

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

# TITLE V/STATE OPERATING PERMIT

Issue Date: September 23, 2010 Effective Date: October 1, 2010

Expiration Date: September 30, 2015

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: 06-05066

Federal Tax Id - Plant Code: 23-0552730-2

#### Owner Information

Name: EXIDE TECHNOLOGIES

Mailing Address: PO BOX 14294

READING, PA 19612-4294

# Plant Information

Plant: EXIDE TECH/READING SMELTER

Location: 06 Berks County 06946 Muhlenberg Township

SIC Code: 3341 Manufacturing - Secondary Nonferrous Metals

# Responsible Official

Name: WILLIAM BARNES

Title: PLT MGR Phone: (610) 921 - 4013

# Permit Contact Person

Name: KEITH DELONG Title: ENV MGR Phone: (610) 921 - 4170

[Signature]		

WILLIAM R. WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER



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# SECTION A. Table of Contents

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

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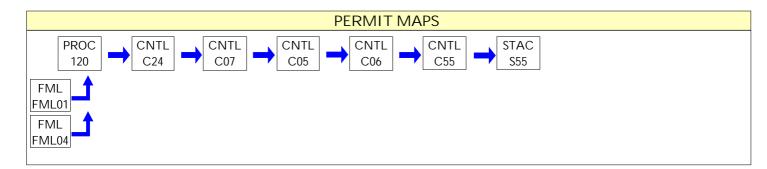
# SECTION A. Site Inventory List

Source	ID Source Name	Capacity/	Throughput	Fuel/Material
120 BLAST FURNACE 1 (OLD)		44.000	MMBTU/HR	
		3.600	Tons/HR	LEAD
		2.000	Tons/HR	COKE
121	BLAST FURNACE 2 (NEW)	44.000	MMBTU/HR	
		3.600	Tons/HR	LEAD
		2.000	Tons/HR	COKE
122	REVERB FURNACE 1 (OLD)	29.600	MMBTU/HR	
		100.000	Gal/HR	#2 FUEL OIL
		25.000	MCF/HR	NATURAL GAS
		8.400	Tons/HR	LEAD
123	REVERB FURNACE 2 (NEW)	29.600	MMBTU/HR	
		8.400	Tons/HR	LEAD
		25.000	MCF/HR	NATURAL GAS
		100.000	Gal/HR	#2 FUEL OIL
124	SMELTER VENTILATION SYSTEM 1	7.000	Tons/HR	LEAD
125	SMELTER VENTILATION SYSTEM 2	7.000	Tons/HR	LEAD
126	BATTERY SHREDDING OPERATION	25.000	Tons/HR	USED BATTERIES
128	SMELTER BUILDING VENTILATION	14.000	Tons/HR	LEAD
129	SLAG COOLING & STORAGE	2.500	Tons/HR	SLAG
130	RAW MATERIAL STORAGE	15.000	Tons/HR	LEAD SCRAP MAT.
131	LIME STORAGE BIN WWTP	20.000	Tons/HR	LIME
132	PLANT ROADWAYS			
137	LIME SLAKER	1.000	Tons/HR	LIME
138	STABILIZATION REAGENT SILO			
146	SLAG CRUSHING OPERATION	100.000	Tons/HR	SLAG
147	REFINING KETTLES	66.000	MMBTU/HR	
		15.000	Tons/HR	LEAD
		66.000	MCF/HR	NATURAL GAS
150	PROPERZI STRIP CASTING	3.500	MCF/HR	NATURAL GAS
C05	BAGHOUSE: SMELTER SYSTEM 1			
C06	SCRUBBER (VENTURI): SMELTER SYSTEM 1			
C07	COOLING TUBES: SMELTER SYSTEM 1			
C08	COOLING TUBES: SMELTER SYSTEM 2			
C11	BAGHOUSE: SMELTER VENTILATION SYSTEM 1			
C13	SCRUBBER: BATTERY SHREDDING OPR			
C15	BAGHOUSE: SMELTER SYSTEM 2			
C16	SCRUBBER (VENTURI): SMELTER SYSTEM 2			
C19	BAGHOUSE: SMELTER VENTILATION SYSTEM 2			
C22	BAGHOUSE 1: RAW MATERIAL STORAGE			
C23A	BAGHOUSE 2: RAW MATERIAL STOR			
C24	AFTERBURNER: SMELTER SYSTEM 1	25.000	MCF/HR	Natural Gas



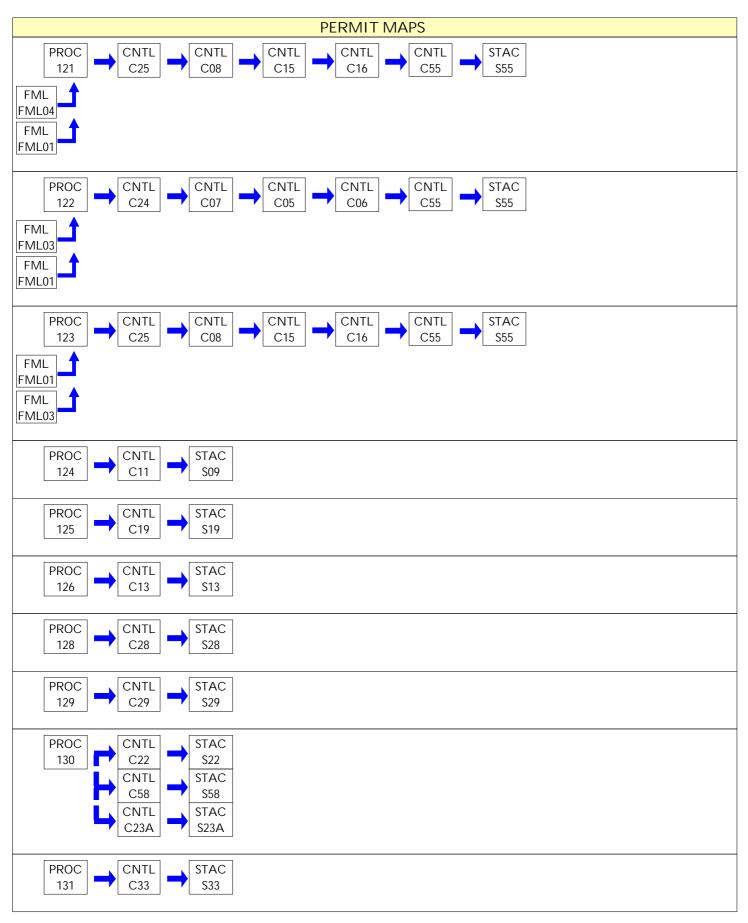
# SECTION A. Site Inventory List

Source II	D Source Name	Capacity/Throughp	ut Fuel/Material
C25	AFTERBURNER: SMELTER SYSTEM 2	27.000 MCF/HF	R Natural Gas
C28	BAGHOUSE: SMELTER BLDG VENT		
C29	BAGHOUSE: SLAG STORAGE		
C33	BIN VENT: LIME STORAGE WWTP		
C37	BIN VENT: LIME SLAKER		
C38	BAGHOUSE: STABILIZATION REAGENT SILO		
C46	BAGHOUSE: SLAG CRUSHING		
C47	BAGHOUSE: REFINING KETTLES		
C50	STRIP CASTING WET SCRUBBER		
C55	SPRAY SCRUBBER: SMELTER SYSTEMS 1 & 2		
C58	BAGHOUSE 3: RAW MATERIAL STORAGE		
C61	ROAD SWEEPER		
FML01	#2 FUEL TANK		
FML03	NATURAL GAS PIPELINE		
FML04	COKE PILE		
S09	STACK: SMELTER VENTILATION SYSTEM 1		
S13	STACK: BATTERY SHREDDER OPR		
S19	STACK: SMELTER VENTILATION SYSTEM 2		
S22	STACK 1: RAW MATERIAL STORAGE		
S23A	STACK 2: RAW MATERIAL STORAGE		
S28	STACK: SMELTER BLDG VENT		
S29	STACK: SLAG STORAGE		
S33	STACK: LIME STORAGE WWTP		
S37	STACK: LIME SLAKER		
S38	STACK: STABILIZATION REAGENT SILO		
S46	STACK: SLAG CRUSHING		
S47	STACK: REFINING KETTLES		
S55	STACK: SMELTER		
S58	STACK 3: RAW MATERIAL STORAGE		
S61	STACK: PLANT RAODWAY SWEEPER		
S70	SRTIP CASTING STACK		
Z61	FUGITIVES: PLANT ROADWAYS		



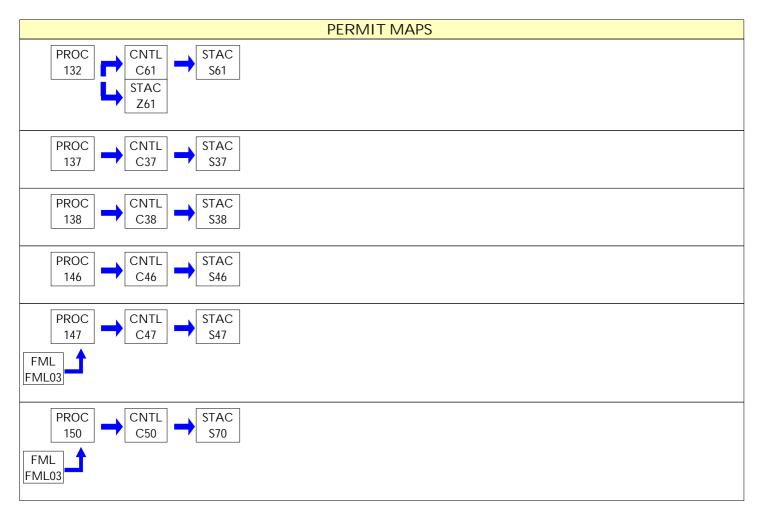












06-05066



# 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.

#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 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.

#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.

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 NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less





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

- (4) Space heaters which heat by direct heat transfer.
- (5) Laboratory equipment used exclusively for chemical or physical analysis.
- (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.
- (e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

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

# Reactivation of Sources

- (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).



#019 [25 Pa. Code §§ 121.9 & 127.216]

#### Circumvention

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

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

#### **Submissions**

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

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

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

Air Enforcement Branch (3AP00)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

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

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

## Sampling, Testing and Monitoring Procedures

- (a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

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

# Recordkeeping Requirements

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



- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

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

# Reporting Requirements

- (a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.
- (c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #020(c) of this permit.
- (d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#024 [25 Pa. Code § 127.513]

# **Compliance Certification**

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



certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance or, of the submittal date specified elsewhere in the permit, to the Department and EPA in accordance with the submission requirements specified in condition #020 of this section.

#025 [25 Pa. Code § 127.3]

# Operational Flexibility

- (a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:
  - (1) Section 127.14 (relating to exemptions)
  - (2) Section 127.447 (relating to alternative operating scenarios)
  - (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
  - (4) Section 127.449 (relating to de minimis emission increases)
  - (5) Section 127.450 (relating to administrative operating permit amendments)
  - (6) Section 127.462 (relating to minor operating permit amendments)
  - (7) Subchapter H (relating to general plan approvals and operating permits)
- (b) Unless precluded by the Clean Air Act or the regulations adopted thereunder, the permit 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 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.
- (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.



I. RESTRICTIONS.

# Emission Restriction(s)

# 001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

No person shall permit the emission into the outdoor atmosphere of any 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. This does not exempt the permittee from complying with the control of fugitive emissions from roads and streets as set forth in 40 CFR Part 63, Subpart X, the National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting.
- d. Clearing of land.
- e. Stockpiling of materials.
- f. Sources and classes of sources other than those identified above, for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
  - 1. The emissions are of minor significance with respect to causing air pollution;
  - 2. The emissions are not preventing or interfering with the attainment or maintenance of any ambient air standard.

# 002 [25 Pa. Code §123.2]

Fugitive particulate matter

No person shall permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, Condition # 001, if the emissions are visible at the point the emissions pass outside the persons property.

# 003 [25 Pa. Code §123.31]

Limitations

No person shall permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

# 004 [25 Pa. Code §123.41]

Limitations

No person shall emit visible air contaminants into the outdoor atmosphere in such a manner that the opacity of the emission is either of the following:

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



# 005 [25 Pa. Code §123.42]

Exceptions

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

- a. The presence of uncombined water is the only reason for failure of the emission to meet the limitation.
- b. The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions:
- c. The emission results from sources specified in Section C, Condition #001 (relating to prohibition of certain fugitive emissions).

## II. TESTING REQUIREMENTS.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

For any testing the permittee shall do the following:

- a. Pursuant to 25 Pa. Code Section 139.3 at least 45 calendar days prior to commencing an emissions testing program, a test protocol shall be submitted to the Department for review and approval. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- b. Pursuant to 25 Pa. Code Section 139.3 at least 15 calendar days prior to commencing an emission testing program, notification as to the date and time of testing shall be given to the appropriate Regional Office. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.
- c. Pursuant to 25 Pa. Code Section 139.53(a)(3) within 15 calendar days after completion of the on-site testing portion of an emission test program, if a complete test report has not yet been submitted, an electronic mail notification shall be sent to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office indicating the completion date of the on-site testing.
- d. Pursuant to 40 CFR Part 60.8(a), 40 CFR Part 61.13(f) and 40 CFR Part 63.7(g) a complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program. For those tests being conducted pursuant to 40 CFR Part 61, a complete test report shall be submitted within 31 days after completion of the test
- e. Pursuant to 25 Pa. Code Section 139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:
- 1. A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
- 2. Permit number(s) and condition(s) which are the basis for the evaluation.
- 3. Summary of results with respect to each applicable permit condition.
- 4. Statement of compliance or non-compliance with each applicable permit condition.



f. Pursuant to 25 Pa. Code Section 139.3 all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

g. All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.

h. Pursuant to 25 Pa. Code Section 139.53(a)(1) and 139.53(a)(3) all submittals, besides notifications, shall be accomplished through PSIMS\*Online available through https://www.depgreenport.state.pa.us/ecomm/Login.jsp when it becomes available. If internet submittal can not be accomplished, two copies of the submittal shall be sent to the Pennsylvania Department of Environmental Protection, Bureau of Air Quality, Division of Source Testing and Monitoring, 400 Market Street, 12th Floor Rachael Carson State Office Building, Harrisburg, PA 17105-8468 with deadlines verified through document postmarks. In a like manner, a copy of the submittal shall be sent to the South Central Regional Office and District Office.

i. The permittee shall ensure all federal reporting requirements contained in the applicable subpart of 40 CFR are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between the state and the federal requirements, the most stringent provision, term, condition, method or rule shall be used by default.

# 007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Section 52.2058 (PSD)]

The Department reserves the right to require exhaust stack testing of the source(s) as necessary during the permit term to verify emissions for purposes including emission fees, malfunctions or permit condition violations.

# 008 [25 Pa. Code §139.1]

Sampling facilities.

Upon the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such source. The Department will set forth, in the request, the time period in which the facilities shall be provided as well as the specifications for such facilities.

#### III. MONITORING REQUIREMENTS.

# 009 [25 Pa. Code §123.43]

Measuring techniques

Visible air contaminants may be measured using either of the following:

- a. A device approved by the Department and maintained to provide accurate opacity measurements.
- b. Observers, trained and certified, to measure plume opacity with the naked eye, as per EPA Method 9, or with the aid of any devices approved by the Department.

# 010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain equipment (a differential manometer or equivalent) on all the facility's collectors so, at any



time, the pressure drops across the collectors may be observed. These pressure drops shall be monitored daily.

# 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall conduct a daily inspection during regular business workdays around the plant periphery during the daylight hours when the plant is in production to detect visible emissions, fugitive visible emissions and malodorous emissions as follows:

- a. Visible emissions in excess of the limits stated in Section C, Condition #004 may be measured according to the methods specified in Section C, Condition #009.
- b. Presence of fugitive visible emissions beyond the plant property boundaries, as stated in Section C, Condition #002.
- c. Presence of malodorous air contaminants beyond the plant property boundaries as stated in Section C, Condition #003.

# 012 [25 Pa. Code §127.512]

Operating permit terms and conditions.

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

The permittee shall report malfunctions which occur at the Title V facility to the Department. As defined in 40 CFR Section 60.2 and incorporated by reference in 25 Pa. Code Chapter 122, a malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

- a. Malfunctions which occur at the Title V facility and which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than four hours after the incident. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.
- b. Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirements of subsection (a)(1), above, shall be reported to the Department, in writing, within five (5) days of discovery of the malfunction.

# IV. RECORDKEEPING REQUIREMENTS.

# 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a logbook for recording exceedances of malodorous air contaminants, visible emissions and fugitive visible emissions. The logbook shall include the name of the company representative, date and time of the monitoring, the wind direction, weather conditions, and the operating conditions of the furnaces (up/down, afterburner temperatures, sulfur dioxide levels).



#### V. REPORTING REQUIREMENTS.

# 014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall submit an annual emissions report to the Department. The report for a given calendar year is due no later than March 1 of the following year, and shall be submitted to the Lancaster/Reading District Supervisor unless otherwise specified. The report shall also include monthly records of fuel usage and operating hours for the sources listed in this permit, and shall ensure that any emissions estimates include emissions not only from normal operations, but also from any malfunctions, startups and shutdowns.

# 015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee's annual Compliance Certification as required by Condition #024, Section B, is due January 1 of each calendar year. The certification should be postmarked or hand-delivered within thirty (30) days of the due date to the Department and EPA in accordance with the submission requirements specified in Condition #020, Section B.

# 016 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Continuous emission/parameter data gathered from the certified monitors shall be submitted to the Department quarterly. These reports are due by the last day of the month following the end of the calendar quarter. The data shall be retained for at least five years following the date of record and shall be made available to the Department representative during facility inspections.

# 017 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.550] Subpart X National Emission Standards From Secondary Lead Smelting Recordkeeping and reporting requirements.

The permittee shall submit semiannual reports to the Department containing the following information for those sources subject to 40 CFR Part 63, Subpart X, National Emission Standards for Hazardous Air Pollutant from Secondary Lead Smelters:

- a. The occurrence and duration of each startup, showdown and malfunction of the sources and air pollution control equipment.
- b. The occurrence, duration of each malfunction of any control devices and CEMs and the response taken.
- c. An identification of the date and time of all bag leak detection system alarms, their cause, and an explanation of the corrective actions taken.
- d. A summary of the records maintained as part of the practices described in the standard operating procedures manual for baghouses and the battery braking scrubber, including an explanation of the periods when the procedures were not followed and the corrective actions taken.
- e. A summary of the fugitive dust control measures performed during the required reporting period, including an explanation of the periods when the procedures outlined in the standard operating procedures manual were not followed and the corrective actions taken.
- f. A summary of any stack test results that were performed during the year.



g. Any other information required by 40 CFR Part 63, Subpart A.

Note: The reports shall not contain copies of the daily records required to demonstrate compliance with the requirements of the standard operating procedures manual. This report maybe submitted annually with approval from the Department.

#### VI. WORK PRACTICE REQUIREMENTS.

# 018 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.548] Subpart X National Emission Standards From Secondary Lead Smelting Monitoring requirements.

The permittee shall operate at all times according to the Department approved standard operating procedures manual the air pollution control devices and monitoring equipment. This manual shall not be changed without written approval from the Department.

#### VII. ADDITIONAL REQUIREMENTS.

# 019 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

# 020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall comply with all of the terms and conditions of the December 12, 2007 Consent Order and Agreement (COA), which is herein incorporated by reference.

# 021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This permit supersedes in their entirety, the following permits:

Title V Operating Permit, Revision 01, issued 11/15/2000 and effective 12/01/2000 and all previous iterations of any Title V permit for this facility.

and plan approvals:



- a. Plan Approval No. 06-05066C,
- b. Plan Approval No. 06-05066D,
- c. Plan Approval No. 06-05066E,
- d. Plan Approval No. 06-05066F,
- e. Plan Approval No. 06-05066G, and
- f. Plan Approval No. 06-05066H.

# 022 [25 Pa. Code §127.512]

Operating permit terms and conditions.

Within 30 days of issuance of this permit, Exide shall update the Fugitive Dust Control Operating Procedures (FDCOP) for the Reading Smelter so as to be consistent with the provisions of this permit, and with Paragraph 3(a) of the Consent Order and Agreement signed with the Department on 6/15/10. Exide shall comply with the FDCOP, as approved by the Department.

# 023 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material in an air basin except where the open burning operations result from:

- a. A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- b. Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- c. A fire set for the prevention and control of disease or pests, when approved by the Department.
- d. A fire set solely for recreational or ceremonial purposes.
- e. A fire set solely for cooking food.

# 024 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.541] Subpart X National Emission Standards From Secondary Lead Smelting Applicability

The permittee is subject to the provisions of 40 CFR Part 63, Subpart A - General Provisions as detailed in Table 1 of 40 CFR Part 63, Subpart X, and shall comply with all applicable requirements in 40 CFR Part 63, Subpart A.

# 025 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.549] Subpart X National Emission Standards From Secondary Lead Smelting Notification requirements.

The facility is subject to Subpart X of the National Emission Standards for Hazardous Air Pollutants for Source Categories and shall comply with all applicable requirements of this Subpart. 40 CFR Section 63.13 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 of Air Protection Division US EPA, Region III



1650 Arch Street Philadelphia, Pa 19103-2029

# 026 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6]

Subpart A--General Provisions

Compliance with standards and maintenance requirements.

On October 16, 2009, the United States District Court of Appeals for the District of Columbia Circuit (D.C. Circuit) issued a Mandate vacating 40 CFR 63.6(f)(1) and 63.6(h)(1). Unless and until the US EPA revises these sections in a manner acceptable to the Court, Exide shall comply with 40 CFR Part 63 in a manner consistent with the Court's Mandate for those sources subject to a Subpart under 40 CFR Part 63.

#### VIII. COMPLIANCE CERTIFICATION.

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

#### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.



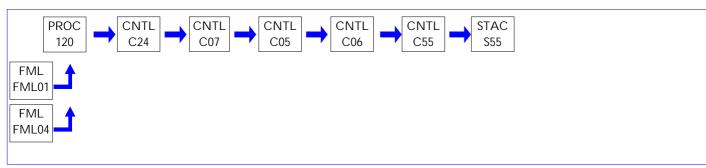
Source ID: 120 Source Name: BLAST FURNACE 1 (OLD)

Source Capacity/Throughput: 44.000 MMBTU/HR

3.600 Tons/HR LEAD 2.000 Tons/HR COKE

Conditions for this source occur in the following groups: SG01 LEAD FURNACES

SG04 SMELTER ODOR CONTROL



#### RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



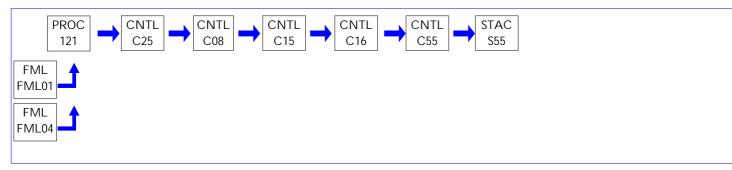
Source ID: 121 Source Name: BLAST FURNACE 2 (NEW)

Source Capacity/Throughput: 44.000 MMBTU/HR

3.600 Tons/HR LEAD 2.000 Tons/HR COKE

Conditions for this source occur in the following groups: SG01 LEAD FURNACES

SG04 SMELTER ODOR CONTROL



#### RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



Source ID: 122 Source Name: REVERB FURNACE 1 (OLD)

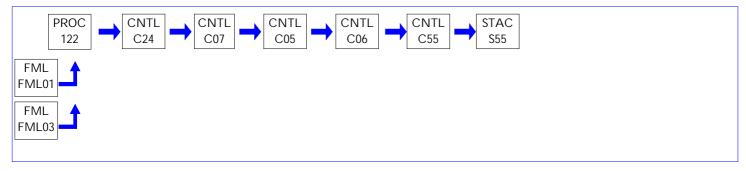
Source Capacity/Throughput: 29.600 MMBTU/HR

100.000 Gal/HR #2 FUEL OIL 25.000 MCF/HR NATURAL GAS

8.400 Tons/HR LEAD

Conditions for this source occur in the following groups: SG01 LEAD FURNACES

SG04 SMELTER ODOR CONTROL



#### RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

# IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).





Source ID: 123 Source Name: REVERB FURNACE 2 (NEW)

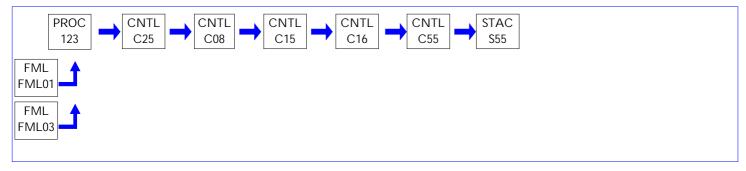
Source Capacity/Throughput: 29.600 MMBTU/HR

8.400 Tons/HR LEAD

25.000 MCF/HR NATURAL GAS 100.000 Gal/HR #2 FUEL OIL

Conditions for this source occur in the following groups: SG01 LEAD FURNACES

SG04 SMELTER ODOR CONTROL



#### RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

# IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



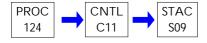




Source ID: 124 Source Name: SMELTER VENTILATION SYSTEM 1

Source Capacity/Throughput: 7.000 Tons/HR LEAD

Conditions for this source occur in the following groups: SG02 PROCESS FUGITIVES



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

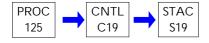
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



Source ID: 125 Source Name: SMELTER VENTILATION SYSTEM 2

Source Capacity/Throughput: 7.000 Tons/HR LEAD

Conditions for this source occur in the following groups: SG02 PROCESS FUGITIVES



# I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

# V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

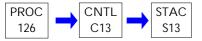
#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



Source Name: BATTERY SHREDDING OPERATION Source ID: 126

> Source Capacity/Throughput: 25.000 Tons/HR **USED BATTERIES**



#### RESTRICTIONS.

# Emission Restriction(s).

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the emissions of lead to 0.017 pounds per hour or less.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the particulate emissions from the operation to 0.02 grains per dry standard cubic foot or less.

# 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for fugitive dust sources

The permittee shall limit the emissions of lead compounds from the source to 0.00087 grains per dry standard cubic foot of exhaust to the atmosphere.

#### Control Device Efficiency Restriction(s).

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a minimum operating pressure drop of 16 inches (water gauge) across the venturi scrubber when the source is operating.

#### TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain equipment on the scrubber so that at any time the following can be measured:

a. The pressure drop across the scrubber, utilizing a differential manometer or equivalent.



b. The water flow rate to the scrubber, utilizing a rotameter or other approved method.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall inspect and maintain the scrubber in accordance with the procedures outlined below:

- a. Daily inspection of the operating status of the scrubber.
- b. Daily monitoring of the pressure drop across the venturi throat.
- c. Daily monitoring of the water flow rate to the scrubber.
- d. Weekly inspection of the collected material removal system.
- e. Quarterly inspection of the physical integrity of the interior of the scrubber for leaks.
- f. Quarterly inspection of the fan for wear, material build-up and corrosion.
- g. Daily inspection of the stack exhaust.

#### IV. RECORDKEEPING REQUIREMENTS.

# 007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.550]

Subpart X National Emission Standards From Secondary Lead Smelting

Recordkeeping and reporting requirements.

The permittee shall record and maintain for a period of five years the following:

- a. A log of the inspections and results of each inspection. This log shall be available to the Department upon request.
- b. Any records required by the practices described in the standard operating procedures manual for the battery shredding scrubber.
- c. The occurrence and duration of each start-up, shutdown and malfunction of the source.
- d. The occurrence and duration of each malfunction of the air pollution control equipment.
- e. All maintenance performed on the air pollution control equipment.
- f. Actions taken during periods of start-up, shutdown and malfunctions when such actions are different from the procedures during normal start-up, shutdown and malfunctions.
- g. All required measurements required to show compliance with any applicable standards.
- h. All results of performance testing.





# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

# 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain the above source in a manner consistent with good operating and maintenance practices.

# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for fugitive dust sources

[Additional authority for this condition is derived from 25 Pa Section 127.441]

The permittee shall maintain the enclosure around the source and the exhaust hoods over the source. All exhaust shall be directed to the venturi scrubber. The enclosure, hoods and scrubber shall be maintained and operated with good pollution control practices.

# VII. ADDITIONAL REQUIREMENTS.

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

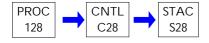




Source Name: SMELTER BUILDING VENTILATION Source ID: 128

> Source Capacity/Throughput: 14.000 Tons/HR **LEAD**

Conditions for this source occur in the following groups: SG02 PROCESS FUGITIVES



# RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# II. TESTING REQUIREMENTS.

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

### MONITORING REQUIREMENTS. Ш.

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

### RECORDKEEPING REQUIREMENTS. IV.

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

# REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

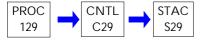
# VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



Source ID: 129 Source Name: SLAG COOLING & STORAGE

Source Capacity/Throughput: 2.500 Tons/HR SLAG



# I. RESTRICTIONS.

# Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

**Processes** 

The permittee shall limit the particulate matter emissions from the source to 0.04 grains per dry standard cubic foot.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the lead emissions from the source to less than 0.0004 grains 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 (Title V General Requirements).

# III. MONITORING REQUIREMENTS.

# 003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall monitor the pressure drop across the cartridge collector daily to monitor the compliance with the particulate limit.

### IV. RECORDKEEPING REQUIREMENTS.

# 004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall record the daily pressure drop readings in a permanent log book.

# V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

# 005 [25 Pa. Code §127.444]

Compliance requirements.



The permittee shall operate and maintain the above source in a manner consistent with good operating and maintenance practices.

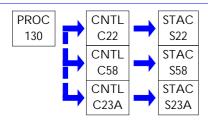
# VII. ADDITIONAL REQUIREMENTS.

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



Source ID: 130 Source Name: RAW MATERIAL STORAGE

Source Capacity/Throughput: 15.000 Tons/HR LEAD SCRAP MAT.



# I. RESTRICTIONS.

# Emission Restriction(s).

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure the lead emissions from the above source exhausted through the Wheelabrator fabric collector (C23A) shall not exceed the following limits:

- a. 0.00044 grains per dry standard cubic foot
- b. 0.13 tons during any consecutive 12-month period

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is derived from 25 PA Section 123.13]

The permittee shall limit the particulate matter emissions from the Raw Material Storage to the following levels:

- a. Flex-Kleen Fabric Collector (C58) 0.004 grains per dry standard cubic foot
- b. Wheelabrator Fabric Collector (C23A) 0.001 grains per dry standard cubic foot
- c. Carborundum Fabric Collector (C22) 0.04 grains per dry standard cubic foot

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The operation of the source shall not result in any visible emissions.

# 004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for fugitive dust sources

The permittee shall limit the emissions of lead compounds from the source to 0.00087 grains per dry standard cubic foot of exhaust to the atmosphere from each fabric collector.



# II. TESTING REQUIREMENTS.

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

### III. MONITORING REQUIREMENTS.

# 005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall provide and maintain equipment (a differential manometer, as approved by the Department) so that, at any time, the pressure drop across the fabric collectors can be measured.

# 006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.548]

Subpart X National Emission Standards From Secondary Lead Smelting

Monitoring requirements.

The permittee shall conduct the following monitoring inspections on the fabric collectors controlling the particulate and lead emissions from this source:

- a. Daily monitoring of the pressure drop across each collector cell.
- b. Weekly conduct a visual inspection to see that the dust is being removed from the hoppers and conveyance systems.
- c. Daily check the compressed air supply to pulse-jet collectors.
- d. Daily monitor the cleaning cycle of the each of the fabric collectors to determine if the cleaning cycles are operating correctly. The method for determining this shall be approved by the Department as part of the facility's SOP.
- e. Monthly check the bag cleaning mechanisms (shakers, isolation dampers, sonic horns, ect.).
- f. Monthly check the bag tension.
- g. Quarterly visual inspections of the physical integrity of collector interiors for leaks.
- h. Quarterly visual inspections of fans for wear, material build-up and corrosion.
- i. Daily visual inspections of the stack exhausts.

# IV. RECORDKEEPING REQUIREMENTS.

# 007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.550]

Subpart X National Emission Standards From Secondary Lead Smelting

Recordkeeping and reporting requirements.

The permittee shall record and maintain records for a period of five years the following items:

- a. The results of the collector monitoring on the Baghouse Operator Inspection Sheets for the Fugitive Dust Control Devices. These sheets shall be maintained in a log book on site and made available upon request.
- b. Any records required by the practices described in the standard operating procedures manual for the fugitive dust emissions.





- c. The occurrence and duration of each start-up, shutdown and malfunction of the operation of the source.
- d. The occurrence and duration of each malfunction of the air pollution control equipment.
- e. All maintenance performed on the air pollution equipment.
- f. Actions taken during periods of start-up, shutdown and malfunctions when such actions are different from the procedures during normal start-up, shutdown and malfunctions.
- g. All required measurements required to show compliance with any applicable standards.
- h. All results of performance testing.

# V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

# 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for fugitive dust sources

The permittee shall maintain a total enclosure of the raw material storage area. The enclosure shall be vented to control devices.

# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for fugitive dust sources

The permittee shall maintain and utilize a vehicle wash at all exits of the enclosure. All vehicles exiting the enclosure must pass through the wash and be washed prior to exiting the enclosure.

# VII. ADDITIONAL REQUIREMENTS.

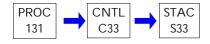
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).



Source ID: 131 Source Name: LIME STORAGE BIN WWTP

Source Capacity/Throughput: 20.000 Tons/HR LIME

Conditions for this source occur in the following groups: SG03 LIME STORAGE



# I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

# IV. RECORDKEEPING REQUIREMENTS.

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

# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

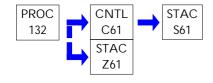
# VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



Source ID: 132 Source Name: PLANT ROADWAYS

Source Capacity/Throughput:



# I. RESTRICTIONS.

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

### II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

# 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for fugitive dust sources

The pressure differential on the road sweeper dust collector shall be read and recorded while in operation during each shift. During normal operation, the pressure differential gauge readings shall be maintained within the range suggested by the manufacturer. When the reading is outside of this range, the permittee shall take corrective actions before the sweeper is returned to service.

The permittee shall maintain equipment and connections to facilitate these requirements.

# IV. RECORDKEEPING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the dates when the wash station is not in operation. This shall include the reason why it is not operating.

# 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.550]

Subpart X National Emission Standards From Secondary Lead Smelting

Recordkeeping and reporting requirements.

The permittee shall record in a Daily Sweeper Maintenance and Operation Log the following items:

- a. A daily record of the pavement cleanings and vehicle washing activates performed during each shift.
- b. The date and time of any times when the road sweeper is not operational and the alternative measures taken to control fugitive emissions from the source.
- c. The cause of any non-operational periods of the road sweeper and corrective actions or repairs made.



- d. All maintenance performed on the road sweeper.
- e. All required measurements required to show compliance with any applicable standard.

The log shall be maintained on file at the plant for a period of five years.

# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Should the permittee choose to replace or change the type or model of road sweeper, a "Request for Determination" form shall be submitted to the Department for approval prior to the action. The permittee may not take the proposed action without approval from the Department.

# 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for fugitive dust sources

The permittee shall limit the speed of vehicle traffic to 10 miles per hour. Speed limit signs shall be posted and maintained throughout the plant roadway areas. The speed limit shall be enforced by the permittee.

# 006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for fugitive dust sources

The permittee shall maintain and operate a wash station at the exit of the plant. All vehicles exiting the plant shall be required to pass through the wash station and be washed to remove any lead compounds on the vehicle.

The permittee may suspend the use of this system when weather conditions may result in hazardous conditions.

# 007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for fugitive dust sources

The permittee shall maintain a drawing of the areas classified as plant roadways. A copy of this drawing shall be submitted to the Department and EPA any time changes are made to it.

# 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for fugitive dust sources



The permittee shall maintain pavement on all areas subject to vehicle traffic. These areas shall be cleaned twice per day using a road sweeper approved by the Department, exhausted through a dust collector to control fugitive dust emissions. The permittee may forgo cleaning, during days when natural precipitation makes cleaning unnecessary or when sand or a similar material has been spread on plant roadways to provide traction on ice or snow.

The road sweeper shall be operated and maintained in accordance with the manufacturer's specifications.

In the event the approved road sweeper is not operational, as an alternative, the permittee shall operate the brush sweepers, normally used inside the smelter buildings, to control the roadway fugitive dust for short periods of time (less then 5 work days). The brush sweepers shall be operated in the same manner as the approved road sweeper. The permittee shall make note of the date and times that the brush sweeper is used in the Sweeper Maintenance and Operation Log. If the permittee believes the road sweeper will be out of service longer than the above time, they shall notify the Department prior to the end of 5 working days by telephone and in writing as follows:

- a. The expected down time of the sweeper,
- b. The cause of the down time, and
- c. The alternative control methods to be used during the extended down time.

If the Department determines that the alternative control methods do not sufficiently minimize emissions, the Department may require Exide to take additional control measures.

### VII. ADDITIONAL REQUIREMENTS.

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



Source ID: 137 Source Name: LIME SLAKER

Source Capacity/Throughput: 1.000 Tons/HR LIME

Conditions for this source occur in the following groups: SG03 LIME STORAGE



# I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

# IV. RECORDKEEPING REQUIREMENTS.

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

# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

# VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



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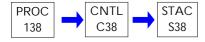


# SECTION D. Source Level Requirements

Source ID: 138 Source Name: STABILIZATION REAGENT SILO

Source Capacity/Throughput:

Conditions for this source occur in the following groups: SG03 LIME STORAGE



### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

# IV. RECORDKEEPING REQUIREMENTS.

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

# V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

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

# VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



Source ID: 146 Source Name: SLAG CRUSHING OPERATION

Source Capacity/Throughput: 100.000 Tons/HR SLAG



# I. RESTRICTIONS.

# Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

**Processes** 

The permittee shall limit the particulate emissions from the source to 0.04 grains per dry standard cubic foot.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The emission of lead from the slag crusher shall not exceed 0.0001 gr/dscf.

### II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

# 003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall daily read and record for the flow of water to the crushing system.

# 004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall record the pressure drop across the fabric collector daily.

# IV. RECORDKEEPING REQUIREMENTS.

# 005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall record the results of the monitoring of the source in a manner approved by the Department.



# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The crushed slag and stabilizing agents shall be discharged to an enclosed container for mixing. The discharging and mixing shall not result in any visible emissions and the mixing shall not be disconnected from the exhaust system until the materials are thoroughly mixed and wetted.

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain:

- a. Equipment (a differential manometer or equivalent, as approved by the Department), so that at any time the pressure drop across the fabric collector can be measured.
- b. Equipment (rotometer or equivalent, as approved by the Department), so that at any time the water flow rate to the system can be measured.

# 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate each control system at the following rates:

- a. The pressure drop across the fabric collector shall range between 3 and 8 inches of water.
- b. The amount of water bring applied to the slag entering the crusher shall be sufficient to suppress all fugitive particulate emissions.

# VII. ADDITIONAL REQUIREMENTS.

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The slag crusher involves the following equipment:

- a. Feed Hopper
- b. Crusher (Kinetic or equivalent)
- c. Screen
- d. Screw Conveyor



e. Two (2) Belt Conveyors	



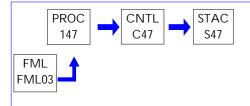
Source ID: 147 Source Name: REFINING KETTLES

Source Capacity/Throughput: 66.000 MMBTU/HR

15.000 Tons/HR LEAD

66.000 MCF/HR NATURAL GAS

Conditions for this source occur in the following groups: SG02 PROCESS FUGITIVES



# RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

# IV. RECORDKEEPING REQUIREMENTS.

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

### V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

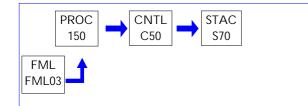
# VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



Source ID: 150 Source Name: PROPERZI STRIP CASTING

Source Capacity/Throughput: 3.500 MCF/HR NATURAL GAS



# I. RESTRICTIONS.

# Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

**Processes** 

The permittee shall limit the emissions of particulate matter to the outdoor atmosphere from the source in a manner that the concentration of particulate matter in the effluent gas does not exceed 0.04 grain per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

General

The permittee may not permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit No.06-319-077B, the permittee shall limit the lead emissions from the source to the following:

a. 0.00044 grains per dry standard cubic foot

b. 0.15 tons during any consecutive 12-month period

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with the Operating Permit No. 06-319-077B, the permittee shall operate the source in a manner that results in no visible emissions.

# II. TESTING REQUIREMENTS.

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



06-05066

### SECTION D. Source Level Requirements

### MONITORING REQUIREMENTS. III.

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

# RECORDKEEPING REQUIREMENTS.

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

# REPORTING REQUIREMENTS.

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

### WORK PRACTICE REQUIREMENTS. VI.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit No. 06-319-077B, equipment (a differential manometer or equivalent, as approved by the Department), shall be provided and maintained so that at any time the pressure drop across the scrubber can be measured.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the scrubber at a pressure drop ranging from 3 to 8 inches of water.

# ADDITIONAL REQUIREMENTS.

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





Source Name: AFTERBURNER: SMELTER SYSTEM 1 Source ID: C24

> Source Capacity/Throughput: 25.000 MCF/HR Natural Gas

# RESTRICTIONS.

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

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

# RECORDKEEPING REQUIREMENTS.

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

# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

### VII. ADDITIONAL REQUIREMENTS.

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







Source ID: C25 Source Name: AFTERBURNER: SMELTER SYSTEM 2

> Source Capacity/Throughput: 27.000 MCF/HR Natural Gas

# RESTRICTIONS.

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

# II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

# RECORDKEEPING REQUIREMENTS.

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

# V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

### VII. ADDITIONAL REQUIREMENTS.

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



Group Name: SG01 LEAD FURNACES

Group Description: Secondary Lead Smelting Process

Sources included in this group:

ID	Name
120	BLAST FURNACE 1 (OLD)
121	BLAST FURNACE 2 (NEW)
122	REVERB FURNACE 1 (OLD)
123	REVERB FURNACE 2 (NEW)

### I. RESTRICTIONS.

# Emission Restriction(s).

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 40 CFR Section 52.2058 (PSD), 40 CFR Section 60.122, NSPS and 40 CFR Section 63.543, MACT]

The emissions from the sources shall not exceed the following:

- a. Total Particulate 6.8 #/hr (25 PA Code Chapter 127, BAT) or 0.022 grains per dry standard cubic foot (40 CFR Part 60, Subpart L, NSPS), whichever is lower.
- b. Total Particulate 28.6 tons per any consecutive 12-months (25 PA Code Chapter 127, BAT).
- c. Lead 0.15 #/hr (25 PA Code Chapter 127, BAT) or 0.00087 grains per dry standard cubic foot (40 CFR Part 63, Subpart X, MACT), whichever is lower.
- d. Lead 0.63 tons per any consecutive 12-months (25 PA Code Chapter 127, BAT).
- e. Sulfur dioxide 110 ppmv (dry basis)(one hour block average)(40 CFR Section 52.2058, PSD). This is equivalent to 112.8 pounds per hour, when the sources are operating at full design exhaust air volume.
- f. Sulfur Dioxide 86 ppmv (dry basis)(12-month average rolling by one month) and 240 tons during any consecutive 12-months (25 PA Code Chapter 127).
- g. Opacity 20 percent (40 CFR Part 60, Subpart L, NSPS)
- # 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.543]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for process sources

The permittee shall limit the emissions of total hydrocarbons from the secondary lead furnaces to the following limits:

- a. 20 ppmv by volume (3 hour average), expressed as propane, corrected to 4 percent carbon dioxide during periods of combined exhaust from both blast furnaces and reverberatory furnaces.
- b. 360 ppmv by volume (3 hour average), expressed as propane, corrected to 4 percent carbon dioxide during periods of discharge from only the blast furnaces.



# Operation Hours Restriction(s).

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit each furnace to 8400 hours of operation per calendar year.

# Throughput Restriction(s).

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Secondary Lead Smelting Operation consists of the following:

System #1

No.1 Blast Furnace (GBC) - 85 tons per day (maximum rated capacity). The actual production rate (annual average) shall not exceed 60 T/day.

No.1 Reverberatory Furnace (GBC) - 200 tons per day (maximum rated capacity). The actual production rate (annual average) shall not exceed 125 tons/day.

System #2

No. 2 Blast Furnace (GBC) - 85 tons per day (maximum rated capacity). The actual production rate (annual average) shall not exceed 60 T/day.

No. 2 Reverberatory Furnace (GBC) - 200 tons per day (maximum rated capacity). The actual production rate (annual average) shall not exceed 115 T/day.

The actual production rates shall be calculated by dividing the annual (calendar) lead production by the furnace by the annual hours of operation (calendar) converted into a daily value (annual production in tons / annual hours x 24 hours per day).

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use the following daily average scrubber water flow rate limits in determining the need for corrective action for the flow rates for each venturi scrubber:

- a. No. 1 Venturi 450 gallons per minute (daily average)
- b. No. 2 Venturi 650 gallons per minute (daily average)

This is the total of the flows from the two feed lines to each scrubber.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use the following daily average scrubber water flow rate limits in determining the need for corrective action for the flow rates for each spray chamber scrubber:



- a. No. 1 Spray Chamber 450 gallons per minute (daily average)
- b. No. 2 Spray Chamber 650 gallons per minute (daily average)

# Control Device Efficiency Restriction(s).

# 007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.548]

Subpart X National Emission Standards From Secondary Lead Smelting

Monitoring requirements.

The permittee shall maintain the afterburners (thermal oxidizers) in such a manner that the average temperatures in any 3-hour period as measured at the approved monitoring locations does not fall more than 50 ° F below the minimum average temperature recorded within the afterburners during the most recent approved source test for total hydrocarbons.

During any such testing, the permittee shall record the temperature of the exhaust from the afterburner's (thermal oxidizer's) combustion section every 15 minutes during the source test for hydrocarbons.

# II. TESTING REQUIREMENTS.

# 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

During each MACT source test for the furnaces conducted pursuant to 40 CFR Section 63.543(h) and (j), the permittee shall determine the average air flow rate passing through each smelter exhaust system. The result of this sampling shall be included in each source test report.

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Using the average air flow rates determined during the most recent MACT test on the furnace system, the permittee shall determine the minimum retention time of each afterburner. The results of this determination shall be included in the source test report.

# 010 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.7, CAM]

In accordance with the Department's "Continuous Source Monitoring Manual," the permittee shall conduct an annual system performance audit of the CEM for sulfur dioxide consistent with the following:

- a. Department approval is obtained prior to testing, and
- b. Notification is provided to the Department's Source Testing and Monitoring, Continuous Emission Monitoring Section, at least 21 days in advance of the testing.

# 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.543]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for process sources



The permittee shall conduct testing for the emissions of lead compounds from the furnaces annually but no later than 12 calendar months after previous compliance test. If the previous compliance test demonstrates the sources emit lead compounds at 0.00044 grains of lead per dry standard cubic foot or less, the permittee is allowed up to 24 calendar months from the previous compliance test to conduct the next annual compliance test for lead compounds.

# 012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.547]

Subpart X National Emission Standards From Secondary Lead Smelting

Test methods.

The permittee shall conduct all testing for lead and hydrocarbons in accordance with the Department and EPA approved test methods as found in 40 CFR Part 63, Sections 63.7 and 63.547.

### III. MONITORING REQUIREMENTS.

# 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 40 CFR Section 52.2058 (PSD) and Section 64.7, CAM]

Equipment (a differential manometer or equivalent, as approved by the Department), shall be provided and maintained so that at any time the pressure drop across each system's fabric collector can be measured.

Equipment shall be provided, operated and maintained so that, at the request of the Department, the following can be measured on each Venturi scrubber and each spray chamber.

- a. Pressure drop across the scrubber, utilizing a differential manometer, or equivalent;
- b. Water flow rate to the scrubber. utilizing a rotameter. or equivalent;
- c. pH of the scrubber water

# 014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 40 CFR Section 52.2058 (PSD) and Section 64.7, CAM]

The permittee shall maintain, calibrate and continuously operate the sulfur dioxide continuous emission monitor in accordance with Chapter 139 and the Department's Continuous Source monitoring Manual. The system shall provide a one hour block average and a 12-month average rolling by one month for periods of operation of any of the furnaces.

# 015 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.7, CAM]

The permittee shall conduct the following monitoring on each smelter system when at least one of the furnaces is operating on a system:

- a. Daily read and record the pressure drop across each scrubber.
- b. Daily measure and record the pH for the scrubber water for each scrubber.





- c. Once per shift (every 8 hours) read and record the scrubber water flows to each scrubber. If after two years the permittee finds no readings below the limits of this permit, the permittee may switch to daily reading for each system. If at any time after switching to daily readings there is an exceedance, the permittee shall return to once per shift schedule until the two year no exceedance period has been attained again.
- d. Continuously monitor and record the afterburner temperatures.

# 016 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.7, CAM]

In accordance with the Department's "Continuous Source Monitoring Manual," the permittee shall observe the following requirements when performing any maintenance/calibration on the CEM system:

- a. Maintenance:
  - 1. Zero and calibration drift checks should be conducted immediately prior to and following any maintenance.
- 2. If the post maintenance zero or the calibration drift checks show drift in excess of twice the applicable performance specifications, recalibration must be conducted in accordance with the quarterly calibration error check procedures in paragraph (B) (2). Monitors may be calibrated in-situ.
- b. Periodic Calibration:
- 1. Calibration must be conducted at least daily for determination of measurement device zero and calibration drift on all measurement devise ranges. The calibration must be performed as per the Department's Continuous Source Monitoring Manual.
- 2. The monitoring system must be adjusted whenever the zero or calibration drift performance specifications are exceeded.
- 3. The zero drift check must be conducted at a measurement level at or between 0 percent and 30 percent of the measurement device's range. The value selected must be lower than the lowest value that would be expected to occur under normal source operating conditions.
- 4. The calibration drift check must be conducted at a measurement level at or between 40 percent and 100 percent of the measurement device's range unless an alternative concentration can be demonstrated to better represent normal source operating levels.
- 5. The permittee shall conduct a quarterly calibration error check on each range of each measurement device (high-level, mid-level, low-level, ect.) and follow procedures as stated in the Department's "Continuous Source Monitoring Manual" or preapproved by the Department.

# 017 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Each time the permittee conducts a test on either of the two control systems pursuant to the 40 CFR Section 63.543(h) and (i), MACT, the permittee shall determine the scrubber water to air ratio for each scrubber using the last guarterly scrubber water flow rate and following formula:

Scrubber Water to Air Ratio = Quarterly Average Flow Rate (gallons per minute) / Test Air Flow (1000 of actual cubic



feet per minute)

In the event that the calculated Scrubber Water to Air ration in less than 10:1, this shall constitute a deviation. Whenever a deviation occurs, the permittee shall conduct a review of the scrubbing systems to determine the cause(s). The permittee shall make any repairs or corrective actions within one week of their discovery unless otherwise approved in writing by the Department.

# 018 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.9, CAM]

In accordance with 25 PA Code Section 139.101(12), SO2 continuous emission monitoring shall meet the following minimum data availability requirements:

- a. In each calendar month, at least 90% of the time periods for which an emission standard applies, shall be valid as set forth in the Quality Assurance section of Revision No. 8 of the Department's Continuous Source Monitoring Manual, 274-0300-001, or
- b. In each calendar quarter, at least 95% of the hours shall be valid as set forth in the Quality Assurance section of Revision No. 8 of the Department's Continuous Source Monitoring Manual, 274-0300-001.

Compliance with any subsequently issued revisions to the Continuous Source Monitoring Manual will constitute compliance with the regulations.

# 019 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.548] Subpart X National Emission Standards From Secondary Lead Smelting Monitoring requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.7, CAM]

The permittee shall maintain a corrective action plan in their standard operating procedures manual. Within 30 minutes of the alarm an investigation shall be conducted to determine the cause of the alarm. The cause of the alarm must be alleviated by taking the necessary corrective action(s) which include, but are not limited to the following:

- a. Inspecting the fabric collector for leaks, torn or broken bags or any other malfunction.
- b. Seal off defective bags.
- c. Replace defective bags.
- d. Repair control device malfunction.
- e. Isolate defective fabric collector cell.
- f. Inspect, cleaning and/or repair bag leak detection system.
- g. Shutdown the process, if corrections will take longer than 30 minutes.

# 020 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.548]

Subpart X National Emission Standards From Secondary Lead Smelting



# Monitoring requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.7, CAM]

The permittee shall maintain bag leak detection systems on the exhausts of the fabric collectors controlling particulate from the processes. The systems shall meet the following specifications and requirements:

- a. Detect particulate concentration as low as 0.0044 grains per dry actual cubic foot. The permittee shall supply the manufacturer's certification for the systems.
- b. Provide relative particulate matter loadings.
- c. Be equipped with an alarm system that will alarm when an increase in relative particulate loading is detected over a preset level.
- d. Be installed and operated in accordance with U.S. Environmental Protection Agency (EPA) guidance, or in the absence of EPA guidance, the manufacturer's written specifications and recommendations for installation, operation and adjustment of the system.
- e. The initial adjustment of the system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time.
- f. Following initial adjustment, the system's sensitivity or range, averaging period, alarm set points or alarm delay time shall not be adjusted, except as detailed in the approved Standard Operating Procedures manual.
- g. In no event shall the sensitivity be increased by more than 100 percent or decreased by more than 50 percent over a 365 day period unless such adjustments follow a complete fabric collector inspection, which demonstrates the fabric collector is in good operating condition.
- h. The leak detector must be located downstream of the fabric collector and upstream of any wet acid gas scrubber.
- i. Multiple leak detectors may share instrumentation and alarm.
- # 021 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.548] Subpart X National Emission Standards From Secondary Lead Smelting Monitoring requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.7, CAM]

The permittee shall conduct the following monitoring inspections on the fabric collectors controlling particulate emissions from the sources in this group:

- a. Monitor the pressure drop across each fabric collector daily.
- b. Weekly conduct a visual inspection that the particulate is being removed from the hoppers and any conveyance system.
- c. Daily monitor the cleaning cycles of each fabric collector to determine if the cleaning cycles are operating correctly. The method for determining this shall be approved by the Department as part of the facility's SOP.
- d. Monthly check the bag cleaning mechanism (shakers, isolation dampers, sonic horns, ect.)
- e. Monthly check bag tension.



- f. Quarterly make visual inspections of physical integrity of the fabric collector interior for leaks.
- g. Quarterly make visual inspections of fans for wear, material build-up and corrosion.
- h. Daily check the vibration meters.
- i. Daily make visual inspections of the stack exhaust.
- j. Daily check of the operating condition of the bag leak detection system.

# 022 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.548]

Subpart X National Emission Standards From Secondary Lead Smelting Monitoring requirements.

[Additional authority for this permit condition is derived from 40 CFR Section 52.2058 (PSD)]

The permittee shall maintain and continuously operate a device, calibrated and approved, to monitor and record the temperature of the exhaust streams from each control system's afterburner for the four secondary lead smelting furnaces at the following locations:

- a. System #1 at the top of the combustion zone within the afterburner (thermal oxidizer) as approved by the Department.
- b. System #2 at the top of the combustion zone within the afterburner (thermal oxidizer) as approved by the Department.

The devices shall be calibrated and approved to monitor and record the temperatures consistent with continuous emission monitoring protocols and 40 CFR Part 60, Sections 63.8 and 63.548(j)(1)(ii)(A through D).

# IV. RECORDKEEPING REQUIREMENTS.

# 023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain the following for each furnace:

- a. Annual (calendar) lead production.
- b. Annual (calendar) hours of operation.
- c. Annual (calendar) production rate in tons of lead per day.
- d. Daily lead production for each furnace.
- e. Monthly hours of operation of each two furnace system.
- f. 12-month rolling total hours of operation of each two furnace system.
- g. The monthly total emissions of sulfur dioxide (SO2) from the entire furnace system.
- h. The 12-month rolling total by one month total emissions of sulfur dioxide (SO2) from the entire furnace system.

# 024 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.9, CAM]

With regard to the SO2 CEMS, the permittee shall comply with the record keeping requirements established in 25 PA Code Chapter 139, Subchapter C (relating to requirements for source monitoring for stationary sources), and the "Record Keeping and Reporting" requirements in the Department's Continuous Source Monitoring Manual, revision No. 8, 274-0300-001. Records shall be retained for at least 5 years and shall be made available to the Department upon request. Compliance



with any subsequently issued revision to the Continuous Source Monitoring Manual will constitute compliance with this permit condition.

# 025 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.550] Subpart X National Emission Standards From Secondary Lead Smelting Recordkeeping and reporting requirements.

[Additional authorization for this condition is derived from 40 CFR Section 64.9, CAM]

The permittee shall record the results of the collector monitoring on the Baghouse Operating Inspection Sheets for Process Control Devices. These sheets shall be maintained in a log book on site and made available upon request.

# 026 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.550] Subpart X National Emission Standards From Secondary Lead Smelting Recordkeeping and reporting requirements.

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.511 and 40 CFR Sections 52.2058, PSD and 64.9, CAM]

The permittee shall maintain the records of the following items for five (5) years at the plant site.

- a. The results of the initial and subsequent compliance tests for lead compounds and total hydrocarbons.
- b. An identification of the date and time of all bag leak detection system alarms, their cause, and an explanation of corrective actions taken.
- c. The output of the continuous temperature monitors, an identification of the periods when the 3-hour average temperature fell below the minimum established during the hydrocarbon testing and an explanation of the corrective actions taken.
- d. The pressure drop, pH and water flow rate of the scrubbers, including:
  - 1. All of the scrubber water flow readings,
  - 2. The daily average scrubber water flow rates for each scrubber,
  - 3. The quarterly average scrubber water flow rates for each scrubber,
  - 4. The calculated scrubber water to air ratios for each scrubber, and
  - 5. The results of all flow meter calibrations.
- e. Maintenance, calibration or other procedures required by the rule for any monitoring systems used to demonstrate compliance.
- f. Any records required by the practices described in the standard operating procedure manual.
- g. The permittee shall comply with all other record keeping requirements specified 40 CFR, Part 63, Section 63.10 of the General Provisions.
- h. Actual production daily rates from the blast and reverberatory furnaces for each calendar quarter.
- i. Operating hours, on a quarterly basis, for each individual smelting system of secondary lead smelting operation.
- j. The occurrence and duration of each startup, shutdown and malfunction of the sources and air pollution control equipment.



- k. The occurrence and duration of each malfunction of the air pollution control equipment and the response taken to the malfunction.
- I. All maintenance performed on the air pollution control equipment.
- m. Actions taken during periods of startup, shutdown and malfunctions when such actions are different from the procedures during normal startup, shutdown and malfunctions.
- n. Each period during which the CEM has malfunctioned or was inoperative.
- o. All required measurements needed to show compliance with any applicable standard.
- p. All results of performance testing.
- q. All calibrations, adjustments and maintenance on CEMs.

# V. REPORTING REQUIREMENTS.

# 027 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall submit all exceedances for the restrictions specified in Section E (SG01) to the Department and EPA, Region III quarterly.

The permittee shall maintain quarterly data for hourly rate production and operating hours for blast and reverberatory furnaces at the site. These data shall be submitted to the Department annually along with the "AIMS" submission.

# 028 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 40 CFR Section 52.2058 (PSD)]

The permittee shall submit to the Department quarterly reports of all instances when the afterburners (thermal oxidizers) fail to maintain the minimum temperature set by the most recent testing for total hydrocarbons. The report shall include the date and time of the failure, reason for the failure and corrective action taken. The reports shall include a verification of the location of the thermocouple within each afterburner. The report is due thirty (30) days from the end of each calendar quarter.

# 029 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Section 64.9, CAM]

The permittee shall report all malfunctions and excursions, corrective actions taken, dates, times, durations and possible causes of events to the Department every six months. This shall be part of the semi-annual compliance reports. The report shall include all monitoring down times.

# 030 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Part 63, Subpart X, MACT]



The permittee shall report in writing each excursion of the 3-hour block average afterburner (thermal oxidizer) temperature requirements in this permit to the Department within 5 days of its occurrence.

# 031 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.9, CAM]

The permittee shall submit a quarterly report listing any daily average scrubber water flow rate deviations, the quarterly averages of the scrubber water flow rates for each scrubber and the latest scrubber water to air ratios for each scrubber. Included in the report shall be any deviations and findings of any deviations reviews including corrective actions and repairs.

# 032 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.7, CAM]

With regard to the SO2 CEMS:

- a. The permittee shall submit quarterly reports of continuous emission monitoring to the Department in accordance with the requirements established in 25 PA Code Chapter 139, Subchapter C (relating to requirements for the source monitoring for stationary sources), and the "Record Keeping and Reporting" requirements as established in the Department's Continuous Source Monitoring Manual, revision No. 8, 274-0300-001.
- b. The permittee shall report emissions for all periods of unit operation, including start-up, shutdown and malfunction.
- c. Initial quarterly reports following system certification shall be submitted to the Department within 35 days following the date upon which the Department notifies the permittee, in writing, of the approval of the continuous source monitoring system for use in determining compliance with the applicable emission standards.
- d. Subsequent quarterly reports shall be submitted to the Department within 30 days after the end of each calendar quarter.
- e. Failure to submit the required reports of continuous emission monitoring within the time periods specified in this condition, shall constitute violations of this permit, unless approved in advance by the Department in writing.
- f. Compliance with any subsequently issued revision to the Continuous Source Monitoring Manual will constitute compliance with this permit condition.

# 033 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.550]

Subpart X National Emission Standards From Secondary Lead Smelting Recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.9, CAM]

The permittee shall:

a. Submit to the Department, on a quarterly basis, the results of the afterburner temperature monitoring. This report is due thirty days after the end of a calendar quarter. The reports in a format specified by the Department shall be submitted to the Regional Office and the Reading District Office as follows below:



- 1. Temperature monitoring output in 3-hour block averages for the guarter.
- 2. Date and time of each time that the afterburner temperature falls below the minimum temperature is set by the most recent testing for total hydrocarbons and action taken.
- b. The temperature monitoring device shall meet the performance and equipment specifications stated in 40 CFR 63, § 63.548 (j)(1).

# VI. WORK PRACTICE REQUIREMENTS.

# 034 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The afterburners (thermal oxidizers) for both systems shall be utilized, whenever either of the associated furnaces are operating. The minimum afterburner (thermal oxidizer) temperatures as set by the most recent testing for total hydrocarbon shall be maintained during the operation of the sources. This minimum temperature shall be attained prior to the charging of materials into any furnace and shall be maintained as long as the furnaces are in use.

No minimum afterburner (thermal oxidizer) temperature shall be required when the reverberatory furnace is not operating and the blast furnace is being charged with reverberatory furnace slag and/or refining dross only.

# 035 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Section 64.7, CAM]

The permittee shall determine the appropriate range of the pressure drop for each of the process system fabric collectors and the pH for the scrubbing water used in each of the process system scrubbers and the appropriate monitoring and averaging times. This shall be done as per the manufacturer's recommendations during the first 90 days after the issuance of this permit. These ranges shall be submitted to the Department within 10 days of this period.

# 036 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Section 64.8, CAM]

The permittee shall weekly inspect each monitoring device listed below to see that it returns to zero. If not it shall be zeroed. Any tubing or connections to and from the meter shall be checked for leakage, breaks and/or blockage, once per quarter. The permittee shall calibrate annually each mechanical device used to measure the pressure drop; and the devices used the measure the water flow rates and the pH of the scrubber water. Any malfunctioning equipment shall be repaired or replaced.

- a. Each fabric collector pressure drop guage
- b. Each scrubber pressure drop guage

# 037 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall quarterly inspect each flow meter and any connections. During this inspection the permittee shall determine if the meters return to zero with no flow. If not, they shall be zeroed. Any malfunctioning equipment shall be repaired or replaced.



# 038 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain on each scrubber water feed line to the scrubbers a magnetic water flow meter or equivalent as approved by the Department. The permittee shall calibrate each meter in conjunction with the exhaust flow testing required by this permit or any subsequent plan approvals issued to the permittee for these sources.

# 039 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain the current intermediate screw conveying systems and ram feeder to feed each reverberatory furnace as approved by Department. The feed system to each reverberatory furnace shall be equipped with a interlock system, that shall automatically shut down the feed system to the furnace should there be an interruption in the firing of the furnace burners. Any changes to the feed systems by the permittee shall have prior approval from the Department.

# 040 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This permit allows the permittee to maintain and operate a water injection system on each Smelting System. The water injection system shall be located after the afterburner (thermal oxidizer) and prior to the cooling tubes. The water injection system shall not interfere with the operation of the afterburner. The water shall be to condition the air to a temperature less than 400°F entering the fabric collector.

# 041 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall determine the quarterly average flow rate for each scrubber using the following formula:

Quarterly Average Flow Rate (gallons per minute) = Total of All Flow Readings (gallons per minute) / Total Number of Readings Taken

# 042 [25 Pa. Code §127.441]

Operating permit terms and conditions.

A deviation occurs whenever the daily average scrubber water flow rate falls below the limits in this permit. Whenever a deviation occurs, the permittee shall conduct a review of the scrubbing systems to determine the cause(s). The permittee shall make any repairs or corrective actions within one week of their discovery unless otherwise approved in writing by the Department.

# 043 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Section 64.7, CAM]

The SO2 CEMS and components must be operated and maintained in accordance with the requirements established in 25 PA Code Chapter 139, Subchapter C (relating to requirements for source monitoring for stationary sources) and the "Quality Assurance" requirements in the Department's Continuous Source Monitoring Manual, Revision No. 8, 274-0300-001. Compliance with any subsequently issued revision to the Continuous Source Monitoring Manual will constitute compliance with this permit condition.



# VII. ADDITIONAL REQUIREMENTS.

# 044 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 40 CFR Section 52.2058 (PSD)]

Pursuant to 25 PA Code 127, Subchapter D, the No.2 secondary reverberatory furnace is subject to 40 CFR, Part 52 (PSD).

Part 52 requires that copies of all requests, reports, applications, submittals and other communications be submitted to both EPA and the Department. The EPA copies shall be forwarded to:

Director Air Protection Division US EPA, Region III 1650 Arch Street Philadelphia, Pa 19103-2029

# 045 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is derived from 40 CFR Section 64.8, CAM]

The permittee shall develop and implement a quality improvement plan (QIP) and submit it to the Department, all within 60 days of the following occurences:

The pressure drop across the filter media exceeds the limits developed under condition #035; the water flow rate drops below the limits of Condition #005 and 006; or the pH of the scrubber waters falls out of the range developed under Condition #035, six or more times during any consecutive 6-month period.

The permittee shall record any actions taken to implement a QIP during a reporting period and all related actions including, but not limited to, inspections, repairs and maintenance performed on the monitoring equipment.

In accordance with 40 CFR Section 64.8, CAM, the QIP shall include procedures for evaluating the control performance problems. Based on the results of the evaluation procedures, the QIP shall be modified to include procedures for conducting more frequent or improved monitoring in conjunction with one or more of the following:

- a. Improved preventive maintenance practices
- b. Process operation changes
- c. Appropriate improvements in control methods
- d. Other step appropriate to correct performance

Following implementation of the QIP, the Department will require reasonable revisions to the QIP if the plan has failed to either:

- a. Address the cause of the control device performance problem
- b. Provide adequate procedures for correcting control device performance as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions.

Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard or any existing monitoring, testing, reporting, work practice and record keeping requirements that may apply under any federal, state or local laws or any other applicable requirement under the Clean Air Act.



# 046 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.120] Subpart L - Standards of Performance for Secondary Lead Smelters Applicability and designation of affected facility.

The No. 2 reverberatory furnace is subject to Subpart L 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 Division US EPA, Region III 1650 Arch Street Philadelphia, Pa 19103-2029





Group Name: SG02 PROCESS FUGITIVES **Group Description: Process Fugitive Sources** 

Sources included in this group:

ID	Name
124	SMELTER VENTILATION SYSTEM 1
125	SMELTER VENTILATION SYSTEM 2
128	SMELTER BUILDING VENTILATION
147	REFINING KETTLES

#### RESTRICTIONS.

### Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

**Processes** 

The permittee shall limit the particulate emissions from the sources to 0.04 grains per dry standard cubic foot.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the emissions of lead from the following source during any consecutive 12-month period to:

- a. Refining Kettles 0.15 tons
- b. Smelter Building Ventilation 0.06 tons

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the lead emissions to the limits below for following sources:

- a. Smelter Ventilation System #2 0.03 lb/hr
- b. Smelter Building Ventilation 0.00005 grains per dry standard cubic foot

# 004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.543]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for process sources

The permittee shall limit the fugitive emissions of total hydrocarbons from the blast furnace charging process to 20 parts per million by volume expressed as propane and corrected to 4 percent carbon dioxide, based on a 3-hour average, as measured at the stack of the #1 and #2 Smelter Ventilation collectors.

# 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.544]

Subpart X National Emission Standards From Secondary Lead Smelting Standards for process fugitive sources.

The permittee shall limit the emissions of lead compounds from process fugitive emission sources to 0.00087 grains per dry standard cubic foot or less.



#### II. TESTING REQUIREMENTS.

# 006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.544] Subpart X National Emission Standards From Secondary Lead Smelting Standards for process fugitive sources.

The permittee shall conduct testing for the emissions of lead compounds from the process fugitive emission sources annually but no later than 12 calendar months after the previous compliance test. If the previous test demonstrates the sources emit lead compounds at 0.00044 grains of lead per dry standard cubic foot or less, the permittee is allowed up to 24 calendar months from the previous compliance test to conduct the next annual compliance test for lead compounds.

# 007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.547] Subpart X National Emission Standards From Secondary Lead Smelting Test methods.

The permittee shall conduct all testing for lead, total hydrocarbons and face velocities in accordance with the Department and EPA approved test methods as found in 40 CFR Part 63, Sections 63.7 and 63.547.

#### III. MONITORING REQUIREMENTS.

# 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall conduct face velocity readings on the refining kettles once per calendar year. The readings shall be conducted in accordance with 40 CFR Part 63, Subpart X.

# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.548] Subpart X National Emission Standards From Secondary Lead Smelting Monitoring requirements.

The permittee shall maintain a corrective action plan in their standard operating procedures manual. Within 30 minutes of the alarm an investigation shall be conducted to determine the cause of the alarm. The cause of the alarm must be alleviated by taking the necessary corrective action(s) which include, but are not limited to the following:

- a. Inspecting the fabric collector for leaks, torn or broken bags or any other malfunction.
- b. Seal off defective bags.
- c. replace defective bags.
- d. Repair control device malfunction.
- e. Isolate defective fabric collector cell.
- f. Inspect, cleaning and/or repair bag leak detection system.
- g. Shutdown the process, if correction will take longer than 30 minutes.

# 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.548] Subpart X National Emission Standards From Secondary Lead Smelting Monitoring requirements.



The permittee shall maintain bag leak detection systems on the exhausts of the fabric collectors controlling particulate from the process fugitive sources. The systems shall meet the following specifications and requirements:

- a. Detect particulate concentrations as low as 0.0044 grains per dry actual cubic foot.
- b. Provide relative particulate matter loadings.
- c. Equipped with an alarm system that will alarm when an increase in the relative particulate loading is detected over a preset level.
- d. Installation and operation in accordance with U.S. Environmental Protection Agency (EPA) guidance, or in the absence of EPA guidance, the manufacturer's written specifications and recommendations for installation, operation and adjustment of the system.
- e. The initial adjustment of the system, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time.
- f. Following initial adjustment, the system's sensitivity or range, averaging period, alarm set points or alarm delay time shall not be adjusted, except as detailed in the approved Standard Operating Procedures manual.
- g. In no event shall the sensitivity be increased by more than 100 percent or decreased by more than 50 percent over a 365 day period unless such adjustments follow a complete fabric collector inspection, which demonstrates the fabric collector is in good operating condition.
- h. The leak detector must be located downstream of the fabric collector.
- i. Multiple Leak detectors may share instrumentation and alarms.

# 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.548] Subpart X National Emission Standards From Secondary Lead Smelting Monitoring requirements.

The permittee shall conduct the following monitoring inspections on the fabric collectors controlling the particulate emissions from the sources of this group:

- a. Monitor the pressure drop across each fabric collector cell daily.
- b. Visually inspect that dust is being removed from hoppers and any conveyance system once per week.
- c. Daily monitor the cleaning cycles of each fabric collector to determine if the cleaning cycles are operating correctly. The method for determining this shall be approved by the Department as part of the facility's SOP.
- d. Monthly Check bag cleaning mechanisms (shakers, isolation dampers, sonic horns, ect.).
- e. Monthly check bag tension.
- $f. \ \ Quarterly \ visually \ inspect \ the \ physical \ integrity \ of \ the \ collector's \ interior \ for \ leaks.$
- g. Quarterly visually inspect the fans for wear, material build-up and corrosion.
- h. Daily visually inspect the stack exhaust.
- i. Daily check of the operating condition of the bag leak detection system.



#### IV. RECORDKEEPING REQUIREMENTS.

# 012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.550] Subpart X National Emission Standards From Secondary Lead Smelting Recordkeeping and reporting requirements.

The permittee shall record and maintain for a period of five years the following items:

- a. The permittee shall record all bag leak detection alarms (date and time), the results of the inspection and any corrective measures taken.
- b. The permittee shall record the results of the initial and subsequent compliance tests for lead compounds and total hydrocarbons.
- c. Any records required by the practices described in the standard operating procedures manual.
- d. The results of the collector monitoring on Baghouse Operator Inspection Sheets for the Process Fugitive Dust Control Devices. These sheets shall be maintained in a log book on site and made available apron request.
- e. The occurrence and duration of each startup, shutdown and malfunction of the sources.
- f. The occurrence and duration of each malfunction of the air pollution control equipment.
- g. All maintenance performed on the air pollution control equipment.
- h. Actions taken during periods of startup, shutdown and malfunctions when such actions are different from the procedures during normal startup, shutdown and malfunctions.
- i. All required measurements needed to show compliance with any applicable standard.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# 013 [25 Pa. Code §127.444]

Compliance requirements.

The permittee shall operate and maintain the above source in a manner consistent with good operating and maintenance practices.

# 014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.544]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for process fugitive sources.

The permittee shall exhaust the ventilation air from all enclosure hoods and/or total enclosures to a control device.

# 015 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.544]

Subpart X National Emission Standards From Secondary Lead Smelting

Standards for process fugitive sources.

The permittee shall equip all process fugitive sources with an enclosure hood meeting the following requirements, or be



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located in a total enclosure subject to general ventilation that maintains the building at a lower than ambient pressure to ensure in-draft through any doorway opening:

- a. All process fugitive enclosure hoods except those specified for refining kettles shall be ventilated to maintain a face velocity of at least 300 feet per minute (90 meters per minute) at all hood openings.
- b. The process fugitive enclosure hoods required for refining kettles shall maintain a face velocity of at least 250 feet per minute (75 meters per minute) at all hood openings.

# 016 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.545] Subpart X National Emission Standards From Secondary Lead Smelting Standards for fugitive dust sources

The permittee shall maintain the following controls on the fugitive dust control measures:

- a. The furnace charging areas shall be maintained within a total enclosure and be vented to control devices.
- b. The furnace area shall be partially enclosed and vented to a control device.
- c. The furnace area's floors and other surfaces shall be cleaned at a minimum of twice per day by means of brooming (at which time a dust inhibiting compound is to be utilized), vacuuming or washing with water.
- d. The refining and casting area shall be partially enclosed and vented to a control device.
- e. The refining and casting area's floors and other surfaces shall be cleaned at a minimum of twice per day by means of brooming (at which time a dust inhibiting compound is utilized), vacuuming and washed down with water.

#### VII. ADDITIONAL REQUIREMENTS.

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

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





Group Name: SG03 LIME STORAGE

Group Description: Lime Storage Sources included in this group:

ID	Name
131	LIME STORAGE BIN WWTP
137	LIME SLAKER
138	STABILIZATION REAGENT SILO

#### I. RESTRICTIONS.

### Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

**Processes** 

The permittee shall limit the emissions of particulate from the following sources to 0.04 grains per dry standard cubic foot:

a. 131 - Lime Storage Bin WWTP

b. 138 - Stabilization Reagent Silo

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the particulate emissions from the lime slaker to 0.01 grains per dry standard cubic foot.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the lime slaker and stabilization reagent silo with no visible emissions.

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain equipment so that at any time the pressure drop across the lime slaker fabric collector can be measured.

### IV. RECORDKEEPING REQUIREMENTS.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record the pressure drop across the lime slaker fabric collector once per week during the operation of the collector.



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## SECTION E. Source Group Restrictions.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall once per week observe the exhaust from each of the above sources for visible emissions, while the control devices are in operation. The results of each observation shall be recorded in a manner approved by the Department.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not place dry lime into the lime storage tanks unless the tanks are vented to a properly designed control device.

#### VII. ADDITIONAL REQUIREMENTS.

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

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





Group Name: SG04 SMELTER ODOR CONTROL

Group Description: Smelter Systems - Odor Control Requirements

Sources included in this group:

ID	Name
120	BLAST FURNACE 1 (OLD)
121	BLAST FURNACE 2 (NEW)
122	REVERB FURNACE 1 (OLD)
123	REVERB FURNACE 2 (NEW)

#### RESTRICTIONS.

### Emission Restriction(s).

# 001 [25 Pa. Code §123.31]

#### Limitations

- a. For the purpose of the malodor control, the permittee shall maintain the temperature in the afterburner of the smelter system, as measured at the approved location, at or above 1200°F during any 15-minute block period. This temperature limit shall apply at all times when either the reverberatory or blast furnace of the system is operating including start-up, shutdown and malfunction, except as noted below for the "blast slag only" scenario.
- b. The definition of operation in (a) above means: any time feed material is being combusted in at least one furnace of a system.
- 1. In the event that feed to a furnace is halted, and the furnace burners continue operating in the reverberatory furnaces or fuel is present in the blast furnaces, combustion of feed is presumed to be present in the furnace until the "burn down" period is over. The burn down period for the reverberatory furnaces shall be that period from the cessation of feed until the feed pile is below the surface of the bath. The burn down period for the blast furnace shall last for one hour from the cessation of feed to the blast furnace. The definitions of burn down periods may be revised by the permittee upon receipt of written approval from the Department.
- 2. In the event that feed is being combusted in a furnace at a time when the furnace burners (reverberatory furnaces) stop operating or malfunction, combustion is presumed to be present based on a case-by-case determination taking into account relevant furnace system information. The permittee may propose revisions to the above definition. If approved by the Department, this proposal shall be incorporated by reference into the permit, and the permittee shall within 60 days of the receipt of such approval modify its written operating procedures to incorporate the approved proposal.
- c. The permittee is exempt from the temperature limit in (a) above during time periods when both of the following are true:
  - 1. The reverberatory furnace is not operating and has passed through the burn down period, and
  - 2. The blast furnace is being fed only reverberatory slag and/or dross. This is known as the "blast slag only" scenario.

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use the thermocouples required in Source Group SG01 to monitor for the minimum temperature in

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EXIDE TECH/READING SMELTER

## SECTION E. Source Group Restrictions.

this group.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

While either of the secondary lead furnace systems is operating, as defined in Condition 001 of this Source Group, the permittee shall continuously monitor and record the associated afterburner temperature.

#### IV. RECORDKEEPING REQUIREMENTS.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall measure and record the temperature leaving each afterburner (thermal oxidizer) combustion section in fifteen-minute block averages during the operation of the secondary lead furnaces, as defined in Condition 001 of this Source Group.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record all corrective actions taken in response to deviations of the above limits and the time elapsed until the corrective actions have been completed. This includes the replacement of a thermocouple.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain daily records of the afterburner (thermal oxidizer) temperature deviations (temperatures less than 1200°F) related to malodor control.

### REPORTING REQUIREMENTS.

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall report all 15-minute deviations related to the malodor control afterburner (thermal oxidizer) temperature limit as an addendum to the quarterly afterburner report.

# 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall report (quarterly) the percentage of thermocouple downtime versus furnace operating hours, related to the afterburner (thermal oxidizer) temperature monitoring, as an addendum to the afterburner reports.

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall report to the Department any time that the afterburner (thermal oxidizer) thermocouples are down for longer than four hours from the time it is determined that the unit needs to be replaced. This report shall be made to the Department in writing 5 business days of the start of the down time.



#### VI. WORK PRACTICE REQUIREMENTS.

# 010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In the event of more than 24 15-minute afterburner (thermal oxidizer) temperature deviations per unit related to the malodor control in any quarterly reporting period, the permittee shall:

a. Notify the Department in writing of the 25th deviation within five business days of its occurrence.

b. Provide to the Department within 60 days of the 25th deviation a corrective action plan outlining steps that the permittee will take to prevent future deviations. The plan shall adequately address the cause(s) of the deviations and shall provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions.

# 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In the event of greater than 5 percent of the afterburner (thermal oxidizer) thermocouple down time verses furnace operating time for either system in any quarterly report, the permittee shall provide to the Department within 60 days of the end of the quarterly reporting period a corrective action plan outlining steps that the permittee will take to minimize afterburner (thermal oxidizer) thermocouple downtime. The plan shall adequately address the cause(s) of the down time and shall provide adequate procedures for correcting thermal couple performance problems as expeditiously as practicable in accordance with good air pollution control and monitoring practices.

#### VII. ADDITIONAL REQUIREMENTS.

# 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Following or during implementation of any corrective action plan pursuant to this Source Group's conditions, the Department may require reasonable revisions to the plan, or may take an enforcement action if the plan has failed to either:

- a. Address the cause(s) of the control device performance problem or monitoring problem.
- b. Provide adequate procedures for correcting control device performance problems or monitoring problems as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions and good monitoring practices.
- c. Prevent malodor violations related to the operation of the furnaces.

# 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Implementation of a corrective action plan pursuant to the conditions in this Source Group, shall not excuse the permittee of a source from compliance with 25 Pa Code Section 123.31(b), or from any other existing emission limitation or standard or any existing monitoring, testing, reporting or record keeping requirements that may apply under any federal, state or local laws or any applicable requirement under the Clean Air Act.

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





# SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

DEP Auth ID: 580599





# SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

DEP Auth ID: 580599





#### SECTION H. Miscellaneous.

#001

This permit incorporates the conditions and operating requirements of the following plan approvals:

- a. 06-05066C [Replacement of #2 fabric collector]
- b. 06-05066D [Adjustment of furnace production limits]
- c. 06-05066E [Sulfur Dioxide limits for BART]
- d. 06-05066F [Replacement of #2 afterburner]
- e. 06-05066G [Adjustment of scrubber rates on furnace controls]
- f. 06-05066H [Replacement of #1 afterburner]

the Title V Operating Permit:

· 06-05066 issued November 15, 2000

and parts of operating permit:

- · 06-319-077B\*
- \* This permit supersedes and incorporates the items dealing with the source previously known as "Bar Casting." The conditions in this permit from the former permit are #3, #4 and #7.

#002

- \*Note: The following are definitions of this facility's ventilation areas
- a. Vent #1- lead and slag taps, blast furnace #1 and reverberatory furnace #1 charging areas, plus general ventilation.
- b. Vent #2- lead and slag taps, blast furnace #2 and reverberatory furnace #2 charging areas, plus general ventilation
- c. Bldg. Vent- a general term used to describe any ventilation occurring in the smelter building where the furnaces are located. This source is the same as the furnace area and refining and casting area as identified in 40 CFR Part 63, Subpart X.

#003

The following source is considered minor:

Waste Stabilization Containment Building - The units included in this building include the following: Mixer, Slag Storage Hopper, and Eight Storage Bins. The source does not have direct exhausts to the atmosphere.

#004

The Battery Shredder Operation includes the following units:

- a. Battery shredder
- b. Hammer Mill



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