



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: March 4, 2004

Effective Date: June 30, 2006

Revision Date: June 30, 2006

Expiration Date: April 1, 2009

Revision Type: Transfer

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: 09-00150

Federal Tax Id - Plant Code: 06-789102-1

Owner Information

Name: UNION ROTO-GRAVING

Mailing Address: 180 PENN AM DR  
QUAKERTOWN, PA 18951-2435

Plant Information

Plant: UNION ROTO-GRAVING/QUAKERTOWN

Location: 09 Bucks County

09940 Richland Township

SIC Code: 2796 Manufacturing - Plate Making Services

Responsible Official

Name: JACKIE E HYLTON

Title: VP & GENERAL MANAGER

Phone: (215) 997 - 6222

Permit Contact Person

Name: LARRY WILLIAMS

Title: PLANT ENGINEER

Phone: (215) 538 - 9956

[Signature] \_\_\_\_\_

FRANCINE B CARLINI, SOUTHEAST REGION AIR PROGRAM MANAGER



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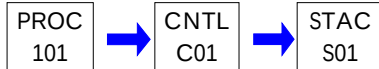
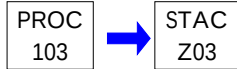
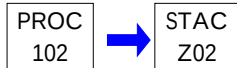
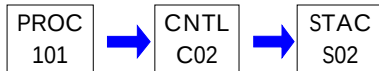
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| Source ID | Source Name                 | Capacity/Throughput | Fuel/Material |
|-----------|-----------------------------|---------------------|---------------|
| 101       | CHROME ELECTROPLATING TANKS | N / A               |               |
| 102       | NICKEL ELECTROPLATING TANK  | N / A               |               |
| 103       | COPPER ELECTROPLATING TANKS | N / A               |               |
| C01       | SCRUBBING SYSTEM            |                     |               |
| C02       | FOAM BLANKET SYSTEM         |                     |               |
| S01       | SCRUBBER STACK              |                     |               |
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**PERMIT MAPS****Alternative Operation**

**SECTION B. General Title V Requirements**

#001 [25 Pa. Code § 121.1]

**Definitions**

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

#002 [25 Pa. Code § 127.512(c)(4)]

**Property Rights**

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

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

**Permit Expiration**

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

#004 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) &amp; 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) &amp; 127.464(a)]

**Transfer of Ownership or Operational Control**

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

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

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

**SECTION B. General Title V Requirements**

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

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

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

**Inspection and Entry**

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

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

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

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

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

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

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

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

**Compliance Requirements**

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

(1) Enforcement action

(2) Permit termination, revocation and reissuance or modification

(3) Denial of a permit renewal application

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

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

**SECTION B. General Title V Requirements**

#008 [25 Pa. Code § 127.512(c)(2)]

**Need to Halt or Reduce Activity Not a Defense**

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

#009 [25 Pa. Code §§ 127.411(d) &amp; 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) &amp; 127.542]

**Reopening and Revising the Title V Permit for Cause**

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

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

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

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

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

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

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

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

#011 [25 Pa. Code § 127.543]

**Reopening a Title V Permit for Cause by EPA**

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

**SECTION B. General Title V Requirements**

#012 [25 Pa. Code § 127.541]

**Significant Operating Permit Modifications**

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

#013 [25 Pa. Code §§ 121.1 &amp; 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 &amp; 127.707]

**Fee Payment**

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



## SECTION B. General Title V Requirements

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

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

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

### Authorization for De Minimis Emission Increases

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

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

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

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

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

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

(2) One ton of NO<sub>x</sub> from a single source during the term of the permit and 5 tons of NO<sub>x</sub> 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 PM<sub>10</sub> from a single source during the term of the permit and 3.0 tons of PM<sub>10</sub> at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

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

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

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

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

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

## SECTION B. General Title V Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### Reactivation of Sources

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

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

**SECTION B. General Title V Requirements**

#019 [25 Pa. Code §§ 121.9 &amp; 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) &amp; 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) &amp; 127.463(e); Chapter 139; &amp; 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 &amp; Chapter 135]

**Recordkeeping Requirements**

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

## SECTION B. General Title V Requirements

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

(2) The dates the analyses were performed.

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

(4) The analytical techniques or methods used.

(5) The results of the analyses.

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

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

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

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

### Reporting Requirements

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

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

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

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

#024 [25 Pa. Code § 127.513]

### Compliance Certification

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

## SECTION B. General Title V Requirements

certification shall include:

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

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

#025 [25 Pa. Code § 127.3]

### Operational Flexibility

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

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

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

#026 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

### Risk Management

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

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

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

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

## SECTION B. General Title V Requirements

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

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

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

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

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

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

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

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

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

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

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

#027 [25 Pa. Code § 127.512(e)]

### Approved Economic Incentives and Emission Trading Programs

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

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

### Permit Shield

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

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

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

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

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

## SECTION B. General Title V Requirements

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

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

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

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

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

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §121.7]

**Prohibition of air pollution.**

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

# 002 [25 Pa. Code §123.1]

**Prohibition of certain fugitive emissions**

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

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

# 003 [25 Pa. Code §123.2]

**Fugitive particulate matter**

No person may permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a)(1) -- (9) if the emissions are visible at the point the emissions pass outside the person's property.

# 004 [25 Pa. Code §123.31]

**Limitations**

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

# 005 [25 Pa. Code §123.41]

**Limitations**

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

- (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**

The emission limitations of 25 Pa. Code § 123.41 shall not apply when:

- (a) The presence of uncombined water is the only reason for failure of the emission to meet the limitations;



**SECTION C. Site Level Requirements**

(b) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions;

(c) The emission results from sources specified in 25 Pa. Code § 123.1(a)(1)-(9).

# 007 [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.

**II. TESTING REQUIREMENTS.**

# 008 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

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

(a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A, of this Permit, may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

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

**III. MONITORING REQUIREMENTS.**

# 009 [25 Pa. Code §123.43]

**Measuring techniques**

Visible emissions may be measured using either of the following:

(a) A device approved by the Department and maintained to provide accurate opacity measurements.

(b) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

# 010 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

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

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

## SECTION C. Site Level Requirements

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

(b) All detectable objectionable odors, that originated on-site and cross the property line, as well as fugitive particulate emissions and visible emissions that originated 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) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

(d) 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, complaints, monitoring results, and/or Department findings.

### IV. RECORDKEEPING REQUIREMENTS.

# 011 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

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

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations 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.

### V. REPORTING REQUIREMENTS.

# 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.]

(a) The permittee shall, within two (2) hours of discovery of any occurrence, notify the Department, at 484-250-5920, of any malfunction of the source(s) or associated air pollution control devices listed in Section A, of this permit, which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit, or of a regulation contained in 25 Pa. Code Article III.

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

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

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

**SECTION C. Site Level Requirements**

# 013 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

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

# 014 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

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

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

# 015 [25 Pa. Code §135.3]

**Reporting**

The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year.

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

**VI. WORK PRACTICE REQUIREMENTS.**

# 016 [25 Pa. Code §123.1]

**Prohibition of certain fugitive emissions**

A person responsible for any source specified in 25 Pa. Code § 123.1(a)(1) -- (9) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but are not limited to, the following:

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

# 017 [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 air contaminant system identified in Sections A or G, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition #017(g), of Section B, of this permit.
- (b) If an unauthorized modification of any source(s) occurs at this facility, the permittee shall immediately notify the Department. If so directed by the Department, then this permit, as it pertains to the modified source(s), may be suspended and the source(s) shall not be operated until the modification is authorized by the Department.

# 018 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

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

The permittee shall ensure that the source(s) and air pollution control device(s), listed in Section A and Section G, where

## SECTION C. Site Level Requirements

applicable, of this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturer's specifications.

# 019 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

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

### 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 04/30/2005 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and annually thereafter.

### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

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

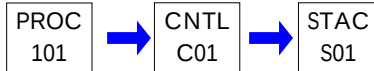
**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: CHROME ELECTROPLATING TANKS

Source Capacity / Throughput:

N / A



This source occurs in alternate operation: FOAM BLANKET-TYPE FUME SUPPRESSANT

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall limit emissions to the atmosphere from the chrome plating tanks according to the following:

(a) chromium compound emissions to 6.6E-6 grains per dry standard cubic foot and 2.63 pounds in a 12-month rolling period.

[Additional authority for (a)(1) is also derived from 40 CFR 63.342(c)(1)(i) Standards for Hard Chromium Electroplating Tanks.]

(b) particulate matter (less than 10 µm) emissions to 2.6E-5 grains per dry standard cubic foot and 12.4 pounds in a 12-month rolling period.

**Throughput Restriction(s).**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall limit the cumulative potential rectifier capacity of the chrome plating tanks to 67.452 million ampere-hour per year, or less.

**II. TESTING REQUIREMENTS.**

# 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.344]

**Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.****Performance test requirements and test methods.**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

(a) Performance test results shall be documented in complete test reports that contain the information required by paragraphs (a)(1) through (a)(9) below. The test plan to be followed shall be made available to the Department prior to the testing, if requested.

(1) A brief process description;

(2) Sampling location description(s);

(3) A description of sampling and analytical procedures and any modifications to standard procedures;

(4) Test results;

(5) Quality assurance procedures and results;

**SECTION D. Source Level Requirements**

- (6) Records of operating conditions during the test, preparation of standards, and calibration procedures;
  - (7) Raw data sheets for field sampling and field and laboratory analyses;
  - (8) Documentation of calculations; and
  - (9) Any other information required by the test method.
- (b) The permittee may use the results of the initial performance testing at startup to demonstrate compliance condition (a).

**III. MONITORING REQUIREMENTS.**

# 004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.343]  
Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.  
Compliance provisions.  
[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]  
The permittee shall monitor the pressure drop across the composite mesh-pad system once each day this source is operating, pursuant to 40 CFR § 63.343(c)(1)(ii).

**IV. RECORDKEEPING REQUIREMENTS.**

# 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.342]  
Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.  
Standards.  
[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]  
(a) The permittee shall keep on hand a written form of the operation and maintenance plan for the life of the source or until the source is no longer subjected to the provisions of Subpart N.  
(b) The permittee shall keep previous (i.e. superseded) versions of the operation and maintenance plan on record in the event the plan is revised, for a period of five years after each revision to the plan, pursuant to 40 CFR § 63.342(f)(3)(v).

# 006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.343]  
Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.  
Compliance provisions.  
[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]  
The permittee shall maintain daily records of the pressure drop across the composite mesh-pad system, when this source is operating, including the date and time data is collected, pursuant to 40 CFR § 63.343(c)(1)(ii) and 40 CFR § 63.346(b)(8).

# 007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.346]  
Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.  
Recordkeeping requirements.  
[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]  
The permittee shall maintain the following records for this source, pursuant to 40 CFR § 63.346(b):

## SECTION D. Source Level Requirements

- (a) Inspection records for the add-on air pollution control device and monitoring equipment, to document that the inspection and maintenance requirements have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
- (b) Records of all maintenance performed on this source, the add-on air pollution control device, and monitoring equipment;
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment;
- (d) Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
- (e) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan requirements;
- (f) Test reports documenting results of all performance tests;
- (g) All measurements as may be necessary to determine the conditions of performance tests;
- (h) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment;
- (i) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment;
- (j) The total process operating time of the affected source during the reporting period;
- (k) Records of the actual cumulative rectifier capacity of hard chromium electroplating tanks at a facility expended during each month of the reporting period, and the total capacity expended to date for a reporting period;
- (l) When a fume suppressant is used to comply with the standards, records of the date and time that fume suppressants are added to the electroplating or anodizing bath;
- (m) Any information demonstrating when the source is meeting the requirements for a waiver of recordkeeping or reporting requirements, if the source has been granted a waiver; and
- (n) All documentation supporting the notifications and reports.

## V. REPORTING REQUIREMENTS.

# 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.342]

Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.  
Standards.

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

If actions taken by the owner or operator during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report to the

**SECTION D. Source Level Requirements**

Department such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Department, pursuant to 40 CFR § 63.342(f)(3)(iv).

# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.347]

**Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.**  
**Reporting requirements.**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

The permittee shall prepare a summary report to document the ongoing compliance status of the source, pursuant to 40 CFR § 63.347(h)(1). The report shall contain the following, pursuant to 40 CFR §63.347(g)(3):

- (a) The company name and address of the affected source;
- (b) An identification of the operating parameter that is monitored for compliance determination;
- (c) The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation;
- (d) The beginning and end dates of the reporting period;
- (e) A description of the type of process performed;
- (f) The total operating time of the source during the reporting period;
- (g) A summary of operating parameter values, including the duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- (h) A certification by a responsible official that the work practice standards for this source were followed in accordance with the operation and maintenance plan for the source;
- (i) If the operation and maintenance plan was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emissions and/or parameter monitoring exceedences are believed to have occurred, and a copy of the report(s) documenting that the operation and maintenance plan was not followed;
- (j) A description of any changes in monitoring, processes, or controls since the last reporting period;
- (k) The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
- (l) The date of the report.

# 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.347]

**Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.**  
**Reporting requirements.**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

- (a) The permittee shall notify the Department in writing of the intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin to allow the Department to have an observer present during the test, pursuant to



## SECTION D. Source Level Requirements

40 CFR § 63.347(d)(1).

(b) In the event the owner or operator is unable to conduct the performance test on the date specified in the notification requirement specified in (a) above, due to unforeseeable circumstances beyond his or her control, the permittee shall notify the Department within five (5) days prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test shall not relieve the owner or operator of legal responsibility for compliance with any other applicable provisions of this part or with any other applicable Federal, State, or local requirement, nor will it prevent the Department from implementing or enforcing this part or taking any other action under the Act, pursuant to 40 CFR § 63.347(d)(2) and 40 CFR § 63.7(b)(2).

# 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.347]

Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.  
Reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

(a) The permittee shall submit reporting requirements to the Department via US Mail, fax, or by another courier, or on approved electronic media, pursuant to 40 CFR § 63.347(a).

(1) US Mail submittals shall be postmarked on or before the specified date.

(2) Submittals sent by other methods shall be received by the Department on or before the specified date.

(b) The permittee shall submit performance test results to the Department no later than 90 days following the completion of the performance test, pursuant to 40 CFR § 63.347(f).

# 012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.347]

Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.  
Reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

The permittee shall prepare a summary report to document the ongoing compliance status of the affected source. The permittee shall complete the summary report annually, except for instances of exceedances, and shall retain the report on site, pursuant to 40 CFR § 63.347(h)(1).

# 013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.347]

Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.  
Reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

(a) The permittee shall prepare and submit to the Department semiannual reports of exceedances if the following is met:

(i) the duration of excess emissions (as indicated in the monitoring data) is one (1) percent or greater of the total operating time for that reporting period, and

(ii) the total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five (5) percent or greater of the total operating time.

(b) The permittee shall submit ongoing compliance status reports semiannually to the Department until a request to reduce reporting frequency is approved, if (a)(i) and (ii) above occur, pursuant to 40 CFR § 63.347(h)(2).

**SECTION D. Source Level Requirements**

# 014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.347]

Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.

Reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

(a) As soon as the monitoring data show that this source is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period.

(b) After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval from the Department to reduce the reporting frequency.

**VI. WORK PRACTICE 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 Chapter 124 and 40 CFR § 63.342(f)(3)]

(a) The permittee shall, once per calendar quarter, conduct the following inspections of the chrome plating process:

(1) a visual inspection of the dry fume scrubber to ensure that there is proper drainage, no chromic acid build-up on the pads, and no evidence of chemical attack on the structural integrity of the dry fume scrubber.

(2) a visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of the chromic acid mist.

(3) a visual inspection of the ductwork from the tank to the control device to ensure that there are no leaks.

(b) The permittee shall washdown the mesh pads in accordance with manufacturer's specifications.

# 016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall comply with the following work practice standards at each chrome electroplating tank and the associated control devices:

(a) The permittee shall control the emissions of chromic acid mist from each chrome electroplating tank by using a pre-scrubber and a three (3) stage mesh type dry fume scrubber.

(b) The maximum pressure drop across the scrubber shall be 2.7 inches of water gage and the minimum pressure drop shall be 0.1 inches of water gage (the limits are set from an average pressure drop across the scrubber of 0.7 inches of water gage).

[Additional authority for (b) is also derived from 40 CFR § 63.343(c)(1)(ii) and 25 Pa. Code Chapter 124.]

(c) The permittee shall operate and maintain a magnehelic gage to monitor the pressure drop across the dry fume scrubber.

(d) The permittee shall operate and maintain a non-resettable ampere-hour meter.

# 017 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.342]

Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.

Standards.

**SECTION D. Source Level Requirements**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

(a) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Department, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source.

(b) Based on the results of a determination made under paragraph (a) above, the Department may require that an owner or operator of an affected source make changes to the operation and maintenance plan for this source. Revisions may be required if the Department finds that the plan:

(1) Does not address a malfunction that has occurred;

(2) Fails to provide for the operation of the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or

(3) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

# 018 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.342]

[Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.](#)  
[Standards.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

The permittee shall implement the operation and maintenance plan, attached as Addendum A, pursuant to 40 CFR § 63.342(f)(3).

# 019 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.342]

[Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.](#)  
[Standards.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

The permittee shall comply with the following work practice standards, which address operation and maintenance practices at this source, pursuant to 40 CFR § 63.342(f)(1):

(a) At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain this source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, and consistent with the operation and maintenance plan,

(b) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan,

(c) Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

**VII. ADDITIONAL REQUIREMENTS.**

# 020 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

This source consists of two (2) Chrome Electroplating Tanks.



## SECTION D. Source Level Requirements

# 021 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

The chromium emission limit for this source must be met at the outlet of the add-on air pollution control device (C01), as per 40 CFR § 63.344(e)(2).

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

**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: NICKEL ELECTROPLATING TANK

Source Capacity / Throughput:

N / A

PROC  
102STAC  
Z02**I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall limit nickel compound emissions from the nickel plating tank to 0.0063 grains per dry standard cubic foot and 0.39 tons in a 12-month rolling 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.**

# 002 [25 Pa. Code §127.511]

**Monitoring and related recordkeeping and reporting requirements.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

The permittee shall monitor the amount of nickel compound emissions from this source on a monthly basis, using the AP-42 emission factors.

**IV. RECORDKEEPING REQUIREMENTS.**

# 003 [25 Pa. Code §127.511]

**Monitoring and related recordkeeping and reporting requirements.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

The permittee shall maintain monthly records of the amount of nickel compound emissions from this source, including 12-month rolling sums.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

# 004 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

This source consists of one (1) Nickel Electroplating Tank.



## SECTION D. Source Level Requirements

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

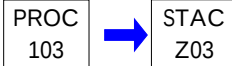
**SECTION D. Source Level Requirements**

Source ID: 103

Source Name: COPPER ELECTROPLATING TANKS

Source Capacity / Throughput:

N / A

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall limit copper compound emissions from the copper plating tanks to 0.0081 grains per dry standard cubic foot and 1.01 tons in a 12-month rolling 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.**

# 002 [25 Pa. Code §127.511]

**Monitoring and related recordkeeping and reporting requirements.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

The permittee shall monitor the amount of copper compound emissions from this source on a monthly basis, using the AP-42 emission factors.

**IV. RECORDKEEPING REQUIREMENTS.**

# 003 [25 Pa. Code §127.511]

**Monitoring and related recordkeeping and reporting requirements.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441]

The permittee shall maintain monthly records of the amount of copper compound emissions from this source, including 12-month rolling sums.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

# 004 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

This source consists of three (3) Copper Electroplating Tanks.



## SECTION D. Source Level Requirements

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





## SECTION E. Alternative Operation Requirements.

Alternative Operation Name: FOAM BLANKET-TYPE FUME SUPPRESSANT

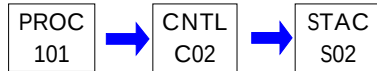
### #001 CHANGES FROM NORMAL OPERATION

Emissions from the two (2) the chromium tanks may be controlled by Foam Blanket-Type Fume Suppressants, when the scrubbing system is not being used.

#### Sources included in this Alternative Operation:

| ID  | Name                        | Source Type |
|-----|-----------------------------|-------------|
| 101 | CHROME ELECTROPLATING TANKS | Process     |

#### Alternative Operation Map:



### 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.

# 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.343]

Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.

Compliance provisions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

The permittee shall monitor the foam blanket thickness every one (1) hour of tank operation, when the foam blanket-type fume suppressant is being utilized as the control device.

### IV. RECORDKEEPING REQUIREMENTS.

# 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.343]

Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Electroplating and Chromium Anodizing Tanks.

Compliance provisions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 124]

The permittee shall maintain hourly records of the foam blanket thickness during tank operation, when the foam blanket-type fume suppressant is being utilized as the control device.

### 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).



## SECTION E. Alternative Operation Requirements.

### VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION F. Emission Restriction Summary.**

| Source Id             | Source Description          |                    |                    |
|-----------------------|-----------------------------|--------------------|--------------------|
| 101                   | CHROME ELECTROPLATING TANKS |                    |                    |
| <b>Emission Limit</b> |                             | <b>Pollutant</b>   |                    |
| 2.630                 | Lbs/Yr                      | Chromium Compounds | Chromium Compounds |
| 12.400                | Lbs/Yr                      |                    | PM10               |
| 102                   | NICKEL ELECTROPLATING TANK  |                    |                    |
| <b>Emission Limit</b> |                             | <b>Pollutant</b>   |                    |
| 0.390                 | Tons/Yr                     | Nickel Compounds   | Nickel Compounds   |
| 103                   | COPPER ELECTROPLATING TANKS |                    |                    |
| <b>Emission Limit</b> |                             | <b>Pollutant</b>   |                    |
| 1.010                 | Tons/Yr                     | Copper Compounds   | Copper             |

## Site Emission Restriction Summary

| Emission Limit | Pollutant |
|----------------|-----------|
|----------------|-----------|

**SECTION G. Miscellaneous.**

- (a) Plan Approval PA-09-0150 serves as the basis for certain terms and conditions contained in this Title V Permit.
- (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 additional limitations, monitoring, or recordkeeping:
- (1) Two (2) dechrome tanks,
  - (2) Four (4) degreasing sinks - use less than 2 gallons of solvent,
  - (3) Two (2) wastewater storage tanks - RFD,
  - (4) Wastewater evaporator - RFD.
- (c) The following SIC Codes apply to the facility:
- (1) SIC Code 3471 - Electroplating, plating, polishing, anodizing, and coloring; and
  - (2) SIC Code 2796 - Manufacturing, plate making services.
- (d) APS No. 356105; Authorization No. 573386 - This permit has been revised under the requirements of 25 Pa. Code § 127.450 to incorporate a change in the statistical range for pressure drops across a composite mesh pad scrubber system due to a change in 40 C.F.R. § 63.343(c)(1). The pressure drop range was 0.5 inches water gage to 3.5 inches water gage, but this has changed to 0.1 inches water gage to 2.7 inches water gage (0.7 inches water gage with a range of +/- 2 inches water gage, but not allowing for negative pressure drops).
- (e) APS No. 356105; Authorization No. 586655 - This permit has been amended under the requirements of 25 Pa. Code § 127.450. The Site Level Requirement to submit AIMS reports has been removed due to emissions less than 1.0 ton per year.
- (f) APS No. 581031; Authorization No. 629283 - This permit has been transferred (Administrative Amendment Application received April 13, 2006) to address the change of ownership from the previous owner Rotoflex Technologies, Inc. (APS No. 356105) to the current owner Union Roto-Graving, Inc.



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