



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

STATE ONLY NATURAL MINOR OPERATING PERMIT

Issue Date:	September 25, 2019	Effective Date:	July 3, 2023
Revision Date:	July 3, 2023	Expiration Date:	September 24, 2024
Revision Type:	Amendment		

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

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

State Only Permit No: 18-00021

Natural Minor

Federal Tax Id - Plant Code: 95-1492269-2

Owner Information

Name: AVERY DENNISON PERFORMANCE POLYMERS
Mailing Address: 171 DRAKETOWN RD
MILL HALL, PA 17751-8608

Plant Information

Plant: AVERY DENNISON PERFORMANCE POLYMERS/MILL HALL PLT
Location: 18 Clinton County 18905 Bald Eagle Township
SIC Code: 2891 Manufacturing - Adhesives And Sealants

Responsible Official

Name: CORD RUFFNER
Title: PLANT MGR
Phone: (570) 748 - 7701 Email: cord.ruffner@averydennison.com

Permit Contact Person

Name: GRANT SHERMAN
Title: ENV MGR
Phone: (570) 927 - 2976 Email: grant.sherman@averydennison.com

[Signature] _____

MUHAMMAD Q. ZAMAN, ENVIRONMENTAL PROGRAM MANAGER, NORTHCENTRAL REGION



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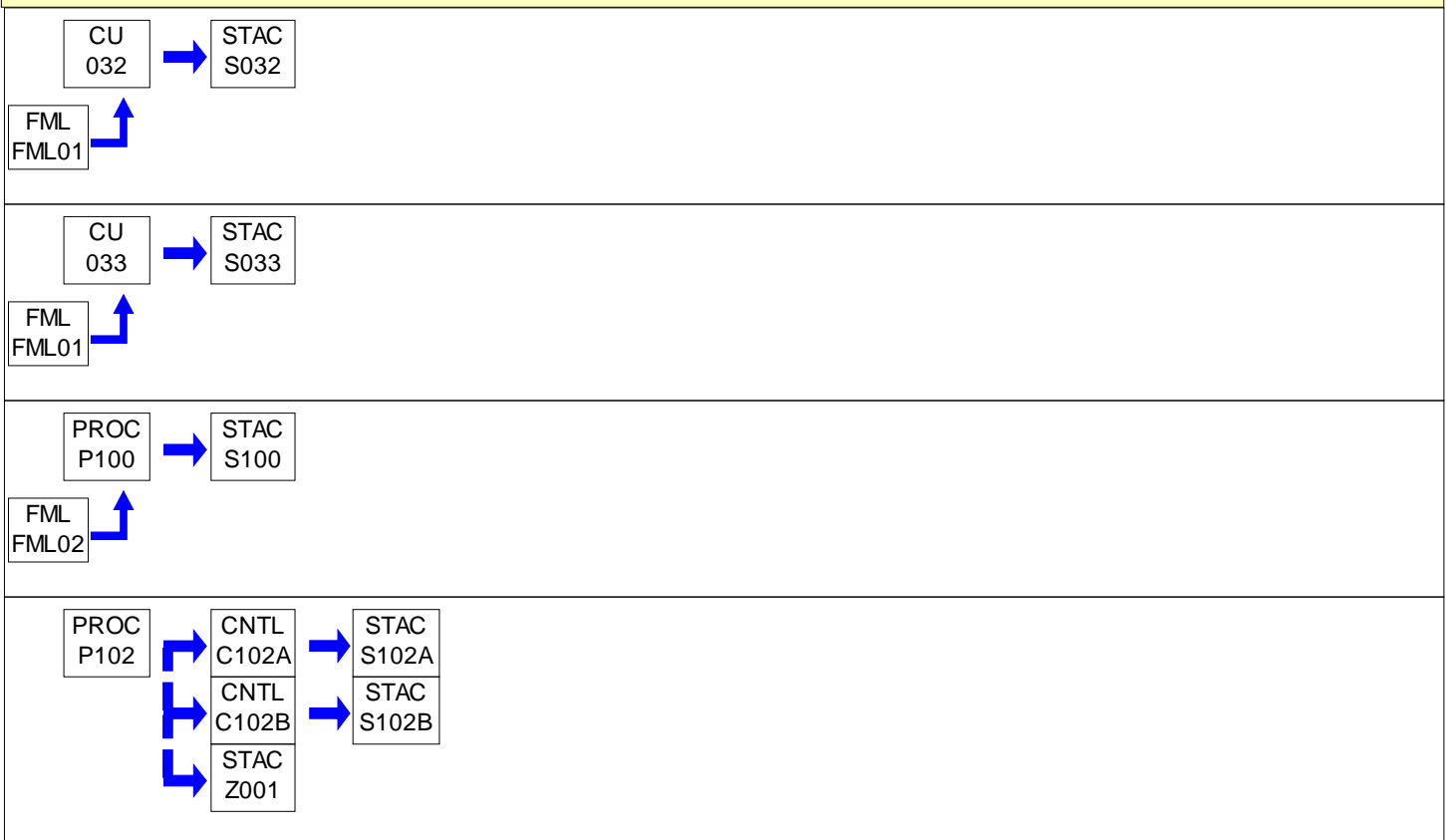
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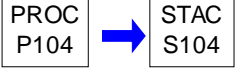
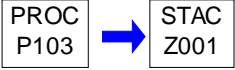
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
032	COMBUSTION UNITS (2.5 MILLION OR LESS BTU PER HR)		
033	COMBUSTION UNITS (>2.5 AND <10.0 MILLION BTU PER HR)		
P100	DIESEL-FIRED ENGINES		
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C102A	CON-SERVE THERMAL FUME OXIDIZER (TOX-1)		
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PERMIT MAPS



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)]**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 as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (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 the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
- (1) For a synthetic minor facility, a fee equal to:
- (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
 - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
 - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.

**SECTION B. General State Only Requirements**

(2) For a facility that is not a synthetic minor, a fee equal to:

- (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
- (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
- (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.

(b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#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 a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:

**SECTION B. General State Only Requirements**

- (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, 127.465 & 127.703]**Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:

**SECTION B. General State Only Requirements**

(b) Administrative Amendments. The permittee shall submit the application for 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 submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.

(e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#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:

**SECTION B. General State Only Requirements**

- (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)

**SECTION B. General State Only Requirements**

(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

**SECTION B. General State Only Requirements**

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 §123.1]****Prohibition of certain fugitive emissions**

No person may permit the emission into the outdoor atmosphere of fugitive air contaminants 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) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.
- (8) Sources and classes of sources other than those identified above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (a) the emissions are of minor significance with respect to causing air pollution; and
 - (b) the emissions are not preventing or interfering with the attainment or maintenance of an ambient air quality standard.

002 [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 (1) through (8) in Condition #001 above if the emissions are visible at the point the emissions pass outside the person's property.

003 [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.

004 [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:

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

**SECTION C. Site Level Requirements****# 005 [25 Pa. Code §123.42]****Exceptions**

The emission limitations of 25 Pa. Code §123.41 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 25 Pa. Code §123.1(a)(1)-(9) (relating to prohibition of certain fugitive emissions).

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

At least 60 days prior to the performance of any testing required herein, the permittee shall submit two copies of a pretest protocol to the Department for review. This protocol shall describe the test methods and procedures to be used for this testing and shall include dimensioned sketches of the exhaust system showing the locations of all proposed sampling ports. The pretest protocol shall also identify all operating parameters to be monitored and recorded during testing.

At least 10 days prior to the performance of any testing required herein, the permittee shall notify the Department of the actual date(s) and time(s) that testing will occur so that Department personnel can arrange to be present during testing. The Department is under no obligation to accept the results of testing without having been given prior notification.

007 [25 Pa. Code §139.1]**Sampling facilities.**

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

008 [25 Pa. Code §139.11]**General requirements.**

- (a) As specified in 25 Pa. Code §139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.
- (b) As specified in 25 Pa. Code §139.11(2), the Department will consider test results for approval where sufficient information is provided to verify the source conditions existing at the time of the test and where adequate data is available to show the manner in which the test was conducted. Information submitted to the Department shall include, as a minimum, all of the following:
 - (1) A thorough source description, including a description of any air cleaning devices and the flue.
 - (2) Process conditions, for example, the charging rate of raw material or rate of production of final product, boiler pressure, oven temperature, and other conditions which may affect emissions from the process.
 - (3) The location of sampling ports.
 - (4) Effluent characteristics, including velocity, temperature, moisture content, gas density (percentage of CO, CO₂, O₂ and N₂), static and barometric pressures.

**SECTION C. Site Level Requirements**

(5) Sample collection techniques employed, including procedures used, equipment descriptions, and data to verify that isokinetic sampling for particulate matter collection occurred and that acceptable test conditions were met.

(6) Laboratory procedures and results.

(7) Calculated results.

III. MONITORING REQUIREMENTS.**# 009 [25 Pa. Code §123.43]****Measuring techniques**

Visible air contaminants 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 certified, to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

IV. RECORDKEEPING REQUIREMENTS.**# 010 [25 Pa. Code §135.5]****Recordkeeping**

The permittee shall maintain such records, including computerized records, as may be necessary to comply with 25 Pa. Code §135.3. These may include records of production, fuel usage, equipment maintenance or other information determined by the Department to be necessary for identification and quantification of air contaminant emissions. All records generated pursuant to this condition shall be retained for at least 5 years and shall be made available to the Department upon request.

V. REPORTING REQUIREMENTS.**# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

1. name, permit or authorization number, and location of the facility,
2. nature and cause of the malfunction, emergency or incident,
3. date and time when the malfunction, emergency or incident was first observed,
4. expected duration of excess emissions,
5. estimated rate of emissions,
6. corrective actions or preventative measures taken.

**SECTION C. Site Level Requirements**

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

(e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.

(f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.

(g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

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

The permittee shall submit all requested reports in accordance with the Department's suggested format.

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

Within 60 days following the completion of any testing required herein, the permittee shall submit two copies of a test report to the Department. This test report shall contain the results of the testing, a description of the test methods and procedures actually used, copies of all raw test data with sample calculations, and copies of all operating parameter data recorded during each test run.

014 [25 Pa. Code §135.3]**Reporting**

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

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

VI. WORK PRACTICE REQUIREMENTS.**# 015 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

For any source specified in 25 Pa. Code §123.1(a)(1) through (7) and (9), 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, or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(3) Paving and maintenance of roadways.

**SECTION C. Site Level Requirements**

(4) 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.

VII. ADDITIONAL REQUIREMENTS.**# 016 [25 Pa. Code §121.7]
Prohibition of air pollution.**

No person may permit air pollution as that term is defined in the act [The Air Pollution Control Act (35 P.S. §§ 4001-4015)].

**# 017 [25 Pa. Code §129.14]
Open burning operations**

No person may permit the open burning of material at this facility unless in accordance with 25 Pa. Code §129.14.

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.

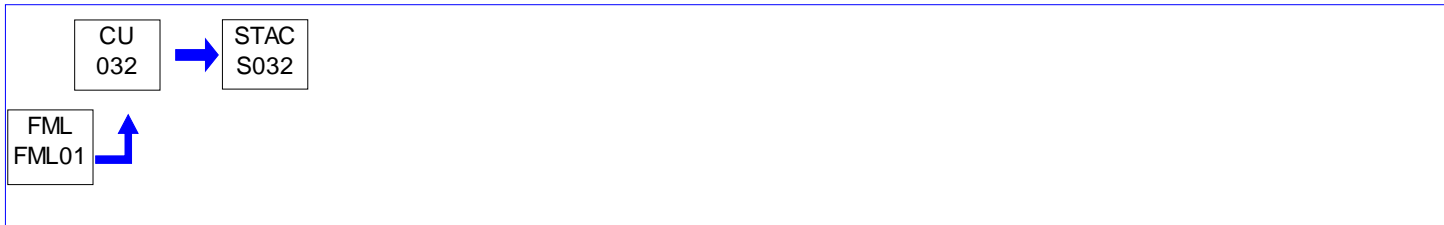
No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 032

Source Name: COMBUSTION UNITS (2.5 MILLION OR LESS BTU PER HR)

Source Capacity/Throughput:

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

001 [25 Pa. Code §123.22]

Combustion units

None of the combustion units incorporated in Source 032 shall emit sulfur oxides, expressed as sulfur dioxide (SO₂), in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

Fuel Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The combustion units incorporated in Source 032 shall be fired on natural gas only.

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.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source 032 consists of the following natural gas-fired combustion units:

**SECTION D. Source Level Requirements**

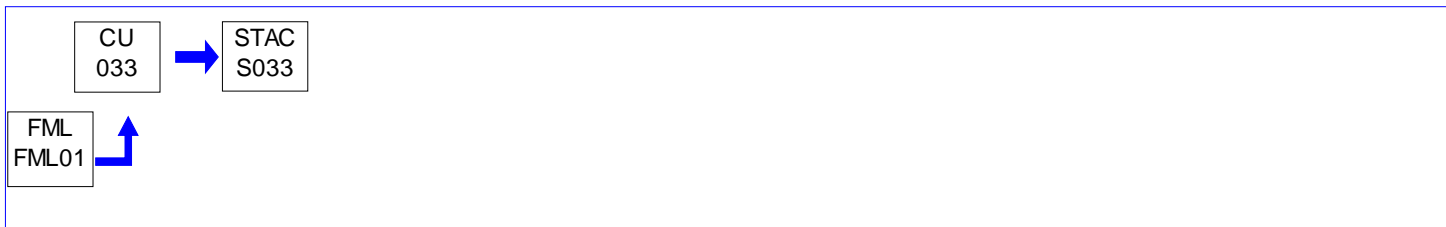
- (a) one (1) 0.0092 million Btu per hour Carrier model 48TFE006-A-511HS heating/cooling unit
- (b) one (1) 0.115 million Btu per hour Carrier model 48TFE006P-611CA heating/cooling unit
- (c) one (1) 0.125 million Btu per hour York model D1HG048N09925BDB heating/cooling unit
- (d) one (1) 0.150 million Btu per hour Reznor model PCBH150HBL heater
- (e) two (2) 0.204 million Btu per hour York model D1EG090N16525E heating/cooling units
- (f) one (1) 0.224 million Btu per hour Carrier model 48HJD014-561DA heating/cooling unit
- (g) two (2) 0.800 million Btu per hour Reznor model PBGL800 heaters
- (h) three (3) 1.20 million Btu per hour Trane model GRBA12GFNBON9JT302-AO-PC heaters
- (i) one (1) 2.20 million Btu per hour Carrier Racan model DIDM-175MG3 heater.

**SECTION D. Source Level Requirements**

Source ID: 033

Source Name: COMBUSTION UNITS (>2.5 AND <10.0 MILLION BTU PER HR)

Source Capacity/Throughput:

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

001 [25 Pa. Code §123.11]

Combustion units

None of the combustion units incorporated in Source 033 shall emit particulate matter in excess of the rate of 0.4 pounds per million Btu of heat input.

002 [25 Pa. Code §123.22]

Combustion units

None of the combustion units incorporated in Source 033 shall emit sulfur oxides, expressed as sulfur dioxide (SO₂), in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The combustion units incorporated in Source 033 shall be fired on natural gas only.

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).

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Source 033 consists of the following natural gas-fired combustion units:

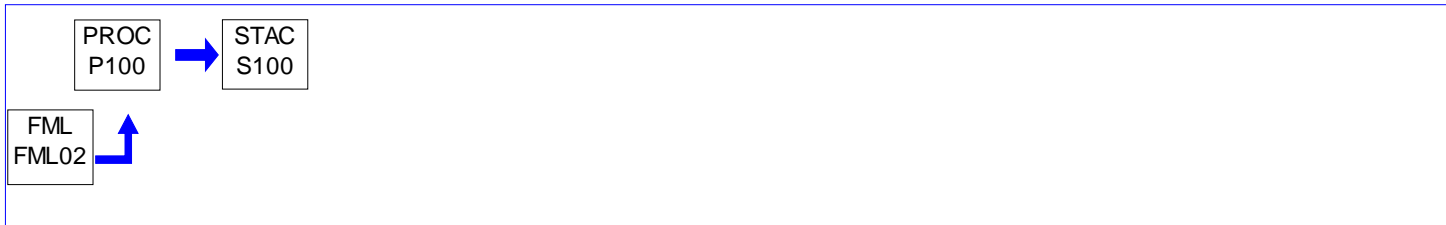
- (a) one (1) 8.60 million Btu per hour Mohawk/Superior model 4-5-1024 boiler
- (b) one (1) 8.60 million Btu per hour Hurst model 2-1000-150-83 boiler

**SECTION D. Source Level Requirements**

Source ID: P100

Source Name: DIESEL-FIRED ENGINES

Source Capacity/Throughput:

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

001 [25 Pa. Code §123.13]

Processes

The concentration of particulate matter in the exhaust of each engine incorporated in Source P100 shall not exceed 0.04 grains per dry standard cubic foot of effluent gas volume.

002 [25 Pa. Code §123.21]

General

The concentration of sulfur oxides, expressed as sulfur dioxide (SO₂), in the exhaust of each engine incorporated in Source P100 shall not exceed 500 parts per million, by volume, dry basis.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The total combined nitrogen oxide (NO_x, expressed as NO₂) emissions from all engines incorporated in Source P100 shall not exceed 100 pounds per hour, 1,000 pounds per day, 2.75 tons per ozone season (May 1 through September 30) and 6.6 tons in any 12 consecutive month period.

Fuel Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All engines incorporated in Source P100 shall only be fired on virgin diesel fuel to which no reclaimed/reprocessed oil, waste oil or other waste materials have been added.

Operation Hours Restriction(s).

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this operating permit condition is derived from the permittee volunteering to comply with the respective limitation.]

None of the fire pump engines incorporated in Source P100 shall operate for more than 100 hours in any 12 consecutive month period.

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).

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall keep records of the following information:

(1) number of hours each engine incorporated in Source P100 is operated on a monthly basis.

(2) The emission of nitrogen oxide (NO_x, expressed as NO₂) emissions from all engines on a monthly basis to verify compliance with the emission limitation in any 12 consecutive month period.

(b) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

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

(a) The permittee shall submit annual reports that include the records required by Condition #005 herein.

(b) The annual reports shall be submitted to the Department by no later than March 1 of each year (for the immediately-preceding January 1 through December 31 twelve consecutive month period).

VI. WORK PRACTICE REQUIREMENTS.**# 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6603]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?**

The permittee shall perform the following work practice standards on the two (2) diesel-fired fire pump engines incorporated in Source P100:

(a) Change the oil and filter every 500 hours of operation or annually, whichever comes first;

(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first and replace as necessary.

(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.

VII. ADDITIONAL REQUIREMENTS.**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Source P100 consists of three (3) diesel-fired engines:

(a) Two (2) 235 brake-horsepower Caterpillar model 3208 fire pump engines.

(b) One (1) 1,505 brake-horsepower Caterpillar model C32 ATAAC emergency generator engine.

010 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4200]**Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines****Am I subject to this subpart?**

The emergency generator incorporated in Source P100 is subject to the requirements of 40 CFR Part 60 Subpart IIII Sections 60.4200 through 60.4219. The permittee shall comply with all applicable requirements of 40 CFR Part 60 Subpart IIII.

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6585]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

**SECTION D. Source Level Requirements****Am I subject to this subpart?**

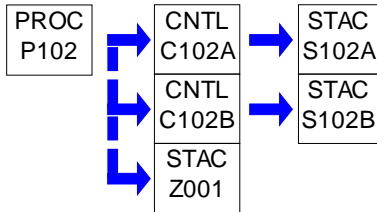
The two (2) diesel-fired fire pump engines incorporated in Source P100 are subject to the requirements of 40 CFR Part 63 Subpart ZZZZ Sections 63.6580 through 63.6675. The permittee shall comply with all applicable requirements of 40 CFR Part 63 Subpart ZZZZ.

**SECTION D. Source Level Requirements**

Source ID: P102

Source Name: POLYMER PRODUCTS PROCESSING OPERATION

Source Capacity/Throughput:

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

001 [25 Pa. Code §123.13]

Processes

The concentration of particulate matter in the exhausts of Control Devices C102A and C102B associated with Source P102 shall not exceed 0.04 grains per dry standard cubic foot of effluent gas volume.

002 [25 Pa. Code §123.21]

General

The concentration of sulfur oxides, expressed as sulfur dioxide (SO₂), in the exhausts of Control Devices C102A and C102B associated with Source P102 shall not exceed 500 parts per million, by volume, dry basis.

Throughput Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The amounts of n-dodecyl mercaptan (NDM) and glycidyl methacrylate (GMA) processed through charging tanks T-U5 and T-U6 incorporated in Source P102 shall not exceed 112,480 and 40,458 pounds, respectively, in any 12 consecutive month period.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this operating permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

None of Reactors R-600, R-700 and R-800 incorporated in Source P102 shall produce more than 876 batches per calendar year.

Control Device Efficiency Restriction(s).

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

All volatile organic compounds captured from each reactor system incorporated into Source ID P102 shall be ducted to Control Devices C102A, C102B and C102C. The volatile organic compound destruction efficiency of Control Device C102C shall be equal to, or greater than 99% or a VOC concentration not to exceed 20 parts per million (as propane) by volume, dry basis (ppmdv) at 3% oxygen at all times.

II. TESTING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) Within 12 months of permit issuance, the permittee shall conduct stack testing on Control Devices C102A and C102B to determine the volatile organic compound/hazardous air pollutant destruction efficiencies as well as the outlet non-methane volatile organic compound concentrations (expressed as propane) while Source P102 is operating at both a minimum volatile organic compound/hazardous air pollutant generation rate and a maximum volatile organic compound/hazardous air

**SECTION D. Source Level Requirements**

pollutant generation rate. All testing shall be performed using test methods and procedures which are acceptable to the Department.

(b) At least 60 days prior to the performance of any testing required herein, the permittee shall submit two copies of a pretest protocol to the Department for review. This protocol shall describe the test methods and procedures to be used for this testing and shall include dimensioned sketches of the exhaust systems showing the locations of all proposed sampling ports. The pretest protocol shall also identify all Source P102, Control Device C102A and Control Device C102B operating parameters to be monitored and recorded during testing.

(c) At least 10 days prior to the performance of any testing required herein, the permittee shall notify the Department of the actual date(s) and time(s) that testing will occur so that Department personnel can arrange to be present during testing. The Department is under no obligation to accept the results of the testing without having been given prior notification.

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

(a) Control Devices C102A, C102B and C102C shall be equipped with instrumentation to continuously monitor and record the outlet temperature.

(b) Control Device C102C shall be equipped with audible and visual alarms to notify the operator that the combustion chamber temperature is less than 1,600°F when controlling air contaminant emissions from any reactor system incorporated in Source ID P102.

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain accurate and comprehensive records of the following:

- (1) outlet temperatures of Control Devices C102A, C102B and C102C;
- (2) date, time and duration in minutes of each occurrence that Control Devices C102A, C102B and C102C are bypassed or operated at a temperature of less than 1,600°F;
- (3) identity of products produced in each batch chemical reactor system incorporated in Source P102 each month;
- (4) description of each product produced in each batch chemical reactor system incorporated in Source P102 that includes, at a minimum, the following:
 - (i) product type (water-based or solvent-based),
 - (ii) vinyl acetate content of monomer mixture by weight (measured as a percentage of total monomer content),
 - (iii) identity and vapor pressure of each monomer, and
 - (iv) identity of solvents, if any;
- (5) number of batches processed by each of the batch chemical reactor systems R-600, R-700 and R-800 incorporated in Source P102 each month; and
- (6) amount in pounds of n-dodecyl mercaptan (NDM) and glycidyl methacrylate (GMA) processed through charging tanks T-U5 and T-U6 incorporated in Source P102 each month.

(b) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

**SECTION D. Source Level Requirements****V. REPORTING REQUIREMENTS.****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall submit annual reports that include the records required by (a)(2) through (a)(6) of Condition #008 herein.

(b) The annual reports shall be submitted to the Department by no later than March 1 of each year (for the immediately-preceding January 1 through December 31 twelve consecutive month period).

VI. WORK PRACTICE REQUIREMENTS.**# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this operating permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

The reactors and process tanks listed in Condition #014 herein shall be covered at all times during use and shall not be vented to atmosphere other than through Control Devices C102A, C102B and C102C, except as may be allowed pursuant to Condition #013 herein.

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

[Additional authority for this operating permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

No more than 40 cubic feet per minute (cfm) shall be vented to either Control Device C102A or C102B. If the reactors and process tanks identified in Condition #014 herein are, in total, venting in excess of 40 cfm, both Control Device C102A and C102B must be in use, except as may be allowed by Condition #013 herein.

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

[Additional authority for this operating permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

Control Devices C102A, C102B and C102C, when in use, shall be operated such that the oxidizer exit gas temperature is at least 1,600°F at all times, except as may be allowed pursuant to Condition #013 herein.

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

Control Devices C102A, C102B and C102C may be bypassed or operated at a temperature of less than 1,600°F for up to 30 minutes per month, during which time the reactors and process tanks identified in Condition #015 herein may continue to operate.

VII. ADDITIONAL REQUIREMENTS.**# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this operating permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

Control Devices C102A, C102B and C102C shall control the air contaminant emissions from the following pieces of equipment incorporated in Source P102:

(a) six (6) batch reactors, designated R-100, R-200, R-300, R-400, R-500 and R-600;

(b) fourteen (14) process tanks, designated T-101, T-201 (1,800 gallons), T-202 (1,800 gallons), T-301 (1,800 gallons), T-302 (1,800 gallons), T-401, T-402, T-406, T-501, T-502, weigh tank T-601 (4,500 gallons), T-602, weigh tank T-605 (3,000 gallons) and R-100 pre-emulsion;

(c) batch chemical reactor system consisting of reactor R-700 and weigh tanks T-701, T-702 and T-705;

**SECTION D. Source Level Requirements**

(d) batch chemical reactor system consisting of reactor R-800 and monomer and solvent weigh tanks T-801, T-801 and T-803;

and

(e) plant vacuum pump.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) Source P102 is a polymer products processing operation consisting of the following equipment:

ID	Capacity (gal.)	Description
R-100	1,400	reactor vessel
T-101	1,000	weigh tank associated with R-100
T-102	1,200	weigh tank associated with R-100
T-103	148	catalyst mix tank associated with R-100
T-104	148	catalyst mix tank associated with R-100
T-105	700	weigh tank associated with R-100
R-200	2,000	reactor vessel
T-201	1,800	process tank associated with R-200
T-202	1,800	process tank associated with R-200
T-206	120	process tank associated with R-200
R-300	2,000	reactor vessel
T-301	1,800	process tank associated with R-300
T-302	1,800	process tank associated with R-300
T-306	120	process tank associated with R-300
R-400	2,000	reactor vessel
T-401	2,000	process tank associated with R-400
T-402	2,000	process tank associated with R-400
T-404	300	process tank associated with R-100
T-405	300	not used
T-406	120	catalyst mixing tank
R-500	1,100	reactor vessel
T-501	2,400	process tank associated with R-500
T-502	3,000	process tank associated with R-500
T-503	300	not used
T-504	400	process tank associated with R-600
T-506	200	process tank associated with R-500
R-600	6,200	reactor vessel
T-601	4,500	weigh tank associated with R-600
T-602	6,100	process tank associated with R-600
T-603	750	process tank associated with R-600
T-604	750	process tank associated with R-600
T-605	3,000	process tank associated with R-600
R-700	6,000	reactor vessel
T-701	4,500	weigh tank associated with R-700
T-702	5,500	process tank associated with R-700
T-703	650	process tank associated with R-700
T-704	650	process tank associated with R-700
T-705	3,000	weigh tank associated with R-700
R-800	6,000	reactor vessel
T-801	4,500	weigh tank associated with R-800
T-802	5,500	weigh tank associated with R-800
T-803	650	weigh tank associated with R-800
T-804	650	weigh tank associated with R-800

**SECTION D. Source Level Requirements**

T-805	3,000	weigh tank associated with R-800
TB-18	6,500	emulsion adhesive storage tank
T-C1	5,500	emulsion blend tank
T-C2	7,500	emulsion blend tank
T-U2	1,000	surfactant mix tank
T-U3	1,000	process tank associated with emulsion blend tanks
T-U5	100	NDM charging tank associated with R-100, R-600, R-700, R-800
T-U6	100	GMA charging tank associated with R-200, R-300, R-400
T-U7	1,000	process tank associated with emulsion blend tanks
none		plant vacuum pump
none	170	mix tank
none	500	caustic/ethyl acetate

(b) Control Device C102A is a 500 SCFM Con-Serve model #1500-M3 thermal fume oxidizer equipped with a 1.7 million Btu per hour Maxon Series LV Airflow LV5-BH-D-24 natural gas-fired burner.

(c) Control Device C102B is a 500 SCFM Yorkaire "vertical 500 cfm" thermal fume oxidizer equipped with a 4.0 million Btu per hour Eclipse model 400 DGB natural gas-fired burner.

(d) Control Device C102C is a 1,000 SCFM Pollution Systems model CEF-1R High-VOC recuperative thermal oxidizer with a 3.3 million Btu per hour, natural gas-fired, low-NOx burner.

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

[Additional authority for this operating permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

The products produced in reactor R-600 incorporated in Source P102 shall be water-based polymer or copolymer products used as adhesives, coatings or resins, manufactured from a monomer mixture containing no more than 37% vinyl acetate by weight (measured as a percentage of total monomer content), containing no monomer with a vapor pressure higher than that of vinyl acetate and containing no halogenated solvents.

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

[Additional authority for this operating permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

The products produced in reactor R-700 incorporated in Source P102 shall either be: (1) water-based polymer or copolymer products used as adhesives, coatings or resins, manufactured from a monomer mixture containing no more than 37% vinyl acetate by weight (measured as a percentage of total monomer content), containing no monomer with a vapor pressure higher than that of vinyl acetate and containing no halogenated solvents, or (2) solvent-based polymer or copolymer products used as adhesives, coatings or resins, as described in the application and supplemental materials submitted for Plan Approval 18-313-018C.

018 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this operating permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

The products provided in reactor R-800 incorporated in Source P102 shall be water-based polymer or copolymer products used as adhesives, coatings or resins, manufactured from a monomer mixture containing no more than 37% vinyl acetate by weight (measured as a percentage of total monomer content), containing no monomer with a vapor pressure higher than that of vinyl acetate and containing no halogenated solvents.

019 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The use of any substances identified as hazardous air pollutants in any reactor or process tank identified in Condition #015 herein, other than those identified in any applicable plan approval application, must be approved by the Department, in writing, prior to use.

**SECTION D. Source Level Requirements****# 020 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Charging tanks T-U5 and T-U6 incorporated in Source P102 shall be used to store n-dodecyl mercaptan (NDM) and glycidyl methacrylate (GMA) only.

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

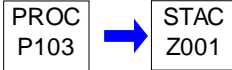
The T-603, T-604, T-703 and T-704 tanks incorporated in Source ID P102 may be vented to atmosphere provided that no volatile organic compound-containing material is processed in each tank other than Bruggolite E01 or equivalent.

**SECTION D. Source Level Requirements**

Source ID: P103

Source Name: STORAGE TANKS

Source Capacity/Throughput:

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

The volatile organic compound content of any material stored in tank designations T-B1, T-B4, T-B5, T-B6, T-B7, T-B8, T-B11, TB-12, T-B13, T-B14, T-B15, T-B16, T-B17, TB-19, T-U4, TE-1, TE-2, TE-3, TE-4, TE-5 AND TE-6 incorporated in Source ID P103 shall not exceed 4.5%, by weight.

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

(a) The permittee shall maintain accurate and comprehensive records of all volatile organic compound-containing and/or volatile hazardous air pollutant-containing materials stored in the tanks incorporated in Source P103. The respective records shall be maintained separately for each of the tanks incorporated in Source P103 and shall, for each tank, include the following:

- (1) the identity of each material stored;
- (2) the vapor pressure at actual storage conditions of each material stored,
- (3) an up-to-date Certified Product Data Sheet (CPDS) for each material,
- (4) the volatile organic compound content of the materials stored in tank designations T-B1, T-B4, T-B5, T-B6, T-B7, T-B8, T-B11, TB-12, T-B13, T-B14, T-B15, T-B16, T-B17, TB-19, T-U4, TE-1, TE-2, TE-3, TE-4, TE-5 AND TE-6 incorporated in Source ID P103.

(b) All records generated pursuant to this condition shall be retained for at least 5 years and shall be made available to the Department upon request. These records shall include all background information and calculations used in the derivation of the reported values.

V. REPORTING REQUIREMENTS.**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall submit annual reports that include the records required by (a)(1) and (a)(2) of Condition #001 herein. The annual reports shall be submitted to the Department by no later than March 1 of each year (for the immediately-preceding January 1 through December 31 twelve consecutive month period).

**SECTION D. Source Level 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.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source P103 consists of the following aboveground storage tanks:

Tank ID	Capacity (gal.)	Contents
T-1	15,000	caustic solution (20% sodium hydroxide)
T-1A	15,000	caustic solution (20% sodium hydroxide)
T-2	4,000	heptane
T-3	4,000	ammonium hydroxide
old T-4	4,000	acetone
T-5	8,000	methyl acrylate or xylene containing 20 wt% or less ethylbenzene
T-6	8,000	ethyl acetate or heptane
T-7	8,000	isopropyl alcohol or acetone
T-8	10,000	methyl methacrylate
T-9	10,000	vinyl acetate
T-10	10,000	vinyl acetate or xylene
T-11	10,000	distilled solvent
T-12	10,000	hexane or isopropyl alcohol
T-13	12,000	methyl methacrylate
T-14	12,000	methyl acrylate
T-15	12,000	methyl acrylate
T-16	12,000	toluene
T-17	12,000	toluene
T-18	20,000	butyl acrylate
T-19	20,000	dioctyl maleate
T-20	50,000	2-ethylhexyl acrylate
TB-1	10,000	emulsion adhesive
TB-4	6,500	emulsion adhesive
TB-5	6,500	emulsion adhesive
TB-6	6,500	emulsion adhesive
TB-7	12,000	emulsion adhesive
TB-8	6,500	emulsion adhesive
TB-11	20,000	emulsion adhesive
TB-12	20,000	emulsion adhesive
TB-13	20,000	emulsion adhesive
TB-14	20,000	emulsion adhesive
TB-15	20,000	emulsion adhesive
TB-16	20,000	emulsion adhesive
TB-17	20,000	emulsion adhesive or tackifying resin
TB-19	20,000	emulsion adhesive
TB-20	6,000	emulsion adhesive
TB-21	6,000	emulsion adhesive
TS-2	2,000	surfactant storage tank
TS-3	10,000	surfactant storage tank
TS-4	10,000	surfactant storage tank
TU-1	3,000	polyvinyl alcohol solution
TU-4	20,000	emulsion adhesive
TE-1	20,000	tackifying resin
TE-2	20,000	tackifying resin

**SECTION D. Source Level Requirements**

TE-3	20,000	emulsion adhesive
TE-4	20,000	emulsion adhesive
TE-5	20,000	waste water
TE-6	20,000	waste water
none	7,000	aqueous ammonia
none	10,000	wastewater equalization tank
none	10,000	wastewater equalization tank
none	300	pilot plant caustic tank

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

Unless otherwise specified in a condition contained herein, each of the aboveground storage tanks incorporated in Source P103 shall only be used to store the respective material(s) identified in Condition #003 herein.

006 [25 Pa. Code §129.57]**Storage tanks less than or equal to 40,000 gallons capacity containing VOCs**

Unless otherwise specified in a condition contained herein, none of the storage tanks incorporated in Source P103 having a capacity equal to or greater than 2,000 gallons and less than or equal to 40,000 gallons shall contain volatile organic compounds with a vapor pressure greater than 1.5 psi under actual storage conditions, unless the tank is equipped with a pressure relief valve maintained in good operating condition and set to release at no less than 0.7 psig of pressure or 0.3 psig of vacuum or the highest possible pressure and vacuum in accordance with state or local fire codes or the National Fire Prevention Association guidelines or other national consensus standards acceptable to the Department.

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

[Additional authority for this operating permit condition is derived from 25 Pa. Code Sections 127.1 and 127.12]

[Compliance with this operating permit condition assures compliance with 25 Pa. Code Section 129.56]

The 50,000-gallon aboveground storage tank identified as T-20 and incorporated in Source P103 shall only be used to store organic liquids with a vapor pressure equal to or less than 0.75 psi under actual storage conditions. At least 7 days prior to any change in material(s) stored in this tank, the permittee shall provide the identity and vapor pressure under actual storage conditions of the new material(s) to the Department.

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

[Compliance with this operating permit condition assures compliance with 25 Pa. Code Section 129.57]

(a) Storage tanks T-3 (old), T-5, T-6, T-7, T-12, T-13 and T-14 incorporated in Source P103 shall be equipped with pressure relief valves set to release at no less than 0.5 psig of pressure and 0.3 psig of vacuum. In addition, these tanks shall be equipped with a vapor recovery system which eliminates working losses of solvent vapor from the tanks upon each occasion material is loaded into the tanks.

(b) Storage tank T-15 incorporated in Source P103 shall be equipped with a pressure relief valve set to release at no less than 0.7 psig of pressure and 0.3 psig of vacuum. In addition, this storage tank shall be equipped with a vapor recovery system which eliminates working losses of solvent vapor from the tank upon each occasion material is loaded into the tank.

(c) Storage tank T-19 incorporated in Source P103 may be used to store vinyl acetate monomer provided that the tank is equipped with an eight ounce (or greater) pressure relief valve at all times and is not vented to atmosphere other than through this valve.

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

Storage tanks T-2, T-4 (old), T-8, T-9, T-10, T-11, T-16, T-17, T-18 and T-19 incorporated in Source P103 shall be equipped with pressure relief valves and a vapor return system which eliminates working losses of solvent vapor from the tanks upon each occasion material is loaded into the tanks.

**SECTION D. Source Level Requirements****# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Storage tanks T-B11, T-B12, T-B13 and T-B14 incorporated in Source P103 shall only be used to store emulsion adhesives AE-3485T, AE-3349, AE-3413, AE-220C or adhesives determined by the Department to have an equivalent, or lower, air contaminant emission potential.

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

Storage tanks TE-2, TE-3, TE-4, TE-5, TE-6, T-B15, T-B16 and T-B17 incorporated in Source P103 shall only be used to store emulsion adhesives AE-3485T, AE-5083V, AE-5083TV, AE-5014, DEV-5108A, AE-3396C, AE-3413CC, AE-3349, DEV-5132 or alternate materials determined by the Department to have an equivalent, or lower, air contaminant emission potential.

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

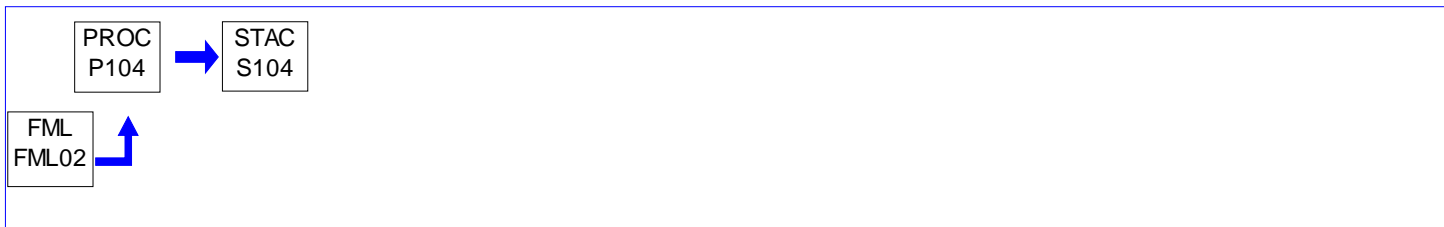
Storage tanks T-U4 and TE-1 incorporated in Source P103 shall only be used to store "Snowtack 925," "Snowtack 775" or alternate materials determined by the Department to have an equivalent, or lower, air contaminant emission potential.

**SECTION D. Source Level Requirements**

Source ID: P104

Source Name: RESEARCH AND DEVELOPEMENT HOODS

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

The concentration of particulate matter in the exhaust of each hood incorporated in Source P104 shall not exceed 0.04 grains per dry standard cubic foot of effluent gas volume.

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

The total combined air contaminant emisisions from all hoods incorporated in Source P104 shall not exceed the following limitations:

- (a) The volatile organic emissions shall not exceed eight (8) tons in any 12 consecutive month period.
- (b) the individual volatile hazardous air pollutant emissions shall not exceed one (1) ton in any 12 consecutive month period,
- (c) the total combined volatile hazardous air pollutant emissions shall not exceed 2.5 tons in any 12 consecutive month period.

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

- (a) The permittee shall keep records of the supporting calculation used to verify compliance with the volatile organic compound emissions and volatile hazardous air pollutant emissions from all hoods incorporated in Source P104.
- (b) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon 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).

**SECTION D. Source Level 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 E. Source Group Restrictions.

**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.

The following air contaminant sources have been determined to be exempt from permit requirements. However, this determination does not exempt the sources from compliance with all applicable air quality regulations specified in 25 Pa. Code Chapters 121-145:

- (1) Baltimore Air Coil Series 3000 cooling tower
- (2) one (1) pilot-scale UV Coater
- (3) one (1) 7,000-gallon aqueous ammonia storage tank
- (4) one (1) pilot scale coater

This operating permit was initially issued on December 9, 2008.

This operating permit was renewed on June 17, 2014.

This operating permit was administratively amended on July 13, 2017, to incorporate the terms and conditions of Plan Approval 18-00021.



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