



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: June 22, 2026

Effective Date: June 22, 2026

Expiration Date: November 28, 2026

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. PA-11-00549A](#)

Federal Tax Id - Plant Code: 87-2807105-1

Owner Information

Name: V&S KORNS GALVANIZING LLC
Mailing Address: 75 BRIDGE ST
JOHNSTOWN, PA 15902-2902

Plant Information

Plant: V&S KORNS GALVANIZING LLC/JOHNSTOWN PLT
Location: 11 Cambria County 11001 Johnstown City
SIC Code:

Responsible Official

Name: JAMIE POND
Title: OPER MGR
Phone: (814) 535 - 3293 Email: jamie.pond@hotdipgalv.com

Plan Approval Contact Person

Name: JAMIE POND
Title: OPER MGR
Phone: (814) 535 - 3293 Email: jamie.pond@hotdipgalv.com

[Signature] _____

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



Plan Approval Description

This Plan Approval No. PA-11-00549A is to install and operate a new Hot Dip Galvanizing Kettle Furnace K3 including acid bath and to continue the operations of two (2) existing galvanizing Kettle Furnaces K1 and K2 including acid baths at Korns Galvanizing Plant located at the intersection of Bond Streer, Central Avenue and Bridge Street on 75 Bridge Street in city of Johnstown in Cambria County.

V&S purchased the existing Korns Galvanizing Plant on March 5, 2023. According to V&S, there were no available records or information to determine whether the facility was previously permitted or was a grandfathered facility.

New air contamination sources and air cleaning devices authorized to be installed and operated at the Facility under this Plan Approval are as follows:

- Source ID 101 (Existing): One (1) natural gas-fired Kettle Furnace #K1, manufactured by Columbiana, Model No. Custom, and rated at 252 cubic feet molten zinc; equipped with two (2) burners manufactured by Eclipse Thermjet, Model # ND6XO, and each burner is rated at 0.75 MMBtu/hr. The maximum capacity of the furnace is rated at 1.50 MMBtu/hr. This kettle is capable of galvanizing 124,800 lbs. steel/day.
- Source ID 102 (Existing): One (1) natural gas-fired Kettle Furnace #K2, manufactured by Columbiana, Model No. Custom, and rated at 112 cubic feet molten zinc; equipped with two (2) burners manufactured by AlGas, Model # S2DI-VH050, and each burner is rated at 0.5 MMBtu/hr. The maximum capacity of furnace is rated at 1.0 MMBtu/hr. This kettle is capable of galvanizing 55,200 lbs. steel/day.
- Source ID 103 (Proposed): One (1) natural gas-fired Kettle Furnace #K3, manufactured by W.W. Pilling, Model No. Custom, and rated at 300 cubic feet molten zinc; equipped with eight (8) burners manufactured by North American, Model # 4832-3-SZ/30, and each burner is rated at 0.25 MMBtu/hr. The maximum capacity of furnace is rated at 2.0 MMBtu/hr. This kettle is capable of galvanizing 156,000 lbs. steel/day.
- Control ID C102: One (1) Suction design Baghouse # 2, manufactured by Imperial Systems, Model No. CMAXX CM-40L, rated at 30,000 ACFM at 70F, and has 98% removal efficiency. This baghouse shall be equipped with a bag leak detection system (BLDS). This baghouse controls emissions of two (2) Kettles (K1 & K2) and exhausts outdoors to atmosphere.
- Control ID C103: One (1) Suction design Baghouse # 1, manufactured by Imperial Systems, Model No. CMAXX CM-40L, rated at 30,000 ACFM at 70F, and has 98% removal efficiency. This baghouse shall be equipped with a bag leak detection system (BLDS). This baghouse will control emissions of Kettle-3 (K3) and will exhaust outdoors to atmosphere.



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

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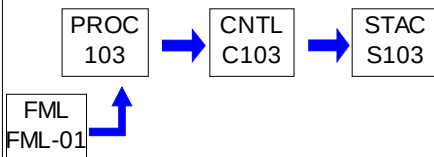
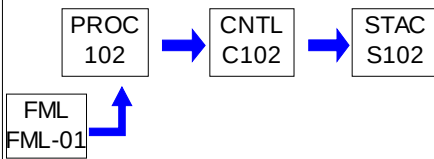
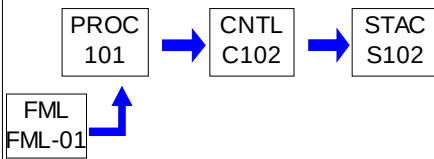
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**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	KETTLE 1 @ 252 CUBIC FEET MOLTEN ZINC		
102	KETTLE 2 @ 112 CUBIC FEET MOLTEN ZINC		
103	KETTLE 3 @ 300 CUBIC FEET MOLTEN ZINC		
C102	BAGHOUSE #2 @ 30,000 ACFM AT 70F		
C103	BAGHOUSE #1 @ 30,000 ACFM AT 70F		
FML-01	FUEL USED		
S102	STACK TO C102		
S103	STACK TO BAGHOUSE 1		

PERMIT MAPS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

(a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.

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

(c) The permittee fails to submit a report required by this plan approval.

(d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

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

(a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

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

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

Regional Air Program Manager

PA Department of Environmental Protection

(At the address given on the plan approval transmittal letter or otherwise notified)

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

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

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

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

**SECTION B. General Plan Approval Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

(1) Construction or demolition of buildings or structures.

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

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

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations.

(7) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.

(8) Coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in § § 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations).

(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.

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

(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) The requirements contained in subsection (a) and 123.2 do not apply to fugitive emissions arising from the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

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.

004 [25 Pa. Code §123.21]**General**

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.

005 [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.

006 [25 Pa. Code §123.41]**Limitations**

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

- (1) Equal to or greater than 10% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 30% at any time.

007 [25 Pa. Code §123.42]**Exceptions**

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

- 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 §123.1(1)-(9).
- d. N/A

Fuel Restriction(s).**# 008 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Pipeline quality natural gas shall be the only fuel permitted for combustion sources at the facility.

**SECTION C. Site Level Plan Approval Requirements****Throughput Restriction(s).****# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The facility-wide zinc usage/throughput shall not exceed 780 tons on a 12-month rolling basis. Record of receipt of zinc received at the facility shall be maintained.

II. TESTING REQUIREMENTS.**# 010 [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.

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

If required, performance testing shall be conducted as follows:

- (a) The permittee shall submit a pre-test protocol electronically to the Department for review at least 120 days prior to the performance of any EPA reference method stack test or portable analyzer test. The permittee may repeat portable analyzer testing without additional protocol approvals provided that the same method and equipment are used. All proposed performance test methods shall be identified in the pre-test protocol and approved by the Department prior to testing.
- (b) The permittee shall notify the Regional Air Quality Manager at least 15 days prior to any performance test so that an observer may be present at the time of the test. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.
- (c) A complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program.
- (d) Pursuant to 25 Pa. Code §139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:
 - (1) A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
 - (2) Permit number(s) and condition(s) which are the basis for the evaluation.
 - (3) Summary of results with respect to each applicable permit condition.
 - (4) Statement of compliance or non-compliance with each applicable permit condition.
- (e) Pursuant to 25 Pa. Code §139.3, all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (f) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.
- (g) All submittals shall be sent electronically to ra-epstacktesting@pa.gov, with CC: to ra-epswstacktesting@pa.gov.
- (h) The permittee shall ensure all federal reporting requirements contained in the applicable subpart of 40 CFR are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between state and the federal, the most stringent provision, term, condition, method or rule shall be used by default.

**SECTION C. Site Level Plan Approval 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.**# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

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.

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

A copy of the manufacturer's recommended maintenance schedule shall be kept on site and records of all maintenance or malfunction inspections, including corrective actions taken, shall be kept.

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

All logs and required records shall be maintained on site, or at an alternative location acceptable to the Department, for a minimum of five (5) years and shall be made available to the Department upon request.

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

The owner/operator shall maintain a log of all preventative maintenance inspections of the source. The inspection logs, at a minimum, shall contain the dates of the inspections, the name of the person performing the inspection, any mechanical repairs and/or adjustments, any potential problems or defects that were encountered, and the steps taken to correct them.

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

The following records shall be maintained:

- Galvanized steel throughput (in tons) on a 12-month rolling basis;
- Zinc usage (in tons) on a 12-month rolling basis;
- Sulfuric acid at 93% throughput on a 12-month rolling basis;
- Natural gas usage on a 12-month rolling basis.
- Acid tank recharge date and acid concentration measurements as prescribed (Records must be of sufficient detail to establish the average acid concentration);
- Daily acid temperature (in °F), when using an external heat source to heat the acid tank;
- Malfunctions in the process, and malfunctions of any air pollution abatement device or system;
- Kettle furnace temperature;
- Daily facility-wide inspections; and
- Hours of operation of hot dip zinc galvanizing operation/MZR.

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

Malfunction reporting shall be conducted as follows:

a. 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 may include, but are not limited to large dust plumes, heavy smoke, a spill or release those results in a malodor that is 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, potential harm to the environment, the permittee shall report the incident to the Department (800-541-2050) within one hour of discovery and to the County Emergency Management agency. The permittee shall also notify the Department within one hour, when

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

corrective measures have been accomplished.

All other malfunctions that must be reported under subsection (a) shall be reported to the Department no later than the next business day.

c. Initial reporting of the malfunction shall identify the following items to the extent known:

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

d. Malfunctions shall be reported to the Department by e-mail (addresses will be provided by the Department) or at the following address:

PA DEP
Office of Air Quality
400 Waterfront Drive
Pittsburgh, PA 15222-4745
412-442-4000

e. If requested by the Department, the permittee 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.**# 018 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

- a. A device approved by the Department and maintained to provide accurate opacity measurements.
- b. Observers trained and qualified to measure plume opacity with the naked eye or with the aid of devices approved by the Department.

019 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall construct, operate, and maintain all air contamination sources and air cleaning devices authorized under this Plan Approval in accordance with the manufacturer's specifications and recommended maintenance schedules.

020 [25 Pa. Code §129.14]**Open burning operations**

Open burning Operations:

- (a) This facility is in the Cambria County which is designated "air basins region", and as such, no person may permit the open burning of material in an air basin.
- (b) Outside of air basins. 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.



SECTION C. Site Level Plan Approval Requirements

- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (5) 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 such structure.
- (6) A fire set solely for recreational or ceremonial purposes.
- (7) A fire set solely for cooking food.

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

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

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

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

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

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

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

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

**SECTION C. Site Level Plan Approval Requirements****VII. ADDITIONAL REQUIREMENTS.****# 021 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall conduct a facility-wide inspection for the presence of visible stack emissions, fugitive emissions, and any potentially objectionable odors at the property line at a minimum of once each day, during daylight hours, and while the sources are operating. If any visible stack emissions, fugitive emissions, and/or potentially objectionable odors are apparent, the permittee shall take corrective action.

022 [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, and at least 60 days prior to the expiration date of the plan approval, the owner/operator shall submit a revision to the pending State Only Operating Permit application.

023 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The owner/operator shall submit requests to extend the temporary operation period at least 30 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 SOOP 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.

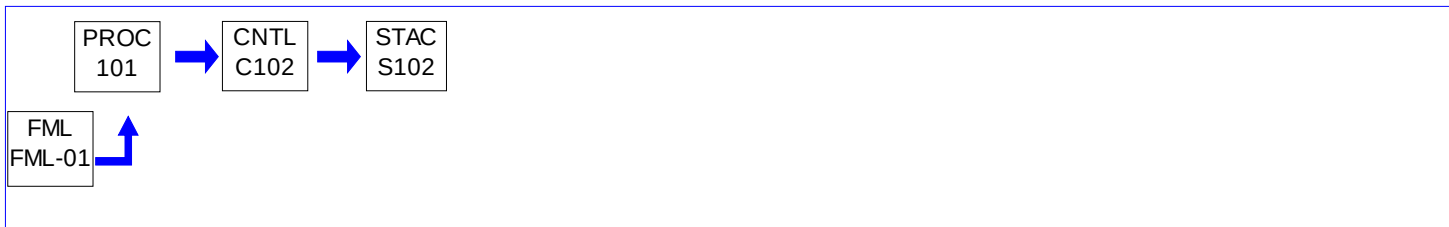
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 101

Source Name: KETTLE 1 @ 252 CUBIC FEET MOLTEN ZINC

Source Capacity/Throughput:

Conditions for this source occur in the following groups: THREE KETTLES

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

Source ID: 102

Source Name: KETTLE 2 @ 112 CUBIC FEET MOLTEN ZINC

Source Capacity/Throughput:

Conditions for this source occur in the following groups: THREE KETTLES

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

Source ID: 103

Source Name: KETTLE 3 @ 300 CUBIC FEET MOLTEN ZINC

Source Capacity/Throughput:

Conditions for this source occur in the following groups: THREE KETTLES

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

Group Name: BAGHOUSES

Group Description: Baghouse #1 and Baghouse #2

Sources included in this group

ID	Name
C102	BAGHOUSE #2 @ 30,000 ACFM AT 70F
C103	BAGHOUSE #1 @ 30,000 ACFM AT 70F

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

Visible emissions from each baghouse stack shall not equal or exceed 10% opacity at any time.

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

PM10 emissions from each baghouse shall not exceed 0.01 gr/dscf as demonstrated by stack testing and/or installation, operation, calibration, and maintenance of bag leak detection systems (BLDS) in a manner consistent with the manufacturer's written specifications and recommendations.

II. TESTING REQUIREMENTS.**# 003 [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.

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

If deemed necessary by the Department, the owner/operator shall perform stack testing on C102 and C103 manufactured by Imperial Systems, Model No. CMAXX CM-40L for PM10 emissions according to the requirements of 25 Pa Code Chapter 139.

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

If required, initial emission testing for each baghouse shall be conducted within 180 days of initial operation, or on an alternative schedule approved by the Department. This testing will be required one time only.

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

The permittee shall maintain a site-specific monitoring plan on-site beginning 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.

007 [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: [25 Pa. Code §127.12b]

- (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.

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

- (iv) Sealing off a defective fabric filter compartment.
- (v) Cleaning the bag leak detection system probe or otherwise repairing the device.

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

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.

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

The owner/operator shall monitor and record the pressure differential across each baghouse on a daily basis when operating. The pressure differential gauges shall be located in an easily accessible location.

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

The permittee shall maintain the following comprehensive and accurate records for each baghouse, Control ID C102 & C103:

- (1) Daily pressure differential across baghouse when operating
- (2) Bag replacement in baghouse
- (3) Any maintenance performed on baghouse
- (4) Copy of the manufacturer's recommended specifications and recommended maintenance schedule
- (5) Daily 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.**# 011 [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 baghouse in accordance with a site-specific monitoring plan. The permittee shall develop a site-specific monitoring plan that 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 record keeping 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.

**SECTION E. Source Group Plan Approval Restrictions.****# 012 [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 each baghouse. These quantities shall be determined by the manufacturer's recommendations, if available, and/or good operating and maintenance practices.

VII. ADDITIONAL REQUIREMENTS.**# 013 [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 or most recent version, 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.

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

Group Name: THREE KETTLES

Group Description: Source 101, 102, and 103

Sources included in this group

ID	Name
101	KETTLE 1 @ 252 CUBIC FEET MOLTEN ZINC
102	KETTLE 2 @ 112 CUBIC FEET MOLTEN ZINC
103	KETTLE 3 @ 300 CUBIC FEET MOLTEN ZINC

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

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The owner/operator may not permit the emission into the outdoor atmosphere of particulate matter from the natural gasfired burners in a manner that the concentration in the effluent gas exceeds 0.04 gr/dscf.

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.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The owner/operator shall tune up each Kettle Furnace as follows:

- (i) Perform annual visual inspection for air to fuel ratio, pressure regulator, valve, and burner.
- (ii) Temperature of fire box and flue shall be monitored continuously; and
- (iii) The furnace shall be continuously monitored by remote telemetry.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The owner/operator shall adopt the following work practices:

- When the flux tank is upstream of the galvanizing kettle, there shall be no pre-flux materials placed in the galvanizing kettle. All fluxing shall be performed in a separate vessel.
- During non-operational periods, either a fume suppressant shall be used in the acid tanks, or the acid tanks shall be covered to reduce evaporative losses.

**SECTION E. Source Group Plan Approval Restrictions.****VII. ADDITIONAL REQUIREMENTS.**

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

**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.**

Miscellaneous Sources:

1. One (1) Cummins emergency diesel engine rated at 26.9 kW (36 bhp) equipped with an hour meter.
2. Three (3) Shot Blasters controlled by a Camfil baghouse rated at 4,000 SCFM and exhausts indoors.



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