

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: July 3, 2001 Effective Date: June 16, 2005
Revision Date: June 16, 2005
Expiration Date: July 31, 2006

Revision Type: Amendment

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

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

TITLE V Permit No: 23-00006

Federal Tax Id - Plant Code: 51-0328824-1

Owner Information

Name: FOAMEX LP Mailing Address: 1500 E 2ND ST

EDDYSTONE, PA 19022-1508

Plant Information

Plant: FOAMEX LP/EDDYSTONE PLT

Location: 23 Delaware County 23821 Eddystone Borough

SIC Code: 3086 Manufacturing - Plastics, Foam Products

Responsible Official

Name: WELSH DAVE

Title: MANUFACTURING, VP

Phone: (610) 499 - 3513

Permit Contact Person

Name: GATTO JAMES Title: EHS MANAGER Phone: (610) 499 - 7824

[Signature] _____

FRANCINE B CARLINI, SOUTHEAST REGION AIR PROGRAM MANAGER





SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General Title V Requirements

- #001 Definitions
- #002 Property Rights
- #003 Permit Expiration
- #004 Permit Renewal
- #005 Transfer of Ownership or Operational Control
- #006 Inspection and Entry
- #007 Compliance Requirements
- #008 Need to Halt or Reduce Activity Not a Defense
- #009 Duty to Provide Information
- #010 Reopening and Revising the Title V Permit for Cause
- #011 Reopening a Title V Permit for Cause by EPA
- #012 Significant Operating Permit Modifications
- #013 Minor Operating Permit Modifications
- #014 Administrative Operating Permit Amendments
- #015 Severability Clause
- #016 Fee Payment
- #017 Authorization for De Minimis Emission Increases
- #018 Reactivation of Sources
- #019 Circumvention
- #020 Submissions
- #021 Sampling, Testing and Monitoring Procedures
- #022 Recordkeeping Requirements
- #023 Reporting Requirements
- #024 Compliance Certification
- #025 Operational Flexibility
- #026 Risk Management
- #027 Approved Economic Incentives and Emission Trading Programs
- #028 Permit Shield

Section C. Site Level Title V Requirements

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

Section D. Source Level Title V Requirements

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

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



SECTION A. Table of Contents

Section E. Alternative Operating Scenario(s)

E-I: Restrictions

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

Section F. Emission Restriction Summary

Section G. Miscellaneous

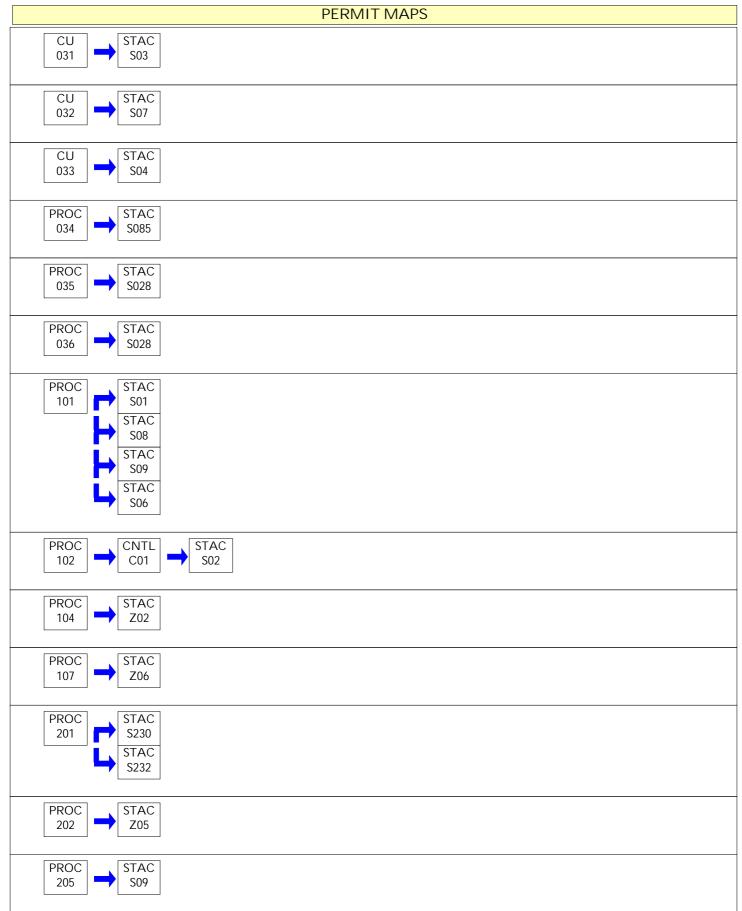




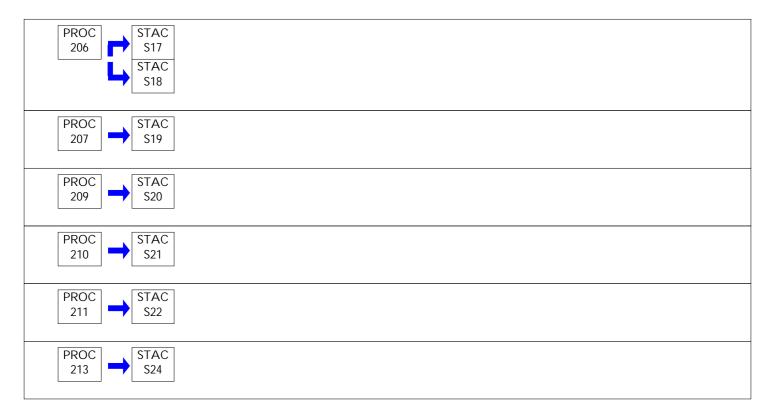
SECTION A. Site Inventory List

| Source | e ID Source Name | Capacity/Throughput | Fuel/Material |
|------------|--|---------------------|-----------------|
| 031 | SUPERIOR BOILER #1 | 10.500 MMBTU/HR | |
| | | 900.00 MCF/HR | Natural Gas |
| 032 | SUPERIOR BOILER #2 | 10.500 MMBTU/HR | |
| | | 900.00 MCF/HR | NAT. GAS |
| 033 | SUPERIOR BOILER #3 | 18.800 MMBTU/HR | |
| | | 8,890.00 Gal/HR | #4 OIL |
| 001 | KELLY HEAT RECOVERY INCINERATOR | 2,21000 24,71 | |
| 034 | EMERGENCY GENERATOR #1 | 277.00 CF/HR | Natural Gas |
| 035 | EMERGENCY GENERATOR #2 | 265.00 CF/HR | Natural Gas |
| 036 | FIRE PUMP GENERATOR | | |
| 101 | MAXFOAM (POLYURETHANE FOAM) | 13,000.00 Lbs/HR | FOAM-POLYURETHA |
| 102 | VINYL COATING BAKING OVEN PROCESS | 120.00 Lbs/HR | MINERAL SPIRITS |
| 104 | CTM/LFM FOAM MACHINE | 10,000.00 Lbs/HR | FOAM-POLYURETHA |
| 107 | LABORATORY OPERATIONS | N/A | CHLOROFORM |
| 201 | FLAME LAMINATOR | 11/7 | JI LORGI JIRW |
| 201 | VINYL COATING MIXING AREA | | |
| 205 | FOAM CURING AREA | | |
| 206 | BUN ZAPPER | | |
| 207 | ROLL ZAPPER | | |
| 209 | FELT PRESS E-1 | | |
| 210 | FELT PRESS E-2 | | |
| 211 | FELT PRESS E-3 | | |
| 212 | FELT PRESS E-4 | | |
| 213 | FELT PRESS E-5 | | |
| 214 C01 | BUN ZAPPER 2 CVM CORP.FUME ELIMINATOR | | |
| S01 | MAXFOAM EXHAUST | | |
| S02 | VINYL COATING OVEN EXHAUS | | |
| S028 | EM. GEN. (F ST.) EXH | | |
| S03 | BOILER #1 EXHAUST | | |
| S04 | BOILER #3 EXHAUST | | |
| S04 | MAXFOAM EXHAUST | | |
| | | | |
| S07 | BOILER #2 EXHAUST | | |
| S08 | MAXFOAM EXHAUST | | |
| S085 | EM. GEN. (B. ROOM) EX | | |
| S09 | MAXFOAM EXHAUST | | |
| S17 | BUN ZAPPER EXHAUST | | |
| S18 | BUN ZAPPER EXHAUST | | |
| S19 | ROLL ZAPPER EXHAUST | | |
| S20 | FELT PRESS #1 EXHAUST | | |
| S21 | FELT PRESS #2 EXHAUST | | |
| S22 | FELT PRESS #3 EXHAUST | | |
| S230 | FLAME LAMINATOR EXHAUST | | |
| S232 | FLAME LAMINATOR EXHAUST | | |
| S24 | FELT PRESS #5 EXHAUST | | |
| Z02 | UNSPECIFIED NAME | | |
| Z05 | UNSPECIFIED NAME | | |
| Z06 | LAB OPERATIONS STACK | | |
| | | | |











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

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other



certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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

Sampling, Testing and Monitoring Procedures

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

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

Recordkeeping Requirements

- (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:
 - (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 §121.7] Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
 - (4) Clearing of land.
 - (5) Stockpiling of materials.
- (6) Sources and classes of sources other than those identified above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (a) The emissions are of minor significance with respect to causing air pollution; and
 - (b) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality

standard.

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

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Condition #002, of this Section, if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]

Limitations

{MALODOR EMISSIONS}

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

005 [25 Pa. Code §123.41]

Limitations

(VISIBLE EMISSIONS)

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

(a) Equal to or greater than 20% for a period or periods aggregating



more than three minutes in any 1 hour.

(b) Equal to or greater than 60% at any time.

006 [25 Pa. Code §123.42]

Exceptions

(VISIBLE EMISSION EXCEPTIONS)

The limitations of Condition #005, of this Section, shall not apply to a visible emission in either of the following instances:

- (a) When the presence of uncombined water is the only reason for failure to meet the limitations.
- (b) When the emission results from the sources specified in Condition #002, of this Section

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) The Nitrogen Oxides (NOx) emissions for the facility shall not exceed 32.0 tons per year, on a twelve (12) month rolling basis.
- (b) The Volatile Organic Compounds (VOCs) emissions for the facility, excluding Source 213, Felt Press E-5, shall not exceed 476 tons per year on a twelve (12) month rolling basis.
- (c) The VOCs emissions from Source 213, Felt Press E-5, shall not exceed 6.6 tons per year on a twelve (12) month rolling basis.

008 [25 Pa. Code §129.14]

Open burning operations

The permittee may not permit the open burning of material in the Southeast Air Basin, except when the open burning results from:

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

TESTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from

25 Pa. Code § 127.511]

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SECTION C. Site Level Requirements

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A of this permit may be in excess of the limitations specified in this permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a). The permittee shall monitor the facility, once per operating day, for the following:
 - (1). Odors, which the Department may determine to be objectionable.
 - (2). Visible Emissions.
 - (3). Fugitive Particulate Matter.
- (b). All detectable fugitive particulate emissions, and/or objectionable odors, that originated on-site and cross the property line as well as visible emissions that originate on site shall:
 - (1). Be investigated.
 - (2). Be reported to the facility management, or individual(s) designated by the permittee.
 - (3). Be recorded in a permanent written log.
- (c). At the end of six months, upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next six month period.
- (d). At the end of the second six month period, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e). The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification and the semi-annual report of monitoring and record keeping, complaints, monitoring results, and/or Department findings.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor, according to the requirements set forth in Section D of this permit or by procedures or criteria



approved by the Department, to determine compliance with VOCs and NOx emissions specified in Condition #007 of this Section.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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

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

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall maintain records of VOC and NOx emissions monthly as well as a twelve (12) month rolling total.

V. REPORTING REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) The permittee shall notify the Department by telephone at (610) 832-6242, within two (2) hours of any malfunction(s) of the source(s), listed in Section A of this permit, or associated air cleaning device(s) which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit or in 25 Pa. Code Article III.
- (b) Malfunction(s) which occur(s) at this Title V facility, and pose(s) an imminent danger to public health, safety, welfare and the environment, and would violate permit conditions if the source continued to operate after the malfunction(s), shall immediately, after becoming knowledgable of any occurrence, be reported to the Department by telephone at the above number.
- (c) A written report describing the malfunction(s) shall be submitted to the Department within two (2) working days following the and (b) above. This report shall describe, at a minimum, the corrective action(s) taken.

 notification by telephone required under subsections (a) malfunction(s), emission(s), duration, and corrective action(s)

016 [25 Pa. Code §135.21]

Emission statements

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



017 [25 Pa. Code §135.3] Reporting

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

VI. WORK PRACTICE REQUIREMENTS.

018 [25 Pa. Code §123.1] Prohibition of certain fugitive emissions

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

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving, and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Sources, and classes of sources, other than those identified in (a) (e) above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1(b), that fugitive emissions from the source, after appropriate controls, meet the following requirements:
- (1) The emissions are of minor significance with respect to causing air pollution; and
- (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall provide a training program to educate the employees on the proper handling of solvents and the effects of volatile organic compounds on the environment and human health.

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The company shall conduct the following:

- (a) Periodic inspection of production activities
- (b) Continual improvement of standard work practices for production method
- (c) Institute good housekeeping procedures for storage, use, and disposal of materials, and
- (d) Post operating instructions including work practices in the mixing room.





021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that sources, listed in Section A of this permit, and air cleaning devices are operated and maintained in a manner

consistent with good operating practices.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) The permittee may not modify any source identified in Section A of this permit, prior to obtaining Department approval except those modifications authorized by Condition #017(g) of Section B, of this permit.
- (b) If an unauthorized modification of a source(s) occurs at the facility, this permit shall be suspended and the permittee shall not thereafter continue to operate the source(s).

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit within thirty days of 07/01/2002 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and annually thereafter.

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Fffect **



Source ID: 031 Source Name: SUPERIOR BOILER #1

Source Capacity/Throughput: 10.500 MMBTU/HR

900.00 MCF/HR Natural Gas

CU STAC S03

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.11(a)(1).

002 [25 Pa. Code §123.22]

Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from the boiler, in the Southeast Air Basin, in excess of 1.0 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

Fuel Restriction(s).

003 [25 Pa. Code §123.22]

Combustion units

The permittee shall use natural gas only for source ID #031 (Boiler #1).

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.

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

- (a) The permittee shall monitor the following:
 - 1. Hours of operation on a weekly basis
 - 2. The amount of fuel consumed on a weekly basis
- (b) The permittee shall calculate particulate matter and sulfur oxides emissions monthly and twelve (12) month rolling basis using EPA AP-42 emission factors.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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





The permittee shall maintain records of:

- (a) The number of hours operated on a weekly basis
- (b) The amount and type of fuel consumed on a weekly basis
- (c) Calculation used to verify sulfur oxides and particulate matter emissions limitation.

V. REPORTING REQUIREMENTS.

006 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

The permittee shall submit to the Department, annually,

- (a) The total hours of operation
- (b) The total amount and the type of fuel consumed
- (c) The supporting calculations used to verify the particulate matter, sulfur oxides and nitrogen oxides emission limitation.

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.441] Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.93]

The boiler shall be maintained and operated in accordance with the manufacturer's specifications and good air 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).

*** Permit Shield in Effect. ***





Source ID: 032 Source Name: SUPERIOR BOILER #2

Source Capacity/Throughput: 10.500 MMBTU/HR

900.00 MCF/HR NAT. GAS

CU 032 STAC S07

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from the boiler in excess of 0.4 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.11(a)(1).

002 [25 Pa. Code §123.22]

Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from the boiler, in the Southeast Air Basin, in excess of 1.0 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

Fuel Restriction(s).

003 [25 Pa. Code §123.22]

Combustion units

The permittee shall use natural gas only for source ID #032 (Boiler #2).

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.

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

- (a) The permittee shall monitor the following:
 - 1. Hours of operation on a weekly basis
 - 2. The amount of fuel consumed on a weekly basis
- (b) The permittee shall calculate particulate matter and sulfur oxides emission, monthly and twelve (12) month rolling basis, using EPA AP-42 emission factors.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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





The permittee shall maintain records of:

- 1. The number of hours operated on a weekly basis
- 2. The amount and type of fuel consumed on a weekly basis
- 3. Calculation used to verify sulfur oxides and particulate matter emissions limitation.

V. REPORTING REQUIREMENTS.

006 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

The permittee shall submit to the Department annually:

- (a) The total hours of operation
- (b) The total amount and the type of fuel consumed
- (c) The supporting calculations used to verify the particulate matter, sulfur oxides and nitrogen oxides emission limitation.

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.441] Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.93]

The boiler shall be maintained and operated in accordance with the manufacturers specifications and good air 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).

*** Permit Shield in Effect. ***



Source ID: 033 Source Name: SUPERIOR BOILER #3

Source Capacity/Throughput: 18.800 MMBTU/HR

8,890.00 Gal/HR #4 OIL

 $\begin{array}{c|c} CU \\ 033 \end{array} \longrightarrow \begin{array}{c} STAC \\ S04 \end{array}$

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from the boiler in excess of 0.4 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.11(a)(1).

002 [25 Pa. Code §123.22]

Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from the boiler, in the Southeast Air Basin, in excess of 1.0 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

Fuel Restriction(s).

003 [25 Pa. Code §123.22]

Combustion units

No person may, at any time, offer for sale, deliver for use, exchange in trade or permit the use of commercial fuel oil for use in combustion units in the Southeast Pennsylvania air basin which contains sulfur in excess of 0.5% by weight, pursuant to 25 Pa. Code § 123.22(e)(2).

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §139.16] Sulfur in fuel oil.

- (a) The following are applicable to tests for the analysis of commercial fuel oil:
- (1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).
- (2) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).
- (3) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).
- (b) The testing requirements in subpart (a), above, shall be waived in the event that a delivery receipt from the supplier, showing the percent sulfur in the fuel, is obtained each time a fuel oil delivery is made.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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





- (a) The permittee shall monitor the following:
 - 1. Hours of operation on a weekly basis
 - 2. The amount of fuel consumed on a weekly basis
- (b) The permittee shall calculate particulate matter and sulfur oxides emission, monthly and twelve (12) month rolling basis, using EPA AP-42 emission factors.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

- (a) The permittee shall maintain records of
 - 1. The number of hours operated on a weekly basis
 - 2. The amount and type of fuel consumed on a weekly basis
 - 3. Percent sulfur and ash content of fuel in each shipment
- (b) In the event that the supplier does not provide fuel specifications, the permittee shall keep records of sampling and analysis for each shipment of fuel to assure fuel quality and comply with conditions #001, #002, and #003 of this Section.

V. REPORTING REQUIREMENTS.

007 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

The permittee shall submit to the Department annually:

- (a) The total hours of operation
- (b) The total amount and the type of fuel consumed
- (c) The supporting calculations used to verify the particulate matter and sulfur oxides emission limitation.

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441] Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-129.95]

The boiler shall be maintained and operated in accordance with the manufacturer's specifications and good air 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).



*** Permit Shield in Effect. ***



Source ID: 001 Source Name: KELLY HEAT RECOVERY INCINERATOR

Source Capacity/Throughput:

I. RESTRICTIONS.

Fuel Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) Liquid waste cannot be burned in the incinerator when the percent halogen (by weight) is greater than 0.5 percent.
- (b) Fire retardant material containing halogen 90.5 percent (by weight) shall also not be burned

Throughput Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The maximum amount of waste to be burned in the incinerator at one time cannot exceed 1,090 pounds per hour.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The throughput of waste fuel oil and waste lubricating oil entering the incinerator shall not exceed the rate of 110 gallons per day.

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.

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

The permittee shall monitor

- (a) the amount of waste burned hourly
- (b) the amount of waste fuel oil and waste lubricating oil used, daily
- (c) the temperature in the secondary combustion chamber continuously, and
- (d) the percent halogen in the liquid waste

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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





The permittee shall keep records of:

- (a) the amount of waste burned hourly
- (b) the amount of waste fuel oil and waste lubricating oil used, daily
- (c) the temperature in the secondary combustion chamber , and
- (d) the percent halogen in the liquid waste

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.

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

The burners associated with the incinerator are to be set so as to maintain a secondary combustion chamber exit gas temperature of at least 1800°F.

VII. ADDITIONAL REQUIREMENTS.

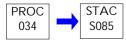
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

*** Permit Shield in Effect. ***



Source ID: 034 Source Name: EMERGENCY GENERATOR #1

Source Capacity/Throughput: 277.00 CF/HR Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from the emergency generator at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

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

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use only natural gas as fuel for the emergency generator.

Operation Hours Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.93]

The permittee shall operate source ID #034 (emergency generator) not more than 500 hours in a consecutive 12-month period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor the following, when in operation:

(a) The number of hours operated.





(b) The amount and type of fuel consumed.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

The permittee shall maintain records of the following, when in operation

- (a) The number of hours operated
- (b) The amount and type of fuel consumed

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.441] Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.93]

The permittee shall operate and maintain theemergency generator in accordance with manufacturer's specifications and good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

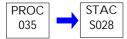
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

*** Permit Shield in Effect. ***



Source ID: 035 Source Name: EMERGENCY GENERATOR #2

Source Capacity/Throughput: 265.00 CF/HR Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from the emergency generator at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

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

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use only natural gas as fuel for teh emergency generator.

Operation Hours Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.93]

The permittee shall operate source ID #035 (emergency generator) not more than 500 hours in a consecutive 12-month period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor the following, when in operation

(a) The number of hours operated



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SECTION D. Source Level Requirements

(b) The amount and type of fuel consumed

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

The permittee shall maintain records of the following, when in operation

- (a) The number of hours operated
- (b) The amount and type of fuel consumed

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.441] Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.93]

The permittee shall operate and maintain the emergency generator in accordance with manufacturer's specifications and good air 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).

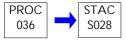
*** Permit Shield in Effect. ***



Source ID: 036

Source Name: FIRE PUMP GENERATOR

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from the fire pump generator at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

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

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use only natural gas as fuel for the fire pump generator

Operation Hours Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.93]

The permittee shall operate the fire pump generator not more than 500 hours in a consecutive 12-month period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor the following, when in operation

- (a) The number of hours operated
- (b) The amount and type of fuel consumed



IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

The permittee shall maintain records of the following, when in operation

- (a) The number of hours operated
- (b) The amount and type of fuel consumed

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.441] Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.93]

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

VII. ADDITIONAL REQUIREMENTS.

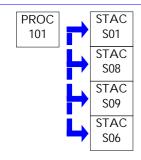
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).





Source ID: 101 Source Name: MAXFOAM (POLYURETHANE FOAM)

Source Capacity/Throughput: 13,000.00 Lbs/HR FOAM-POLYURETHA



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR 63.1290(c)(5)]

Effective October 8, 2001, the total non-diisocyante Hazardous Air pollutants (HAPs) used at the facility shall not exceed 5 tons per year to escape the standards of 40 CFR Part 63 Subpart III.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

- (a) The permittee shall monitor the following operating parameters:
- (1) Number of hours of operation per job.
- (2) Effective October 8, 2001, the total non-diisocyanate Hazardous Air Pollutants (HAPs) used at the facility and calculate the HAPs used with Equation 1 as per 40 CFR 63.1290(c)(5).
- (b) The permittee shall calculate:
- (1) total VOC emissions per job based on yield (pounds produced)
- (2) non TDI HAP emissions monthly.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

(a) The permittee shall maintain records total hours of operation on a per job basis.



(b) Effective October 8, 2001, the permittee shall maintain records the total non-diisocyanate Hazardous Air Pollutants (HAPs) used at the facility and calculate the HAPs used with Equation 1 as per 40 CFR 63.1290(c)(5)

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: 102 Source Name: VINYL COATING BAKING OVEN PROCESS

> Source Capacity/Throughput: 120.00 Lbs/HR MINERAL SPIRITS



L. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from the vinyl coating baking oven process at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor, per job:

- (a) the hours of operation.
- (b) the VOC content of the coating as applied.
- (c) the amount of solvent used.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall maintain records per job:

- (a) the hours of operation.
- (b) the VOC content of the coating as applied.



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SECTION D. Source Level Requirements

(c) the amount of solvent used.

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 §127.441] Operating permit terms and conditions.

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

This vinyl coating baking oven process shall be operated and maintained in accordance with manufacturer's specifications.

VII. ADDITIONAL REQUIREMENTS.

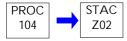
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).





Source ID: 104 Source Name: CTM/LFM FOAM MACHINE

Source Capacity/Throughput: 10,000.00 Lbs/HR FOAM-POLYURETHA



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR 63.1290(c)(5)]

Effective October 8, 2001, the total non-diisocyante Hazardous Air pollutants (HAPs) used at the facility shall not exceed 5 tons per year to escape the standards of 40 CFR Part 63 Subpart III.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) The permittee shall monitor the following operating parameters:
- (1) Number of hours of operation per job.
- (2) Effective October 8, 2001, the total non-diisocyanate Hazardous Air Pollutants (HAPs) used at the facility and calculate the HAPs used with Equation 1 as per 40 CFR 63.1290(c)(5).
- (b) The permittee shall calculate:
- (1) total VOC emissions per job based on yield (pounds produced)
- (2) non TDI HAP emissions monthly.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) The permittee shall maintain records total hours of operation on a per job basis.
- (b) Effective October 8, 2001, the permittee shall maintain records the total non-diisocyanate Hazardous Air Pollutants (HAPs) used at the facility and calculate the HAPs used with Equation 1 as per 40 CFR 63.1290(c)(5)



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SECTION D. Source Level Requirements

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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.

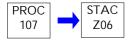
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).





Source ID: 107 Source Name: LABORATORY OPERATIONS

Source Capacity/Throughput: N/A CHLOROFORM



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.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall keep records of the amount of chloroform used in the laboratory operations on a quarterly basis.

V. REPORTING REQUIREMENTS.

002 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall report the consumption of chloroform to the Department annually.

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.

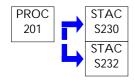
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).





Source ID: 201 Source Name: FLAME LAMINATOR

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from the flame laminator at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permitee shall monitor the amount of fuel used monthly.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permitee shall kieep records of the amount of fuel used monthly.

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).



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SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

005 [25 Pa. Code §127.441] Operating permit terms and conditions.

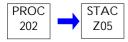
The source shall be maintained and operated in accordance with the manufacturer's specifications and good air pollution control practices.



Source ID: 202

Source Name: VINYL COATING MIXING AREA

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

001 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall maintain and operate the vinyl coating mixing area in accordance with manufacturer's specification and good air 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).



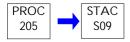
SECTION D. Source

Source Level Requirements

Source ID: 205

Source Name: FOAM CURING AREA

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

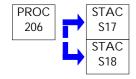
VII. ADDITIONAL REQUIREMENTS.

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



Source ID: 206 Source Name: BUN ZAPPER

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

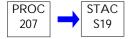
001 [25 Pa. Code §127.441] Operating permit terms and conditions.

The source shall be maintained and operated in accordance with the manufacturer's specifications and good air pollution control practices.



Source ID: 207 Source Name: ROLL ZAPPER

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

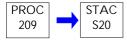
001 [25 Pa. Code §127.441] Operating permit terms and conditions.

The source shall be maintained and operated in accordance with the manufacturer's specifications and good air pollution control practices.



Source ID: 209 Source Name: FELT PRESS E-1

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.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall maintain records of

- (a) the number of hours operated on a per job basis
- (b) the VOC emitted on a per job basis.

V. REPORTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor

- (a) the hours of operation on a per job basis
- (b) the VOC emission on a per job basis.

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain the source ID #209 (Felt Press No. 1) in accordance with manufacturer's specifications and good air pollution control practices.



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SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

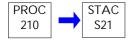
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).





Source ID: 210 Source Name: FELT PRESS E-2

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 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor

- (a) the hours of operation on a per job basis
- (b) the VOC emission on a per job basis.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

The permittee shall maintain records of

- (a) the number of hours operated on a per job basis
- (b) the VOC emitted on a per job basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall operate and maintain the source ID #210 (Felt Press No. 2) in accordance with manufacturer's specifications and good air pollution control practices.



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VII. ADDITIONAL REQUIREMENTS.

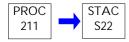
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).





Source ID: 211 Source Name: FELT PRESS E-3

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.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall maintain records of

- 1. the number of hours operated on a per job basis
- 2. the VOC emitted on a per job basis.

V. REPORTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor:

- (a) the hours of operation on a per job basis
- (b) the VOC emission on a per job basis.

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall operate and maintain the source ID #211 (Felt Press No. 3) in accordance with manufacturer's specifications and good air pollution control practices.



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SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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



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SECTION D. Source Level Requirements

Source ID: 212 Source Name: FELT PRESS E-4

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 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor:

- (a) the hours of operation on a per job basis
- (b) the VOC emission on a per job basis.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

The permittee shall maintain records of

- (a) the number of hours operated on a per job basis
- (b) the VOC emitted on a per job basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall operate and maintain the source ID #212 (Felt Press No. 4) in accordance with manufacturer's specifications and good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

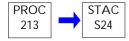
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).





Source ID: 213 Source Name: FELT PRESS E-5

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The VOC emission from this source ID #213 (Felt Press No. 5) shall not exceed 6.6 tons per year on a twelve (12) month rolling basis.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor

- (a) the hours of operation per job basis
- (b) the VOC emission per job basis.

The permittee shall calculate the VOC emissions monthly.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall maintain records of

- (a) the number of hours operated per job basis
- (b) the VOC emitted per job basis.

V. REPORTING REQUIREMENTS.

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



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SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall operate and maintain the source ID #213 (Felt Press No. 5) in accordance with manufacturer's specifications and good air 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).



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SECTION D. Source Level Requirements

Source ID: 214 Source Name: BUN ZAPPER 2

Source Capacity/Throughput:

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) The total Volatile Organic Compounds (VOC) emission from this source shall not exceed more than 4.14 pounds per hour, 18.14 tons per year on a twelve (12) month rolling basis, including fugitive emissions.
- (b) The total Carbon Monoxide (CO) emissions from this source shall not exceed more than 6.43 pounds per hour, 28.16 tons per year on a twelve (12) month rolling basis.

Operation Hours Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The operating hours of this source shall not exceed 5,760 hour per year on a twelve (12) month rolling basis

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) The permittee shall monitor the operating hours using an elapsed time meter.
- (b) The permittee shall monitor monthly
 - (1) the raw material usage,
 - (2) the number of foam buns processed, and
 - (3) the hours of operation
- (c) The permittee shall calculate the VOC and CO emissions monthly as well as on a twelve (12) rolling basis.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall keep monthly records of

(a) the raw material usage,



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SECTION D. Source Level Requirements

- (b) the number of foam buns processed,
- (c) the hours of operation, and
- (d) the VOC and CO emissions

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441] Operating permit terms and conditions.

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

The Bun Zapper, manufactured by MacGregor, Model No. 1247, shall have a maximum rated capacity of 105,000 foam buns per year.

VII. ADDITIONAL REQUIREMENTS.

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



SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.





SECTION F. Emission Restriction Summary.

| SECTION 1. | Emission Restriction Summary. | |
|-----------------------|-----------------------------------|-----------|
| Source Id | Source Description | |
| 031 | SUPERIOR BOILER #1 | |
| Emission Limit | | Pollutant |
| 0.400 | Lbs/MMBTU | PM10 |
| 1.000 | Lbs/MMBTU | SOX |
| 032 | SUPERIOR BOILER #2 | |
| Emission Limit | | Pollutant |
| 1.000 | Lbs/MMBTU | SOX |
| 0.400 | Lbs/MMBTU | TSP |
| 033 | SUPERIOR BOILER #3 | |
| Emission Limit | | Pollutant |
| | Lbs/MMBTU | SOX |
| 0.400 | Lbs/MMBTU | TSP |
| 034 | EMERGENCY GENERATOR #1 | |
| Emission Limit | | Pollutant |
| 500.000 | PPMV | SOX |
| 0.040 | gr/DRY FT3 | TSP |
| 035 | EMERGENCY GENERATOR #2 | |
| Emission Limit | | Pollutant |
| 500.000 | PPMV | SOX |
| 0.040 | gr/DRY FT3 | TSP |
| 036 | FIRE PUMP GENERATOR | |
| Emission Limit | | Pollutant |
| 500.000 | | SOX |
| 0.040 | gr/DRY FT3 | TSP |
| 102 | VINYL COATING BAKING OVEN PROCESS | |
| Emission Limit | | Pollutant |
| 500.000 | PPMV | SOX |
| 0.040 | gr/DRY FT3 | TSP |
| 201 | FLAME LAMINATOR | |
| Emission Limit | | Pollutant |
| 500.000 | PPMV | SOX |
| 0.040 | gr/DRY FT3 | TSP |
| 213 | FELT PRESS E-5 | |
| Emission Limit | | Pollutant |
| 6.600 | Tons/Yr 12 mth rolling | VOC |





SECTION F. Emission Restriction Summary.

| | Source Id | Source Description | | |
|----|----------------|--------------------|----------------|-----------|
| ſ | 214 | BUN ZAPPER 2 | | |
| | Emission Limit | | | Pollutant |
| | 6.430 | Lbs/Hr | | CO |
| | 28.160 | Tons/Yr | 12 mth rolling | CO |
| | 4.140 | Lbs/Hr | | VOC |
| | 18.140 | Tons/Yr | 12 mth rolling | VOC |
| Ι, | | | | |

Site Emission Restriction Summary

| Emission Limit | | Pollutant |
|-----------------|------------------------|-----------|
| 32.000 Tons/Yr | 12 month rolling basis | NOX |
| 476.000 Tons/Yr | 12 month rolling basis | VOC |





SECTION G. Miscellaneous.

Company Designation

(a) The following previously issued Operating Permit serves as the basis for certain terms and conditions set forth in this Title V Permit:

RACT 23-0006A

Source No.

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

| Source No. | Company Designation |
|------------|--|
| Insig 01 | Foam Machine Flushing |
| Insig 02 | Maxfoam Machine Clean-up and Flush |
| Insig 03 | Adhesive Spray (Baumer Loop) |
| Insig 04 | Cutter, Shredders and Bailers |
| Insig 06 | Resins Mix Area (Warehouse) |
| Insig 07 | Toluene Di-isocyanate (32,500 Gal.) |
| Insig 08 | Toluene Di-isocyanate (25,500 Gal.) |
| Insig 09 | Toluene Di-isocyanate (2)(4,500 Gal. each) |
| Insig 10 | Toluene Di-isocyanate (1,500 Gal.) |
| Insig 14 | Solvent Degrease (Maintenance Area) |
| Insig 16 | Baumer Loop Dust Collector |
| Insig 17 | Peeler #2 Dust Collector |
| Insig 18 | Flat Top Baumer Dust Collect |
| Insig 19 | Pressure Cutter Dust Collector |
| Insig 20 | Maintenance Shops |
| Insig 21 | Forklift (Propane Fueled) |
| Insig 22 | Electric Hot Roll Laminator |
| Insig 23 | Electric Hot Water Heater |
| Insig 24 | Electric Quench Oven |
| Insig 25 | Electric Heaters (3-WWTP) |
| Insig 26 | Electric Felt Press Drying Oven |
| Insig 27 | Natural Gas Fired Heater#1 (foam storage area) |
| Insig 28 | Natural Gas Fired Heater#2 (foam storage area) |
| Insig 29 | Natural Gas Fired Heater#3 (foam storage area) |
| Insig 30 | Natural Gas Hot Water Heater (fire system) |
| Insig 31 | Wastewater Tank |
| Insig 32 | R & D Hoods |
| Insig 33 | Electric R & D Dry Testing Ovens (5) |
| Insig 34 | R & D Building |
| Insig 35 | Peeler #3 Dust Collector |
| Insig 36 | Peeler #4 Dust Collector |
| Insig 37 | Mini Pilot Foam Machine |
| 208 | Mineral Oil Booth |
| 103 | Vinyl Coating Clean-up |
| FML01 | #4 Fuel Oil (2)(12,000 gallon each) |
| FML02 | #4 Fuel Oil (50,000 gallon) |
| FML03 | Diesel (275 gallon reservior) |
| FML04 | Diesel (550 gallon) |
| FML05 | Gasoline (1950) |
| FML06 | Natural Gas Line from Public Utility |
| FML07 | Propane Storage Tank (1850 gallon) |
| FML08 | Propane Storage Tanks (2)(120 gallon each) |

(c) Administrative Amendment APS: 345215 AUTH: 590418

The incorporation of Plan Approval PA 23-0006D that was issued for the modification of a polyurethane foam thermal reticulation/Bun Zapper 2, Source 214.



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