



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: February 7, 2002

Effective Date:

Revision Date: July 18, 2003

Expiration Date: March 1, 2007

Revision Type: Amendment

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

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

[TITLE V Permit No: 46-00015](#)

Federal Tax Id - Plant Code: 16-0484732-1

Owner Information

Name: OCCIDENTAL CHEM

Mailing Address: 375 ARMAND HAMMER BLVD
PO BOX 699
POTTSTOWN, PA 19464

Plant Information

Plant: OCCIDENTAL CHEM CORP/POTTSTOWN

Location: 46 Montgomery County 46936 Lower Pottsgrove Township

SIC Code: 2821 Manufacturing - Plastics Materials And Resins

Responsible Official

Name: STACEY A MORRIS

Title: PLANT MANAGER

Phone: (610) 327 - 6715

Permit Contact Person

Name: MICHAEL E SHIREY

Title: SENIOR ENVIRONMENTAL ENGI

Phone: (610) 327 - 6701

[Signature] _____

FRANCINE B CARLINI, SOUTHEAST REGION AIR PROGRAM MANAGER



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Section A. Site Inventory List

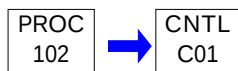
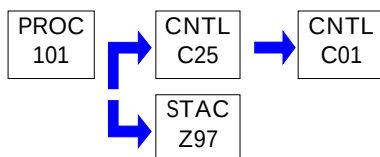
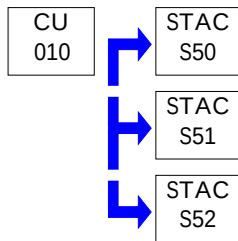
Source ID	Source Name	Capacity/Throughput	Fuel/Material
010	BOILERS NO.11, 12 & 13	98.00 MMBTU / HR	
		98.00 MCF / HR	Natural Gas
		700.00 Gal / HR	#2 Oil
101	38 DISPERSION RESIN REACTORS	12.50 Tons / HR	DISPERSION PVC
102	VCM RECOVERY SYSTEM	1.40 Tons / HR	VCM WASTE GAS
103	23 SUSPENSION RESIN REACTORS	6.30 Tons / HR	SUSPENSION PVC
104	NO. 3, 4, 6 & 7 - LINE SPRAY DRYERS	15.25 Tons / HR	DISPERSION POLYMER
114	NO. 11, 12 & 13 ROTARY DRYERS	9.00 Tons / HR	SUSPENSION POLYMER
115	16-SUSPENSION RESIN SILOS W/BAGHOUSES	9.00 Tons / HR	BULK SUSP HOMO
124	AIR STRIPPER	29,167.00 Gal / HR	WASTEWATER
125	DISP.RESIN SEMI-BULK STR.AREA W/BAGHS.	15.20 Tons / HR	DISPERSION RESIN
128	OXY 461 REACTOR & VACUUM DRYER	0.03 Tons / HR	SPECIALITY RESIN
129	LINE #11,12&13 PROD. COLLECTORS	9.00 Tons / HR	SUSPENSION POLYMER
130	LINE NO. 3, 4, 6 & 7 GRINDERS	15.25 Tons / HR	DISPERSION POLYMER
151	18-VINYL CHLORIDE STORAGE TANKS	N / A	VINYL CHLORIDE
154	WASTEWATER TREATMENT PLANT	29,000.00 Gal / HR	WASTEWATER
160	5-EMERGENCY DIESEL GENERATORS	296.80 Gal / HR	#2 Oil
C01	FOAM TRAP		
C02	CATALYTIC INCINERATOR	90.00 Gal / HR	PROPANE
C03	LINE NO.3 PRIMARY BAGHOUSE		
C04	LINE NO.3 GROUND BAGHOUSE		
C05	LINE NO.3 UNGROUND BAGHOUSE		
C06	LINE NO.4 PRIMARY BAGHOUSE		
C08	LINE NO.4 UNGROUND BAGHOUSE		
C11-A	LINE NO. 6 PRIMARY 2 BAGHOUSE		
C11-B	LINE NO. 6 PRIMARY 3 BAGHOUSE		
C12	LINE NO. 6 PRIMARY 1 BAGHOUSE		
C13	LINE NO. 7 PRIMARY BAGHOUSE		
C14	LINE NO. 7 GROUND BAGHOUSE		
C17A	LINE NO. 11 PRIMARY BAGHOUSE		
C17B	LINE NO. 11 SECONDARY BAGHOUSE		
C19A	LINE NO. 12 PRIMARY BAGHOUSE		
C19B	LINE NO. 12 SECONDARY BAGHOUSE		
C21A	LINE NO. 13 PRIMARY BAGHOUSE		
C21B	LINE NO. 13 SECONDARY BAGHOUSE		
C24	16-BULK SILO DUST COLLECTORS		
C25	DISPERSION RESIN STRIPPING		
C26	SUSPENSION RESIN STRIPPING		
C27	LINE NO. 7 PRIMARY BAGHOUSE		
C28A	LINE NO.4 GROUND BAGHOUSE		
C28B	LINE NO.4 GROUND BAGHOUSE		
C29	LINE NO. 6 UNGROUND BAGHOUSE	1.11 Lbs / HR	PARTICULATE MATTER
C30	LINE NO. 6 GROUND BAGHOUSE		
C35A	T-THERMAL INCINERATOR	247.00 Lbs / HR	VINYL CHLORIDE
		15.00 Gal / HR	PROPANE
C35B	WET PACKED TOWER SCRUBBER	247.00 Lbs / HR	HYDROGEN CHLORIDE
C36	SEMI-BULK COLLECTORS		
S01	CATALYTIC INC. STACK		
S06	LINE NO.3 PR. BAGHS. STK.		
S07	UNSPECIFIED NAME		

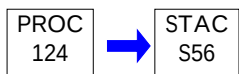
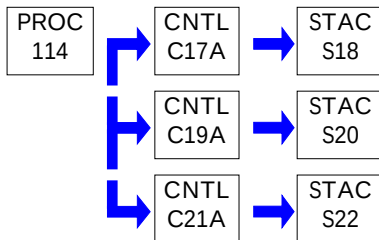
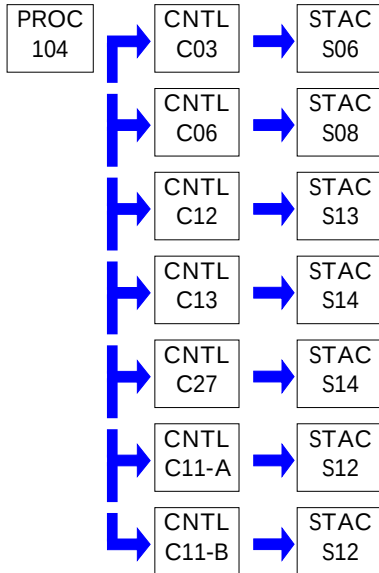
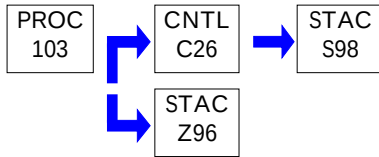


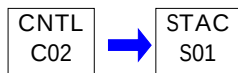
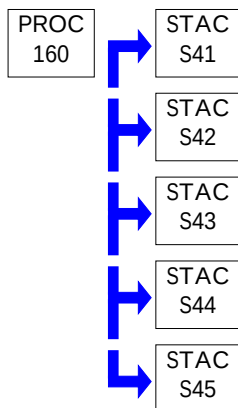
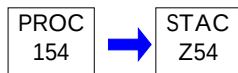
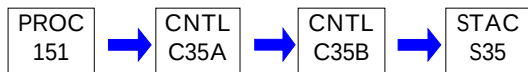
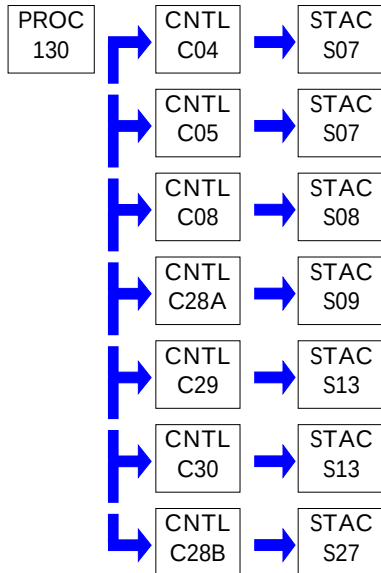
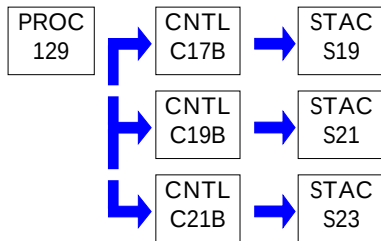
Section A. Site Inventory List

S08	LINE NO.4 PR. BAGHS. STK.	
S09	LINE NO.4 GR.BAGHOUSE STK	
S12	LINE NO.6 UNGR.BAGHS.STK.	
S13	LINE NO.6 PR.1 BAGHS.STK.	
S14	LINE NO.7 PR.BAGHS.STK.	
S18	LINE NO.11 PR.BAGHS.STK.	
S19	LINE NO.11 SEC.BAGHS.STK.	
S20	LINE NO.12 PR. BAGHS.STK.	
S21	LINE NO.12 SEC.BAGHS.STK.	
S22	LINE NO.13 PR. BAGHS.STK.	
S23	LINE NO.13 SEC.BAGHS.STK.	
S26	BULK SILO DUST COLL.STK.	
S27	LINE NO.4 GR.BAGHS. STK.	
S35	T-THERMAL INC. STACK	
S41	EMERGENCY GEN. STACK	
S42	EMERGENCY GEN. STACK	
S43	EMERGENCY GEN. STACK	
S44	EMERGENCY GEN. STACK	
S45	EMERGENCY GEN. STACK	
S48	SEMI-BULK STACK	
S50	BOILER 11 STACK	
S51	BOILER 12 STACK	
S52	BOILER#13 STACK	
S56	W.W. AIR STRIPPER STACK E	
S98	SUSP.RESIN STRIP.STACK	
Z54	W/WATER TP FUGITIVE	
Z96	SUSP.RESIN REACTOR FUG.	
Z97	DISP.RESIN REACTOR FUG.	

PERMIT MAPS









CNTL
C29 → STAC
S13

CNTL
C35A → CNTL
C35B → STAC
S35

CNTL
C35B → STAC
S35



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,

(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.



Section B. General Title V Requirements

#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.

#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

**Section B. General Title V Requirements**

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.

#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.



Section B. General Title V Requirements

#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).

(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.

Section B. General Title V Requirements

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, liquified petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

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

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

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

(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 §

**Section B. General Title V Requirements**

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).

#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:

Office of Enforcement and Permit Review (3AP10)
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

Section B. General Title V Requirements

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:

- (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.

Section B. General Title V Requirements

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 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 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 shield 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

**Section B. General Title V Requirements**

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,
- (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.

Section B. General Title V Requirements

(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.

(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.

The permittee may not permit the presence in the outdoor atmosphere of any form of contaminant, including, but not limited to, the discharging from stacks, chimneys, openings, buildings, structures, open fires, vehicles, processes or any other source of any smoke, soot, fly ash, dust, cinders, dirt, noxious or obnoxious acids, fumes, oxides, gases, vapors, odors, toxic, hazardous or radioactive substances, waste or other matter in a place, manner or concentration inimical or which may be inimical to public health, safety or welfare or which is or may be injurious to human, plant or animal life or to property or which unreasonably interferes with the comfortable enjoyment of life or property.

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee may not 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) Open burning operations (see 129.14 for restrictions).
- (g) Sources, and classes of sources, other than those identified in
(a) - (f) 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 §123.2]

Fugitive particulate matter

The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 123.1(a)-(f) - condition #002 of this section - (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the property on which the source(s) are operating or are located.

004 [25 Pa. Code §123.31]

Limitations**[Malodor Emissions]**

The permittee may not permit the emission into the outdoor atmosphere of malodorous air contaminants from any source in a manner that the malodors are detectable outside the property on which the source(s) is being operated.

005 [25 Pa. Code §123.41]

Limitations**[Visible Emissions]**

Unless stricter requirements are stated in Section D of this operating permit, the 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.

**SECTION C. Site Level Requirements**

006 [25 Pa. Code §123.42]

Exceptions

The limitations of 123.41 - condition #005 of this section - (relating to limitations) shall not apply to a visible emission in any of the following instances:

- (1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in 123.1(a)--(f) - condition #002 of this section - (relating to prohibition of certain fugitive emissions).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall ensure that total vinyl chloride emissions from all sources (including fugitive) at the facility do not exceed 75 tons per year calculated on a consecutive 12-month basis.
- (b) The permittee shall ensure that VOC (volatile organic compound) emissions from the dryers, blenders, and centrifuges does not exceed, in total, 95.5 lb/hr, and 243.1 tons on a 12-month rolling basis.
- (c) Notwithstanding the De Minimus Emission Increases authorized in condition #017(b) of Section B of this permit, this permit does not authorize any De Minimus emissions increases of vinyl chloride monomer.

008 [25 Pa. Code §129.14]

Open burning operations

The permittee may not 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 for the prevention and control of disease or pests, when approved by the Department.

II. TESTING REQUIREMENTS.

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.]

- (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.
- (c) Measurements of the RVCM concentration must be made in conformance with 40 CFR part 61, subpart F, National Emission Standards for Vinyl Chloride.

**SECTION C. Site Level Requirements****III. MONITORING REQUIREMENTS.**

010 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions, pursuant to condition #005 of this section, 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.

011 [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, at least once per operating shift, for the following:

- (1) Odors.
- (2) Visible emissions.
- (3) Fugitive particulate matter.

(b) Objectionable odors, which may cause annoyance or discomfort to the public, and /or are detectable outside the site property boundaries, that are caused, or may be caused, by operations at the site; fugitive particulate matter in excess of Condition #002, and #003, of this Section; or visible emissions in excess of Condition #005 of this Section shall:

- (1) Be investigated.
- (2) Be reported to the Environmental Health & Safety Department
- (3) Have appropriate corrective action taken (for emissions that originate on-site).
- (4) Be recorded in a permanent written log, or other method approved by the Department.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61 Sections 61.68 and 61.65(b)(8)(i)]

(a) The permittee shall comply with all appropriate emission monitoring requirements in accordance with Sections 61.68 and 61.65(b)(8)(i) of 40 CFR Part 61 Subpart F and 40 CFR Part 61 Subpart V, and with applicable conditions contained in this permit including, but not limited to, Condition #025(b)(8)(i) of this section.

(b) In certain cases, the appropriate emission monitoring requirements referenced in paragraph (a) above have been spelled out in this permit. However, the company shall be subject to all the requirements referenced above, regardless of whether they appear in their entirety in this operating permit.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Parts 61.71 and 61.246].

(a) The permittee shall maintain records of the leaks detected by the vinyl chloride monitoring system, as required by 40 CFR Part 61.65(b)(8) and this permit, including the concentrations of vinyl chloride measured, analyzed, and recorded by the vinyl chloride detector, the location of each measurement and the date and approximate time of each measurement.

(b) The permittee shall maintain records of the leaks detected during routine monitoring with the portable hydrocarbon detector and the action taken to repair the leaks, as required by 40 CFR Part 61.65(b)(8) and this permit, including a brief statement explaining the location and cause of each leak detected with the portable hydrocarbon detector, the date and time of the leak, and any action taken to eliminate that leak.

(c) The permittee shall comply with the recordkeeping requirements in accordance with 40 CFR 61.246.

SECTION C. Site Level Requirements

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

Within thirty (30) days after permit issuance, the permittee shall submit, to the Department for approval, the proposed monitoring and recordkeeping formats required in this Operating Permit.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The permittee shall maintain a record of all reports of fugitive emissions, visible emissions and odors that the Department may consider to be malodors. The report shall contain, at a minimum, the following items:

- (1) Date, time, and location of the incident(s).
- (2) The cause of the event.
- (3) The corrective action taken, if necessary to abate the situation and prevent future occurrences.
- (4) The name of the person(s) making the report.

(b) Copies of the records shall be made available to the PADEP personnel upon request.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61 - Subpart M].

The permittee shall maintain records that may be necessary to demonstrate compliance with the requirements for asbestos removal. These include the location, amount of asbestos removed, and the dates of the removal operation(s).

V. REPORTING REQUIREMENTS.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.64, 61.65 and 61.70].

- (a) The permittee shall notify the Department by telephone at 610-832-6242 within 1-hour of a relief valve discharge. A written report shall be sent to the Department within 10-days of the incident.
- (b) The permittee shall notify the Department within 10 days of any discharge to the atmosphere from any manual vent valve.
- (c) The permittee shall notify the Department within 10 days of any relief valve discharge.
- (d) The permittee shall submit to the Department, in writing, at a minimum, the following information if (b) or (c) occurs:
- (1) the source,
 - (2) nature and cause of the discharge,
 - (3) the date and time of the discharge,
 - (4) the approximate total vinyl chloride loss during the discharge,
 - (5) the method used for determining the vinyl chloride loss,
 - (6) the action that was taken to prevent the discharge, and
 - (7) measures adopted to prevent future discharges.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Parts 61.04, 61.70, 61.71, 61.246 & 61.247].

(a) This facility is subject to Subpart F and V of the National Emission Standards for Hazardous Air Pollutants (NESHAP) and shall comply with all applicable requirements of these subparts. 40 CFR Section 61.04 requires submission of copies of all

SECTION C. Site Level Requirements

requests, reports, applications, submittals, and other communications to both EPA and the Department. The EPA copies shall be forwarded to:

Permits and Technical Assessment Branch, APD
US EPA, Region III
1650 Arch Street (3AP11)
Philadelphia, PA 19103

(b) The permittee shall comply with the reporting requirements in accordance with 40 CFR Sections 61.70 and 61.247.

019 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this condition is also derived from 40 CFR part 61 - Subpart M].

(a) The permittee shall notify the Department on an annual basis of asbestos projects planned for the upcoming year.

(b) The permittee shall notify the Department within 10-days of an asbestos removal project greater than 260 linear feet or 160 square feet.

020 [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) Unless stated elsewhere in this operating permit, the permittee shall, within two (2) hours, of becoming knowledgeable, of any occurrence, notify the Department, at (610) 832-6242, 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 /or 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.

021 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 40 CFR Parts 61.65 and 61.70].

(a) The permittee shall provide quarterly reports, in a Department approved format, consisting of, but not limited to, the following information:

(1) The VCM emissions that were in excess of 10 ppmv (3-hour average) from any or all sources that have an applicable VCM emission limit. If emissions in excess of the emission limits are not detected, the report shall contain a statement that no excess emissions have been determined.

(2) The number of 3-hour periods for which average emissions were determined during the reporting period.

SECTION C. Site Level Requirements

(3) Results of reactor opening testing, as required in Section D, for Source ID(s): 101 and 103, and reactor opening emissions in excess of 0.00002 lb vinyl chloride/lb of polyvinyl chloride product.

(4) The number of 24-hour average concentrations for each resin type determined during the reporting period.

(5) Any 24-hour average VCM concentrations in the suspension resin in excess of 400 ppmw or in the dispersion resin in excess of 2,000 ppmw. If no 24-hour average resin vinyl chloride concentrations in excess of these limits are measured, the report shall state that no excess resin vinyl chloride concentrations were measured.

(6) Any monthly average VCM concentration in the dispersion resin in excess of 1,200 ppmw as a 12-month rolling sum.

(7) Equipment-opening emissions in excess of 2% of the equipment's volume.

(8) The vinyl chloride content in the polyvinyl chloride resins.

(b) The permittee shall provide to the Department the results of the leak detection and performance tests on a quarterly basis. Additionally (if applicable), a report explaining why equipment remained in service after a leak was detected if the leak was not repaired within 15 days after detection shall be submitted.

022 [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. Additionally, a description of the method used to calculate the emissions shall be included. The statement shall contain a certification by a company officer or the plant manager that the information contained in the AIMS inventory report and the statement is true and accurate.

023 [25 Pa. Code §135.3]

Reporting

(a) The permittee shall submit by March 1, of each year, an Air Information Management System (AIMS) inventory report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.

(b) The permittee may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

VI. WORK PRACTICE REQUIREMENTS.

024 [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.

025 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.64 and 61.65].

SECTION C. Site Level Requirements

(a) Except for an emergency manual vent valve discharge and emergency relief valve discharge, the permittee shall ensure that there is no discharge to the atmosphere from any manual vent valve on any polyvinyl chloride reactor in vinyl chloride service and no discharge to the atmosphere from any relief valve on any equipment in vinyl chloride service.

(1) An emergency manual vent valve discharge means a discharge to the atmosphere which could not have been avoided by taking measures to prevent the discharge.

(2) An emergency relief valve discharge means a discharge which could not have been avoided by taking measures to prevent the discharge. Relief valve means each pressure relief device including pressure relief valves, rupture disks and other pressure relief systems used to protect process components from overpressure conditions.

(3) Equipment shall be monitored to prevent unsafe conditions. If an unsafe condition is detected, immediate actions shall be taken to correct the unsafe condition.

(b) The permittee shall adhere to the following practices:

(1) Fugitive emission sources - Loading and unloading lines. Vinyl chloride emissions from loading and unloading lines in vinyl chloride service which are opened to the atmosphere after each loading or unloading operation are to be minimized as follows:

(i) After each loading or unloading operation and before opening a loading or unloading line to the atmosphere, the quantity of vinyl chloride in all parts of each loading or unloading line that are to be opened to the atmosphere is to be reduced so that the parts combined contain no greater than 0.13 cubic feet of vinyl chloride (0.0038 cubic meters), at standard temperature and pressure; and

(ii) Any vinyl chloride removed from a loading or unloading line in accordance with paragraph (i) of this section is to be ducted through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppmv (average for 3-hour period), or equivalent as provided in 40 CFR Part 61.66.

(2) Slip gauges. During loading or unloading operations, the vinyl chloride emissions from each slip gauge in vinyl chloride are to be minimized by ducting any vinyl chloride discharged from the slip gauge through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppmv (average for 3-hour period), or equivalent as provided in 40 CFR Part 61.66.

(3) Leakage from pumps, compressors, and agitator seals:

(i) Rotating pumps. Vinyl chloride emissions from seals on all rotating pumps in vinyl chloride service are to be minimized by installing sealless pumps, pumps with double mechanical seals or equivalent as provided in 40 CFR part 61.66. If double mechanical seals are used, vinyl chloride emissions from the seals are to be minimized by maintaining the pressure between the two seals so that any leak that occurs is into the pump; by ducting any vinyl chloride between the two seals through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppmv; or equivalent as provided in 40 CFR part 61.66. Compliance with the provisions of 40 CFR part 61 subpart V demonstrates compliance with the provisions of this paragraph.

(ii) Reciprocating pumps. Vinyl chloride emissions from seals on all reciprocating pumps in vinyl chloride service are to be minimized by installing double outboard seals, or equivalent as provided in 40 CFR part 61.66. If double outboard seals are used, vinyl chloride emissions from the seals are to be minimized by maintaining the pressure between the two seals so that any leak that occurs is into the pump; by ducting any vinyl chloride between the two seals through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppmv; or equivalent as provided in 40 CFR part 61.66. Compliance with the provisions of 40 CFR part 61 subpart V demonstrates compliance with the provisions of this paragraph.

(iii) Rotating compressors. Vinyl chloride emissions from seals on all rotating compressors in vinyl chloride service are to be minimized by installing compressors with double mechanical seals, or equivalent as provided in 40 CFR part 61.66. If double mechanical seals are used, vinyl chloride emissions from the seals are to be minimized by maintaining the pressure between the two seals so that any leak that occurs is into the compressor; by ducting any vinyl chloride between the two seals through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppmv; or equivalent

SECTION C. Site Level Requirements

as provided in 61.66. Compliance with the provisions of 40 CFR part 61 subpart V demonstrates compliance with the provisions of this paragraph.

(iv) Reciprocating compressors. Vinyl chloride emissions from seals on all reciprocating compressors in vinyl chloride service are to be minimized by installing double outboard seals, or equivalent as provided in 40 CFR part 61.66. If double outboard seals are used, vinyl chloride emissions from the seals are to be minimized by maintaining the pressure between the two seals so that any leak that occurs is into the compressor; by ducting any vinyl chloride between the two seals through a control system from which concentration of vinyl chloride in the exhaust gases does not exceed 10 ppmv; or equivalent as provided in 40 CFR part 61.66. Compliance with the provisions of 40 CFR part 61 subpart V demonstrates compliance with the provisions of this paragraph.

(v) Agitator. Vinyl chloride emissions from seals on all agitators in vinyl chloride service are to be minimized by installing agitators with double mechanical seals, or equivalent as provided in 40 CFR part 61.66. If double mechanical seals are used, vinyl chloride emissions from the seals are to be minimized by maintaining the pressure between the two seals so that any leak that occurs is into the agitated vessel; by ducting any vinyl chloride between the two seals through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppmv; or equivalent as provided in 40 CFR part 61.66.

(4) Leaks from relief valves. Vinyl chloride emissions due to leaks from each relief valve on equipment in vinyl chloride service shall comply with 40 CFR part 61.242-4.

(5) Manual venting of gases. Except as provided in 40 CFR Part 61.64(a)(3), all gases which are manually vented from equipment in vinyl chloride service are to be ducted through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppmv (average for 3-hour period); or equivalent as provided in 40 CFR part 61.66.

(6) Opening of equipment. Vinyl chloride emissions from opening of equipment (excluding crude, intermediate, and final EDC storage tanks, but including prepolymerization reactors used in the manufacture of bulk resins and loading or unloading lines that are not opened to the atmosphere after each loading or unloading operation) are to be minimized follows:

(i) Before opening any equipment for any reason, the quantity of vinyl chloride which is contained therein is to be reduced to an amount which occupies a volume of no more than 2.0 percent of the equipment's containment volume or 0.0950 cubic meters (25 gallons), whichever is larger, at standard temperature and pressure.

(ii) Any vinyl chloride removed from the equipment in accordance with paragraph (b)(6)(i) of this section is to be ducted through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppmv (average for 3-hour period); or equivalent as provided in 40 CFR part 61.66.

(7) Samples. Unused portions of samples containing at least 10 percent by weight vinyl chloride are to be returned to the process or destroyed in a control device from which concentration of vinyl chloride in the exhaust gas does not exceed 10 ppmv (average for 3-hour period) or equivalent as provided in 40 CFR part 61.66. Sampling techniques are to be such that sample containers in vinyl chloride service are purged into a closed process system. Compliance with the provisions of 40 CFR part 61 subpart V demonstrates compliance with the provisions of this paragraph.

(8) Leak detection and elimination. Vinyl chloride emissions due to leaks from equipment in vinyl chloride service are to be minimized as follows:

(i) A reliable and accurate vinyl chloride monitoring system shall be operated for detection of major leaks and identification of the general area of the plant where a leak is located. A vinyl chloride monitoring system means a device which obtains air samples from one or more points on a continuous sequential basis and analyzes the samples with gas chromatography or, if the permittee assumes that all hydrocarbons measured are vinyl chloride, with infrared spectrophotometry, flame ion detection, or an equivalent or alternative method. The vinyl chloride monitoring system shall be operated according to a program developed by the permittee. The permittee shall submit a description of the program to the Department within 45 days of the effective date of this operating permit, unless a waiver of compliance is granted under 40 CFR part 61.11, or the program has been approved and the Administrator / Department does not request a review of the program. Approval of a program will be granted by the Department provided he finds:

SECTION C. Site Level Requirements

(A) The location and number of points to be monitored and the frequency of monitoring provided for in the program are acceptable when they are compared with the number of pieces of equipment in vinyl chloride service and size and physical layout of the plant.

(B) It contains a definition of leak which is acceptable when compared with the background concentrations of vinyl chloride in the areas of the plant to be monitored by the vinyl chloride monitoring system. Measurements of background concentrations of vinyl chloride in the areas of the plant to be monitored by the vinyl chloride monitoring system are to be included with the description of the program. The definition of leak for a given plant may vary among the different areas within the plant and is also to change over time as background concentrations in the plant are reduced.

(C) It contains an acceptable plan of action to be taken when a leak is detected.

(D) It provides for an acceptable calibration and maintenance schedule for the vinyl chloride monitoring system and portable hydrocarbon detector. For the vinyl chloride monitoring system, a daily span check is to be conducted with a concentration of vinyl chloride equal to the concentration defined as a leak according to paragraph (b)(8)(i)(B) of this section. The calibration is to be done with either:

(1) A calibration gas mixture prepared from the gases specified in sections 5.2.1. and 5.2.2. of Test Method 106 and in accordance with section 7.1 of Test Method 106, or

(2) A calibration gas cylinder standard containing the appropriate concentration of vinyl chloride. The gas composition of the calibration gas cylinder standard is to have been certified by the manufacturer. The manufacturer must have recommended a maximum shelf life for each cylinder so that the concentration does not change greater than 5 percent from the certified value. The date of gas cylinder preparation, certified vinyl chloride concentration, and recommended maximum self life must have been affixed to the cylinder before shipment from the manufacturer to the buyer. If a gas chromatograph is used as the vinyl chloride monitoring system, these gas mixtures may be directly used to prepare a chromatograph calibration curve as described in section 7.3 of Test Method 106. The requirements in section 5.2.3.1. and 5.2.3.2. of Test Method 106 for certification of cylinder standards and for establishment and verification of calibration standards are to be followed.

(ii) For each process unit subject to this subpart, a formal leak detection and repair program shall be implemented consistent with subpart V of 40 CFR, except as provided in paragraph (b)(8)(iii) of this section. This program is to have been implemented within 90 days of the effective date of these regulations, unless a waiver of compliance is granted under 40 CFR part 61.11. Except as provided in paragraph (b)(8)(ii)(E) of this section, the permittee shall be exempt from 40 CFR parts 61.242-1(d), 61.242-7(a), (b), and (c), 61.246, and 61.247 of subpart V of 40 CFR for any process unit in which the percentage of leaking valves is demonstrated to be less than 2.0 percent, as determined in accordance with the following:

(A) A performance test as specified in paragraph (b)(8)(ii)(B) of this section shall be conducted initially within 90 days of the effective date of these regulations, annually, and at times requested by the Department.

(B) For each performance test, a minimum of 200 or 90 percent, whichever is less, of the total valves in VOC service (as defined in 40 CFR part 60.481 of subpart VV of part 60) within the process unit shall be randomly selected and monitored within 1 week by the methods specified in 40 CFR part 61.245(b). If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. The leak percentage shall be determined by dividing the number of valves in VOC service for which leaks are detected by the number of tested valves in VOC service.

(C) If a leak is detected, it shall be repaired in accordance with 61.242-7(d) and (e) of subpart V of 40 CFR.

(D) The results of the performance test shall be submitted in writing to the Department in the first quarterly report following the performance test as part of the reporting requirements of 40 CFR part 61.70.

(E) Any process unit in which the percentage of leaking valves is found to be greater than 2.0 percent according to the performance test prescribed in paragraph (b)(8)(ii)(B) of this section must comply with all provisions of subpart V of 40 CFR within 90 days.

(iii) Open-ended valves or lines located on multiple service process lines which operate in vinyl chloride service less than 10 percent of the time are exempt from the requirements of 40 CFR part 61.242-6 of subpart V, provided the open-ended valves

SECTION C. Site Level Requirements

or lines are addressed in the monitoring system required by paragraph (b)(8)(i) of this section. The Department may apply this exemption to other existing open-ended valves or lines that are demonstrated to require significant retrofit cost to comply with the requirements of 40 CFR part 61.242-6 of subpart V.

(9) Inprocess Wastewater. The permittee shall reduce vinyl chloride emissions to the atmosphere from inprocess wastewater as follows:

(i) The concentration of vinyl chloride in each inprocess wastewater stream containing greater than 10 ppmv vinyl chloride measured immediately as it leaves a piece of equipment and before being mixed with any other inprocess wastewater stream is to be reduced to no more than 10 ppmv by weight before being mixed with any other inprocess wastewater stream which contains less than 10 ppmv vinyl chloride; before being exposed to the atmosphere; before being discharged to a wastewater treatment process; or before being discharged untreated as a wastewater.

(ii) Any vinyl chloride removed from the inprocess wastewater in accordance with paragraph (9)(i) of this section is to be ducted through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppmv (average for 3-hour period).

(c) The requirements of this section are to be incorporated into a standard operating procedure. The standard operating procedure is to include provisions for measuring the vinyl chloride in equipment 1255 gallons in volume for which an emission limit is prescribed in paragraph (6)(i) of this section after opening the equipment and using Test Method 106, a portable hydrocarbon detector, or an alternative method. The method of measurement is to meet the requirements in 40 CFR Part 61.67(g)(5)(i)(A) or (g)(5)(i)(B).

(d) A RVD that is ducted to a control device that is continually operating while emissions from the release are present at the device is subject to the following requirements:

(1) A discharge from a control device other than a flare shall not exceed 10 ppmv (average for 3-hour period) as determined by the continuous emission monitor system required under 40 CFR Part 61.68. Such a discharge is subject to the requirements of 40 CFR Part 61.70.

(10) The permittee shall operate and maintain the VCM loading/unloading system in accordance with manufacturers specifications in order to help ensure the integrity of the system.

026 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.65].

(a) The permittee shall maintain a leak detection and repair program. If leaks are detected during testing or by the fugitive emissions monitoring system, the relief valves shall be repaired and monitored in accordance with 40 CFR Part 61.242-4.

(1) Performance tests shall be performed at least annually on a minimum of 200 or 90%, whichever is less, of the total valves in VOC service within the process unit, to determine if there are any leaks. If leaks are determined during the testing or by the monitoring system, the equipment shall be repaired and monitored in accordance with 40 CFR Part 61.242.

(b) The permittee shall strip the PVC according to specifications to prevent residual vinyl chloride in excess of the applicable limits.

(c) The permittee shall maintain and clean the reactors in accordance with 40 CFR Part 61.6 in order to help assure compliance with VCM limits.

(d) The permittee shall take PVC samples in accordance with 40 CFR Part 61.67 to prevent emissions from PVC slurry samples greater than 10 ppmv.

(e) The permittee shall ensure that the mixing, weighing, and holding tanks are operated under vacuum or in such a way that no emissions occur during normal operations. The permittee shall operate and maintain the vacuum system in accordance with manufacturers specifications in order to keep the integrity of the system.

SECTION C. Site Level Requirements

027 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.65].

(a) The permittee shall ensure that the concentration of vinyl chloride in each inprocess wastewater stream containing greater than 10 ppm vinyl chloride measured immediately as it leaves a piece of equipment and before being mixed with any other inprocess wastewater stream is reduced to no more than 10 ppm by weight before being mixed with any other inprocess wastewater stream which contains less than 10 ppm vinyl chloride; before being exposed to the atmosphere; before being discharged to a wastewater treatment process; or before being discharged untreated as a wastewater.

(b) Any vinyl chloride removed from the inprocess wastewater in accordance with paragraph (a) of this section is to be ducted through the control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppm (average for 3 hour period).

(c) The wastewater from the VCM recovery system is collected in Tanks 51 or 52 prior to undergoing additional stripping in the water stripping column to remove VCM.

(d) The facility shall operate and maintain the sources to prevent VCM concentrations in the wastewater from exceeding 10 ppmv.

028 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61 - Subpart M].

The permittee shall comply with 40 CFR Part 61 - Subpart M - relating to asbestos removal projects.

029 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall demonstrate compliance with the VOC emission limitation for the dryers, blenders, and centrifuges, of this section on a semi-annual basis using the data listed below:

- (1) the amount of dried VCM slurry during the 6-months;
- (2) vinyl chloride, vinyl acetate, acetaldehyde and methanol concentrations in dispersion and suspension resins measured semi-annually.

030 [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)].

(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, then this permit shall be suspended and the source(s) shall not be operated until authorized by the Department.

031 [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 immediately, upon discovery, implement measures, which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in 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.

SECTION C. Site Level Requirements

032 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 82 - Subpart F].

The permittee shall reduce emissions of Class I and class II refrigerants during the service, maintenance, repair, and disposal of equipment in accordance with the requirements of 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

033 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain all combustion units, air cleaning devices and processes in accordance with manufacturer's specifications and in accordance with good air pollution control practices in order to minimize emissions of air pollutants.

034 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR part 61.242-1 - 10].

(a) The permittee shall adhere to the provisions contained in 40 CFR parts 61.242-1 - 10, relating to standards for equipment leaks (fugitive emissions sources).

(b) The permittee shall ensure that rupture disks are installed and maintained before the relief valves; and that pressure gauges are located between the rupture disks and relief valves in order to detect leaks. The permittee shall establish work practices to prevent relief valve discharges.

(c) If leaks are detected by the monitoring system, the relief valves shall be repaired and monitored in accordance with 40 CFR Part 61.242.

035 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The permittee shall comply with all of the applicable requirements set forth in 40 CFR Parts 60, 61 & 63.

VII. ADDITIONAL REQUIREMENTS.

036 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The methods for emission tracking and calculations shall be consistent with those in the RACT proposal approved by the Department. Any changes in tracking and calculation emissions shall be submitted and approved by the Department prior to the application of those changes.

VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit on or before 01/07/2003 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.

No compliance milestones exist.

*** Permit Shield In Effect **

**SECTION D. Source Level Requirements**

Source ID: 010

Source Name: BOILERS NO.11, 12 & 13

Source Capacity / Throughput:

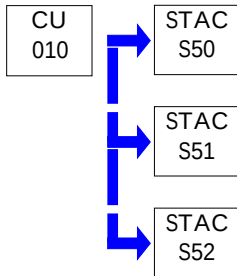
98.00 MMBTU / HR

98.00 MCF / HR

Natural Gas

700.00 Gal / HR

#2 Oil

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

001 [25 Pa. Code §123.11]

Combustion units

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from any boiler in excess of 0.28 lbs / MMBtu of heat input.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall ensure that the operation of each boiler does not result in nitrogen oxide emissions in excess of 7.35 lb / hour when firing natural gas and 14.7 lb / hour when firing No. 2 fuel oil.

(b) The permittee shall limit the total nitrogen oxide (NOx) emissions from the three boilers that make up this source to less than 111.1 tons on a consecutive 12-month rolling basis.

Fuel Restriction(s).

003 [25 Pa. Code §123.22]

Combustion units

When firing No. 2 fuel oil in this source(s), the permittee may not use fuel oil which contains sulfur in excess of 0.3% by weight.

[This streamlined condition assures compliance with 40 CFR Part 60.42(c)].

II. TESTING REQUIREMENTS.

004 [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.

SECTION D. Source Level Requirements**III. MONITORING REQUIREMENTS.**

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the type and amount of fuel combusted in each boiler on a daily basis.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 60.48c(g)].

(a) The permittee shall maintain records of certifications from the fuel supplier documenting the sulfur and ash content (wt. percent of each), the heating value, and a statement that the oil complies with the specifications for fuel oil No. 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils."

(b) The permittee shall record the amount and type of each fuel combusted for each boiler on a daily basis.

V. REPORTING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall submit quarterly reports in accordance with 40 CFR Sections 60.48c(d), (e) and (f) when No. 2 fuel oil has been combusted.

(b) This source(s) is subject to Subpart Dc of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 40 CFR Section 60.4 requires submission of copies of all requests, reports, applications, submittals, and other communications to both EPA and the Department. The EPA copies shall be forwarded to:

Director
Air Protection Program
US EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall ensure that each boiler is equipped and operates with low-NO_x burners and flue gas recirculation (FGR) to control thermal NO_x formation.

(b) The permittee shall ensure that the total heat input for the three boilers that make up this source, when firing No. 2 fuel oil, does not exceed 386,610 MMBtu per year.

VII. ADDITIONAL REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) This source identification number consists of 3-98.00 MMBtu/hr boilers fired on natural gas fired with No. 2 fuel oil used as a back-up; DEP ID#011, 012 & 013, respectively.

New Source Review Requirements:

(b) Pursuant to the provisions of 25 Pa. Code Section 127.206(f), the emission reduction credits (ERCs) created from the shutdown of Boiler No. 1, 3, 4 and 5 (DEP ID#031, 032, 033, and 034, respectively) shall expire, if not consumed prior to, February 28, 2007.

(c) As of March 29, 2000, 72.2 tpy NO_x ERCs and 557.3 tpy of SO_x ERCs were remaining.

**SECTION D. Source Level Requirements**

(d) Boilers No. 1, 3, 4 and 5 (DEP ID#031, 032, 033 and 034) are permanently shutdown. If the company plans to bring these sources back into production, the company shall submit an appropriate plan approval application. Any subsequent emissions from these sources shall comply with New Source Review (NSR) regulations in 25 Pa. Code Chapter 127 Subchapter E.

(e) The permittee and any subsequent user of the credits shall comply with the requirements of 25 Pa. Code Sections 127.206 through 127.209.

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

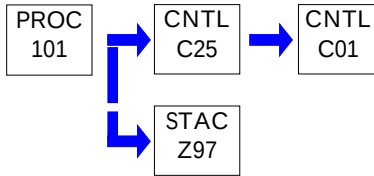
Source ID: 101

Source Name: 38 DISPERSION RESIN REACTORS

Source Capacity / Throughput:

12.50 Tons/ HR

DISPERSION PVC

**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 40 CFR Part 61.64].

VINYL CHLORIDE EMISSION LIMITS:

- (a) The permittee shall ensure that the concentration of vinyl chloride in each exhaust gas stream from each reactor does not exceed 10 ppm (average for 3-hour period).
- (b) The permittee shall limit the concentration of vinyl chloride in each exhaust gas stream from each stripper to less than 10 ppm (average for 3-hour period).
- (c) The permittee shall ensure that the concentration of vinyl chloride in each exhaust gas stream from each mixing, weighing, or holding container in vinyl chloride service which precedes the stripper in the plant process flow does not exceed 10 ppm (average 3-hour period).

REACTOR OPENING LOSS LIMITS:

- (a) The permittee shall limit the reactor opening loss from each reactor to less than 0.00002 lb vinyl chloride/lb of polyvinyl chloride product (0.02 gm / kg), with the product determined on a dry solids basis.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)**VINYL CHLORIDE CONCENTRATION LIMITS**

[Additional authority for part of this permit condition is also derived from 40 CFR Part 61.64].

- (a) The permittee shall limit the weighted average residual vinyl chloride monomer (RVCM) concentration in dispersion resin to less than 1,200 ppmw on an annual basis.
- (b) The permittee shall limit the weighted average residual vinyl chloride concentration (RVCM) in dispersion resin processed through the stripping operation on each calendar day, measured immediately after the stripping operation is completed, to a maximum of 2,000 ppmw.
- (c) While the maximum daily weighted average RVCM concentration is stated in paragraph (b) above, the permittee shall adhere to the more stringent concentration limit above in paragraph (a) above, for the weighted average RVCM concentration in dispersion resin on an annual basis.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 40 CFR Part 61.70].

SECTION D. Source Level Requirements

The permittee shall adhere to the following testing requirements:

- (a) One representative sample of polyvinyl chloride resin is to be taken for each grade of resin processed or at intervals of 8 hours for each grade of resin which is being processed, whichever is more frequent. The sample is to be taken as the resin flows out of the stripper and identified by resin type and grade and the date and time the sample was taken. The corresponding quantity of material processed by each stripper over the time period represented by the sample during the 8-hour period, is to be recorded and identified by resin type and grade and the date and time it represents.
- (b) The vinyl chloride content in each sample is to be determined by Test Method 107 as prescribed in 40 CFR Part 61.67(g)(3) on a daily basis.
- (c) The vinyl chloride content found in each sample required by paragraph (a) above shall be averaged separately for each type of resin, over each calendar day and weighted according to the quantity of each grade of resin processed by the stripper(s) that calendar day, according to the equation found in 40 CFR Part 61.70(c)(2)(v).
- (d) If applicable, the measured concentration(s) of RVCM processed through the stripping operation must be made immediately after the stripping operation is completed for each batch of dispersion resin processed.

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

- (a) The permittee shall sample a batch semi-annually for vinyl chloride, acetaldehyde, vinyl acetate and methanol.
- (b) The permittee shall test at least one of the Building II reactors (38 Dispersion Resin Reactors), per week for vinyl chloride concentration upon opening. Each reactor shall so be tested at least twice in an 18-month period. The two required tests of an individual reactor can not occur in the same quarter or 3 month period. The tests shall be conducted using Department approved methods.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

- (a) The permittee shall continuously monitor each reactor for temperature and pressure and to prevent unsafe conditions. If an unsafe operating condition is detected, the permittee shall take immediate actions to correct the unsafe operating condition.
- (b) The permittee shall monitor the vinyl chloride content (after stripping) for each batch of polyvinyl chloride processed.

006 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 40 CFR Part 61.68].

- (a) The permittee shall use a vinyl chloride monitoring system on a continuous basis for this source (and for any source referenced in 40 CFR Part 61.68) and for any control system to which reactor emissions are required to be ducted in 40 CFR Part 61.65(b)(1)(ii), (b)(2), (b)(5), (b)(6)(ii), and (b)(9)(ii).
- (b) The vinyl chloride monitoring system(s) used to meet the requirement in paragraph (a) of this section is to be a device which obtains representative samples from one or more applicable emission points on a continuous sequential basis and analyzes the samples with gas chromatography or, if the company assumes that all hydrocarbons measured are vinyl chloride, with infrared spectrophotometry, flame ion detection, or an alternative method. The vinyl chloride monitoring system used to meet the requirements in 40 CFR Part 61.65(b)(8)(i) may be used to meet the requirements of this section.
- (c) A daily span check is to be conducted for each vinyl chloride monitoring system used. For all emission sources listed in paragraph (a) of this section, the daily span check is to be conducted with a concentration of vinyl chloride equal to 10 ppm.
- (d) The calibration is to be done according to procedures and methods described in 40 CFR Part 61.68(c)(1) & (2).

**SECTION D. Source Level Requirements**

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the weighted average residual vinyl chloride monomer concentration in the resin on a daily basis.

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Parts 61.70 and 61.71].

The permittee shall maintain records that include, but are not limited to, the following:

- (1) the vinyl chloride content found in all the samples (after stripping), identified by the resin type and grade and the time and date of the sample, and
- (2) the corresponding quantity of polyvinyl chloride resin processed by the stripper(s), identified by the resin type and grade and the time and date it represents.
- (3) daily operating records (including temperature and pressure);
- (4) amount of PVC manufactured on a daily basis (including material usage, material recovered, and material disposed of);
- (5) upset and emergency conditions that result in emissions to be released from slip gauges, pumps, compressors, agitator seals, relief valves or any other equipment;
- (5) any manual venting which results in emissions to be released;
- (6) the date of each equipment opening;
- (7) capacity of equipment;
- (8) test and monitoring results and conclusions from leak detection and performance tests;
- (9) identification of leaking components;
- (10) the date leaking components/leaks were detected and repaired.
- (11) records of any emissions from reactor opening in excess of 0.00002 lb vinyl chloride per lb of polyvinyl chloride product.
- (12) the number of reactor openings.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the emissions measured according to the monitoring and work practice standards for this source.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate and record the monthly weighted average residual vinyl chloride monomer concentration (12-month rolling sum) in order to demonstrate compliance with the 1,200 ppmw annual limit. This record shall be based on the daily samples collected and tested.

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

See Conditions #017, #018, and #021 in Section C for applicable reporting requirements.

VI. WORK PRACTICE REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for part of this permit condition is also derived from 40 CFR Part 61.64 and 61.65].

- (a) Except for an emergency manual vent valve discharge, the permittee shall ensure that there is no discharge to the atmosphere from any manual vent valve on any polyvinyl chloride reactor in vinyl chloride service. An emergency manual vent or relief valve discharge means a discharge to the atmosphere which could not have been avoided by taking measures to prevent the discharge.
- (b) Except for an emergency relief valve discharge, the permittee shall ensure that there is no discharge to the atmosphere from

SECTION D. Source Level Requirements

any relief valve on any equipment in vinyl chloride service. An emergency relief discharge means a discharge which could not have been avoided by taking measures to prevent the discharge.

(c) The permittee shall ensure that the facility has rupture disks before the relief valves and has established work practices to prevent relief valve discharges.

(d) The permittee shall ensure that pressure gauges are located between the rupture disks and relief valves in order to detect leaks. If leaks are detected by the monitoring system, the relief valves shall be repaired and monitored in accordance with 40 CFR Part 61.242.

(e) The permittee shall maintain and clean the reactors in accordance with 40 CFR Subpart F in order to assure compliance with the VCM limits.

013 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall follow the following work practices:

(a) The permittee shall operate and maintain the reactors and strippers in accordance with manufacturers specifications and also in a manner that maintains the integrity of the system.

(b) The reactors must be closed during normal operating conditions; therefore, no emissions shall occur during normal operating conditions.

(c) The permittee shall use the best methods, approved by the Department, to reduce VCM concentrations in the reactors and strippers prior to opening(s), that may include, but not be limited to, steam purging.

(d) The permittee shall operate the mixing, weighing, and holding tanks under vacuum.

014 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall operate this source in a manner that the unreacted VOC and vinyl chloride vapors are ducted to and controlled by a common recovery system (DEP ID#102) in series with the thermal incinerator (DEP ID#C35), followed by a packed tower (DEP ID#C35B), or a catalytic incinerator (DEP ID#C02) as a secondary incinerator.

015 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 40 CFR Part 61.68]

The permittee shall adhere to the following work practice standards:

(a) When exhaust gas(es) are emitted to the atmosphere without passing through the control system and required vinyl chloride monitoring system, the vinyl chloride content of the emission shall be calculated (in units of each applicable emission limit) by best practical engineering judgment based on the discharge duration and known vinyl chloride concentrations in the affected equipment as determined in accordance with 40 CFR Part 61.67(h) or other Department approved method.

(b) For each 3-hour period, the vinyl chloride content of emissions shall be averaged (weighted according to the proportion of time that emissions were continuously monitored and that emissions by-passed the continuous monitor) for purposes of reporting excess emissions under 40 CFR Part 61.70 and the Reporting Requirements of Section C of this operating permit.

(c) For each vinyl chloride emission to the atmosphere determined in accordance with paragraph (b) of this section to be in excess of the applicable emission limits, the permittee shall record the identity of the source(s), the date, time, and duration of the excess emission, and the approximate total vinyl chloride loss during the excess emission, and the method used for determining the vinyl chloride loss. This information is subject to the reporting requirements of Section C of this operating permit.

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.**

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of 38 Dispersion resin reactors. The control of emissions is an intricate part of this process and consists of dispersion stripping (C25), VCM / Vinyl Acetate Recovery System (102), and steam purge dispersion reactors (C37-1).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

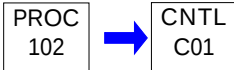
Source ID: 102

Source Name: VCM RECOVERY SYSTEM

Source Capacity / Throughput:

1.40 Tons/ HR

VCM WASTE GAS

**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 40 CFR Part 61.64].

The permittee shall ensure that the concentration of vinyl chloride in each exhaust gas stream from each monomer recovery system does not exceed 10 ppm (average for 3-hour period).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to 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 40 CFR Part 61.68].

(a) The permittee shall use a vinyl chloride monitoring system on a continuous basis for this source (and for any source referenced in 40 CFR Part 61.68) and for any control system to which reactor emissions are required to be ducted in 40 CFR Part 61.65(b)(1)(ii), (b)(2), (b)(5), (b)(6)(ii), and (b)(9)(ii).

(b) The vinyl chloride monitoring system(s) used to meet the requirement in paragraph (a) of this section is to be a device which obtains representative samples from one or more applicable emission points on a continuous sequential basis and analyzes the samples with gas chromatography or, if the company assumes that all hydrocarbons measured are vinyl chloride, with infrared spectrophotometry, flame ion detection, or an alternative method. The vinyl chloride monitoring system used to meet the requirements in 40 CFR Part 61.65(b)(8)(i) may be used to meet the requirements of this section.

(c) A daily span check is to be conducted for each vinyl chloride monitoring system used. For all emission sources listed in paragraph (a) of this section, the daily span check is to be conducted with a concentration of vinyl chloride equal to 10 ppm.

(d) The calibration is to be done according to procedures and methods described in 40 CFR Part 61.68(c)(1) & (2).

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain records of the emissions measured according to the monitoring and work practice standards for this source.

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

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.65].

(a) The permittee shall notify the Department by telephone at 610-832-6241, or 832-6242, or 832-6000, within 1-hour of a relief valve discharge. A written report shall be sent to the Department and the USEPA within 10-days of the incident.

(b) The permittee shall notify the Department within 10 days of any discharge to the atmosphere from any manual vent valve. The permittee shall submit to the Department, in writing, at a minimum, the following information:

- (1) the source,
- (2) nature and cause of the discharge,
- (3) the date and time of the discharge,
- (4) the approximate total vinyl chloride loss during the discharge,
- (5) the method used for determining the vinyl chloride loss,
- (6) the action that was taken to prevent the discharge, and
- (7) measures adopted to prevent future discharges.

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.68]

The permittee shall adhere to the following work practice standards:

(a) When exhaust gas(es) are emitted to the atmosphere without passing through the control system and required vinyl chloride monitoring system, the vinyl chloride content of the emission shall be calculated (in units of each applicable emission limit) by best practical engineering judgment based on the discharge duration and known vinyl chloride concentrations in the affected equipment as determined in accordance with 40 CFR Part 61.67(h) or other Department approved method.

(b) For each 3-hour period, the vinyl chloride content of emissions shall be averaged (weighted according to the proportion of time that emissions were continuously monitored and that emissions by-passed the continuous monitor) for purposes of reporting excess emissions under 40 CFR Part 61.70 and the Reporting Requirements of Section C of this operating permit.

(c) For each vinyl chloride emission to the atmosphere determined in accordance with paragraph (b) of this section to be in excess of the applicable emission limits, the permittee shall record the identity of the source(s), the date, time, and duration of the excess emission, and the approximate total vinyl chloride loss during the excess emission, and the method used for determining the vinyl chloride loss. This information is subject to the reporting requirements of Section C of this operating permit.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the VCM system under vacuum at all times.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of a variety of control devices, pumps, compressors and other equipment. The foam trap (C01) is intrinsic to the process. The process terminates at the thermal incinerator / wet scrubber (C35A and C35B) and the backup catalytic incinerator (C02). The latter are treated as individual sources and are included separately in this operating permit.

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

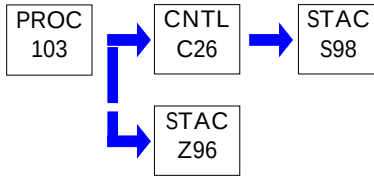
Source ID: 103

Source Name: 23 SUSPENSION RESIN REACTORS

Source Capacity / Throughput:

6.30 Tons / HR

SUSPENSION PVC

**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 40 CFR Part 61.64].

VINYL CHLORIDE EMISSION LIMITS:

(a) The permittee shall ensure that the concentration of vinyl chloride in each exhaust gas stream from each reactor does not exceed 10 ppm (average for 3-hour period).

(b) The permittee shall limit the concentration of vinyl chloride in each exhaust gas stream from each stripper to less than 10 ppm (average for 3-hour period).

(c) The permittee shall ensure that the concentration of vinyl chloride in each exhaust gas stream from each mixing, weighing, or holding container in vinyl chloride service which precedes the stripper in the plant process flow does not exceed 10 ppm (average 3-hour period).

REACTOR OPENING LOSS LIMITS:

(a) The permittee shall limit the reactor opening loss from each reactor to less than 0.00002 lb vinyl chloride/lb of polyvinyl chloride product (0.02 gm / kg), with the product determined on a dry solids basis.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)**VINYL CHLORIDE CONCENTRATION LIMIT**

[Additional authority for this permit condition is also derived from 40 CFR Part 61.64].

The permittee shall ensure that the weighted average residual vinyl chloride concentration does not exceed 400 ppmw for suspension and latex resins, averaged separately for each type of resin for each calendar day. The measured concentration must be made immediately after the stripping operation is completed.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 40 CFR Part 61.70].

The permittee shall adhere to the following testing requirements:

(a) One representative sample of polyvinyl chloride resin is to be taken from each batch of each grade of resin immediately following the completion of the stripping operation, and identified by resin type and grade and the date and time the batch is completed. The corresponding quantity of material processed in each stripper batch is to be recorded and identified by resin type and grade and the date and time the batch is completed.

SECTION D. Source Level Requirements

(b) The vinyl chloride content in each sample is to be determined by Test Method 107 as prescribed in 40 CFR Part 61.67(g)(3) on a daily basis.

(c) The vinyl chloride content found in each sample required by paragraph (a) above shall be averaged separately for each type of resin, over each calendar day and weighted according to the quantity of each grade of resin processed by the stripper(s) that calendar day, according to the equation found in 40 CFR Part 61.70(c)(2)(v).

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(a) The permittee shall sample a batch semi-annually for vinyl chloride, acetaldehyde, vinyl acetate and methanol.

(b) The permittee shall test at least one of the Building I reactors (23 Suspension Resin Reactors), per week for vinyl chloride concentration upon opening. Each reactor shall so be tested at least twice in a 12-month period. The two required tests of an individual reactor can not occur in the same quarter or 3-month period. The tests shall be conducted using Department approved methods.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(a) The permittee shall continuously monitor each reactor for temperature and pressure and to prevent unsafe conditions. If an unsafe operating condition is detected, the permittee shall take immediate actions to correct the unsafe operating condition.

(b) The permittee shall monitor the vinyl chloride content (after stripping) for each batch of polyvinyl chloride processed.

006 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 40 CFR Part 61.68].

(a) The permittee shall use a vinyl chloride monitoring system on a continuous basis for this source (and for any source referenced in 40 CFR Part 61.68) and for any control system to which reactor emissions are required to be ducted in 40 CFR Part 61.65(b)(1)(ii), (b)(2), (b)(5), (b)(6)(ii), and (b)(9)(ii).

(b) The vinyl chloride monitoring system(s) used to meet the requirement in paragraph (a) of this section is to be a device which obtains representative samples from one or more applicable emission points on a continuous sequential basis and analyzes the samples with gas chromatography or, if the company assumes that all hydrocarbons measured are vinyl chloride, with infrared spectrophotometry, flame ion detection, or an alternative method. The vinyl chloride monitoring system used to meet the requirements in 40 CFR Part 61.65(b)(8)(i) may be used to meet the requirements of this section.

(c) A daily span check is to be conducted for each vinyl chloride monitoring system used. For all emission sources listed in paragraph (a) of this section, the daily span check is to be conducted with a concentration of vinyl chloride equal to 10 ppm.

(d) The calibration is to be done according to procedures and methods described in 40 CFR Part 61.68(c)(1) & (2).

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 40 CFR Parts 61.70 and 61.71].

The permittee shall maintain records that include, but are not limited to, the following:

(1) the vinyl chloride content found in all the samples (after stripping), identified by the resin type and grade and the time and date of the sample, and

(2) the corresponding quantity of polyvinyl chloride resin processed by the stripper(s), identified by the resin type and grade

**SECTION D. Source Level Requirements**

and the time and date it represents.

(3) daily operating records (including temperature and pressure);

(4) amount of PVC manufactured on a daily basis (including material usage, material recovered, and material disposed of);

(5) upset and emergency conditions that result in emissions to be released from slip gauges, pumps, compressors, agitator seals, relief valves or any other equipment;

(5) any manual venting which results in emissions to be released;

(6) the date of each equipment opening;

(7) capacity of equipment;

(8) test and monitoring results and conclusions from leak detection and performance tests;

(9) identification of leaking components;

(10) the date leaking components/leaks were detected and repaired.

(11) records of any emissions from reactor opening in excess of 0.00002 lb vinyl chloride per lb of polyvinyl chloride product.

(12) the number of reactor openings.

008 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain records of the emissions measured according to the monitoring and work practice standards for this source.

V. REPORTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

See Conditions #017, #018, and #021 in Section C for applicable reporting requirements.

VI. WORK PRACTICE REQUIREMENTS.

010 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for part of this permit condition is also derived from 40 CFR Part 61.64 and 61.65].

(a) Except for an emergency manual vent valve discharge, the permittee shall ensure that there is no discharge to the atmosphere from any manual vent valve on any polyvinyl chloride reactor in vinyl chloride service. An emergency manual vent or relief valve discharge means a discharge to the atmosphere which could not have been avoided by taking measures to prevent the discharge.

(b) Except for an emergency relief valve discharge, the permittee shall ensure that there is no discharge to the atmosphere from any relief valve on any equipment in vinyl chloride service. An emergency relief discharge means a discharge which could not have been avoided by taking measures to prevent the discharge.

(c) The permittee shall ensure that the facility has rupture disks before the relief valves and has established work practices to prevent relief valve discharges.

(d) The permittee shall ensure that pressure gauges are located between the rupture disks and relief valves in order to detect leaks. If leaks are detected by the monitoring system, the relief valves shall be repaired and monitored in accordance with 40 CFR Part 61.242.

(e) The permittee shall maintain and clean the reactors in accordance with 40 CFR Subpart F in order to assure compliance with the VCM limits.

011 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall follow the following work practices:

(a) The permittee shall operate and maintain the reactors and strippers in accordance with manufacturers specifications and also in a manner that maintains the integrity of the system.

(b) The reactors must be closed during normal operating conditions; therefore, no emissions shall occur during normal

SECTION D. Source Level Requirements

operating conditions.

(c) The permittee shall use the best methods, approved by the Department, to reduce VCM concentrations in the reactors and strippers prior to opening(s), that may include, but not be limited to, steam purging.

(d) The permittee shall operate the mixing, weighing, and holding tanks under vacuum.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate this source in a manner that the unreacted VOC and vinyl chloride vapors are ducted to and controlled by a common recovery system (DEP ID#102) in series with the thermal incinerator (DEP ID#C35), followed by a packed tower (DEP ID#C35B), or a catalytic incinerator (DEP ID#C02) as a secondary incinerator.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.68]

The permittee shall adhere to the following work practice standards:

(a) When exhaust gas(es) are emitted to the atmosphere without passing through the control system and required vinyl chloride monitoring system, the vinyl chloride content of the emission shall be calculated (in units of each applicable emission limit) by best practical engineering judgment based on the discharge duration and known vinyl chloride concentrations in the affected equipment as determined in accordance with 40 CFR Part 61.67(h) or other Department approved method.

(b) For each 3-hour period, the vinyl chloride content of emissions shall be averaged (weighted according to the proportion of time that emissions were continuously monitored and that emissions by-passed the continuous monitor) for purposes of reporting excess emissions under 40 CFR Part 61.70 and the Reporting Requirements of Section C of this operating permit.

(c) For each vinyl chloride emission to the atmosphere determined in accordance with paragraph (b) of this section to be in excess of the applicable emission limits, the permittee shall record the identity of the source(s), the date, time, and duration of the excess emission, and the approximate total vinyl chloride loss during the excess emission, and the method used for determining the vinyl chloride loss. This information is subject to the reporting requirements of Section C of this operating permit.

VII. ADDITIONAL REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This process consists of 23 Suspension resin reactors. Air pollutants are controlled by suspension stripping (C26), VCM recovery system (102), and steam purge suspension resin reactors (C37-2).

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

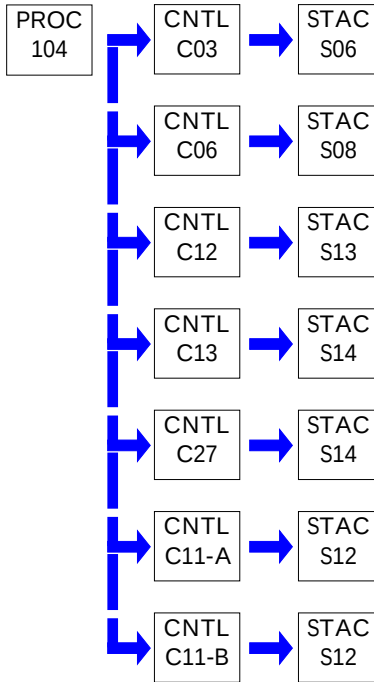
Source ID: 104

Source Name: NO. 3, 4, 6 & 7 - LINE SPRAY DRYERS

Source Capacity / Throughput:

15.25 Tons / HR

DISPERSION POLYMER



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 Section 123.13. Conditions (b) and (c) incorporate PA-46-0015A].

(a) The individual particulate matter emission rates from stacks S06, S08, S12, S13, and S14 associated with this source shall not exceed 0.04 grains per dry standard cubic foot (per stack).

(b) The particulate matter emissions from stack S13 shall not exceed 0.04 grains per dry standard cubic foot and 32.7 tons per year in a 12-month rolling sum.

(c) The particulate matter emissions from the Unground product collector shall not exceed 0.02 grains per dry standard cubic foot.

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall conduct a stack test on at least one stack associated with this source within the first 3 years of the effective date of this operating permit for Total Combined Particulate Matter (front and back half) in order to demonstrate compliance with the particulate matter emission limit(s). The permittee shall follow the following procedures:

1. The permittee shall perform the test(s) when Oxy 80 HC or other PVC product known to produce high potential condensable particulate emissions is being processed.

**SECTION D. Source Level Requirements**

2. At least 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.
3. At least 30 days prior to the test, the Regional Air Quality Manager shall be informed of the date and time of the test.
4. Within 30 days after the source test(s), two copies of the complete test report, including all operating conditions and process flow rates at the facility, shall be submitted to the Regional Air Quality Manager.

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the pressure differential across the fabric collectors associated with this source at least once per shift.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the daily pressure drop readings across each control device associated with this source(s).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The fabric collectors associated with this source(s) shall be equipped with bags, and shall be operated and maintained in accordance with the manufacturer's specifications and good air pollution control practices.
- (b) The fabric collector shall be equipped with a differential manometer so that at the request of the Department the pressure drop across the fabric can be measured.
- (c) The pressure drop across each of the fabric collectors shall be maintained at a minimum of 0.5 inches and a maximum of 12 inches water gauge at anytime when the lines are operating.
- (d) A sufficient quantity of spare bags shall be kept in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the collectors.
- (e) When the pressure differential indicates a possible leak or bag breakage, the process will be immediately discontinued and the collectors inspected for leaks and bag breakage.
- (f) Should a leak occur, the permittee shall isolate and repair / replace the broken bag(s).

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) This source consists of 4-Line Spray Dryers; DEP ID#105, 106, 108 & 109, Line No. 3, 4, 6 & 7 Spray Dryers, respectively. Each line Spray Dryer is ducted to the following product collectors:
 - (1) Line No. 3 Spray Dryer is ducted to: Line 3 Primary Baghouse (C03).
 - (2) Line No. 4 Spray Dryer is ducted to: Line 4 Primary Baghouse (C06).
 - (3) Line No. 6 Spray Dryer is ducted to: Line 6 Primary-2 baghouse (C11-A); Line 6 Primary-3 baghouse (C11-B); and Line 6

**SECTION D. Source Level Requirements**

Primary-1 baghouse (C12).

(4) Line No. 7 Spray Dryer is ducted to: Line 7 Primary Baghouse (C13) and Line 7 ground baghouse (C27).

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

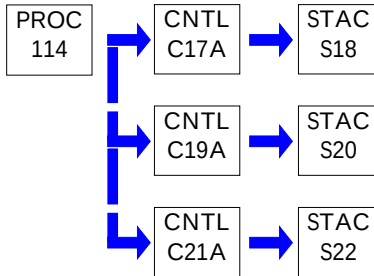
Source ID: 114

Source Name: NO. 11, 12 & 13 ROTARY DRYERS

Source Capacity / Throughput:

9.00 Tons/ HR

SUSPENSION POLYMER



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from this process(es) in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall conduct a stack test on at least one stack associated with this source within the first 3 years of the effective date of this operating permit for Total Combined Particulate Matter (front and back half) in order to demonstrate compliance with the particulate matter emission limit(s). The permittee shall follow the following procedures:

1. At least 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.
2. At least 30 days prior to the test, the Regional Air Quality Manager shall be informed of the date and time of the test.
3. Within 30 days after the source test(s), two copies of the complete test report, including all operating conditions and process flow rates at the facility, shall be submitted to the Regional Air Quality Manager.

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the pressure differential across the fabric collectors associated with this source at least once per shift.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the daily pressure drop readings.

**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 (relating to Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The fabric collectors associated with this source(s) shall be equipped with bags, and shall be operated and maintained in accordance with the manufacturer's specifications and good air pollution control practices.
- (b) The fabric collector shall be equipped with a differential manometer so that at the request of the Department the pressure drop across the fabric can be measured.
- (c) The pressure drop across each of the fabric collectors shall be maintained at a minimum of 0.5 inches and a maximum of 12 inches water gauge at anytime when the lines are operating.
- (d) A sufficient quantity of spare bags shall be kept in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the collectors.
- (e) When the pressure differential indicates a possible leak or bag breakage, the process will be immediately discontinued and the collectors inspected for leaks and bag breakage.
- (f) Should a leak occur, the permittee shall isolate and repair / replace the broken bag(s).

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) This source consists of 3-Rotary Dryers; DEP ID#111, 112 & 113, Line No. 11, 12 and 13 Rotary Dryers, respectively. Each is ducted to the following product collectors:
 - (1) Line No. 11 Rotary Dryer is ducted to line 11 primary baghouse (C17A) and line 11 secondary baghouse (C17B).
 - (2) Line No. 12 Rotary Dryer is ducted to line 12 primary baghouse (C19A) and line 12 secondary baghouse (C19B).
 - (3) Line No. 13 Rotary Dryer is ducted to line 13 primary baghouse (C21A) and line 13 secondary baghouse (C21B).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

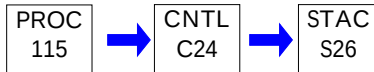
Source ID: 115

Source Name: 16-SUSPENSION RESIN SILOS W/BAGHOUSES

Source Capacity / Throughput:

9.00 Tons/ HR

BULK SUSP HOMO

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

001 [25 Pa. Code §123.13]

Processes

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from this process(es) in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the operation of the fabric collectors associated with this source on at least a daily basis.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a daily record of this sources fabric collectors' operational status.

V. REPORTING REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of 16-Suspension Resin Bulk Silos and each one has a dust collector.

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

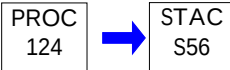
Source ID: 124

Source Name: AIR STRIPPER

Source Capacity / Throughput:

29,167.00 Gal / HR

WASTEWATER

**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 40 CFR Part 61.64].

The permittee shall ensure that the following emission limitations from the air stripper are adhered to:

Vinyl chloride monomer (VCM) emissions shall not exceed 10 ppm (average for 3-hour period) and 1.4 tons per year calculated on a consecutive 12-month period.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall ensure the trichlorethylene (TCE) emissions shall not exceed 0.076 ppm at any time and 57.3 pounds per year calculated on a consecutive 12-month period.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall test the air stripper inlet and outlet for VCM (vinyl chloride monomer) and TCE (trichloroethylene) concentrations on a weekly basis using Department approved methods.

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain records sufficient to demonstrate compliance with the emission limitations of this section. This may include, but not be limited to, waste / water analysis at the inlet and outlet locations of the process.

V. REPORTING REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall provide quarterly reports, in a format approved by the Department, showing the quantification of VCM and TCE emissions.

VI. WORK PRACTICE REQUIREMENTS.

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

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.**

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

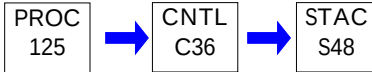
Source ID: 125

Source Name: DISP.RESIN SEMI-BULK STR.AREA W/BAGHS.

Source Capacity / Throughput:

15.20 Tons/ HR

DISPERSION RESIN

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

001 [25 Pa. Code §123.13]

Processes

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from this process(es) in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the pressure differential across the fabric collector(s) associated with this source at least once per shift.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the daily pressure drop readings.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall adhere to the following:

- (1) The fabric collector(s) associated with this source shall be equipped with fabric collector bags, and shall be operated and maintained in accordance with manufacturer's specifications and good air pollution control practices.
- (2) The collector(s) must be equipped with a differential manometer or equivalent to allow monitoring.
- (3) A pressure drop across the fabric collector bags shall be maintained to assure operation of the product collector(s). The pressure drop across each collector(s) shall be less than 6" w.g.
- (4) A sufficient quantity of spare fabric collector bags shall be kept in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the collector(s).

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.**

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following conditions apply to 2 Dispersion Resin PVC pneumatic conveying systems for Manufacturing operations (Line No. 3 and 6) along with associated air cleaning devices (these conditions are incorporated from operating permit 46-313-142):

- (1) All dispersion PVC resin shall be stripped below 2000 ppm prior to drying and handling in the "semi-bulk" loading system as required under 40 CFR Section 61.64(e)(i).
- (2) The fabric collector(s) must be equipped with a device for monitoring the pressure differential across the collector(s). The pressure drop across each collector shall be less than 6" w.g.
- (3) Each fabric collector shall have a bag break detector on the clean air outlet.
- (4) The permittee shall keep on hand a sufficient quantity of spare fabric collector bags for the fabric collector(s) associated with the aforementioned source(s) in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the source(s) and fabric collector(s).

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

**SECTION D. Source Level Requirements**

Source ID: 128

Source Name: OXY 461 REACTOR & VACUUM DRYER

Source Capacity / Throughput:

0.03 Tons/ HR

SPECIALITY RESIN

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

001 [25 Pa. Code §123.13]

Processes

The permittee shall not permit the emission into the outdoor atmosphere of particulate matter from this process 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 §127.441]

Operating permit terms and conditions.

The permittee shall limit the VCM emissions from this source(s) to less than 46.6 ppmv on a daily basis (0.0056 lb / hr).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.64].

VINYL CHLORIDE EMISSION LIMITS:

(a) The permittee shall ensure that the concentration of vinyl chloride in each exhaust gas stream from each reactor does not exceed 10 ppm (average for 3-hour period).

(b) The permittee shall ensure that the concentration of vinyl chloride in each exhaust gas stream from each mixing, weighing, or holding container in vinyl chloride service which precedes the stripper in the plant process flow does not exceed 10 ppm (average 3-hour period).

(c) The permittee shall limit the reactor opening loss from each reactor to less than 0.00002 lb vinyl chloride / lb of polyvinyl chloride product, with the product determined on a dry solids basis.

(d) When a nonbulk resin reactor is used as a stripper this paragraph may be used in lieu of paragraph (c) above:

(1) The weighted average emissions of vinyl chloride from reactor opening loss and all sources following the reactor used as a stripper from all grades of polyvinyl chloride resin stripped in the reactor on each calendar day may not exceed:

(i) 0.00202 lb / lb of polyvinyl chloride product for dispersion polyvinyl chloride resins, excluding latex resins, with the product determined on a dry solids basis.

(ii) 0.00042 lb / lb of polyvinyl chloride product for all other polyvinyl chloride resins, including latex resins, with the product determined on a dry solids basis.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the vinyl chloride emissions from the specialty resin used in this process does not exceed 62.9 lb / yr (0.031 tons / year) calculated in a consecutive 12-month period.

II. TESTING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.70].

(a) The permittee shall take one representative sample of polyvinyl chloride resin from each batch of each grade of resin immediately following the completion of the stripping operation, and identified by resin type and grade and the date and time the batch is completed.

(b) The permittee shall sample each batch for residual vinyl chloride monomer (RVCM).

**SECTION D. Source Level Requirements**

(c) The vinyl chloride content in each sample is to be determined by Test Method 107 as prescribed in 40 CFR Part 61.67(g)(3).

(d) The combined emissions from reactor opening loss and all sources following the reactor used as a stripper are to be determined for each batch stripped in a reactor according to the procedure prescribed in 40 CFR Part 61.67(g)(6).

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall continuously monitor each reactor for temperature and pressure.

(b) The permittee shall monitor the vinyl chloride emissions from this source (after stripping) and the quantity of polyvinyl chloride produced in order to demonstrate compliance with the emission limitation of this section.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.68].

(a) The permittee shall use a vinyl chloride monitoring system on a continuous basis for this source (and for any source referenced in 40 CFR Part 61.68) and for any control system to which reactor emissions are required to be ducted in 40 CFR Part 61.65(b)(1)(ii), (b)(2), (b)(5), (b)(6)(ii), and (b)(9)(ii).

(b) The vinyl chloride monitoring system(s) used to meet the requirement in paragraph (a) of this section is to be a device which obtains representative samples from one or more applicable emission points on a continuous sequential basis and analyzes the samples with gas chromatography or, if the company assumes that all hydrocarbons measured are vinyl chloride, with infrared spectrophotometry, flame ion detection, or an alternative method. The vinyl chloride monitoring system used to meet the requirements in 40 CFR Part 61.65(b)(8)(i) may be used to meet the requirements of this section.

(c) A daily span check is to be conducted for each vinyl chloride monitoring system used. For all emission sources listed in paragraph (a) of this section, the daily span check is to be conducted with a concentration of vinyl chloride equal to 10 ppm.

(d) The calibration is to be done according to procedures and methods described in 40 CFR Part 61.68(c)(1) & (2).

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Parts 61.64, 61.70 and 61.242-1-11]

(a) The permittee shall maintain records that may be necessary to demonstrate compliance with the emission restriction limitations of this section. This may include, but not be limited to, the following:

- (1) reactor opening test results,
- (2) dates of each reactor opening,
- (3) upset or emergency conditions,
- (4) concentration of vinyl chloride after stripping,
- (5) amount of polyvinyl chloride (PVC) processed in each stripper batch, and identified by resin type and grade and the date and time the batch is completed.
- (6) daily operating parameters, including, but not limited to, temperature and pressure,
- (7) RVC concentration, batch number, date of analysis, etc.

(b) The permittee shall maintain records necessary to demonstrate compliance with the conditions of this section. This may include, but is not limited to, the following:

- (1) identification of leaking equipment,
- (2) date leak(s) were detected and repaired.

SECTION D. Source Level Requirements

- (3) material usage,
- (4) material recovered,
- (5) material disposed of.

(c) The permittee shall calculate the weighted average emissions of vinyl chloride from this source on a daily basis in order to demonstrate compliance with the emission limitation of this section.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the emissions measured according to the monitoring and work practice standards for this source.

V. REPORTING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.70].

The permittee shall include the following information in the quarterly reports required under Section C of this permit:

- (1) A record of the vinyl chloride emissions from reactor opening loss and all sources following the reactor used as a stripper.
- (2) A record of any 24-hour average combined reactor opening loss and emissions from all sources following the reactor used as a stripper, in excess of the limits prescribed in 40 CFR Part 61.64(f). The combined reactor opening loss and emissions from all sources following the reactor used as a stripper associated with each batch are to be averaged separately for each type of resin, over each calendar day and weighted according to the quantity of each grade of resin stripped in reactors that calendar day according to the equations prescribed in 40 CFR Part 61.70.

The number of 24-hour average emissions determined during the reporting period shall be reported. If no 24-hour average combined reactor opening loss and emissions from all sources following the reactor used as a stripper in excess of the limits in 40 CFR Part 61.64(f) are determined, the report shall state that no excess vinyl chloride emissions were determined.

VI. WORK PRACTICE REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall operate and maintain the vacuum system associated with this source(s) whenever the source(s) are in operation and in accordance with manufacturer's specifications in order to keep the integrity of the system and to help demonstrate compliance with the emission limitation of this section.
- (b) The permittee shall use the best method(s), approved by the Department, to reduce VCM concentrations in the reactors and strippers prior to opening(s), that may include, but not be limited to, steam purging.
- (c) The permittee shall maintain and clean the reactors in accordance with 40 CFR Part 61 in order to assure compliance with VCM limits.
- (d) The permittee shall establish practices to prevent relief valve discharges.
- (e) The permittee shall strip the PVC according to specifications to prevent residual vinyl chloride in excess of the limit.
- (f) The permittee shall maintain a leak detection and elimination program. Relief leaks are to be repaired and monitored in accordance with 40 CFR Part 61.242. At least once per year, performance tests shall be performed on at least 90% of the valves or 200 random valves, to determine if there are any leaks. If leaks are determined during testing or by the monitoring system, the equipment shall be repaired and monitored in accordance with 40 CFR Part 61.242.
- (g) The permittee shall take PVC samples in accordance with 40 CFR Part 61.67 to prevent emissions from PVC slurry samples greater than 10 ppm.

SECTION D. Source Level Requirements

(h) During normal operating conditions, the permittee shall ensure that the reactors are closed; therefore, no emissions can occur.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate this source in a manner that the unreacted VOC and vinyl chloride vapors are ducted to and controlled by a common recovery system (DEP ID#102) in series with the thermal incinerator (DEP ID#C35), followed by a packed tower (DEP ID#C35B), or a catalytic incinerator (DEP ID#C02) as a secondary incinerator.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.68]

The permittee shall adhere to the following work practice standards:

(a) When exhaust gas(es) are emitted to the atmosphere without passing through the control system and required vinyl chloride monitoring system, the vinyl chloride content of the emission shall be calculated (in units of each applicable emission limit) by best practical engineering judgment based on the discharge duration and known vinyl chloride concentrations in the affected equipment as determined in accordance with 40 CFR Part 61.67(h) or other Department approved method.

(b) For each 3-hour period, the vinyl chloride content of emissions shall be averaged (weighted according to the proportion of time that emissions were continuously monitored and that emissions by-passed the continuous monitor) for purposes of reporting excess emissions under 40 CFR Part 61.70 and the Reporting Requirements of Section C of this operating permit.

(c) For each vinyl chloride emission to the atmosphere determined in accordance with paragraph (b) of this section to be in excess of the applicable emission limits, the permittee shall record the identity of the source(s), the date, time, and duration of the excess emission, and the approximate total vinyl chloride loss during the excess emission, and the method used for determining the vinyl chloride loss. This information is subject to the reporting requirements of Section C of this operating permit.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR Part 61.64 and 61.65].

(a) Except for an emergency manual vent valve discharge, the permittee shall ensure that there is no discharge to the atmosphere from any manual vent valve on any polyvinyl chloride reactor in vinyl chloride service. An emergency manual vent valve discharge means a discharge to the atmosphere which could not have been avoided by taking measures to prevent the discharge.

VII. ADDITIONAL REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of OXY. 461 Reactor and OXY. 461 Vacuum Dryer (DEP ID#126 & 127).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

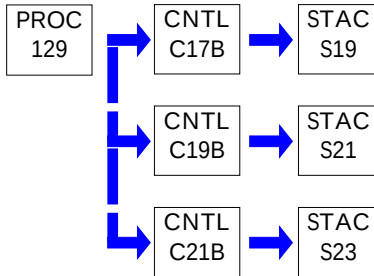
Source ID: 129

Source Name: LINE #11,12&13 PROD. COLLECTORS

Source Capacity / Throughput:

9.00 Tons / HR

SUSPENSION POLYMER

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

001 [25 Pa. Code §123.13]

Processes

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from this process(es) in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the pressure differential across the fabric collectors associated with this source at least once per shift.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the daily pressure drop readings.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The fabric collectors associated with this source(s) shall be equipped with fabric filter bags, and shall be operated and maintained in accordance with the manufacturer's specifications and good air pollution control practices.

(b) The fabric collector shall be equipped with a differential manometer so that at the request of the Department the pressure drop across the fabric can be measured.

SECTION D. Source Level Requirements

(c) The pressure drop across each of the fabric collectors shall be maintained at a minimum of 0.5 inches and a maximum of 12 inches water gauge at anytime when the lines are operating.

(d) A sufficient quantity of spare bags shall be kept in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the collectors.

(e) When the pressure differential indicates a possible leak or bag breakage, the process will be immediately discontinued and the collectors inspected for leaks and bag breakage.

(f) Should a leak occur, the permittee shall isolate and repair / replace the broken bag(s).

VII. ADDITIONAL REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

This source consists of Line No. 11, 12 & 13 primary and secondary Product Collectors (DEP ID#121, 122 & 123, respectively).

(1) Line No. 11 ---> line 11 primary baghouse (C17A) and line 11 secondary baghouse (C17B).

(2) Line No. 12 ---> line 12 primary baghouse (C19A) and line 12 secondary baghouse (C19B).

(3) Line No. 13 ---> line 13 primary baghouse (C21A) and line 12 secondary baghouse (C21B).

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

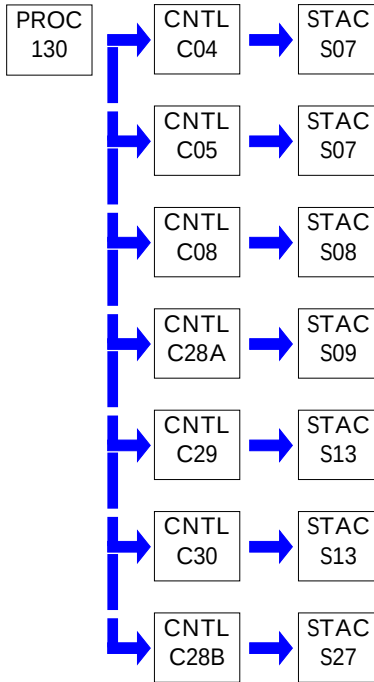
Source ID: 130

Source Name: LINE NO. 3, 4, 6 & 7 GRINDERS

Source Capacity / Throughput:

15.25 Tons / HR

DISPERSION POLYMER



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from this process(es) in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the pressure differential across the fabric collectors associated with this source at least once per shift.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the daily pressure drop readings.

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 (relating to Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall adhere to the following:

- (1) The fabric collectors associated with this source shall be equipped with fabric collector bags, and shall be operated and maintained in accordance with manufacturer's specifications and good air pollution control practices.
- (2) The collectors must be equipped with a differential manometer or equivalent to allow monitoring.
- (3) A pressure drop across the fabric collector bags shall be maintained to assure operation of the product collector.
- (4) A sufficient quantity of spare fabric collector bags shall be kept in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the collector.

VII. ADDITIONAL REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of Line No. 3, 4, 6 & 7 Grinders (Unground and Ground) and Product Collectors (2 each), DEP ID#116, 117, 118 & 119, respectively. Each Line grinder is connected to product collectors, as follows:

Line No. 3 --> line 3 ground baghouse (C04) and line 3 unground baghouse (C05).

Line No. 4 --> line 4 unground baghouse (C08); line 4 ground baghouses (C28A) and (C28B).

Line No. 6 --> line 6 unground baghouse (C29) and line 6 ground baghouse (C30).

Line No. 7 --> line 7 ground baghouse (C14).

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

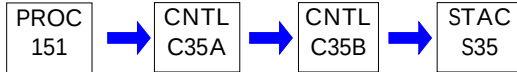
Source ID: 151

Source Name: 18-VINYL CHLORIDE STORAGE TANKS

Source Capacity / Throughput:

N / A

VINYL CHLORIDE



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate this source in a manner that the unreacted VOC and vinyl chloride vapors are ducted to and controlled by a common recovery system (DEP ID#102) in series with the thermal incinerator (DEP ID#C35), followed by a packed tower (DEP ID#C35B), or a catalytic incinerator (DEP ID#C02) as a secondary incinerator.

VII. ADDITIONAL REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of 15-25,000 gallon, 2-10,000 gallon and 1-170,000 gallon vinyl chloride storage tanks.

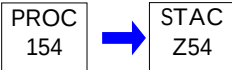
*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 154

Source Name: WASTEWATER TREATMENT PLANT

Source Capacity / Throughput: 29,000.00 Gal / HR WASTEWATER

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the volatile organic compound (VOCs) emissions from the wastewater treatment plant do not exceed 6.4 lb/hr, and 25.0 tons on a 12-month rolling basis.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records sufficient to demonstrate compliance with the emission limitations of this section. This may include, but not be limited to, waste / water analysis at the inlet and outlet locations of the process.

V. REPORTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall provide quarterly reports, in a format approved by the Department, showing the quantification of VCM and TCE emissions.

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) Compliance with the VOC emission limitation of this section shall be determined semi-annually using U.S.EPA Water 8 Modeling System (or equivalent if EPA develops any) and the data listed below:

(1) the amount of wastewater processed during the previous 6-months;

(2) total VOC from the wastewater pretreatment plant semi-annually.

(b) The permittee shall operate and maintain the process equipment associated with this source to prevent wastewater from exceeding the 10 ppm VCM limit.

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.**

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

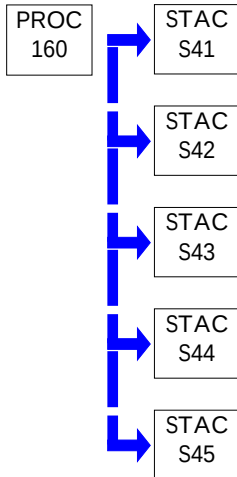
*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 160

Source Name: 5-EMERGENCY DIESEL GENERATORS

Source Capacity / Throughput: 296.80 Gal / HR #2 Oil

**I. RESTRICTIONS.****Operation Hours Restriction(s).**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the hours of operation per generator to 500 hours per consecutive 12-month period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the operating hours for each emergency generator.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain records from the fuel supplier documenting the sulfur and ash content (wt. percent of each), and the heating value of the fuel.

(b) The permittee shall maintain records that demonstrate compliance with the limitations of this section. These may include fuel usage or operating hours.

V. REPORTING REQUIREMENTS.

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

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.**

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain the emergency generators in accordance with manufacturer's specifications and good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source identification number consists of the following individual units:

- (1) 1-1.7 MMBtu / hr Emergency Diesel Generator (150 kW).
- (2) 1-2.3 MMBtu / hr Emergency Diesel Generator (200 kW).
- (3) 1-31.0 MMBtu / hr Emergency Diesel Generator (2,700 kW).
- (4) 1-2.6 MMBtu / hr Emergency Diesel Generator (230 kW).
- (5) 1-3.4 MMBtu / hr Emergency Diesel Generator (300 kW).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

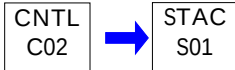
Source ID: C02

Source Name: CATALYTIC INCINERATOR

Source Capacity / Throughput:

90.00 Gal / HR

PROPANE

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall operate and maintain this control device in accordance with manufacturers specifications.

VII. ADDITIONAL REQUIREMENTS.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

This control device is part of Source #102 - VCM / Vinyl Acetate Recovery System and is the back-up control device to C35A.

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

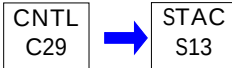
Source ID: C29

Source Name: LINE NO. 6 UNGROUND BAGHOUSE

Source Capacity / Throughput:

1.11 Lbs/HR

PARTICULATE MATTER

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

No person may permit the emission into the outdoor atmosphere of particulate matter from No. 6 Line Unground (Product Collector) Baghouse (Source ID: C29) at any time, in excess of 0.04 grains per dry standard cubic foot, and 32.7 tons per year in a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the pressure drop across the baghouse, with a differential manometer or other Department approved device, for the No. 6 Line Unground (Product Collector) Baghouse (Source ID: C29) on a daily basis when the source is in operation.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the pressure drop across the baghouse, for the No. 6 Line Unground (Product Collector) Baghouse (Source ID: C29), on a daily basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep a sufficient quantity of spare fabric filter bags in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the baghouse (product collector) (Source ID: C29).

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the No. 6 Line Unground (Product Collector) Baghouse (Source ID: C29) shall be equipped with fabric filter bags, and shall be operated and maintained in accordance with the manufacturer's specifications and good air pollution control practices.

**SECTION D. Source Level Requirements**

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the pressure drop across the baghouse shall be maintained at a minimum of 0.5 inches (w.g.) anytime the No. 6 Line Underground (Product Collector) Baghouse (Source ID: C29) is operating.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: C35A

Source Name: T-THERMAL INCINERATOR

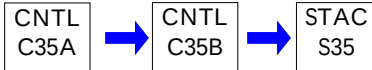
Source Capacity / Throughput:

247.00 Lbs / HR

VINYL CHLORIDE

15.00 Gal / HR

PROPANE

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall limit the VCM emissions from the incinerator and packed tower scrubber to less than 5 ppmv on a daily basis.

(b) The permittee shall limit the VCM emissions from the incinerator and packed tower scrubber to less than 141 pounds per year calculated on a consecutive 12-month rolling basis.

(c) The permittee shall limit the hydrogen chloride (HCl) emission from the packed tower scrubber to less than 1 pound per hour.

Control Device Efficiencies Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the overall destruction and removal efficiency (DRE) of the thermal incinerator and packed tower, at maximum operating conditions, is at least 99.99% for Vinyl Chloride Monomer (VCM) and 99% for Hydrogen Chloride (HCl).

II. TESTING 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 127.511]

The permittee shall conduct the annual CEM RATA (Relative Accuracy Test Audit) compliance test on the control system.

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain and operate a continuous emission monitoring system for VCM concentration. The system shall meet the requirements of Chapter 139 of the Rules and Regulations of the Pennsylvania Department of Environmental Protection.

(b) The permittee shall maintain and operate a temperature monitoring instrumentation which continuously indicates and records the combustion exit gas temperature. The system shall meet the requirements of Chapter 139 of the Rules and Regulations of the Pennsylvania Department of Environmental Protection.

005 [25 Pa. Code §139.101]

General requirements.

(a) The CEM system certification and operation shall be conducted under the direct supervision of persons qualified by training and experience.

(b) The CEM monitoring system may be designed to monitor source emissions or stack emissions if the representativeness of emissions can be verified. The method of conversion of monitoring results to source or stack emissions shall be approved by

SECTION D. Source Level Requirements

the Department.

(c) The permittee shall provide permanent sampling facilities as specified in Section 139.1 to permit verification testing by the Department. For extractive monitors, calibration gas inlets shall be available as near as possible to the monitor probe inlet to permit the Department to verify calibration of the monitoring system.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain a log of all calibration testing conducted on the temperature monitoring instrumentation. The log shall contain references to any deviations, that would effect the reliability and validity of the monitored parameters, occurring during the testing. The permittee shall report such deviations in the semi-annual report to the Department in accordance with Section B (General Title V Conditions) Condition #023(b).

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain records of the continuous incinerator's combustion chamber exit gas temperature.

008 [25 Pa. Code §139.101]

[General requirements.](#)

The permittee shall maintain records that contain monitoring information and report data as specified in PADEP's Continuous Source Monitoring Manual as referenced in 25 Pa. Code Section 139.102(3).

V. REPORTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall report, to the Department, on a quarterly basis and in the quarterly reports, VCM and HCl emissions in excess of the limits specified in this operating permit.

010 [25 Pa. Code §139.53]

[Filing monitoring reports.](#)

(a) Persons responsible for the operation of sources subject to monitoring requirements established by order, by condition of plan approval or permit or under this subchapter, shall submit periodic reports of the results of tests, samples or observations conducted, obtained or made in accordance with the methods or techniques referenced in 139.52 (relating to monitoring methods and techniques). The reports shall be:

(1) Submitted on forms supplied or in a format specified by the Department.

(2) Sworn by the person exercising managerial responsibility over the operation of the source for which monitoring is required.

(3) Submitted on the schedule established by order, condition of plan approval or permit or this subchapter.

(4) Submitted to the Regional Air Pollution Control Engineer for the region of the Department in which the source is located.

(b) In addition to the information required by subsection (a) the Department may, by use of a standard form or by written notice, require information regarding test methods, test conditions, operating conditions of the source or other information which may be necessary to properly evaluate the results of emissions monitoring performed at a source.

VI. WORK PRACTICE REQUIREMENTS.

011 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The temperature monitoring instrumentation shall be operated and maintained in accordance

SECTION D. Source Level Requirements

to a Department approved procedure.

The permittee shall calibrate and test the temperature monitoring instrumentation on a semi-annual basis to verify and validate the reliability of the exit gas temperature thermocouple analysis.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall ensure that the burner associated with this incinerator is set so as to maintain the combustion chamber exit gas temperature at a minimum of 1,800 degrees F at all times while vinyl chloride monomer (VCM) is fed to the incinerator.

(b) The permittee shall operate and maintain this control device in accordance with manufacturer's specifications.

(c) The permittee shall limit the VCM feed rate to the incinerator to less than 247 pounds per hour.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain the incinerator, monitoring and recording equipment according to manufacturing specifications and Department approved procedures.

The permittee shall perform maintenance at a frequency consistent with manufacturing specifications unless otherwise noted by the Department.

The permittee shall record all maintenance performed on the incinerator, monitoring and recording equipment. During each maintenance the permittee shall record all parameters, including but not limited to: operating values, values before and after calibration, span values and deviations of the above as they relate to manufacturing specifications and criteria established during previous stack testing.

014 [25 Pa. Code §139.101]

General requirements.

The permittee shall adhere to the following practices:

(1) Verification testing for monitoring systems shall be in accordance with Subchapter B (relating to monitoring duties of certain sources), and of the manual referenced in 139.102(3).

(2) A quality assurance program shall be established and maintained by the owner of the monitored source. This program shall be in accordance with the criteria in the sources listed in 139.102.

(3) The Department's approval will be based on the criteria specified in the manual referenced in 139.102(3). Failure to utilize the specified procedures or to conduct the quality assurance program could result in denying or rescinding the Department's approval.

(4) The owner of a monitored source shall notify the Department when the monitoring system is inoperative for more than 1 hour during an air pollution episode as specified in Chapter 137 (relating to air pollution episodes). The notice shall be given within 2 hours of the malfunction.

(5) Manual sampling conducted under Subchapter B may be required if the Department determines that the monitoring system data is not accurate or that the owner of the monitored source does not conduct the quality assurance program specified in the manual referenced in 139.102(3).

(6) Required monitoring shall meet at least one of the following minimum data availability requirements unless other data availability requirements are stipulated elsewhere in this title, in a plan approval or permit condition under Chapter 127 (relating to construction, modification, reactivation and operation of sources), or in an order issued under section 4 of the act. For purposes of calculating data availability, "process down" time, as specified in the manual referenced in 139.102(3), shall be considered valid time.

(i) In each calendar month, at least 90% of the time periods for which an emission standard or an operational parameter applies shall be valid as set forth in the quality assurance section of the manual referenced in 139.102(3).

**SECTION D. Source Level Requirements**

(ii) In each calendar quarter, at least 95% of the hours during which the monitored source is operating shall be valid as set forth in the quality assurance section of the manual referenced in 139.102(3).

(7) The monitor results shall be expressed in terms of the applicable standard or criteria required. The method used to convert monitor data shall be approved by the Department.

(8) Monitoring systems shall comply with the applicable performance specifications section of the manual referenced in 139.102(3). The Department has the authority to determine which of the performance specifications are applicable.

(9) Verification of calibration standards shall be conducted in accordance with the applicable sampling methods in the Department's "Source Testing Manual" or as otherwise approved by the Department. The "Source Testing Manual" may be obtained from the Department.

(10) The requirements of this section apply to monitoring to demonstrate compliance with emissions standards and process operational parameter criteria.

015 [25 Pa. Code §139.52]

Monitoring methods and techniques.

The permittee shall operate and maintain the continuous emission monitor (CEM) associated with this control device in accordance with manufacturer's specifications and good operating and maintenance practices to assure compliance regarding continuous emission monitoring.

VII. ADDITIONAL REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This incinerator is rated at 2.1 MMBtu/hr and is ducted to a wet scrubber for removal of HCl emissions.

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

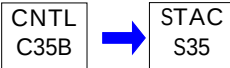
Source ID: C35B

Source Name: WET PACKED TOWER SCRUBBER

Source Capacity / Throughput:

247.00 Lbs/HR

HYDROGEN CHLORIDE

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall limit the VCM emissions from the incinerator and packed tower scrubber to less than 5 ppmv on a daily basis.

(b) The permittee shall limit the VCM emissions from the incinerator and packed tower scrubber to less than 141 pounds per year calculated on a consecutive 12-month rolling basis.

(c) The permittee shall limit the hydrogen chloride (HCl) emission from the packed tower scrubber to less than 1 pound per hour.

Control Device Efficiencies Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the overall removal efficiency of the packed tower, at maximum operating conditions, is 99% for Hydrogen Chloride (HCl).

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

See testing requirements under Source #C35A.

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall, at least once per operating day, monitor the following parameters for this source:

(1) pressure drop across the packed tower scrubber utilizing a differential manometer, or equivalent.

(2) water flow rate to the packed tower scrubber and quench chamber, utilizing a differential rotometer, or equivalent.

(3) pH of the packed tower scrubbing solution.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain daily records of this source's operational parameters.

V. REPORTING REQUIREMENTS.

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

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.**

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall ensure that a minimum flow rate of 9 gallons per minute (GPM) to the packed tower and a minimum flow rate of 35 GPM to the quench chamber is maintained at all times when the thermal incinerator is operating.
- (b) The permittee shall ensure that a pressure drop of less than 6 inches w.g. is maintained across the packed tower.
- (c) Equipment, or records shall be provided so that at the request of the Department, the percent caustic of the scrubbing solution can be determined.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (relating to 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.

Dep Id	Source Description										
010	BOILERS NO.11, 12 & 13										
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.280 Lbs/MMBTU</td><td>PM10</td></tr> </table>		Emission Limit	Pollutant	0.280 Lbs/MMBTU	PM10						
Emission Limit	Pollutant										
0.280 Lbs/MMBTU	PM10										
114	NO. 11, 12 & 13 ROTARY DRYERS										
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr / DRY FT3</td><td>PM10</td></tr> </table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10						
Emission Limit	Pollutant										
0.040 gr / DRY FT3	PM10										
115	16-SUSPENSION RESIN SILOS W/BAGHOUSES										
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr / DRY FT3</td><td>PM10</td></tr> </table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10						
Emission Limit	Pollutant										
0.040 gr / DRY FT3	PM10										
124	AIR STRIPPER										
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.076 PPMV At any time</td><td>T182</td></tr> <tr> <td>57.300 Lbs/Yr</td><td>T182</td></tr> <tr> <td>1.400 Tons/Yr 12-cons.month sum</td><td>T188</td></tr> <tr> <td>10.000 PPMV 3-hr.avg.</td><td>T188</td></tr> </table>		Emission Limit	Pollutant	0.076 PPMV At any time	T182	57.300 Lbs/Yr	T182	1.400 Tons/Yr 12-cons.month sum	T188	10.000 PPMV 3-hr.avg.	T188
Emission Limit	Pollutant										
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1.400 Tons/Yr 12-cons.month sum	T188										
10.000 PPMV 3-hr.avg.	T188										
125	DISP.RESIN SEMI-BULK STR.AREA W/BAGHS.										
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr / DRY FT3</td><td>PM10</td></tr> </table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10						
Emission Limit	Pollutant										
0.040 gr / DRY FT3	PM10										
128	OXY 461 REACTOR & VACUUM DRYER										
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr / DRY FT3</td><td>PM10</td></tr> <tr> <td>10.000 PPMV 3-hr.avg.</td><td>T188</td></tr> </table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10	10.000 PPMV 3-hr.avg.	T188				
Emission Limit	Pollutant										
0.040 gr / DRY FT3	PM10										
10.000 PPMV 3-hr.avg.	T188										
129	LINE #11,12&13 PROD. COLLECTORS										
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr / DRY FT3</td><td>PM10</td></tr> </table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10						
Emission Limit	Pollutant										
0.040 gr / DRY FT3	PM10										
130	LINE NO. 3, 4, 6 & 7 GRINDERS										
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr / DRY FT3</td><td>PM10</td></tr> </table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10						
Emission Limit	Pollutant										
0.040 gr / DRY FT3	PM10										
154	WASTEWATER TREATMENT PLANT										
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>25.000 Tons/Yr 12-month roll.sum</td><td>VOC</td></tr> </table>		Emission Limit	Pollutant	25.000 Tons/Yr 12-month roll.sum	VOC						
Emission Limit	Pollutant										
25.000 Tons/Yr 12-month roll.sum	VOC										
C29	LINE NO. 6 UNGROUND BAGHOUSE										
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr / DRY FT3</td><td>PM10</td></tr> <tr> <td>32.700 Tons/Yr 12-month rolling sum</td><td>PM10</td></tr> </table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10	32.700 Tons/Yr 12-month rolling sum	PM10				
Emission Limit	Pollutant										
0.040 gr / DRY FT3	PM10										
32.700 Tons/Yr 12-month rolling sum	PM10										



SECTION F. Emission Restriction Summary.

Dep Id	Source Description			
C35A	T-THERMAL INCINERATOR			
	Emission Limit			Pollutant
	1.000	Lbs/Hr		T119
	5.000	PPMV	Daily basis	T188
	141.000	Lbs/Yr	12-month roll.sum	T188

Site Emission Restriction Summary

Emission Limit	Pollutant
75.000 Tons / Yr	T188

**SECTION G. Miscellaneous.**

(a) The following sources are considered to be insignificant sources of air pollutants. They are still subject to Sections B and C of this operating permit, as well as any other Federal, State or local laws / regulations that may apply.

- (1) 1-Diesel air compressor.
- (2) 1-125-hp backup river pump (propane-fired).
- (3) 1-4 kW propane-fired generator.
- (4) Solution storage tanks containing low vapor pressure compounds.
- (5) Charge pots.
- (6) Research and Development.
- (7) Portable space heaters.
- (8) Air conditioning and ventilation systems.
- (9) 1-Hydrogen Chloride Storage tank (DEP ID#152).
- (10) 2-Diesel Fire Pumps.

(b) Three (3) vinyl acetate storage tanks (DEP ID#150) with a capacity of 25,000 gallons each shall be operated in accordance with 25 Pa. Code Section 129.57. The permittee shall monitor and record parameters for this source according to Department approved methods in order to calculate emissions of VOCs / HAPs.

(c) The following storage tanks are subject to 25 Pa. Code Section 129.95:

- (1) 2-3,500 gallon Tanks, No. 61 & 62; storing 2-mercaptoethanol; control method = nitrogen blanket.
- (2) 2-10,600 gallon tanks, No. 111 & 112; storing fatty alcohol.
- (3) 12-Pressurized 1,000 gallon tanks, No. 121 - 132; storing propane.
- (4) 1-1,500 gallon gasoline tank, No. 819; equipped with conservation vent.
- (5) 1-5,000 gallon No. 2 fuel oil tank (DEP ID#137A).
- (6) 1-230,000 gallon No. 2 fuel oil tank.
- (7) 12-275 gallon diesel fuel tanks; designated 275-1, 275-2, Disp.-1, Disp.-2, Main A, Main B, Pump 1, RPH, SCHRAM, SUSP, TS, and WTH.
- (8) 1-500 gallon diesel fuel tank; designated Pump 2.
- (9) 2-275 gallon Kerosene tanks; designated Stores 1 and 2.
- (10) 1-550 gallon Heating Oil tanks.
- (11) 1-10,000 gallon No. 2 fuel oil tank (DEP ID#136A).

(c.1) The permittee shall monitor and record the annual throughput and materials stored in each tank listed in paragraph (c) above.

(c.2) The VOC emissions from the tanks listed in paragraph (c) above, shall not exceed 3 pounds per hour, 15 pounds per day, and 2.7 tons per year calculated in a consecutive 12-month period.

(d) Operating Permit Requirements for the Parts Cleaners:

- (1) These tanks range from 20 to 60 gallons and shall be covered when not in use.
- (2) The VOC emissions from these cleaning tanks shall not exceed 2.7 tons per year calculated in a consecutive 12-month period.
- (3) The permittee shall keep records, which clearly demonstrate that the requirements of condition (2) is met.

(e) The following previously issued plan approvals and operating permits serve as a basis for certain terms and conditions contained in this Title V Operating Permit:

- (1) RACT-OP-46-0015 (Revised version - 03/29/2000).
- (2) 46-330-011
- (3) 46-313-142

(f) The permittee shall limit the VOC emissions from the pilot plant to less than 2.7 tons on a 12-month rolling basis.

(g) The permittee shall limit the VOC emissions from the laboratories to less than 2.7 tons on a 12-month rolling basis.

(h) The permittee shall maintain records that clearly demonstrate to the Department that sources, with an emission limitation of 2.7 tons per year or less, are not subject to 25 Pa. Code Sections 129.91 through 129.94.

(i) This administratively amended Title V Operating Permit (APS No. 345519, Auth ID: 494285) incorporates conditions from plan approval PA-46-0015A. PA-46-0015A is for the replacement of a product cyclone to Production Line 6 (Spray Dryer No. 6) with a new unground product collector manufactured by CAMCORP, Model No. 1965-8-25-

**SECTION G. Miscellaneous.**

TR-C. Product Line 6 is identified in the TVOP as Source ID: 104.

(j) This Title V Operating Permit was amended in March 2003 (APS No. - 345519; Auth ID - 494285) in response to a Notice of Appeal (EHB Docket No. 2002-056-MG).



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