



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM**

STATE ONLY OPERATING PERMIT

Issue Date: February 24, 2020

Effective Date: July 11, 2020

Expiration Date: July 10, 2025

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 unless otherwise designated.

State Only Permit No: 48-00101

Federal Tax Id - Plant Code: 47-0353233-1

Owner Information

Name: AIRLITE PLASTICS CO
Mailing Address: 2860 BATH PIKE
NAZARETH, PA 18064

Plant Information

Plant: AIRLITE PLASTICS CO/NAZARETH
Location: 48 Northampton County 48933 Upper Nazareth Township
SIC Code: 3086 Manufacturing - Plastics, Foam Products

Responsible Official

Name: JOHN BUNGERT
Title: VP
Phone: (610) 759 - 0280

Permit Contact Person

Name: TONY ALFIERI
Title: GM
Phone: (610) 759 - 0280 Ext.6426

[Signature] _____
MARK J. WEJKSZNER, NORTHEAST REGION AIR PROGRAM MANAGER



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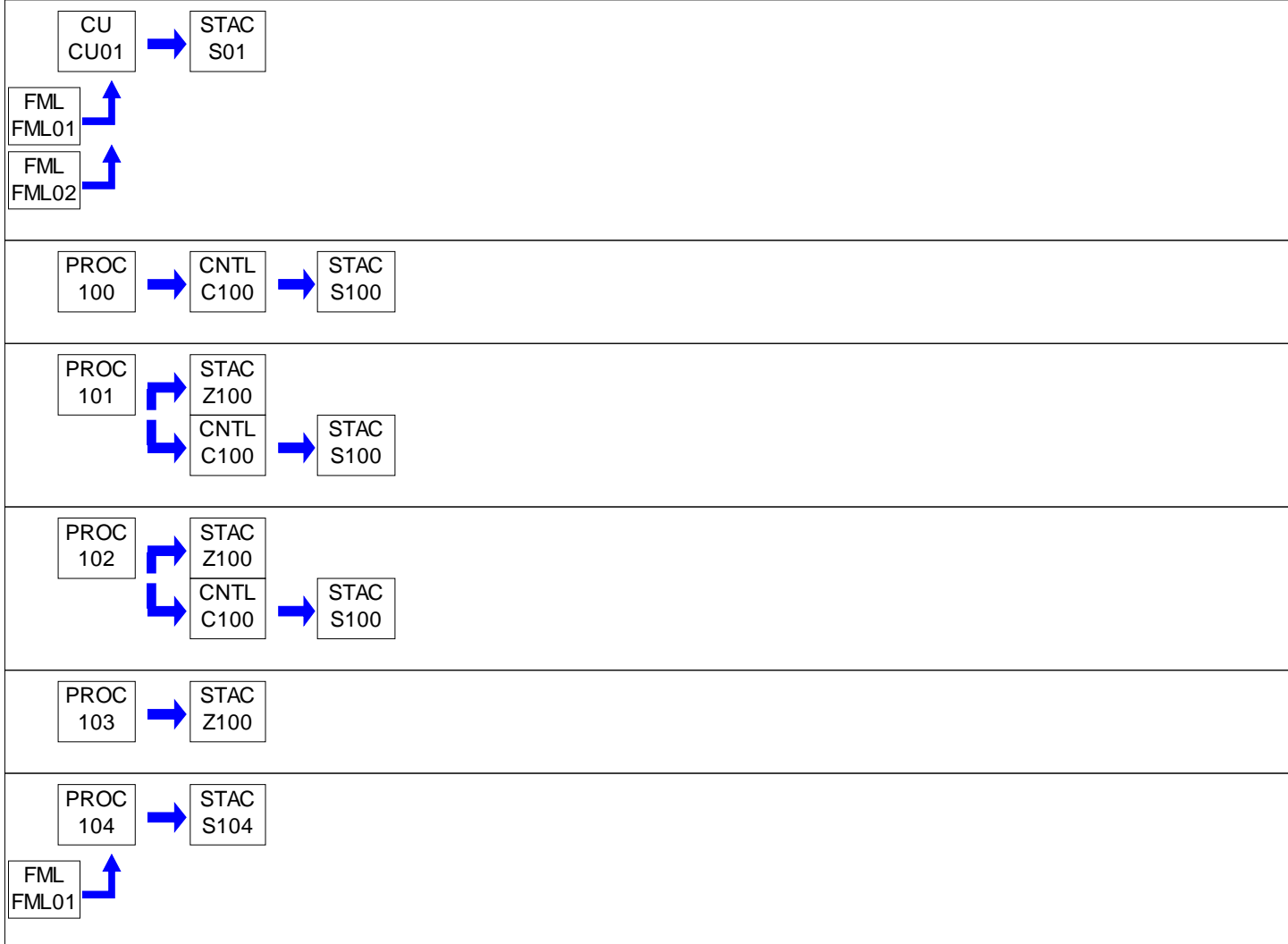
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
CU01	BOILER	5.230 MMBTU/HR	
100	PRE-EXPANDER		
101	TEN (10) MESH AGING BAGS		
102	FOUR (4) MOLDING PRESSES		
103	MOLDED PART STORAGE		
104	BURN OFF OVEN		
C100	REGENERATIVE THERMAL OXIDIZER		
FML01	NATURAL GAS PIPELINE		
FML02	#2 FUEL OIL		
S01	BOILER STACK		
S100	RTO STACK		
S104	BURN OFF OVEN STACK		
Z100	FUGITIVE EMISSION POINT		

PERMIT MAPS

**SECTION B. General State Only 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 in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]**Operating Permit Duration.**

- (a) 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.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating 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.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)]**Permit Renewal.**

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).
- (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.
- (d) 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.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]**Operating Permit Fees under Subchapter I.**

- (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):
- (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,

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modification, revision, renewal, and re-issuance of each operating permit or part thereof.

(b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).

(1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.

(2) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.

(c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund".

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]**Transfer of Operating Permits.**

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and 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 a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]**Inspection and Entry.**

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

(1) Enter at reasonable times upon the permittee's premises where a 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, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any 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, any 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 or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

(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 §§ 127.441 & 127.444]**Compliance Requirements.**

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes

**SECTION B. General State Only Requirements**

a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one 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 for the source is 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 State-Only 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 § 127.441]**Need to Halt or Reduce Activity Not a Defense.**

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

#009 [25 Pa. Code §§ 127.442(a) & 127.461]**Duty to Provide Information.**

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]**Revising an Operating Permit for Cause.**

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450 & 127.462]**Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and

**SECTION B. General State Only Requirements**

significant operating permit modifications, under this permit, as outlined below:

(b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]**Severability Clause.**

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

#013 [25 Pa. Code § 127.449]**De Minimis Emission Increases.**

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. 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.

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

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

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

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

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

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

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

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:

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- (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 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.
- (e) 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 (c)(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 this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (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, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making 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.

#014 [25 Pa. Code § 127.3]**Operational Flexibility.**

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (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)

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(6) Section 127.462 (relating to minor operating permit modifications)

(7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11]**Reactivation**

(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).

(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).

#016 [25 Pa. Code § 127.36]**Health Risk-based Emission Standards and Operating Practice Requirements.**

(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].

(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]**Circumvention.**

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 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#018 [25 Pa. Code §§ 127.402(d) & 127.442]**Reporting Requirements.**

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

(c) 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 in the permit transmittal letter, or otherwise notified)

(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

(e) Any records, reports or information submitted to the Department shall be available to the public except for such

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records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#019 [25 Pa. Code §§ 127.441(c) & 135.5]**Sampling, Testing and Monitoring Procedures.**

(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.

(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#020 [25 Pa. Code §§ 127.441(c) and 135.5]**Recordkeeping.**

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

- (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 any 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.

#021 [25 Pa. Code § 127.441(a)]**Property Rights.**

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

#022 [25 Pa. Code § 127.447]**Alternative Operating Scenarios.**

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.

**SECTION B. General State Only Requirements****#023 [25 Pa. Code §135.3]****Reporting**

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]**Report Format**

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.

**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**

(a) The permittee may not permit the emission into the outdoor atmosphere of 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) Open burning operations.
- (7) Sources and classes of sources other than those identified in paragraphs (1)-(6), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) the emissions are of minor significance with respect to causing air pollution; and
 - (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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

The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Site Level Condition #002 if such 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****VISIBLE EMISSIONS**

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

- (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.

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

The permittee shall comply with the following emission limitations:

1. Total volatile organic compound (VOC) emissions to less than 50.00 tons per year (12 month rolling sum) including VOC

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emissions from cleanup solvent from the facility.

2. The emission of total combined hazardous air pollutants (HAPs) from the facility shall be less than 25 tons in any 12 consecutive month period from the facility.

3. The emission of a single hazardous air pollutant (HAP) from the facility shall be less than 10 tons in any 12 consecutive month period from the facility.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.**# 007 [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.

008 [25 Pa. Code §127.511]**Monitoring and related recordkeeping and reporting requirements.****VISIBLE EMISSION**

(a) The permittee shall conduct weekly monitoring of the plant property, while the facility is in operation, for the presence of fugitive emissions and visible emissions. All weekly monitoring shall be recorded and maintained in a log book.

(b) All detected fugitive emissions and visible emissions shall be reported to the plant supervisor.

IV. RECORDKEEPING REQUIREMENTS.**# 009 [25 Pa. Code §127.511]****Monitoring and related recordkeeping and reporting requirements.****VISIBLE EMISSIONS**

The permittee shall maintain a record of all reports of fugitive and visible emissions monitoring and the corrective action taken to abate any deviation or prevent future occurrences.

V. REPORTING REQUIREMENTS.**# 010 [25 Pa. Code §127.511]****Monitoring and related recordkeeping and reporting requirements.****VISIBLE EMISSIONS**

On a semi-annual basis, the permittee shall compile a report of all monitoring and any logged instances of deviations from the fugitive and visible emissions, to be submitted to the Department. If no deviations were detected this report shall be retained on site and made available to the Department upon request.

011 [25 Pa. Code §127.511]**Monitoring and related recordkeeping and reporting requirements.**

The company, within one hour of discovery, shall notify the Department, at 610-861-2070, of any malfunction, recordkeeping and reporting errors, or other possible non-compliance issues, which result in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or

**SECTION C. Site Level Requirements**

regulations contained in Article III of the Rules and Regulations of the Department of Environmental Protection. A written report shall be submitted to the Department within five working days following the incident describing the malfunction, recordkeeping and reporting error or other non-compliance issue and the corrective actions being taken. The Department may take enforcement action for any violations of the applicable standards.

VI. WORK PRACTICE REQUIREMENTS.**# 012 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (1) 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.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (3) Paving and maintenance of roadways.
- (4) 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.

013 [25 Pa. Code §129.14]**Open burning operations**

- (a) No person may permit the open burning of material in an area outside of air basins in a manner that:
 - (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
 - (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life or property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health.
- (b) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:
 - (1) 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.
 - (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
 - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (c) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:
 - (1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.



SECTION C. Site Level Requirements

(2) Subsection (a) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:

(i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.

(ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.

(3) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

VII. ADDITIONAL REQUIREMENTS.

014 [25 Pa. Code §123.42]

Exceptions

The limitations of Site Level Condition #005 shall not apply to a visible emission in any of the following instances:

(1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.

(2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

(3) When the emission results from sources specified in Site Level Condition #002.

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

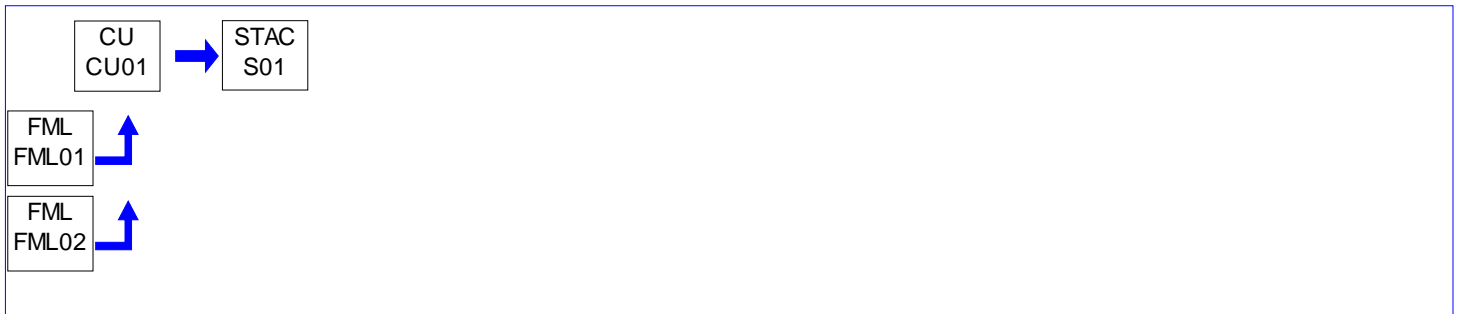
No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: CU01

Source Name: BOILER

Source Capacity/Throughput: 5.230 MMBTU/HR

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11237]****SUBPART JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources****What definitions apply to this subpart?**

(a) The permittee shall comply with the applicable requirements specified in 40 CFR Part 63, Subpart JJJJJJ (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources). Pursuant to 40 CFR § 60.4 (relating to address), the submission of copies of all requests, reports, applications, submittals and other communications shall be provided to both EPA and the Department.

(b) Copies of all documents provided to EPA shall be sent to:

Director of Air Protection Division
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(c) Copies of all documents provided to the Department shall be sent to the appropriate DEP Regional Office.

DEP Northeast Regional Office
Air Quality Program Manager
2 Public Square
Wilkes-Barre, PA 18701-1915

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11237]**SUBPART JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources****What definitions apply to this subpart?**

40 CFR 63.11237

The boilers are exempt from 40 CFR 63 Subpart JJJJJJ, if they meet the following requirement(s).

- (a) The boilers shall only fire natural gas except during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.
- (b) Whenever the boilers are fired on anything other than natural gas, the facility shall keep records of the hours of operation and type of fuel used.
- (c) If the conditions described above are not met, the facility shall immediately comply with the requirements of 40 CFR Part 63 Subpart JJJJJJ. The requirements of 40 CFR Part 63 Subpart JJJJJJ will remain in effect throughout the remaining term of the permit.



SECTION D. Source Level Requirements

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

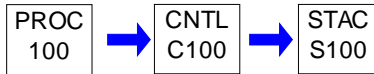
**SECTION D. Source Level Requirements**

Source ID: 100

Source Name: PRE-EXPANDER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

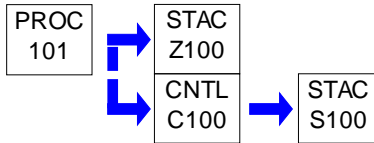
**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: TEN (10) MESH AGING BAGS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

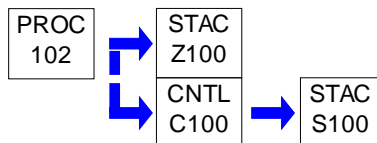
**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: FOUR (4) MOLDING PRESSES

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

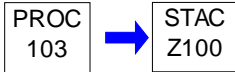
**SECTION D. Source Level Requirements**

Source ID: 103

Source Name: MOLDED PART STORAGE

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 104

Source Name: BURN OFF OVEN

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Nothing in this Burn Off Ovens Permit relieves the permittee from its obligation to comply with all applicable Federal, state and local laws and regulations.

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

Approval herein granted to operate under this Burn Off Ovens Permit is limited to:

- a. Burn off ovens designed to remove cured hydrocarbon coatings, grease or oils from metal parts. The burn off ovens shall not be used to burn coatings that contain halogenated hydrocarbons like PVC, or Teflons.
- b. Burn off ovens fueled by natural gas supplied by a public utility, liquified petroleum gas, or by commercial fuel oils which are No. 2 or lighter.

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

This permit authorizes operation of Burn Off Oven(s) that meets best available technology (BAT) required under 25 Pa code §§127.1 and 127.12(a)(5). For the purposes of this general permit, BAT shall include installation of a secondary chamber capable of reducing particulate matter emissions to or below 0.02 grains per dry standard cubic foot (gr/dscf) corrected to 12% CO₂.

The burn off oven secondary chamber shall be designed to: a) maintain a minimum temperature of 1400°F during the period of operation; and, b) have a minimum retention time of gas within the secondary chamber of at least 0.5 seconds.

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

The operation of a burn off oven shall not at any time result in the emission of:

- a. Particulate matter emissions in excess of 0.02 gr/dscf.
- b. Sulfur compound emissions in excess of 500 parts per million, by volume, dry basis, as specified in 25 Pa. Code §123.21.

II. TESTING REQUIREMENTS.**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

If, at any time, the Department has cause to believe that air contaminant emissions from a burn off oven covered by this Permit are in excess of the limitations specified in, or established pursuant to, any applicable regulation contained in 25 Pa. Code, Subpart C, Article III, the permittee shall conduct tests deemed necessary by the Department to determine the actual emission rate(s). The permittee shall perform such testing in accordance with applicable provisions of 25 Pa. Code Chapter 139 (relating to sampling and testing) and in accordance with any restrictions or limitations established by the Department at the time the permittee is notified, in writing, of the testing requirement.

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

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

IV. RECORDKEEPING REQUIREMENTS.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall comply with applicable monitoring, recordkeeping and reporting requirements set forth in 25 Pa. Code Chapter 135 (relating to reporting of sources), 139 (relating to sampling and testing), the Air Pollution Control Act, the Clean Air Act, or the regulations thereunder as applicable to the source. The permittee shall, upon Department request, provide fuel analysis, or fuel samples, of the fuel used in the burn off oven. The permittee shall install, maintain, and operate a temperature indicator and recorder to measure and record the temperature in the secondary chamber of the burn off oven. Records under this general permits shall be kept for a period of five (5) years and shall be made available to the Department upon its request.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Any burn off oven operating under this Permit must comply with the terms and conditions of the permit. The burn off ovens and any associated air cleaning devices shall be:

- a. Operated in such a manner as not to cause air pollution.
- b. Operated and maintained in a manner consistent with good operating and maintenance practices.
- c. Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this Permit.

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

The permittee shall immediately notify the Department of any malfunction of the burn off oven which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code, Subpart C, Article III (relating to air resources).

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall immediately notify the Department of any malfunction of plant equipment or associated air cleaning device(s) which results in, or may possibly be resulting in the emission of air contaminants in excess of any applicable limitation.

010 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The burn off oven secondary chamber shall be maintained at a minimum temperature of 1400°F during the period of operation. This minimum temperature of 1400°F must be established prior to the commencement of parts burn off in the burn off chamber. Instrumentation shall be provided for the monitoring of the secondary chamber temperature. The minimum retention time of gas within the secondary chamber shall be 0.5 seconds.

011 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

Burn off ovens shall not be used to burn coatings that contain halogenated hydrocarbons like PVC, or Teflons.

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

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

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 1

Group Description: EXPANDABLE POLYSTYRENE PROCESS

Sources included in this group

ID	Name
100	PRE-EXPANDER
101	TEN (10) MESH AGING BAGS
102	FOUR (4) MOLDING PRESSES
103	MOLDED PART STORAGE
C100	REGENERATIVE THERMAL OXIDIZER

I. RESTRICTIONS.**Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Pursuant to the provision of 25 PA Code, Chapter 123, Section 123.31, there shall be no malodors emissions from any operation related to any sources covered by this Operating Permit.

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

Pursuant to the Best Available Technology provision of 25 PA Code, Chapter 127, the regenerative thermal oxidizer (RTO) shall meet the following limitations:

(a) Destruction Efficiency--- 98 % destruction efficiency for the VOC (Volatile Organic Compound) emission in the control device.

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

The company shall demonstrate following capture efficiency for VOCs (Volatile Organic Compounds) from the operations.

Bag opening - 100%
 Pre-expansion - 100%
 Prepuff aging - 90%
 Molding - 90%

Throughput Restriction(s).**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

1. The permittee shall only use expandable polystyrene (EPS) beads that has pentane as the sole blowing agent.
2. The maximum hourly raw EPS bead throughput shall not exceed 2,000 lbs/hr, based on a daily average.

II. TESTING REQUIREMENTS.**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

1. The Permittee shall demonstrate that the bag opening and pre-expansion operations meets all requirements of a total enclosure.
2. The Permittee shall determine the average residual VOC content in the final products as shipped to quantify the storage emissions.

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

1. The company shall perform stack testing once every five (5) years from the previous stack test date. This stack testing shall be conducted in the last year of that five year period.

**SECTION E. Source Group Restrictions.**

Stack tests shall be performed in accordance with the provision of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection to demonstrate the compliance with the VOC destruction efficiency for the RTO and VOC capture efficiency for various operations. The Permittee shall test the destruction efficiency for each operating scenario (combination of pre-expansion, aging and molding processes) that occurs during normal operation. If aging occurs alone during normal operation, this scenario must also be tested. Performance tests shall be conducted while operating under representative bead pre-expansion, aging and molding conditions and shall result in the manufacture of a saleable product. The facility shall test using either the highest VOC content of bead that will be used by the facility or another commonly used bead type selected by the Department. Testing shall encompass one complete operating cycle that is representative of daily operations. At the completion of the test, the aging bags shall have the same mass of beads as at the beginning of the test (i.e. empty-to-empty or full-to-full). Normal aging times shall apply during testing. If the prepuff is normally aged overnight, then testing shall also occur overnight.

For capture efficiency demonstration, the Permittee shall use the EPA's "Guidelines for Determining Capture Efficiency" dated January 9, 1995, as applicable. If the Permittee is using EPA Test Method 25A for VOC determination, then an analyzer response factor must be determined for pentane. This response factor shall be used to compare the VOC content of both the raw and finished material and the VOC content entering the thermal oxidizer on an equal basis (as pentane) for proper calculation of the VOC capture efficiency.

The total enclosure demonstration shall be conducted in accordance with EPA Test Method 204.

2. At least sixty (60) calendar days prior to commencing an emission testing program required by this permit, a test protocol shall be submitted to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office for the review and approval. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
3. At least fifteen (15) calendar days prior to commencing an emission testing program required by this permit, written notification of the date and time of testing shall be provided to the Department's appropriate Regional Office. Written notification shall also be sent to the Department's Bureau of Air Quality, Division of Source Testing and Monitoring. The notification shall not be made without prior receipt of a protocol acceptance letter from the Department. The Department is under no obligation to accept the results of any testing performed without adequate advance written notice to the Department of such testing. In addition, the emissions testing shall not commence prior to receipt of a protocol acceptance letter from the Department.
4. A complete test report shall be submitted to the Department no later than sixty (60) calendar days after completion of the on-site testing portion of an emission test program.
5. A complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:
 - a. A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings;
 - b. Permit number(s) and condition(s) which are the basis for the evaluation;
 - c. Summary of results with respect to each applicable permit condition; and
 - d. Statement of compliance or non-compliance with each applicable permit condition.

III. MONITORING REQUIREMENTS.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment when operating the RTO:

- (a) A temperature monitoring device equipped with a continuous recorder and having an accuracy of (+/-) 1 percent of the temperature being measured expressed in degrees Celsius or degrees Fahrenheit (+/-) 0.5°C or (+/-) 0.9°F, whichever is

**SECTION E. Source Group Restrictions.**

greater.

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

Temperature sensing and recording devices shall be installed to show that the minimum temperature maintained in the regenerative thermal oxidizer combustion chamber is 1500 degrees F.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

1. The company shall ensure that the control devices shall be equipped with the applicable monitoring equipment and the monitoring equipment shall be installed, calibrated, operated, and maintained according to the vendor's specifications at all times the control device is in use.

2. The operating temperature of the RTO unit shall be continuously measured and recorded.

IV. RECORDKEEPING REQUIREMENTS.**# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The Permittee shall record the VOC content of the EPS beads processed, bead usage rates for each process, aging time of beads and actual operating times of each process during the performance test. The Permittee shall record the oxidizer combustion chamber temperature and combustion chamber set-point temperature during the performance test.

011 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The average operating temperature of the regenerative thermal oxidizer shall be continuously measured, recorded and maintained above 1500 OF. The average combustion temperature shall be measured at least every 15 minutes and averaged over the same time period of the performance test.

012 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

1. The Permittee shall retain VOC content records of all expandable polystyrene bead shipment received & utilized at the facility for five years after the date and year of record. The records shall be available for inspection or submittal to the Department personnel, upon request, and contain the following:

- a. The analytical method used to determine the initial VOC content of the expandable polystyrene beads.
- b. A certification of each analysis of the initial VOC content of the expandable polystyrene beads.

2. The Permittee shall use the Certificate of Analysis (COA) provided by the supplier(s) to determine the VOC (pentane) content of each shipment/lot of EPS bead. If the COA is not available, then the Permittee shall use a Material Safety Data Sheet (MSDS) provided by the supplier. If a range of VOC is given on the MSDS, the Permittee shall use the highest number in the range.

3. The Permittee shall use the records required by Condition above to determine the initial monthly VOC content of expandable polystyrene bead. All calculations used to determine this VOC content should be kept as part of the monthly record.

013 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain records of the following:

- a. the company identification for each raw EPS bead employed;
- b. an identification of the blowing agents contained in each raw EPS bead employed;
- c. records from the EPS bead suppliers for each shipment that documents the total weight percent of VOC (pentane) contained in the raw EPS beads;
- d. the average weight percent of VOC retained in all final EPS products.

**SECTION E. Source Group Restrictions.****# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

1. The company shall maintain a file containing all records and other data that are required to be collected pursuant to the various provisions of this operating permit. The file shall include, but not be limited to: all air pollution control systems performance evaluations and records of calibration checks, adjustments and maintenance performed on all equipment which is subject to this operating permit. All measurements, records and other data required to be maintained by the company shall be retained for at least five years following the date on which such measurements, records or data are recorded.
2. The company shall maintain following records:
 - (a) Data which clearly demonstrates that all the sources never exceeds its rated capacity.
 - (b) The records shall provide sufficient data to clearly demonstrate that the requirement of plan approval conditions are met.
 - (c) Monthly throughput.
 - (d) The emission of VOCs & HAPs on a monthly basis and calculations to verify compliance with the VOC & HAPs emissions limitations in any 12 consecutive month period.
 - (e) These records shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

015 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (a) The permittee shall keep comprehensive and accurate records of the following information:
 - (1) The supporting calculations on a monthly basis used to verify compliance with the volatile organic compound limitations for the facility in any 12 consecutive month period.
 - (2) The emissions factor and supporting calculations used to verify compliance with the volatile organic compound emissions limitations.
- (b) All records generated pursuant to this condition shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

016 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.

017 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

1. The Permittee shall maintain daily usage records of all expandable polystyrene (EPS) bead processed at the facility. These records shall include the total weight and the volatile organic compound content (expressed as a weight percentage).

All calculations used to determine usages should be kept as part of the monthly record. These usage records shall be kept available for inspection or submittal for five years from the date of record.
2. The Permittee shall use the calculations to determine the twelve month rolling total VOC emissions from expandable polystyrene associated with sources for each month.

All calculations used to determine the twelve month rolling total VOC emissions should be kept as part of the monthly record.

**SECTION E. Source Group Restrictions.****V. REPORTING REQUIREMENTS.****# 018 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

1. Any notification as a result of any condition herein should be directed to:

Mark J Wejkszner
Air Quality Program Manager
Department of Environmental Protection
2 Public Square
Wilkes-Barre, Pa 18701-1915

VI. WORK PRACTICE REQUIREMENTS.**# 019 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The company shall ensure that the capture system and control devices are operated at all times of production except shutdown for routine maintenance, checkups and repairs.

020 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

1. The aforementioned source(s) may only be operated as long as the associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth here in.

2. The company shall maintain and operates the air pollution control equipment and sources in accordance with good engineering practice.

3. The company shall ensure that all openings are closed within the enclosures used to capture the VOC's from the processes and the control device is operated to the maximum extent practical for good manufacturing & engineering practices.

021 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

Spills of unexpanded polystyrene beads shall be collected and any spilled material shall be placed in a closed container to prevent and suppress emissions.

VII. ADDITIONAL REQUIREMENTS.

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



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

(a) The Department received the operating permit application for this facility on 10/8/2019. The annual operating permit administrative fee shall be submitted to the Department in accordance with 25 Pa. Code, Chapter 127, Section 127.703. The fee is due 30 days prior to the anniversary date of the issuance of the permit.

(b) This is a Synthetic Minor Operating Permit.

(c) General Permits include:

GP4-48-002 for Source ID 104 issued 7/22/2014

(d) Plan Approvals include:

48-00101A issued 2/12/2014

48-00101B issued 12/22/2015

(d) Requests for Determination include:

48-0777 approved 7/13/2015 for 6 pre-puff aging bags (total of 10)

48-0802 denied 2/12/2016 for expansion of EPS molding process

48-0803 approved 3/10/2016 for Source ID 102 de minimus VOC increase

48-0804 approved 3/10/2016 for Source ID 103 de minimus VOC increase

48-0805 approved 3/10/2016 for Source ID 101 de minimus VOC increase

48-0806 approved 3/10/2016 for Source ID 100 de minimus VOC increase

48-0942 approved 9/9/2019 for addition of 5th EPS Molding Press to Source ID 102



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