



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: December 31, 2001

Effective Date: February 1, 2002

Expiration Date: January 31, 2007

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

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

TITLE V Permit No: 23-00002

Federal Tax Id - Plant Code: 23-2960407-1

Owner Information

Name: STONEY CREEK TECHNOLOGIES LLC

Mailing Address: 3300 W 4TH ST
TRAINER, PA 19061-5112

Plant Information

Plant: STONEY CREEK TECH / TRAINER

Location: 23 Delaware County 23949 Trainer Borough

SIC Code: 2843 Manufacturing - Surface Active Agents

Responsible Official

Name: SAMUEL C THOMAS

Title: PLANT MANAGER

Phone: (215) 494 - 3561

Permit Contact Person

Name: RAY BROWN

Title: SAFETY, HEALTH AND ENVIRON

Phone: (610) 859 - 3504

[Signature] _____

FRANCINE B CARLINI, SOUTHEAST REGION AIR PROGRAM MANAGER



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SECTION A. Site Inventory List

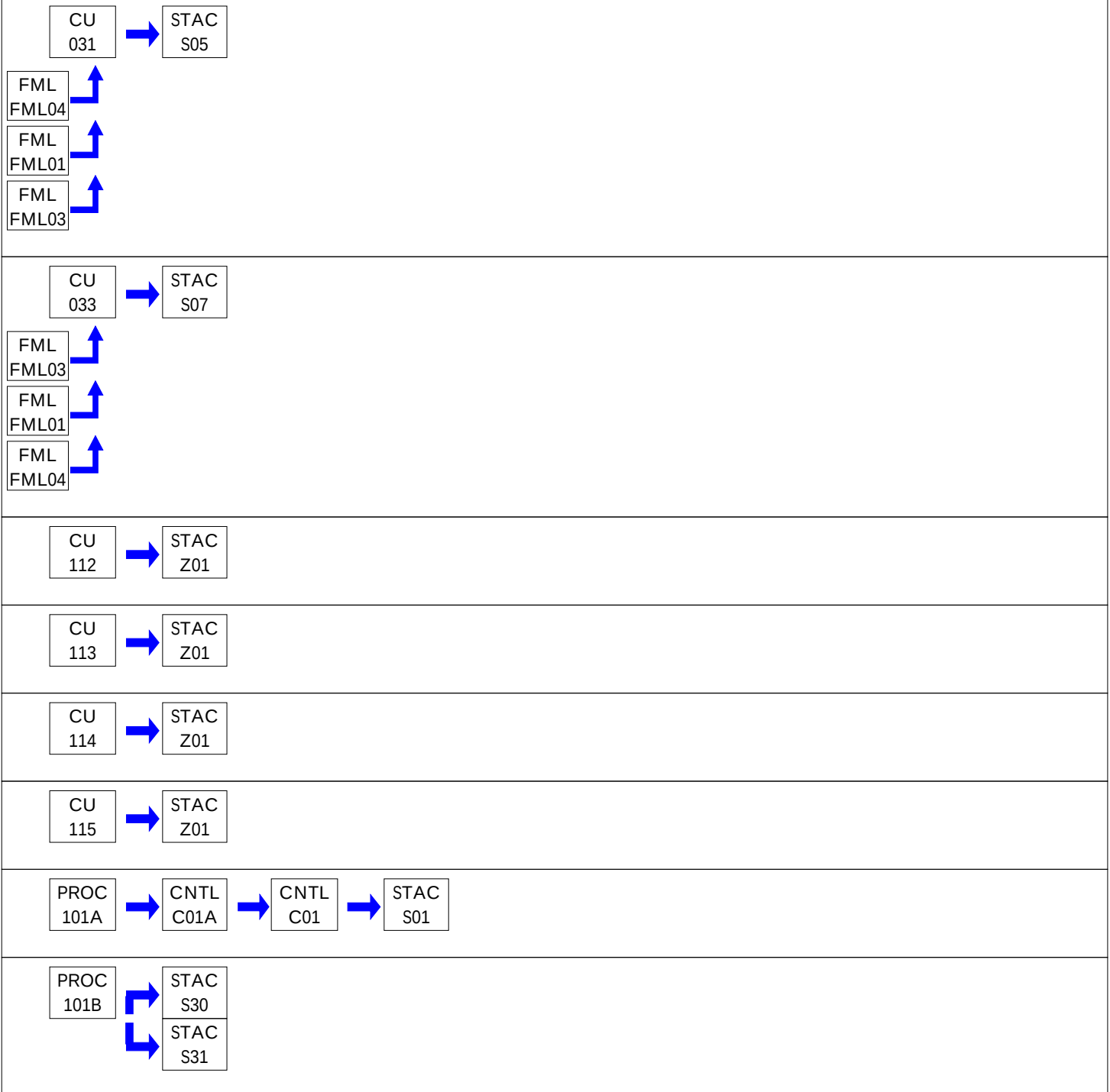
Source ID	Source Name	Capacity/Throughput		Fuel/Material
031	ERIE CITY BOILER 1 (CU001)	76.500	MMBTU / HR	
		N / A		#2 Oil
		79.800	MCF / HR	Natural Gas
		N / A		#4 Oil
033	ERIE CITY BOILER 2 (CU002)	94.000	MMBTU / HR	
		N / A		#2 FUEL OIL
		N / A		#4 FUEL OIL
		94.100	MCF / HR	NAT'L GAS
112	DIESEL FIRE PUMP 1	0.001	Th Gal / HR	
113	DIESEL FIRE PUMP 2	N / A		
114	DIESEL WASTEWATER PUMP	0.001	Th Gal / HR	
115	GASOLINE WASTEWATER PUMP	0.001	Th Gal / HR	Gasoline
101A	SULFONATION / SULFONIC MANUFACTURING (ACID RXN)	13,327.700	Lbs / HR	SOLVENTS
101B	TWO OLEUM ST TANKS T-105 & T106	1.500	Tons / HR	OLEUM
105	SACI PROD. W/ SACI SOLVENT RECOVERY SYSTEM	0.100	H Tons / HR	MINERAL SPIRITS
107	FUGITIVE EMISSIONS	10.500	Lbs / HR	SOLVENTS
109	WASTE WATER TREATMENT PLANT	0.100	Tons / HR	SOLVENTS
116	TWO PARTS WASHERS			
201	CONTROLLED STORAGE TANKS			
202	SOLIDS STORAGE SILO (T-490)			
203	SOLIDS SCALE (T-491)			
204	SOLIDS STORAGE SILO (T-623)			
205	SOLIDS STORAGE SILO (T-624)			
206	REACTOR (T-600)			
207	REACTOR (T-407)			
208	REACTOR (T-435)			
C01	SOLVENT RECOVERY UNIT (CD001)			
C01A	KOH SCRUBBER (CD002)			
C02	PLANT FLARE (CD003)			
C06	T-435 BAGHOUSE			
C09	T-623 & T-624 BAGHOUSE (SH003 & SH004)			
C10	FRACTIONATION COLUMN (LIMOH TOWER)P067			
C11	T-490 & T-491 BAGHOUSE (SH001 & SH002)			
C12	BAGHOUSE SH001 SH002 SH003 SH004			
FML01	TANK 210 - STORING EITHER #2 OR #4 FUEL OIL			
FML03	TANK 209 - STORING EITHER #2 OR #4 FUEL OIL			
FML04	NATURAL GAS LINE			
S01	SOLVENT RECOVERY UNIT			
S02	FUGITIVE EMISSION STACK			
S05	BOILER 031			



SECTION A. Site Inventory List

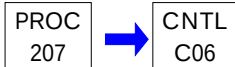
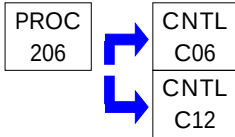
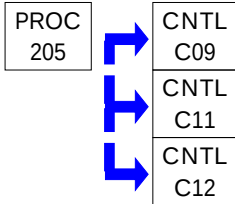
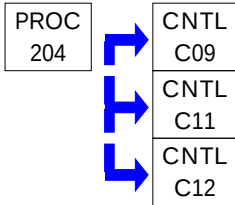
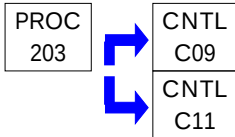
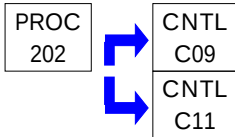
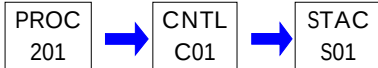
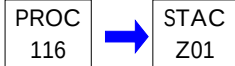
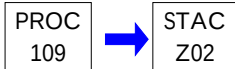
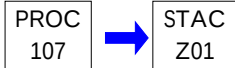
Source ID	Source Name	Capacity/Throughput	Fuel/Material
S07	BOILER 033		
S30	OLEUM TANK TRUCK UNLOADING STACK		
S31	SPENT OLEUM TANK TRUCK LOADING		
Z01	FUGITIVE EMISSIONS		
Z02	SACI PROD STACK		

PERMIT MAPS





PERMIT MAPS





PERMIT MAPS

PROC
208



CNTL
C06

**SECTION B. General Title V Requirements**

#001 [25 Pa. Code § 121.1]

Definitions

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

#002 [25 Pa. Code § 127.512(c)(4)]

Property Rights

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

#003 [25 Pa. Code § 127.446(a) and (c)]

Permit Expiration

This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#004 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]

Permit Renewal

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.

(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#005 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]

Transfer of Ownership or Operational Control

(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:

(1) The Department determines that no other change in the permit is necessary;

(2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,

SECTION B. General Title V Requirements

(3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#006 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

Inspection and Entry

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

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

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

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

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

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

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

#007 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

Compliance Requirements

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

(1) Enforcement action

(2) Permit termination, revocation and reissuance or modification

(3) Denial of a permit renewal application

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

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

**SECTION B. General Title V Requirements**

#008 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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

#009 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

Duty to Provide Information

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#010 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#011 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

**SECTION B. General Title V Requirements**

#012 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541.

#013 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

- (a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (b) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to an operational flexibility change authorized by 25 Pa. Code § 127.462.

#014 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

- (a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations thereunder from being processed as an administrative amendment.
- (b) Upon taking final action granting a request for an administrative permit amendment in accordance with § 127.450(c), the Department will allow coverage under 25 Pa. Code § 127.516 (relating to permit shield) for administrative permit amendments which meet the relevant requirements of 25 Pa. Code Article III, unless precluded by the Clean Air Act or the regulations thereunder.

#015 [25 Pa. Code § 127.512(b)]

Severability Clause

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

#016 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

SECTION B. General Title V Requirements

(e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.

(f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

#017 [25 Pa. Code §§ 127.14(b) & 127.449]

Authorization for De Minimis Emission Increases

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

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

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

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

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

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

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

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

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

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

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

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

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less

SECTION B. General Title V Requirements

than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

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

(d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#018 [25 Pa. Code §§ 127.11a & 127.215]

Reactivation of Sources

(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

SECTION B. General Title V Requirements

#019 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

(a) The owner of this Title V facility, 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 permit, 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.

#020 [25 Pa. Code §§ 127.402(d) & 127.513(1)]

Submissions

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

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

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Air Enforcement Branch (3AP12)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#021 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

Sampling, Testing and Monitoring Procedures

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#022 [25 Pa. Code §§ 127.511 & Chapter 135]

Recordkeeping Requirements

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

SECTION B. General Title V Requirements

(1) The date, place (as defined in the permit) and time of sampling or measurements.

(2) The dates the analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of the analyses.

(6) The operating conditions as existing at the time of sampling or measurement.

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

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#023 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #020(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#024 [25 Pa. Code § 127.513]

Compliance Certification

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This

SECTION B. General Title V Requirements

certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance or, of the submittal date specified elsewhere in the permit, to the Department and EPA in accordance with the submission requirements specified in condition #020 of this section.

#025 [25 Pa. Code § 127.3]

Operational Flexibility

(a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

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

(b) Unless precluded by the Clean Air Act or the regulations adopted thereunder, the permit shall authorized under 25 Pa. Code § 127.516 shall extend to operational flexibility changes made at this Title V facility pursuant to this permit condition and other applicable operational flexibility terms and conditions of this permit.

#026 [25 Pa. Code §§ 127.441(d), 127.512(i) and 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 Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:

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

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,

SECTION B. General Title V Requirements

(ii) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

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

(d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

(1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,

(2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

(e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

(1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #24 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#027 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#028 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

Permit Shield

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.



SECTION B. General Title V Requirements

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department on minor or significant permit modifications, and operational flexibility changes shall be covered by the permit shield. Upon taking final action granting a request for an administrative permit amendment, the Department will allow coverage of the amendment by the permit shield in § 127.516 for administrative amendments which meet the relevant requirements of 25 Pa. Code Article III.

(d) The permit shield authorized under § 127.516 is in effect for the permit terms and conditions in this Title V permit, including administrative operating permit amendments and minor operating permit modifications.



SECTION C. Site Level 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 Air Pollution Control Act (35 P.S. Section 4003).
002 [25 Pa. Code §123.1] Prohibition of certain fugitive emissions No person may permit the emission into the outdoor atmosphere of a fugitive air contaminant from a source other than the following: (a) Construction or demolition of buildings or structures. (b) Grading, paving, and maintenance of roads and streets. (c) 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. (d) Clearing of land. (e) Stockpiling of materials. (f) Sources, and classes of sources, other than those identified in (a) - (e) above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1(b), that fugitive emissions from the source, after appropriate controls, meet the following requirements: (1) The emissions are of minor significance with respect to causing air pollution; and (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.
003 [25 Pa. Code §123.11] Combustion units The limitations of Condition #005, of this Section, shall not apply to a visible emission in either of the following instances: (a) When the presence of uncombined water is the only reason for failure to meet the limitations. (b) When the emission results from the sources specified in Condition #002, of this Section.
004 [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 Condition #002, of this Section, if such emissions are visible at the point the emissions pass outside the person's property.
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 Permittee may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour. (2) Equal to or greater than 60% at any time.
007 [25 Pa. Code §129.14] Open burning operations No person may permit the open burning of material in the Southeast Air Basin, except when the open burning results from: (a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer. (b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department. (c) A fire set solely for cooking food.



SECTION C. Site Level Requirements

- (d) A fire set solely for recreational or ceremonial purposes.
- (e) A fire set for the prevention and control of disease or pests, when approved by the Department.

II. TESTING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

(a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A, of this Permit, may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in

25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.

009 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

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

- (1) Odors, which the Department may determine to be objectionable.
- (2) Visible Emissions.
- (3) Fugitive Particulate Matter.

(b) All detectable fugitive particulate emissions, and/or objectionable odors, that originated on-site and cross the property line as well as visible emissions that originate on site shall:

- (1) Be investigated.
- (2) Be reported to the facility management, or individual(s) designated by the permittee.
- (3) Be recorded in a permanent written log.

(c) At the end of six months, upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next six month period.

(d) At the end of the second six month period, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

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

SECTION C. Site Level Requirements

IV. RECORDKEEPING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) Records of the monitoring and supporting data required by this Operating Permit shall be retained for a minimum of five (5) years.
- (b) Within thirty (30) days after permit issuance, the permittee shall submit, to the Department for approval, the proposed recordkeeping formats required in subparagraph (a), above.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]

The permittee shall maintain a record of all reports of fugitive emissions, visible emissions and malodors which deviate from the terms and conditions of this permit. The report shall contain, at a minimum, the following items:

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

V. REPORTING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c).]

The report of the monitoring required by Condition #023(b), of Section B, of this permit, shall be submitted to the Department, within six (6) months after final permit issuance, and, at a frequency of at least every six (6) months thereafter.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]

(a) The permittee shall, within two (2) hours of any occurrence, notify the Department, at (610) 832-6241, of any malfunction of the source(s) or associated air pollution control devices listed in Section A, of this permit, which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit, or regulation contained in 25 Pa. Code Article III.

(b) Malfunction(s) which occur at this Title V facility, and pose(s) an imminent danger to public health, safety, welfare and the environment, and would violate permit conditions if the source were to continue to operate after the malfunction, shall immediately be reported to the Department by telephone at the above number.

(c) A written report shall be submitted to the Department within two (2) working days following the notification of the incident, and shall describe, at a minimum, the following:

- (1) The malfunction(s).
- (2) The emission(s).
- (3) The duration.
- (4) Any corrective action taken.

015 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The report of the monitoring required by Condition #023(a)(1), of Section B, of this permit, shall be submitted to the Department, within six (6) months after final permit issuance, and, at a frequency of at least every six (6) months thereafter.

016 [25 Pa. Code §135.21]

Emission statements

The permittee shall submit by March 1, of each year, an annual emission statement for the preceding calendar year.

**SECTION C. Site Level Requirements**

017 [25 Pa. Code §135.3]

Reporting

The permittee shall submit by March 1, of each year, an Air Information Management System (AIMS) inventory report for the preceding calendar year.

VI. WORK PRACTICE REQUIREMENTS.

018 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in Condition #002, of this Section, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

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

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee may not modify any source identified in Section A, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition #017(g), of Section B, of this permit.

(b) If an unauthorized modification of any source occurs at this facility, the permittee shall immediately notify the Department. If so directed by the Department, then this permit, as it pertains to the modified source(s), shall be suspended and the source(s) shall not be operated until the modification is authorized by the department.

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91]

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

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]

The permittee shall ensure that the sources and air pollution control devices, listed in Section A&H, of this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturers specifications.

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit within thirty days of 10/01/2002 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and annually thereafter.

IX. COMPLIANCE SCHEDULE.

**SECTION C. Site Level Requirements**

#022 01-OCT-01

This permit is subject to a compliance schedule for the Solvent Recovery Unit.

#023 01-DEC-01

The permittee shall perform stack test(s) to demonstrate compliance.

***** Permit Shield In Effect *****

**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: ERIE CITY BOILER 1 (CU001)

Source Capacity / Throughput:

76.500 MMBTU / HR

N / A

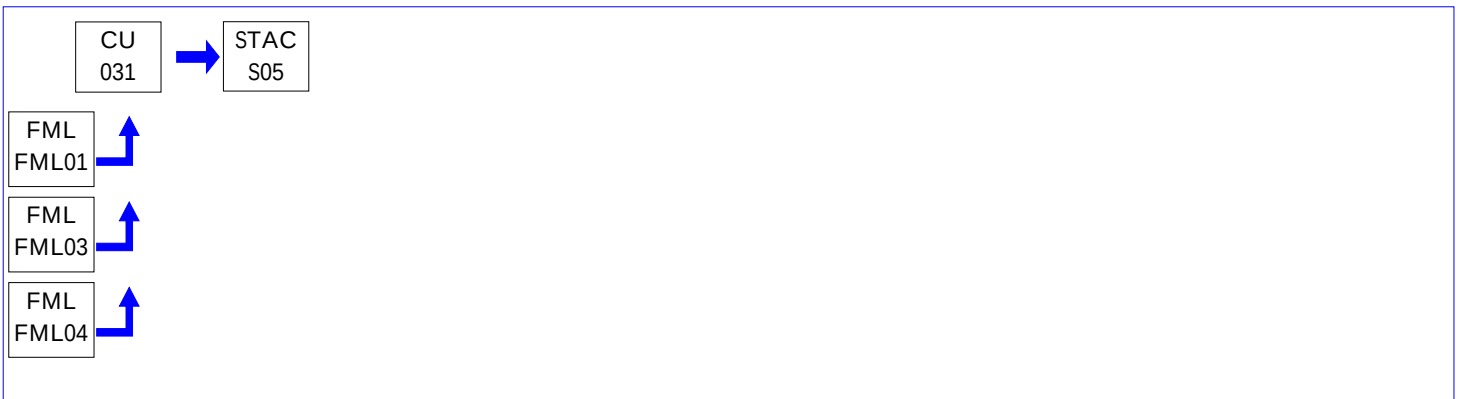
#2 Oil

79.800 MCF / HR

Natural Gas

N / A

#4 Oil

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

001 [25 Pa. Code §123.11]

Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pounds per million Btu of heat input.

002 [25 Pa. Code §123.22]

Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from any combustion unit in excess of 1.0 pounds per million Btu of heat input.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following air contaminant emission limits, on a twenty-four (24) hour basis, are approved for this boiler, however, the Department reserves the right to establish and impose more stringent limitations based on test results from stack testing,

(a) Oxides of nitrogen (NO_x): 0.14 lb / MMBtu when firing Natural Gas and 56 Tons per Year on a 12 month rolling basis.

(b) Oxides of Nitrogen (NO_x): 0.13lb / MMBtu when firing No.4 fuel oil and 56 Tons per Year on a 12 month rolling basis.

(c) Oxides of Nitrogen (NO_x): 0.13lb / MMBtu when firing No.2 fuel oil and 56 tons per year on a 12 month rolling basis.

Fuel Restriction(s).

004 [25 Pa. Code §123.22]

Combustion units

No person may, at any time, offer for sale, deliver for use, exchange in trade or permit the use of commercial fuel oil for use in combustion units in the Southeast Pennsylvania air basin which contains sulfur in excess of 0.2% by weight for No.2 fuel oil or 0.5% for No.4 fuel oil.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use only natural gas as fuel for this boiler unless there is an interruption in supply, then #2 fuel oil or #4 fuel oil can be used.



SECTION D. Source Level Requirements

II. TESTING REQUIREMENTS.

006 [25 Pa. Code §139.16]

Sulfur in fuel oil.

(a) The following are applicable to tests for the analysis of commercial fuel oil:

(1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).

(3) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

(b) The testing requirements in subpart (a), above, shall be waived in the event that a delivery receipt from the supplier, showing the percent sulfur in the fuel, is obtained each time a fuel oil delivery is made.

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters on a daily basis:

- (a) The hours of operation.
- (b) The amount of fuel consumed.
- (c) The type of fuel consumed.
- (d) Duration of any Natural Gas curtailments
- (e) Amount and type of fuel used during natural gas curtailments

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain records of the following operating parameters on a daily basis:

- (1) The hours of operation.
- (2) The amount of fuel consumed.
- (3) The type of fuel consumed.

(b) The permittee shall maintain certificates of analysis of each shipment of #2 and #4 oil. Each certificate shall contain the Nitrogen content, Sulfur content, the sampling method, and sampling protocol used.

(c) The permittee shall maintain records of natural gas curtailments-number of hours of curtailment,type of alternate fuel used,and amount of fuel consumed.

V. REPORTING REQUIREMENTS.

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



SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall perform an annual boiler tune-up in accordance with the following conditions.

- (a) Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
- (b) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO_x, and to the extent practicable, minimize the emissions of CO.
- (c) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.
- (d) Each adjustment conducted under the procedures in Condition 10A shall be recorded in a permanently bound log book.
 - (1) The date of the tuning procedure;
 - (2) The name of the service company and technicians;
 - (3) The final operating rate or load;
 - (4) The final CO and NO_x emission rates;
 - (5) The final excess oxygen rate;
- (e) The annual adjustment shall be made in accordance with the EPA document "Combustion Efficiency Optimization Manual for Operators of Oil and Gas-fired Boilers", September 1983 (EPA-340/1-83-023) or equivalent procedures approved in writing by the Department.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 033

Source Name: ERIE CITY BOILER 2 (CU002)

Source Capacity/Throughput:

94.000 MMBTU/HR

N/A

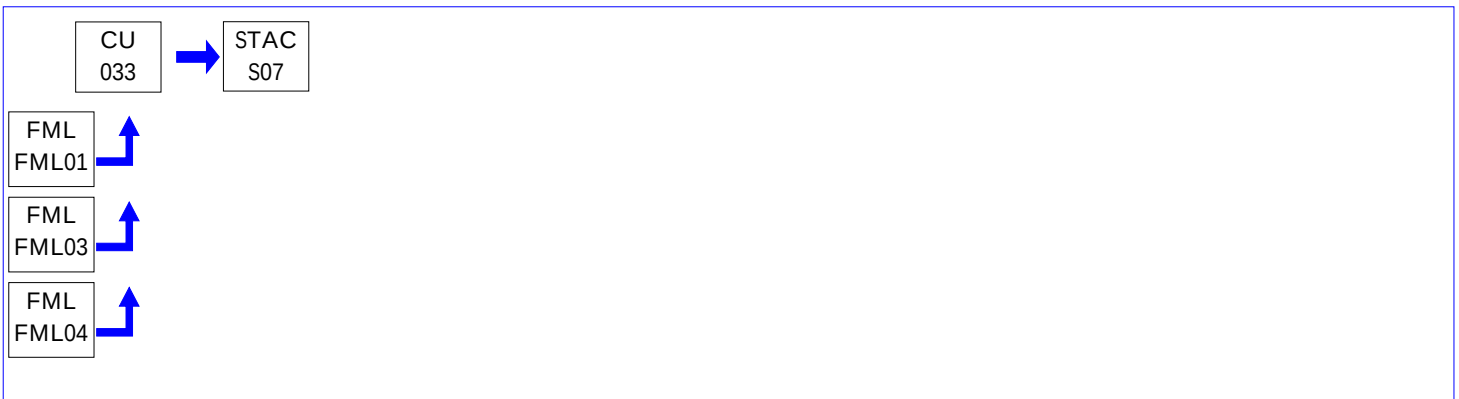
#2 FUEL OIL

N/A

#4 FUEL OIL

94.100 MCF/HR

NAT'L GAS

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

001 [25 Pa. Code §123.11]

Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pounds per million Btu of heat input.

002 [25 Pa. Code §123.22]

Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from any combustion unit in excess of 1.0 pounds per million Btu of heat input.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following air contaminant emission limits, on a twenty-four (24) hour basis, are approved for this boiler, however, the Department reserves the right to establish and impose more stringent limitations based on test results from stack testing,

- (a) Oxides of nitrogen (NO_x): 0.14 lb/MMBtu when firing Natural Gas and 56 Tons per Year on a 12 month rolling basis.
- (b) Oxides of Nitrogen (NO_x): 0.13lb/MMBtu when firing No.4 fuel oil and 56 Tons per Year on a 12 month rolling basis.

- (c) Oxides of Nitrogen (NO_x): 0.13lb/MMBtu when firing No.2 fuel oil and 56 tons per year on a 12 month rolling basis.

Fuel Restriction(s).

004 [25 Pa. Code §123.22]

Combustion units

No person may, at any time, offer for sale, deliver for use, exchange in trade or permit the use of commercial fuel oil for use in combustion units in the Southeast Pennsylvania air basin which contains sulfur in excess of 0.2% by weight for No.2 fuel oil or 0.5% for No.4 fuel oil.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use only natural gas as fuel for this boiler unless there is an interruption in supply, then #2 fuel oil or #4 fuel oil can be used.

SECTION D. Source Level Requirements

II. TESTING REQUIREMENTS.

006 [25 Pa. Code §139.16]

Sulfur in fuel oil.

The following are applicable to tests for the analysis of commercial fuel oil:

(a) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa.Code §139.4(10) (relating to references).

(b) Test methods and procedures for the determination of viscosity shall be that specified in 25 Pa. Code §139.4(11) (relating to references). The viscosity shall be determined at 100 F.

(c) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa.Code §139.4(12)--(15).

(d) Results shall be reported in accordance with the units specified in 25 Pa.Code §123.22 (relating to combustion units).

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters on a daily basis:

(a) The hours of operation.

(b) The amount of fuel consumed.

(c) The type of fuel consumed.

(d) Duration of any Natural Gas curtailments

(e) Amount and type of fuel used during natural gas curtailments

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain records of the following operating parameters on a daily basis:

(1) The hours of operation.

(2) The amount of fuel consumed.

(3) The type of fuel consumed.

(b) The permittee shall maintain certificates of analysis of each shipment of #2 and #4 oil. Each certificate shall contain the Nitrogen content, Sulfur content, the sampling method, and sampling protocol used.

(c) The permittee shall maintain records of natural gas curtailments-number of hours of curtailment, type of alternate fuel used, and amount of fuel consumed.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall perform an annual boiler tune-up in accordance with the following conditions.

(a) Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.

(b) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO_x, and to the extent practicable, minimize the emissions of CO.

(c) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

(d) Each adjustment conducted under the procedures in Condition 10A shall be recorded in a permanently bound log book.



SECTION D. Source Level Requirements

- (1) the date of the tuning procedure
- (2) the name of the service company and technicians
- (3) the final operating rate or load
- (4) the final CO and NOx emission rates
- (5) the final excess oxygen rate

(e) The annual adjustment shall be made in accordance with the EPA document "Combustion Efficiency Optimization Manual for Operators of Oil and Gas-fired Boilers", September 1983 (EPA-340/1-83-023) or equivalent procedures approved in writing by the Department.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

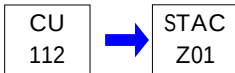
**SECTION D. Source Level Requirements**

Source ID: 112

Source Name: DIESEL FIRE PUMP 1

Source Capacity / Throughput:

0.001 Th Gal / HR

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a pump motor 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.

Operation Hours Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate the source more than 500 hours in any 12 consecutive month period.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall only use Diesel fuel for this source.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters on a daily basis when the source is operated:

- (a) The hours of operation.
- (b) The amount of fuel consumed.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall keep appropriate records to demonstrate that the source is being maintained and operated in accordance with manufacturer's specifications. A copy of the installation, maintenance, and operating instructions shall be kept.
- (b) The permittee shall keep a bound log book for the two firewater pumps and the two waste water pumps. They shall contain, at a minimum, the following information:



SECTION D. Source Level Requirements

- (1) The amount of time each source operates each month.
- (2) The amount of time each source has operated in the 12 month rolling period.
- (3) The date, reason, and duration of the operation of the pumps.
- (4) The calculated amount of fuel usage based on hours of operation and manufactures specifications or inventory records.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters on a daily basis when the source is operated:

- (a) The hours of operation.
- (b) The amount of fuel consumed.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The source shall be maintained and operated in accordance with manufacturer's specifications.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

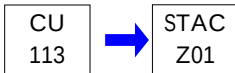
**SECTION D. Source Level Requirements**

Source ID: 113

Source Name: DIESEL FIRE PUMP 2

Source Capacity / Throughput:

N / A

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a pump motor 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.

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate the source more than 500 hours in any 12 consecutive month period.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall only use Diesel fuel for this source.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters on a daily basis when the source is operated:

- (a) The hours of operation.
- (b) The amount of fuel consumed.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters on a daily basis when the source is operated:

- (a) The hours of operation.
- (b) The amount of fuel consumed.



SECTION D. Source Level Requirements

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall keep appropriate records to demonstrate that the source is being maintained and operated in accordance with manufacturer's specifications. A copy of the installation, maintenance, and operating instructions shall be kept.
- (b) The permittee shall keep a bound log book for the two firewater pumps and the two waste water pumps. They shall contain, at a minimum, the following information:
- (1) The amount of time each source operates each month.
 - (2) The amount of time each source has operated in the 12 month rolling period.
 - (3) The date, reason, and duration of the operation of the pumps.
 - (4) The calculated amount of fuel usage based on hours of operation and manufactures specifications or inventory records.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The source shall be maintained and operated in accordance with manufacturer's specifications.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

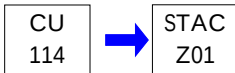
**SECTION D. Source Level Requirements**

Source ID: 114

Source Name: DIESEL WASTEWATER PUMP

Source Capacity / Throughput:

0.001 Th Gal / HR

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a pump motor 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.

Operation Hours Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate the source more than 500 hours in any 12 consecutive month period.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall only use Diesel fuel for this source.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters on a daily basis when the source is operated:

- (a) The hours of operation.
- (b) The amount of fuel consumed.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall keep appropriate records to demonstrate that the source is being maintained and operated in accordance with manufacturer's specifications. A copy of the installation, maintenance, and operating instructions shall be kept.
- (b) The permittee shall keep a bound log book for the two firewater pumps and the two waste water pumps. They shall contain, at a minimum, the following information:



SECTION D. Source Level Requirements

- (1) The amount of time each source operates each month.
- (2) The amount of time each source has operated in the 12 month rolling period.
- (3) The date, reason, and duration of the operation of the pumps.
- (4) The calculated amount of fuel usage based on hours of operation and manufactures specifications or inventory records.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters on a daily basis when the source is operated:

- (a) The hours of operation.
- (b) The amount of fuel consumed.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The source shall be maintained and operated in accordance with manufacturer's specifications.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

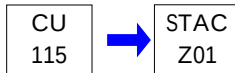
Source ID: 115

Source Name: GASOLINE WASTEWATER PUMP

Source Capacity / Throughput:

0.001 Th Gal / HR

Gasoline

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a pump motor 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.

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate the source more than 500 hours in any 12 consecutive month period.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall only use Gasoline for this source.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters on a daily basis when the source is operated:

- (a) The hours of operation.
- (b) The amount of fuel consumed.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall keep appropriate records to demonstrate that the source is being maintained and operated in accordance with manufacturer's specifications. A copy of the installation, maintenance, and operating instructions shall be kept.
- (b) The permittee shall keep a bound log book for the two firewater pumps and the two waste water pumps. They shall contain, at a minimum, the following information:



SECTION D. Source Level Requirements

- (1) The amount of time each source operates each month.
- (2) The amount of time each source has operated in the 12 month rolling period.
- (3) The date, reason, and duration of the operation of the pumps.
- (4) The calculated amount of fuel usage based on hours of operation and manufactures specifications or inventory records.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters on a daily basis when the source is operated:

- (a) The hours of operation.
- (b) The amount of fuel consumed.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The source shall be maintained and operated in accordance with manufacturer's specifications.

VII. ADDITIONAL REQUIREMENTS.

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

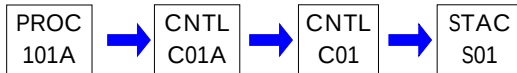
*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 101A

Source Name: SULFONATION / SULFONIC MANUFACTURING (ACID RXN)

Source Capacity / Throughput: 13,327.700 Lbs / HR SOLVENTS

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

001 [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.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 129.91-95]

The VOC emissions for the KOH Scrubber shall not exceed 56 Tons per Year on a 12 month rolling basis

Throughput Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 129.91-95]

For the KOH Scrubber, the Permittee shall maintain KOH solution at 25% concentration and 10 gallons per minute flow rate.

Control Device Efficiencies Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 129.91-95]

Volatile organic compound emissions shall not exceed 107 tons of potential volatile organic compound emissions in any 12 consecutive month period on a rolling basis.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Process emissions containing Sulfur Oxide emissions and volatile organic compound emissions shall be 100 percent vented, first to Control Device C01A to remove 99.7% of the Sulfur Oxide emissions and then to Control Device C01 to remove 90% of the volatile organic emissions.

Control Device C01, REFRIGERATED CONDENSERS(2)SRU(CD001), may not have an efficiency less than 90.0000% for Volatile Organic Compounds.

Control Device C01A, KOH SCRUBBER (CD002) shall have an efficiency not less than 99.7000% for Sulfur Oxides.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

The reduction of potential VOC emissions by the refrigerated condensers shall be a minimum of 90%.

SECTION D. Source Level Requirements

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Permittee shall monitor and keep records of the outlet temperature of each condenser to ensure a 90% reduction in VOC emissions by maintaining the temperature below 20 degrees Fahrenheit for the neutral waste stream and 40 degrees Fahrenheit for the acid waste stream.

II. TESTING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall perform stack test for (boiler, incinerator, etc.), using the Department Approved procedures for stack testing, twelve (12) month prior to this permit expiration. The stack test shall, at a minimum, test for the PM, SO_x, NO_x, CO, etc.

(b) At least sixty (60) days prior to the test, the company shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

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

(d) Within thirty (30) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 129.91-95]

For the KOH Scrubber, the Permittee shall test for KOH concentration as often as necessary to maintain its concentration at 25%.

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The Permittee shall monitor on a daily basis the pounds of finished product produced and estimate the volatile organic compound emissions after the control device. The estimates shall be based on formula and previous experience with inventory discrepancies and control device efficiency.

(b) The permittee shall monitor purchasing records and material throughput on a weekly basis and calculate actual emissions.

(c) The permittee shall monitor control device C01A hourly for:

- (1) KOH solution flow rate
- (2) KOH solution PH
- (3) Air flow through column

(d) The permittee shall monitor control device C01 hourly for:

- (1) Outlet temperature of recovered solvent
- (2) Inlet and outlet temperature of refrigerant
- (3) Pressure drop across condenser

(e) The permittee may, after six months of compliance, request from the Department a reduction in frequency.

**SECTION D. Source Level Requirements**

011 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 129.91-95]

For the KOH Scrubber, the Permittee shall monitor KOH solution concentration and flowrate at least on an hourly basis to maintain 99.55% efficiency in removing sulfur oxides.

012 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

The permittee shall keep hourly records of condenser outlet temperatures.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(a) The permittee shall record on a hourly basis:

(1) For Control Device C01A

(i) KOH solution flow rate

(ii) KOH solution PH

(iii) Air flow through column

(2) For control device C01

(i) Outlet temperature of recovered solvent

(ii) Inlet and outlet temperature of refrigerant

(iii) Pressure drop across condenser

(b) The permittee shall record on a daily basis:

(i) Pounds throughput

(ii) Estimated emissions from Control Device C01

(c) The permittee shall record on a weekly basis the actual throughput and emissions.

014 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 129.91-95]

For the KOH Scrubber, the Permittee shall maintain hourly (or more frequent if necessary) records of flow rate and KOH concentration.

015 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

The permittee shall maintain at least hourly records of the outlet temperature of both the acidic waste condenser and the neutral waste condenser.

**SECTION D. Source Level Requirements****V. REPORTING REQUIREMENTS.**

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

VI. WORK PRACTICE REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 129.72]

(1) The permittee shall exhaust the emissions thru an emissions reduction system which is designed and operated to recover 90% by weight of the VOC emissions exhausted.

(2) In the case where the surface active agent manufacturing process produces Sulfur Oxides and or Sulfur oxides emissions. The emissions shall be passed through a control device that removes 99.9 percent of all the sulfur compounds before going to the VOC emission control device.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

(a) The Voc emissions and acid waste streams from the following sources shall be directed to the Refrigerated Condenser Solvent Recovery System prior to discharge to the atmosphere.

- (1) Source 201 Controlled Solvent Storage Tanks
- (2) Control Device CO1A KOH Scrubber
- (3) Control Device C10 Limoh Tower
- (4) Source 101A Sulfonic acid and Sulfonate manufacture.

VII. ADDITIONAL REQUIREMENTS.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following process vessels and storage tanks are part of source 101A. All vessels and tanks are fixed roof and 100% vented to control device C01A and /or C01.

Heptane Sulfonic Acid Manufacture

P050 T-105 P051 T-106 P052 D-101 P053 D-102 P054 D-103 P055 D-104 P056 T-127 P057 T-128 P058 T-129 P060 T-426 P061 T-427 P062 T-428 P063 T-446 P064 T-401 ST003T-120 St027 T-431A ST028 T-432 ST030 T-434 ST039 T-613 St029 T-433

St032 T-448 P013 T-191 P014 T-192 P015 T-193 ST073 T-177 ST039 T-613

ST036 T-610 P079 T-438

Sulfonate Manufacture

St049 T-673 ST063 T-534 ST071 T-536 P018 T-531 P019 T-532 P020 T-533 P022 T-600 P023 T-670 P024 T-672 P026 T-671

P027 T-674 P030 SHARPLES #3 & #4 P033 T-802 P037 T-407
P039 T-409 P040 SHARPLES #1 & #2 P041 T-435 P042 T-511
P043 T-512 P044 SB-60 #1 #2 #3 P045 T-640 P046 T-641
P047 T-663 P048 T-680 P049 T-681

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 PA. Code § 129.92]



SECTION D. Source Level Requirements

The (SRU) Solvent Recovery system consists of two (2) refrigerated condensers one for neutral waste streams and one for acidic waste streams. The Permittee shall monitor and keep records of the outlet temperature of each condenser to ensure a 90% reduction in VOC emissions by maintaining the temperature below 20 degrees Fahrenheit for the neutral waste stream and 40 degrees Fahrenheit for the acid waste stream.

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

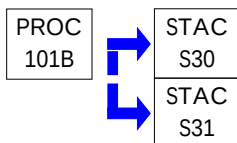
Source ID: 101B

Source Name: TWO OLEUM ST TANKS T-105 & T106

Source Capacity / Throughput:

1.500 Tons/ HR

OLEUM

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

001 [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.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §123.21]

General

- (a) The Permittee shall monitor the gallons of Oleum received and the gallons of spent Oleum shipped on a weekly basis.
- (b) The Permittee shall calculate the pounds of sulfur compounds emitted to the atmosphere on a weekly basis.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §123.21]

General

The Permittee shall maintain records, in a bound notebook, of gallons of Oleum received, gallons of spent Oleum shipped, and pounds of sulfur compound emissions, on a weekly basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Oleum storage and handling system.

- (a) Oleum tank truck off loading to storage tanks T-105 and T-106 which are vented to S30.
- (b) Spent Oleum loaded to tank trucks which are vented to S31



SECTION D. Source Level Requirements

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

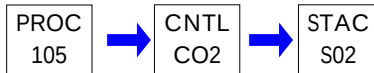
Source ID: 105

Source Name: SACI PROD. W/ SACI SOLVENT RECOVERY SYSTEM

Source Capacity / Throughput:

0.100 H Tons / HR

MINERAL SPIRITS

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

001 [25 Pa. Code §123.21]

General

(a) This section applies to sources except those subject to other provisions of this article, with respect to the control of sulfur compound emissions.

(b) 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.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 129.91-95]

Volatile organic compound emissions shall not exceed 14 tons of volatile organic compound emissions in any 12 consecutive month period on a rolling basis.

003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.18]

Subpart A - General Provisions**General control device requirements.**

(a) Flares shall be designed for and operated with no visible emissions as determined by the method 22 except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

(b) Flares shall be operated with a flame present at all times.

(c) Flares shall be used only with the net heating value of the gas being combusted being 11.2 MJ/scm (300 Btu/scf) or greater.

(d) Nonassisted flares designed for and operated with an exit velocity equal to or greater than 18.3 m/sec (60 ft/sec) but less than 122 m/sec (400 ft/sec) are allowed if the net heating value of the gas being combusted is greater than 37.3 MJ/scm (1,000 Btu/scf).

(e) Flares used to comply with provisions of this subpart shall be operated at all times when emissions may be vented to them.

(f) Reference Method 22 shall be used to determine the compliance of flares with the visible emission provisions of this subpart. The observation period is 2 hours and shall be used according to Method 22.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor purchasing records, material throughput and inventory on a weekly basis and calculate actual volatile organic compound emissions.



SECTION D. Source Level Requirements

005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.18]

[Subpart A - General Provisions](#)

[General control device requirements.](#)

The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall keep purchasing records, throughput and emissions on a weekly basis.

007 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.18]

[Subpart A - General Provisions](#)

[General control device requirements.](#)

The Permittee shall maintain a record of the flares operation on an hourly basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

008 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Source 105 consists of the following fixed roof tanks and reactors, all of which are vented to Control Device C02:

P001 T-201 P002 T-203 P003 T-204 P004 T-205 P006 T-250 P007 T-332 P008 T-438 P009 T-212 P010 T-213 P011 T-222

P012 HI VISCOSITY UNIT ST011T-176

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: FUGITIVE EMISSIONS

Source Capacity / Throughput:

10.500 Lbs / HR

SOLVENTS

PROC
107STAC
Z01**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §129.71]

[Synthetic organic chemical and polymer manufacturing -- fugitive sources](#)

Fugitive VOC emissions are restricted to 46 tons per 12 month period on a rolling basis.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §129.71]

[Synthetic organic chemical and polymer manufacturing -- fugitive sources](#)

The Permittee shall monitor purchasing records, inventory and material throughput on a monthly basis and calculate fugitive emissions.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §129.71]

[Synthetic organic chemical and polymer manufacturing -- fugitive sources](#)

The initiation and maintenance of a log of leaking components. The log shall contain, at a minimum, the total number of components checked, the total number of components found leaking, the location of the leaking component, the type of component--for example: valve, seal and the like--the tag identification number, the date on which the component was discovered to be leaking, date of repair, leak detection instrument reading after repairs, the components that cannot be repaired until a process shutdown that will not occur within 15 days from the date of detection and a record of the calibration of the leak detection monitoring instrument. The monitoring log shall be retained by the owner for 2 years after the date on which an entry was made. The log shall be made available to the Department upon oral or written request.

004 [25 Pa. Code §129.71]

[Synthetic organic chemical and polymer manufacturing -- fugitive sources](#)

The permittee shall keep purchasing records, throughput and emissions on a monthly basis.

V. REPORTING REQUIREMENTS.

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



SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §129.71]

Synthetic organic chemical and polymer manufacturing -- fugitive sources

- (a) Install a second valve, blind flange, plug, cap or other equivalent sealing system on open ended lines, except for safety pressure relief valves.
- (b) Develop and initiate a leak detection program, including liquid leaks for pumps, valves, compressors and safety pressure relief valves and a repair program for these components that cause a hydrocarbon detection instrument reading equal to or greater than 10,000 ppm. The leak detection and repair program shall include the following:
 - (1) A leak check during every calendar month of all components. A first attempt at repair is to be made no later than 5 working days after the leak is detected; final repairs are to be made within 15 working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.
 - (2) Attachment of an identification tag to the leaking component causing an instrument reading equal to or greater than 10,000 ppm. The identification tag shall be waterproof, readily visible, bear an identification number, the date on which the leak was detected, and indicate if the component cannot be repaired until a process shutdown that will not occur within 15 days from the date of detection.
 - (3) Repair and retest of a leaking component within 15 days or as soon as possible if a shutdown is required to make the repair.
 - (4) A weekly visual check of pumps in light liquid service for indications of leaks.
 - (5) Check a safety relief valve within 24 hours after it has vented to the atmosphere to assure that the safety relief valve has resealed.

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §129.71]

Synthetic organic chemical and polymer manufacturing -- fugitive sources

- (a) This section applies to surface active agent manufacturing facilities with emissions of 100 tons per year of VOC'S or more and to a facility with design capability to manufacture 1,000 tons per year
- (b) The owner or operator of a facility subject to this section may submit to the Department an alternative plan for the control of leaks from components. If the Department finds that the alternative plan will achieve an emission reduction which is equivalent to or greater than the reduction which can be achieved under this section and that the alternative plan is as enforceable as this section, the Department may approve the alternative plan.
- (c) The owner or operator of a facility subject to this section may submit to the Department a list of components the inspection of which would involve a significant element of danger. The Department may exempt the components on the list from the requirements of this section if the owner or operator can demonstrate to the satisfaction of the Department that a significant element of danger exists which cannot be reasonably eliminated, and that these exemptions will not result in a significant reduction of the VOC emission control effectiveness.

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 109

Source Name: WASTE WATER TREATMENT PLANT

Source Capacity / Throughput:

0.100 Tons / HR

SOLVENTS

PROC
109STAC
Z02**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 129.91-95]

The VOC emissions for this source shall not exceed 16 Tons per year on a 12 month rolling average as fugitive emissions.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(a) Periodic inspections shall be made to be sure all covers and hatches are closed.

(b) Permittee shall monitor total amount of solvent/oil recovered on a daily basis.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Permittee shall keep records of:

(a) Total amount of solvent recovered on a daily basis;

(b) Hours of operation.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The Waste Water Plant shall be maintained and operated in conformance with the Compliance Permit CP-23-0002.

VII. ADDITIONAL REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The Waste Water Treatment Plant consists of:

WW001 (10Ft.x20ft Surge Tank) Waste water and storm water containing mixed solvents and an oil foam are delivered to the 10ft.x10ft.box from the collection system. In the event of a storm water surge, waste water overflows the 10ft.x10ft. weir



SECTION D. Source Level Requirements

into the 10ft.x20ft surge box. The surge box has a capacity of 18000 gallons. Although the box is uncovered, it is located below grade, has a freeboard of 6.75ft. and is topped with a grate to reduce wind contact with the surface of the water.

WW002 (10ft.x10ft. Box) The 10ft.x10ft. box with a volume of 8230 gallons serves as an equalization basin to reduce fluctuations in waste water temperature and flow rates. Acting as a damper for batch processes, the 10ft.x10ft. box discharges waste water at a steady rate to the chemical /physical treatment plant. The 10ft.x10ft. box is also located below grade and has a freeboard of 1.5ft. Discharge from the equalization basin flows into the pH adjustment tank.

WW003 (pH Adjustment Tank) The pH adjustment tank is a covered unit with a 5ft. diameter, and 7.25ft. height with a liquid depth of approximately 5.75ft. Sulfuric acid or caustic soda are added to the wastewater to facilitate the separation process in the primary separator.

WW004 (Primary Separator) The primary separator is a corrugated plate separator which physically separates the oil film /solvent layer from the surface of the waste water. This unit yields a 90% reduction in the volume of oil film /solvent layer from inlet to outlet. The skimmed oil fraction is pumped to the oil /solvent storage tanks prior to reprocessing the material on site. Discharge of waste water to the secondary separator occurs via a submerged fill.

WW005 (Secondary Separator) The secondary separator operates the same as the primary separator resulting in an additional 90% recovery. The skimmed solvent /oil is transferred to a storage tank.

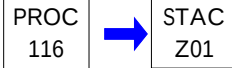
*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 116

Source Name: TWO PARTS WASHERS

Source Capacity / Throughput:

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

The aggregated Volatile Organic Compounds (VOC) from the (3) three solvent cleaners shall not exceed 2.8 tons per year on a twelve month rolling basis.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

(a) The permittee shall monitor the amount of solvent used monthly.

(b) The permittee shall calculate the total VOC emissions of the parts washers monthly, and determine the twelve month rolling average of the VOC emissions to show compliance with the emission limitations set forth in the Condition #001 of this Section.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

The permittee shall maintain records of the following:

- (a) the amount of solvent used,
- (b) the average monthly calculations of the total VOC emissions, and
- (c) the twelve (12) month rolling average of the total VOC emissions.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

The permittee shall operate and maintain these parts washers in accordance with good air pollution control practices to comply with the limitations set forth in Condition #001 of this Section.



SECTION D. Source Level Requirements

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

The permittee shall:

- (a) use only Safety type washing solvents for the parts washers;
- (b) service the parts washers monthly.

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

This source (ID 116) consists of three parts washers.

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 201

Source Name: CONTROLLED STORAGE TANKS

Source Capacity / Throughput:

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

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 129.91-95]

The VOC emissions for this source shall not exceed 56 Tons per Year on a 12 month rolling average.

Control Device Efficiencies Restriction(s).

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

The reduction of potential VOC emissions by the control equipment shall be a minimum of 90%.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The Permittee shall monitor and keep records of the outlet temperature of each condenser to ensure a 90% reduction in VOC emissions by maintaining the temperature below 20 degrees Fahrenheit for the neutral waste stream and 40 degrees Fahrenheit for the acid waste stream.

004 [25 Pa. Code §129.56]

[Storage tanks greater than 40,000 gallons capacity containing VOCs](#)

(a) No person may permit the placing, storing, or holding in a stationary tank, reservoir, or other container with a capacity greater than 40,000 gallons of any volatile organic compounds with a vapor pressure greater than 1.5 psia (10.5 kilopascals) under actual storage conditions unless such tank, reservoir or other container is a pressure tank capable of maintaining working pressures sufficient at all times to prevent vapor or gas loss to the atmosphere or is designed and equipped with one of the following vapor loss control devices:

(1) Vapor recovery system. A vapor recovery system consisting of a vapor gathering system capable of collecting the volatile organic compound vapors and gases discharged and a vapor disposal system capable of processing such volatile organic vapors and gases so as to prevent their emission to the atmosphere. Tank gauging and sampling devices shall be gas tight except when gauging or sampling is taking place. The vapor recovery system shall be maintained in good working order and recover at least 90% of the vapors emitted by such tank.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

**SECTION D. Source Level Requirements**

For monitoring for this source refer to Control Device C01.

006 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

The permittee shall keep hourly records of condenser outlet temperatures.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

The permittee shall maintain at least hourly records of the outlet temperature of both the acidic waste condenser and the neutral waste condenser.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

(a) The Voc emissions and acid waste streams from the following sources shall be directed to the Refrigerated Condenser Solvent Recovery System prior to discharge to the atmosphere.

- (1) Source 201 Controlled Solvent Storage Tanks
- (2) Control Device CO1A KOH Scrubber
- (3) Control Device C10 Limoh Tower
- (4) Source 101A Sulfonic acid and Sulfonate manufacture.

009 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 127.512]

All controlled storage tanks shall be connected to a control device that has a minimum 90% reduction in VOC'S.

VII. ADDITIONAL REQUIREMENTS.

010 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The following storage tanks are connected to control device C01:

T-412(ST001) T-620(ST002) T-341(P008)

**SECTION D. Source Level Requirements**

T-408(P038) T-409(P039) T-205(P004) T-173(ST008) T-414(ST017) T-415(ST018) T-416(ST019) T-447(ST031) T-495(ST033) T-650(ST041) T-652(ST042) T-660(ST044) T-661(ST045) T-201(ST065) T-218(ST066) T-206(P005) T-213(P010) T-222(P011) T-212(P009) T-600(P022)
T-400(ST012) T-411(ST016) T-419(ST020) T-420(ST021) T-421(ST022)
T-422(ST023) T-423(ST024) T-424(ST025) T-425(ST026) T-660(ST040)
T-650(ST043) T-664(ST046) T-665(ST047) T-667(ST048) T-675(ST050)
T-330(ST058) T-331(ST059) T-337(ST060) T-338(ST061) T-339(ST062)
T-218(ST064) T-341(ST072) T-668(P025) T-801(P028) T-803(P029)
SB-60 #4 & #5(P031) T-456(P068) T-457(P069) T-458(P070)
T-470(P071) T-471(P072) T-513(P073) T-528(P074) T-450(P075)
T-451(P076)

011 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 PA. Code § 129.92]

The (SRU) Solvent Recovery system consists of two (2) refrigerated condensers one for neutral waste streams and one for acidic waste streams. The Permittee shall monitor and keep records of the outlet temperature of each condenser to ensure a 90% reduction in VOC emissions by maintaining the temperature below 20 degrees Fahrenheit for the neutral waste stream and 40 degrees Fahrenheit for the acid waste stream.

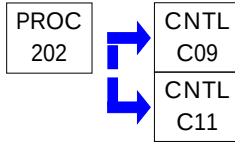
*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 202

Source Name: SOLIDS STORAGE SILO (T-490)

Source Capacity / Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The allowable particulate matter emissions from these baghouses shall not exceed 0.04 grains/dry standard cubic feet and 0.20 pounds per hour.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Permittee shall monitor the baghouse periodically during operation for particulate emissions caused by a broken bag or any other malfunction.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall keep on hand a sufficient quantity of spare fabric collector bags for the fabric collectors associated with the aforementioned sources in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the sources and fabric collectors.

VII. ADDITIONAL REQUIREMENTS.

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

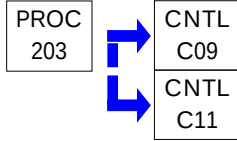
*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 203

Source Name: SOLIDS SCALE (T-491)

Source Capacity / Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The allowable particulate matter emissions from these baghouses shall not exceed 0.04 grains/dry standard cubic feet and 0.20 pounds per hour.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Permittee shall monitor the baghouse periodically during operation for particulate emissions caused by a broken bag or any other malfunction.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall keep on hand a sufficient quantity of spare fabric collector bags for the fabric collectors associated with the aforementioned sources in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the sources and fabric collectors.

VII. ADDITIONAL REQUIREMENTS.

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

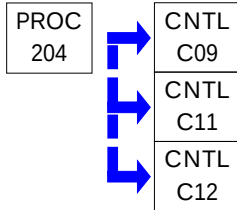
*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 204

Source Name: SOLIDS STORAGE SILO (T-623)

Source Capacity / Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The allowable particulate matter emissions from C09 and C11 shall not exceed 0.04 grains / dry standard cubic feet and 0.20 pounds per hour.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from Permit No.23-399-028]

The allowable particulate matter emissions from C12 shall not exceed 0.02 grains / dry standard cubic feet and 0.10 pounds per hour.

Operation Hours Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from Permit No.23-399-028]

The equipment hours of operation for C12 shall not exceed 12 hours per day of operation.

Control Device Efficiencies Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from Permit No.23-399-028]

The pressure drop across baghouse C12 shall not exceed 6 inches water gauge.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Permittee shall monitor the baghouse periodically during operation for particulate emissions caused by a broken bag or any other malfunction.



SECTION D. Source Level Requirements

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall keep on hand a sufficient quantity of spare fabric collector bags for the fabric collectors associated with the aforementioned sources in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the sources and fabric collectors.

VII. ADDITIONAL REQUIREMENTS.

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

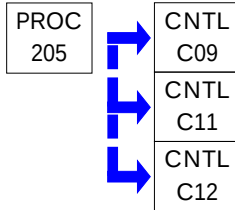
*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 205

Source Name: SOLIDS STORAGE SILO (T-624)

Source Capacity / Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from Permit No.23-399-028]

The equipment hours of operation for C12 shall not exceed 12 hours per day of operation.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The allowable particulate matter emissions from C09 and C11 shall not exceed 0.04 grains/dry standard cubic feet and 0.20 pounds per hour.

Control Device Efficiencies Restriction(s).

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from Permit No.23-399-028]

The allowable particulate matter emissions from C12 shall not exceed 0.02 grains/dry standard cubic feet and 0.10 pounds per hour.

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from Permit No.23-399-028]

The pressure drop across baghouse C12 only shall not exceed 6 inches water gauge.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The Permittee shall monitor the baghouses periodically during operation for particulate emissions caused by a broken bag or any other malfunction.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).



SECTION D. Source Level Requirements

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall keep on hand a sufficient quantity of spare fabric collector bags for the fabric collectors associated with the aforementioned sources in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the sources and fabric collectors.

VII. ADDITIONAL REQUIREMENTS.

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

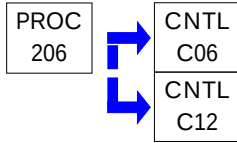
*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 206

Source Name: REACTOR (T-600)

Source Capacity / Throughput:



I. RESTRICTIONS.

Operation Hours Restriction(s).

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from Permit No.23-399-028]

The equipment hours of operation shall not exceed 12 hours per day of operation.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The allowable particulate matter emissions from C06 shall not exceed 0.04 grains / dry standard cubic feet and 0.20 pounds per hour.

Control Device Efficiencies Restriction(s).

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from Permit No.23-399-028]

The allowable particulate matter emissions from C12 shall not exceed 0.02 grains / dry standard cubic feet and 0.10 pounds per hour.

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from Permit No.23-399-028]

The pressure drop across baghouse C12 only shall not exceed 6 inches water gauge.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The Permittee shall monitor the Baghouse periodically during operation for particulate emissions caused by a broken bag or any other malfunction.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).



SECTION D. Source Level Requirements

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall keep on hand a sufficient quantity of spare fabric collector bags for the fabric collectors associated with the aforementioned sources in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the sources and fabric collectors.

VII. ADDITIONAL REQUIREMENTS.

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

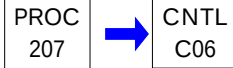
*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 207

Source Name: REACTOR (T-407)

Source Capacity / Throughput:

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The allowable particulate matter emissions from C06 shall not exceed 0.04 grains/dry standard cubic feet and 0.20 pounds per hour.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Permittee shall monitor Baghouse periodically during operation for particulate emissions caused by a broken bag or any other malfunction.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall keep on hand a sufficient quantity of spare fabric collector bags for the fabric collectors associated with the aforementioned sources in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the sources and fabric collectors.

VII. ADDITIONAL REQUIREMENTS.

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

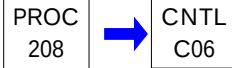
***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: 208

Source Name: REACTOR (T-435)

Source Capacity / Throughput:

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The allowable particulate matter emissions from C06 shall not exceed 0.04 grains/dry standard cubic feet and 0.20 pounds per hour.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Permittee shall monitor Baghouse periodically during operation for particulate emissions caused by a broken bag or any other malfunction.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall keep on hand a sufficient quantity of spare fabric collector bags for the fabric collectors associated with the aforementioned sources in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the sources and fabric collectors.

VII. ADDITIONAL REQUIREMENTS.

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

***** Permit Shield in Effect. *****



SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

**SECTION F. Emission Restriction Summary.**

Source Id	Source Description		
031	ERIE CITY BOILER 1 (CU001)		
Emission Limit		Pollutant	
0.130	Lbs/MMBTU	#2 Oil	NOX
0.130	Lbs/MMBTU	#4 Oil	NOX
0.140	Lbs/MMBTU	Natural Gas	NOX
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU		TSP
101A	SULFONATION /SULFONIC MANUFACTURING (ACID RXN)		
Emission Limit		Pollutant	
500.000	PPMV		SOX
107.000	Tons/Yr		VOC
105	SACI PROD. W/ SACI SOLVENT RECOVERY SYSTEM		
Emission Limit		Pollutant	
14.000	Tons/Yr		VOC
107	FUGITIVE EMISSIONS		
Emission Limit		Pollutant	
46.000	Tons/Yr	by inventory	VOC
116	TWO PARTS WASHERS		
Emission Limit		Pollutant	
2.800	Tons/Yr		VOC
201	CONTROLLED STORAGE TANKS		
Emission Limit		Pollutant	
56.000	Tons/Yr	after RACT	VOC
C01A	KOH SCRUBBER (CD002)		
Emission Limit		Pollutant	
500.000	PPMV		SOX
29.000	Tons/Yr		VOC
C10	FRACTIONATION COLUMN (LIMOH TOWER)P067		
Emission Limit		Pollutant	
7.000	Tons/Yr		VOC

Site Emission Restriction Summary

Emission Limit	Pollutant
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**SECTION G. Miscellaneous.****INSIGNIFICANT ACTIVITIES**

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

- (1) Low Volatile storage tanks With Vapor Pressure less than 1.5 PSIA and Volatile Organic Emission less than one Ton per Year
IS014-IS070 ST004-007 ST053-054 ST057 ST067-68 ST070
- (2) Tank Truck Transfers With Less than one Ton per Year VOC emissions
SOURCE NO. IS013
- (3) SOURCE NO. IS012 Cooling Tower with negligible Emissions.
- (4) SOURCE NO. IS009 Nitrogen Tank (T-903) Negligable Emissions.
- (5) SOURCE NO. IS008 Cooling Water tank (T-529) Negligable Emissions.
- (6) SOURCE NO. IS007 Pilot Plant Less one Ton per Year VOC emissions.
- (7) SOURCE NO. IS006 SACI Emulsion Unit Water based less than one ton
per Year Voc Emissions
- (8) SOURCE NO. IS005 Drum Storage Less than one ton per year VOC
emissions
- (9) SOURCE NO. IS004 Lab Hoods (R&D) Less than one ton per year VOC
emissions
- (10) SOURCE NO IS003 Fire Water Tank Negligable Emissions.
- (11) SOURCE NO.P021(T-551) SACI Feed Tank Less than one ton per year
VOC emissions

GENERAL

The following previously issued Operating Permits serve as the basis for certain terms and conditions set forth in this Title V Permit:

- (1) OP-23-313-002 Hydrocarbon Sulfonation Process with Caustic
Scrubber
- (2) OP-23-313-011 Inert Gas Stripper (Packed Towers)
- (3) OP-23-399-028 CaO & Ca(OH)₂ Conveyance System with Baghouse
- (4) PA-23-0002 RACT Sources
- (5) CP-23-0002 RACT Sources



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