmental conditions prior to commencement of burning. Proposals approved under this subparagraph need not obtain plan approval or operating permits under Chapter 127 (relating to construction modification, reactivation and operation of sources).
- (iii) Approval for use of an air curtain destructor at one site may be granted for a specified period not to exceed 3 months but may be extended for additional limited periods upon further approval by the Department.
- (iv) The Department reserves the right to rescind approval granted if a determination by the Department indicates that an air pollution problem exists.

- (3) Not applicable

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

**SECTION C. Site Level Plan Approval Requirements****Throughput Restriction(s).****# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The facility shall be limited to a throughput processing of 1,600 tons of stainless steel and the permittee shall keep a throughput record of the stainless steel, Source ID # 101, on a monthly basis and on a 12-month rolling basis. These records shall be kept on site and presented to the Department on request.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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

Malfunction reporting shall be conducted as follows:

(a) The owner or operator shall report each malfunction that occurs at this facility that poses an imminent and substantial danger to the public health and safety or the environment or which it should reasonably believe may result in citizen complaints to the Department. For purpose of this condition, a malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or source to operate in a normal or usual manner that may result in an increase in the emission of air contaminants. Examples of malfunctions that may result in citizen complaints include, but are not limited to, large dust plumes, heavy smoke, or a spill or release that may result in an odor detectable outside the property of the person on whose land the source is being operated.

(b) When the malfunction poses an imminent and substantial danger to the public health and safety or the environment, the notification shall be submitted to the Department no later than one hour after the incident. All other malfunctions that must be reported under subsection (a) shall be reported to the Department no later than the next business day.

(c) The report shall describe the:

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

(d) The owner or operator shall notify the Department immediately when corrective measures have been completed.

(e) Subsequent to the malfunction, the owner/operator shall submit a full written report to the Department including the items identified in (c) and corrective measures taken on the malfunction within 15 days.

(f) The owner/operator shall submit reports on the operation and maintenance of the source to the Regional Air Program Manager at such intervals and in such form and detail as may be required by the Department. Information required in the reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and maintenance

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

schedules.

(g) Malfunctions shall be reported to the Department at the following address:

PADEP

Office of Air Quality

400 Waterfront Drive

Pittsburgh, PA 15222-4745

412-442-4000

(h) If requested by the Department, the Owner/Operator shall submit a full written report to the Department including final determinations of the items identified in c. and the corrective measures taken on the malfunction. The report shall be submitted within 15 days of the Department's request or accomplishing corrective measures, whichever is later.

VI. WORK PRACTICE REQUIREMENTS.**# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Visible fugitive emissions from material handling shall be minimized through water sprays or equivalent wet suppression methods to ensure that fugitive particulate matter is minimized and does not go beyond the property line.

010 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

All air contamination sources, and air cleaning devices authorized under this plan approval shall be maintained and operated per the manufacturer's specifications and recommended maintenance schedule, and in accordance with good air pollution control practices. These records shall, at a minimum, contain the dates of the inspections, any problems or defects, any actions taken to correct the problems or defects, and any routine maintenance performed.

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

A facility-wide inspection shall be conducted at a minimum of once each day that the facility is operated by the Owner/Operator, during daylight hours, and while the sources are operating. The permittee shall monitor the perimeter of the facility for the presence of the following:

- a. Visible emissions;
- b. Fugitive emissions; and
- c. Potentially objectionable odors at the property line.

If any visible emissions, fugitive emissions, or potentially objectionable odors are apparent, the Owner/Operator shall take corrective action. Records of each inspection shall be maintained in a log and at the minimum include the date, time, name and title of the observer, along with any corrective action taken as a result.

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

This Plan Approval No. PA-04-00755 is for the installation and temporary operation of a new Torch Cutting Operation (Source 101) and dust collection system equipped with a new Airex Dust Collector, Model No. P135-361275, rated at 64,000 SCFM at Cronimet Terminal located at 1 Pilarsky Way in Aliquippa City in Aliquippa Borough, Beaver County.

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

The following air contamination sources and air cleaning devices are authorized to install and operate under plan approval No. PA-04-00755:

- Source ID 101: One (1) Oxy-Propane fired Torching Operations; and
- Control ID C101: One (1) Dust Collector manufactured Airex, Model No. P135-361275, and rated at 64,000 SCFM

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

equipped with BLDS (Bag Leak Detection System).

- Source ID 102: One (1) Existing Emergency Cummins diesel-fired generator engine, Model No. C90D6, rated at 121 bhp. This unit is model year is 2004 and used as a backup generator in case of power outage.

014 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Environmental permit awareness training shall be provided to each employee that includes, at a minimum:

- Provide an overview of permit limitations, testing, work practices, monitoring, recordkeeping and reporting requirements
- Identify work practices to minimize visible fugitive emissions
- Identify personnel responsible for visible fugitive emission and visible emission inspections
- Identify corrective actions and procedures for the implementation of corrective actions
- Identify personnel responsible for documentation and the documentation requirements

This training shall be performed prior to the initial plan approval compliance demonstration inspection for each employee and then upon start-date of new employees, thereafter.

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

Upon determination by the Owner/Operator that the source(s) covered by this Plan Approval are in compliance with all conditions of the Plan Approval the Owner/Operator shall contact the Department's reviewing engineer and schedule the Initial Operating Permit Inspection.

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

Upon completion of the Initial Operating Permit Inspection and determination by the Department that the source(s) covered by this Plan Approval are in compliance with all conditions of the Plan Approval the Owner/Operator shall submit an administrative amendment application to the State Only Operating Permit or include the sources covered by this plan approval in the State Only Operating Permit Renewal application for this Facility.

017 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

If, at any time, the Department has cause to believe that air contaminant emissions from the sources listed in this Plan Approval may be in excess of the limitations specified in or established pursuant to this plan approval or the permittee's operating permit, the permittee may be required to conduct test methods and procedures deemed necessary by the Department to determine the actual emissions rate. Such testing shall be conducted in accordance with 25 Pa. Code Chapter 139, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

018 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall submit requests to extend the temporary operation period at least 15 days prior to the expiration date of any authorized period of temporary operation until the source(s) covered by this authorization are incorporated into an issued State Only Operating Permit for this facility.

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

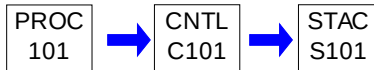
No compliance milestones exist.

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

Source ID: 101

Source Name: TORCH CUTTING OPERATIONS

Source Capacity/Throughput:

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

The concentration of particulate matter (PM) in the effluent gas from the dust collector shall not exceed 0.02 gr/dscf. Compliance with this condition shall be deemed satisfied if:

- the baghouse capture and control system is operated in accordance with the manufacturer's specifications, if available, and/or good operating practices;
- the dust collector capture and control system - is maintained per manufacturer's recommended maintenance schedule, if available, and/or good operating practices; and
- the absence of any visible emissions from the dust collector capture and control device stack.

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

Visible emissions from the stack shall not equal or exceed 10% opacity at any time. If any visible emissions are noted the owner/operator shall take corrective action. Compliance with 10% opacity limit shall be assured by conducting a visual emission observation on a daily basis (when source is operating) to ensure there are no visible emissions from the baghouse stack.

Fuel Restriction(s).**# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Propane and pipeline quality natural gas shall be the only fuel permitted for combustion in the torch(es).

Control Device Efficiency Restriction(s).**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall select filters for the baghouse that are capable of controlling ultra-fine particulate matter (PM) from torch cutting emissions to assure compliance with a minimum average control efficiency of no less than 89% for 0.3-1.0-micron particulate unless approved by the Department. These filters shall be spark and flame resistant.

II. TESTING REQUIREMENTS.**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

An initial performance evaluation of the required bag leak detection systems (BLDS) will be required. The data collected from the bag leak detection systems (BLDS) during the initial performance test (Method 9) shall be used to provide a reasonable assurance of ongoing compliance. Once the bag leak detection systems have been installed, calibrated, and put into operation, the permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the bag leak detection systems.

**SECTION D. Source Level Plan Approval Requirements****III. MONITORING REQUIREMENTS.****# 006 [25 Pa. Code §123.42]****Exceptions**

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.

IV. RECORDKEEPING REQUIREMENTS.**# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The Airex dust collector shall be subject to the following monitoring and recordkeeping requirements:

- i. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, an acceptable range shall be established, for diagnostic purposes only, for the pressure differential across the baghouse in accordance with the manufacturer's specifications. Pressure differentials outside of the acceptable diagnostic range shall not by themselves be a violation of plan approval requirements in the absence of other noncompliant parameters.
- ii. The owner/operator shall properly install, operate, and maintain equipment to continuously monitor the pressure differential, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The owner/operator shall record the pressure drop across the baghouse on a daily basis.

The monitoring equipment (including BLDS) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). Whenever the monitored value for the pressure differential is outside of the range established in accordance with this permit, the owner/operator shall promptly investigate the cause.

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

The permittee shall maintain the following comprehensive and accurate records:

- (1) Daily pressure differential across dust collector when operating
- (2) Bag replacement in dust collector
- (3) Any maintenance performed on dust collector
- (4) Copy of the manufacturer's recommended specifications and recommended maintenance schedule
- (5) Keep records of any visible emissions, the investigation of cause, and the corrective action taken
- (6) Records shall be kept of BLDS alarms, the investigation of cause, and the corrective action taken.
- (7) For each investigation of cause, a determination as to whether any emissions in excess of the limitations in this authorization occurred.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall conduct a performance evaluation for each bag leak detection system (BLDS) installed on the dust collector in accordance with a site-specific monitoring plan. The permittee shall develop a site-specific monitoring plan that

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

addresses the following:

- (i) Installation of the bag leak detection system;
- (ii) Performance and equipment specifications;
- (iii) Performance evaluation procedures and acceptance criteria (e.g., calibrations).
- (iv) Initial and periodic adjustment of the bag leak detection system, including how the alarm set-point will be established;
- (v) Operation of the bag leak detection system, including quality assurance procedures;
- (vi) How the bag leak detection system will be maintained, including a routine maintenance schedule and spare parts inventory list;
- (vii) How the bag leak detection system output will be recorded and stored.
- (viii) Ongoing operation, quality assurance, maintenance, and reporting procedures;
- (ix) Ongoing data quality assurance procedures. (QA/QC guidance may be found in 40 CFR § 63.8(d));
- (x) Ongoing recordkeeping and reporting procedures;
- (xi) How the bag leak detection systems will comply with the provisions of this plan approval.
- (xii) The manufacturer's recommended procedures and specifications and good engineering practices for installing, testing, and operating the bag leak detection systems.

The permittee shall submit a site-specific monitoring plan to the Department's Southwest Regional Office at least 90 days prior to the scheduled source testing (Method 9) required by this plan approval. This monitoring plan shall identify how the bag leak detection systems (BLDS) will comply with the provisions of this plan approval.

010 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The bag leak detection system (BLDS) must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations, in accordance with the guidance provided in EPA-454/R-98-015, September 1997, and in accordance with good air pollution control practices. The permittee shall calibrate and check the accuracy of the BLDS considering manufacturer's specifications at least annually.

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

The permittee shall initiate procedures to determine the cause of every alarm within 8 hours of the alarm. The permittee must alleviate the cause of the alarm within 24 hours of the alarm by taking whatever corrective action(s) are necessary. Corrective actions may include but are not limited to the following:

- (i) Inspecting the fabric filter for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in PM emissions;
- (ii) Sealing off defective bags or filter media;
- (iii) Replacing defective bags or filter media or otherwise repairing the control device;
- (iv) Sealing off a defective fabric filter compartment;
- (v) Cleaning the bag leak detection system probe or otherwise repairing the device.

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

The baghouse capture system shall be operated all the times when the torch cutting operation is in progress.

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

The permittee shall keep on hand a supply of clean spare filter cartridges for maintenance and repair of the baghouse. These quantities shall be determined by the manufacturer's recommendations, if available, and/or good operating and maintenance practices.

014 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall operate the proposed Airex dust collector per the manufacturer's specification and maintain per manufacturer's recommended maintenance schedule. A copy of the manufacturer's recommended maintenance schedule

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

shall be kept on site and records of all maintenance, including corrective actions taken, shall be kept

VII. ADDITIONAL REQUIREMENTS.

015 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The following restrictions shall apply to the torch cutting operations:

- All torch cutting activities shall take place within the capture area of the booth.
- Scrap pieces shall be positioned at all times so as to maintain an air gap between the ground and material being cut.
- No high chromium, nickel chrome alloys, or lead containing scrap may be cut on site without prior written approval from the Department.

016 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

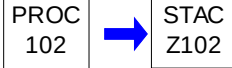
The baghouse capture system shall be equipped with a spark arrestor to prevent control device malfunction.

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

Source ID: 102

Source Name: EMERGENCY CUMMINS DIESEL GENERATOR RATED AT 121 BHP

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



SECTION E. Source Group Plan Approval Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

The following are miscellaneous emission sources:

- Safety-Kleen Metal Parts Washer – Model 16 is located inside maintenance shop.
- QSOL 300 Cleaning Solvent is used, VOC = 7.9 lbs/gallon density.
- Paved Roadways – Approximately 7,900 feet long
- Material Handling
- Crusher rated at 1,600 tons/year
- Conveyor
- Forced Air Heater rated at 175,000 Btu/hour; and run by kerosene.
- Waste Oil Burner and run by #2 fuel. Annual throughput = 4,176-gallon. The fuel has following specifications:
 - Sulfur = 0.5% (by weight)
 - Btu = 16,787 btu/lb
 - Flashpoint = 100°F
 - Pb, wt % = 0.00%
 - PCBs Not Detectable
 - Ash = 0.01% (by weight)



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