



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

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date: November 21, 2023

Effective Date: December 6, 2023

Expiration Date: December 5, 2028

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: 23-00027

Synthetic Minor

Federal Tax Id - Plant Code: 41-0417775-3

Owner Information

Name: 3MCO
Mailing Address: 50 MILTON DR
ASTON, PA 19014-2217

Plant Information

Plant: 3MASTON/CHESTER TWP
Location: 23 Delaware County 23817 Chester Township
SIC Code: 3087 Manufacturing - Custom Compound Purchased Resins

Responsible Official

Name: GREG COUVES
Title: DIRECTOR PLANT OPERATIONS
Phone: (651) 737 - 2533 Email: gcouves@mmm.com

Permit Contact Person

Name: EDWIN B. SHIVELY
Title: EHS ENGINEER
Phone: (610) 497 - 7010 Email: eshively@mmm.com

[Signature] _____
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER



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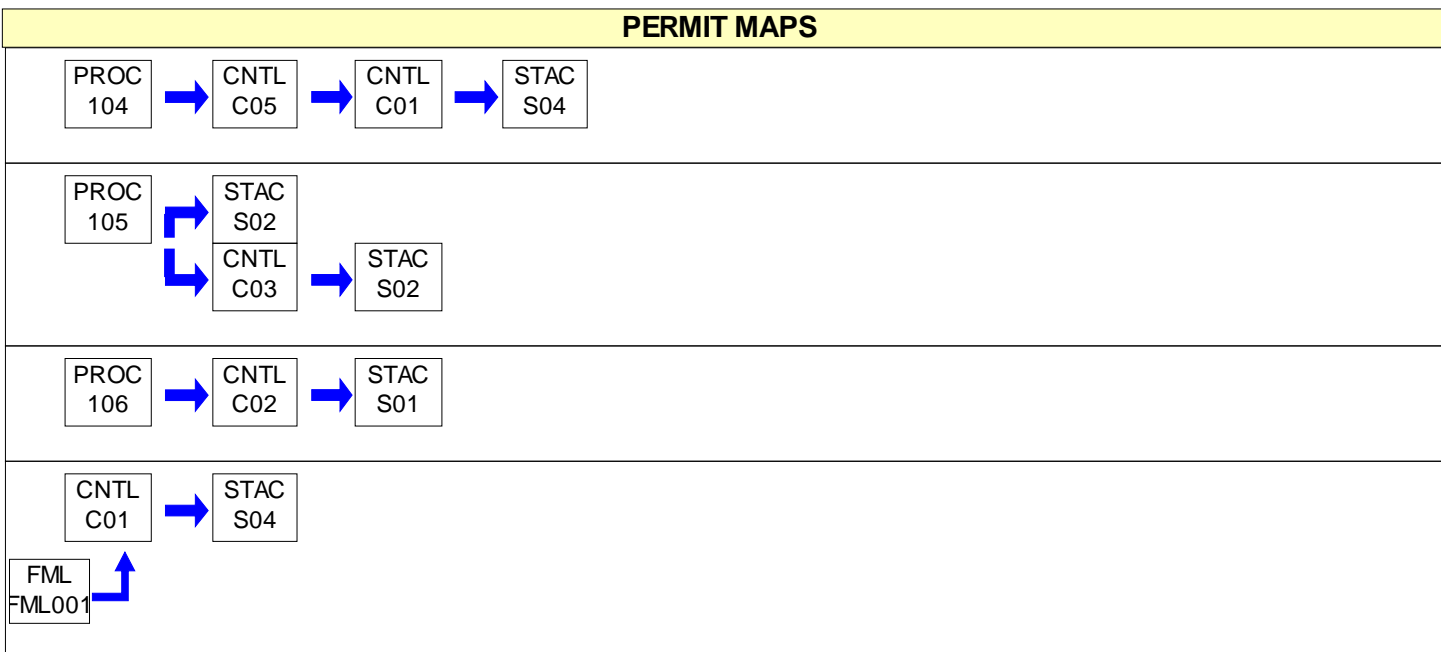
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
104	FREE FLOW SYSTEM (CCI-004)	N/A	
105	CENTRAL VACUUM/MILLING SYSTEMS (CCI-002)	N/A	
106	PLASTIC PROCESSING SYSTEM (CCI-001)	N/A	
C01	THERMAL OXIDIZER		
C02	DUST COLLECTOR		
C03	CARTRIDGE COLLECTOR		
C05	BAGHOUSE		
FML001	NATURAL GAS		
S01	STACK FOR MAIN DUST COLLECTION SYSTEM		
S02	STACK FOR CENTRAL VACUUM		
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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:

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- (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 §127.441]****Operating permit terms and conditions.**

The permittee shall limit the total VOC emissions from the facility to less than 10 tons per year calculated on a 12-month rolling sum.

002 [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).

003 [25 Pa. Code §123.1]**Prohibition of certain fugitive emissions**

(a) No person may 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, as specified in 25 Pa. Code § 129.14.
- (7) N/A
- (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) of this condition, for which the permittee 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.

004 [25 Pa. Code §123.2]**Fugitive particulate matter**

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

005 [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.

006 [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:

**SECTION C. Site Level Requirements**

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

007 [25 Pa. Code §123.42]**Exceptions**

The opacity limitations as per 25 Pa. Code § 123.41 shall not apply to a visible emission in any of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions).

II. TESTING REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, the most current version of the DEP Source Testing Manual, and the EPA Clean Air Act National Stack Testing Guidance, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

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

Visible emissions may be measured using either of the following:

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

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

- (a) The permittee shall monitor the facility, once per operating day, for the following:
 - (1) odors which may be objectionable (as per 25 Pa. Code §123.31);
 - (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
 - (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).
- (b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:
 - (1) be investigated;
 - (2) be reported to the facility management, or individual(s) designated by the permittee;
 - (3) have appropriate corrective action taken (for emissions that originate on-site); and
 - (4) be recorded in a permanent written log.
- (c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly.

**SECTION C. Site Level Requirements**

(d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

(e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification (if applicable), complaints, monitoring results, and/or Department findings.

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

(a) The permittee shall monitor the quantity and identity of all VOC solvents used for cleanup on a monthly basis.

(b) The permittee shall keep on hand chemical composition data for all the chemicals applied and shall monitor on a monthly basis all chemicals and any volatile organic compound (VOC) solvent or thinner usage.

(c) The permittee shall monitor the types and quantities of all waste disposed on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.**# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

(a) Date, time, and location of the incident(s);

(b) The cause of the event; and

(c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

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

(a) The permittee shall keep records of the quantity and identification of all VOC solvents used for cleanup purposes on a monthly basis.

(b) The permittee shall keep on hand chemical composition data for all the chemicals applied and shall record on a monthly basis all chemicals and any volatile organic compound (VOC) solvent or thinner usage.

(c) The permittee shall keep a record of the types and quantities of all waste disposed on a monthly basis.

014 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall keep records of all notifications and reports (including performance test results) sent to the Department to comply with 40 C.F.R. 63 Subpart BBBBBBBB.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11585(d)(1)(i)]

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

The permittee shall calculate and record the total VOC emissions for the facility monthly and on a 12-month rolling sum.

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

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

(a) emissions increase of minor significance without notification to the Department.

(b) de minimis increases with notification to the Department, via letter.

(c) increases resulting from a Request for Determination (RFD) to the Department.

(d) increases resulting from the issuance of a plan approval and subsequent operating permit.

**SECTION C. Site Level Requirements****V. REPORTING REQUIREMENTS.****# 017 [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 at 484-250-5920. 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; and
- (6) Corrective actions or preventative measures taken.

(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.

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

[Additional authority for this condition is also derived from 40 CFR Part 68.]

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

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

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

**SECTION C. Site Level Requirements**

- (i) Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

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

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

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

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

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

(f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to submit a compliance schedule or fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

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

[Additional authority for this permit condition is also derived from 40 C.F.R. 63 Subpart BBBBBBB Section 63.11585(c).]

The permittee shall submit a semi-annual compliance report to the Department. The reports must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(a) The compliance report must contain the following information:

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) If there are no deviations from the emission reduction or 0.03 gr/dscf PM concentration requirements as specified in Table 1 of Subpart BBBBBBB, a statement that there were no deviations from the emission reduction or 0.03 gr/dscf PM concentration requirements during the reporting period.

(v) If there were no periods during which the CPMS (if a CPMS is used to demonstrate compliance) was out-of-control as defined by the manufacturer's recommendations, a statement that there were no periods during which the CPMS was out-of-control during the reporting period.

(vi) A description of any changes in monitoring systems or CPMS, processes (including changes that establish the

**SECTION C. Site Level Requirements**

basis for certification that the PM concentration from process vents will not exceed 0.03 gr/dscf or the addition of new processes), or controls since the last reporting period or for the first compliance report, since the notification of compliance status report.

- (b) For each deviation, as applicable and as defined in 40 C.F.R. § 63.11588, you must include the information that apply:
- (i) The date and time that each deviation started and stopped.
 - (ii) The date and time that each bag leak detector, parameter monitor, or CPMS was inoperative, except for zero (low-level) and high-level checks.
 - (iii) If a CPMS is used, the date, time and duration that each CPMS was out-of-control.
 - (iv) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
 - (v) A list of reasons for the deviations during the reporting period.
 - (vi) If a CPMS is used, a summary of the total duration of CPMS downtime during the reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that reporting period.
 - (vii) A brief description of the process units.
 - (viii) A brief description of the bag leak detector, parameter monitor, or CPMS.
 - (ix) If a CPMS is used, the date of the latest CPMS certification or audit.

VI. WORK PRACTICE REQUIREMENTS.**# 020 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following

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

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

The permittee shall ensure that the source(s) and air pollution control device(s), listed in this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturer's specifications.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11584(c)]

022 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall ensure the following work practice standards are being followed:

- (A) All containers that contain solvent(s) shall be kept closed when not in use.
- (B) All used rags containing solvent(s) shall be kept in closed containers.

**SECTION C. Site Level Requirements****# 023 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

024 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee may not modify any air contaminant system identified in this permit, prior to obtaining Department approval, except those modifications authorized by Condition #013(g), of Section B, of this permit.

025 [25 Pa. Code §129.14]**Open burning operations**

No person may permit the open burning of material in the Southeast Air Basin except where the open burning operations result from:

- (a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (c) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (d) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.
- (f) A fire set solely for recreational or ceremonial purposes.
- (g) A fire set solely for cooking food.

VII. ADDITIONAL REQUIREMENTS.

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

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**

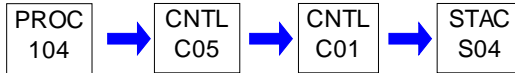
Source ID: 104

Source Name: FREE FLOW SYSTEM (CCI-004)

Source Capacity/Throughput:

N/A

Conditions for this source occur in the following groups: ALL PROCESSES

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

No person shall permit the emission into the outdoor atmosphere of particulate matter from this source (source ID 104) at any time, in excess of 0.02 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11581(b)]

Fuel Restriction(s).**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall only use natural gas as fuel for the thermal oxidizer.

Control Device Efficiency Restriction(s).**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The thermal oxidizer shall maintain a minimum overall control destruction efficiency of at least 96.0% on all VOCs at all times when operating.

II. TESTING REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall perform a stack test using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. 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. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(c) The stack test shall, at a minimum, test for filterable particulate matter and VOC emissions. Tests shall be conducted in accordance with the provisions of EPA Method/s or other Department approved methodology and 25 Pa. Code Chapter 139.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions,

**SECTION D. Source Level Requirements**

shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall continuously monitor the exhaust combustion temperature of the thermal oxidizer while operating.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the pressure drop daily across the baghouse while the Thermal Oxidizer is operating.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11583(b)]

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep daily records of all inspections/maintenance performed on the thermal oxidizer and any deficiencies and corrective action(s) taken.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11585(d)(1)(vi)]

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of the thermal oxidizer combustion exhaust temperature readings at least once every 15 minutes when operating and the 3-hour block average temperature.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of the following:

- The pressure drop across the baghouse daily when the thermal oxidizer is operating.
- All inspections and maintenance performed on the baghouse as well as any deficiencies and corrective actions.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11585(d)(1)(vi)]

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.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall control VOC emissions from this source by a Thermal Oxidizer. Manufacturing processes associated with the Thermal Oxidizer shall not be operated if any component of the the Thermal Oxidizer is not working, malfunctions, and/or is determined to have reduced control efficiency.

(b) The thermal oxidizer shall maintain a minimum combustion temperature set point equal to the average temperature demonstrated during the most recent compliant source test approved by the Department and a minimum retention time, at this temperature, for 1.0 second.

**SECTION D. Source Level Requirements**

(c) The thermal oxidizer shall operate at a 3-hour average temperature not lower than 50°F below the average temperature demonstrated during the most recent compliant source test approved by the Department.

Note: The average thermal oxidizer temperature measured during the November 29, 2022 stack test was 1,594°F.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall have an inspection and a maintenance program for the thermal oxidizer.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall have an inspection and maintenance program for the baghouse.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

1) The permittee shall maintain the pressure drop across the baghouse between 0.3 to 4.0 inches of water.

2) Pressure drop requirements apply only when the manufacturing production is in operation.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a continuous audible alarm on the baghouse for the pressure drop if it should exceed the maximum pressure drop of 4.0 inches of water.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11583(b)]

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep on hand a sufficient quantity of spare filters for the baghouse.

VII. ADDITIONAL REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The thermal oxidizer contains two (2) burners, each with a design capacity of 2.8 MMBTU/HR.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Thermal Oxidizer associated with this source is Manufactured by Research-Cottrell, model number VFC-24,000.

The Burner is manufactured by North American Mfg Co, model number 4422-5.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Free Flow System (CCI-004) consists of the following:

- (a) 5 Electric Ovens
- (b) 5 Exhaust Hoods
- (c) 3 Vibratory Decks
- (d) 3 Feeders
- (e) 3 Mills
- (f) 3 Hoods
- (g) 1 Rack Room Exhaust (three pickups in the room)

The baghouse associated with this source is manufactured by Donaldson Torit-Dalamatic, model number DLMC 4/8/15.

**SECTION D. Source Level Requirements**

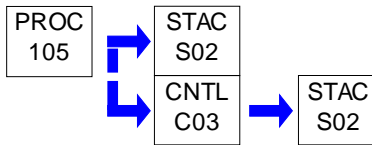
Source ID: 105

Source Name: CENTRAL VACUUM/MILLING SYSTEMS (CCI-002)

Source Capacity/Throughput:

N/A

Conditions for this source occur in the following groups: ALL PROCESSES
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.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall perform a stack test using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. 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. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(c) The stack test shall, at a minimum, test for filterable particulate matter emissions. Tests shall be conducted in accordance with the provisions of EPA Method/s or other Department approved methodology and 25 Pa. Code Chapter 139.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

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

The permittee shall keep records of the pressure drop across the cartridge collector of the primary filter daily when

**SECTION D. Source Level Requirements**

operating.

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

The permittee shall maintain the pressure drop across the cartridge collector of the primary filter between 1.0 - 5.0 inches w.g.

The permittee shall operate and maintain a pressure gauge across the cartridge collector of the primary filter in accordance with the manufacturer's specifications.

VII. ADDITIONAL REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source (Source ID 105) consists of the following processes:

- (a) 1 mill with a cartridge collector (3 pleated filters),
- (b) 1 sieve with a cartridge collector (6 pleated filters), and
- (c) 1 intermittent use central vacuum system with a cyclone, and a cartridge collector (7 pleated filters) serving as the primary filter.

Note: Items (a) and (b) above vent directly to the stack and item (c) vents to the control device (C03) before venting to the stack.

The filters associated with the cartridge collectors for this source are:

- Donaldson Torit TD-573,
- Wheelabrator MPF 13-LV, and
- Camcorp 45SFPRB7 primary vacuum filtration with a Stoddard F8-108 secondary filter

**SECTION D. Source Level Requirements**

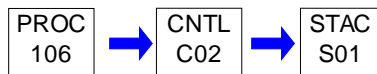
Source ID: 106

Source Name: PLASTIC PROCESSING SYSTEM (CCI-001)

Source Capacity/Throughput:

N/A

Conditions for this source occur in the following groups: ALL PROCESSES
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.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The permittee shall perform a stack test using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. 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. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.
- (b) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.
- (c) The stack test shall, at a minimum, test for filterable particulate matter emissions. Tests shall be conducted in accordance with the provisions of EPA Method/s or other Department approved methodology and 25 Pa. Code Chapter 139.
- (d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.
- (e) Within sixty (60) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.
- (f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

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).

**SECTION D. Source Level Requirements****V. REPORTING REQUIREMENTS.**

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

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

The permittee shall maintain the pressure drop across the dust collector between 1.0 - 6.0 inches w.g.

The permittee shall operate and maintain a pressure gauge across the dust collector in accordance with the manufacturer's specifications.

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

The permittee shall keep records of the pressure drop across the dust collector daily when operating.

VII. ADDITIONAL REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source (Source ID 106) consists of the following equipment for the process:

- (a) 2 mills
- (b) 13 hoods
- (c) 3 vibrating screens
- (e) 2 multiple hood connections

The filters associated with the dust collector for this source is a Micro Pulsair CFH24TV.

**SECTION E. Source Group Restrictions.**

Group Name: ALL PROCESSES

Group Description: manuf requirements

Sources included in this group

ID	Name
104	FREE FLOW SYSTEM (CCI-004)
105	CENTRAL VACUUM/MILLING SYSTEMS (CCI-002)
106	PLASTIC PROCESSING SYSTEM (CCI-001)

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General 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.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep Safety Data Sheets (SDS) of Target HAP containing materials being processed.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11585(d)(1)(ii)(B)]

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

The permittee shall keep records of each inspection performed on the vent collection system ductwork, the records shall contain the following for each inspection:

- (1) The date, place, and time;
- (2) Person conducting the activity;
- (3) Method of inspection;
- (4) Operating conditions during the activity;
- (5) Results; and
- (6) Description of any correction actions taken.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11584(b)(1-6) and 40 C.F.R. § 63.11585(d)(3)(ii)]

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

The permittee shall operate and maintain this process, including the control device parameters, in accordance with the manufacturer's specifications and consistent with good air pollution control practices at all times.

**SECTION E. Source Group Restrictions.**

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11583(b) and 40 C.F.R. § 63.11583(f)(5)]

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

For each pressure measurement device, the permittee shall do the following:

(1) Check pressure tap for plugging daily. Perform an accuracy check at least quarterly or following an operating parameter deviation:

- (i) According to the manufacturer's procedures; or
- (ii) By comparing the sensor output to redundant sensor output.

(2) Conduct calibration checks any time the sensor exceeds the manufacturer's specified maximum operating pressure range or install a new pressure sensor.

(3) At least monthly or following an operating parameter deviation, perform a leak check of all components for integrity, all electrical connections for continuity, and all mechanical connections for leakage, if redundant sensors are not used.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11583(e)(1-6)]

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

The permittee shall inspect and maintain each dry particulate control unit according to the following requirements:

(1) You must conduct monthly visual inspections of the vent collection system ductwork for leaks (as defined in 40 C.F.R. § 63.11588, "What definitions apply to this subpart?").

(2) You must conduct inspections of the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.

(3) You are required to inspect ductwork that is unsafe or difficult to inspect only during periods when it is safe or physically possible to do so.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11584(a)(2)(ii)]

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: Sub Facilities 105 and 106

Sources included in this group

ID	Name
105	CENTRAL VACUUM/MILLING SYSTEMS (CCI-002)
106	PLASTIC PROCESSING SYSTEM (CCI-001)

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

No person shall permit the emission into the outdoor atmosphere of particulate matter from this source at any time, in excess of 0.03 grains per dry standard cubic foot.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11581(b)]

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

The permittee shall monitor the pressure drop across the control device daily when operating.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11583(b)]

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

The permittee shall keep records of the inspections/maintenance performed on the control device, any deficiencies and any corrective action taken.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11585(d)(1)(vi)]

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

(a) The permittee shall keep on hand a sufficient quantity of spare fabric collector bags/filters for the fabric collector(s) associated with the source in order to be able to immediately replace bags/filters requiring replacement due to deterioration resulting from routine operation of the source and fabric collector(s).

(b) The fabric collector(s) must be equipped with a device for monitoring the pressure differential across the filters(s).

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

(a) The permittee shall have an inspection and maintenance program for the control device.

(b) The permittee shall control particulate matter emissions by a cartridge collector or dust collector for this source.

**SECTION E. Source Group Restrictions.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall operate and maintain a continuous alarm and have the alarm set to indicate any pressure drop deviation beyond the maximum set point on the control device.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.11583(b)]

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.**

Source Id	Source Description				
104	FREE FLOW SYSTEM (CCI-004)				
<table border="1"> <thead> <tr> <th>Emission Limit</th> <th>Pollutant</th> </tr> </thead> <tbody> <tr> <td>0.020 gr/DRY FT3</td> <td>PM10</td> </tr> </tbody> </table>		Emission Limit	Pollutant	0.020 gr/DRY FT3	PM10
Emission Limit	Pollutant				
0.020 gr/DRY FT3	PM10				
105	CENTRAL VACUUMMILLING SYSTEMS (CCI-002)				
<table border="1"> <thead> <tr> <th>Emission Limit</th> <th>Pollutant</th> </tr> </thead> <tbody> <tr> <td>0.030 gr/DRY FT3</td> <td>PM10</td> </tr> </tbody> </table>		Emission Limit	Pollutant	0.030 gr/DRY FT3	PM10
Emission Limit	Pollutant				
0.030 gr/DRY FT3	PM10				
106	PLASTIC PROCESSING SYSTEM (CCI-001)				
<table border="1"> <thead> <tr> <th>Emission Limit</th> <th>Pollutant</th> </tr> </thead> <tbody> <tr> <td>0.030 gr/DRY FT3</td> <td>PM10</td> </tr> </tbody> </table>		Emission Limit	Pollutant	0.030 gr/DRY FT3	PM10
Emission Limit	Pollutant				
0.030 gr/DRY FT3	PM10				

Site Emission Restriction Summary

Emission Limit	Pollutant
10.000 Tons/Yr	VOC



SECTION H. Miscellaneous.

(a) Certain terms and conditions of this permit are based on the previous operating permits and plan approvals, permit numbers:
23-313-033
23-313-034
23-313-035
23-313-036
PA-23-0027

(b) The following are insignificant emission sources (RFDs):
005 - 23-A01-554 for two small electric QC ovens
006 - 23-A01-547 for a Lab PTFE Welding operation

(c) The following is an insignificant source:
Tank 001A - Solvent Storage Tank (Registration 23-45693) - above ground tank - 7000 gallons

(d) The operating permit was amended according to 25 Pa. Code §127.450 a(1). Please note changes on page 17 of the revised operating permit. The permit was amended because testing for VOCs and PM does not apply to Source ID 103.

APS: 351229 AUTH: 698043

The information in Section A is for informational purposes only.

This permit, Auth 698043, has been renewed and removed control device CO4 from Process 104 (Free Flow System) from the operating permit. Control device CO4 was replaced with CO5 which is currently under Plan Approval 23-0027A and waiting to be incorporated.

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

- A 100 L mixer to mix dry raw materials with a 5-hp nuisance dust collector which vents indoors. (RFD 23-A01-917).

(e) APS: 688817 AUTH: 785701

The information in Section A is for informational purposes only.

This Amendment is being issued to incorporate Plan Approval 23-0027A for a Donaldson Torit Baghouse.

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

- A compactor / mill and Minox sieve to mix dry raw materials. Compactor / mill operations vent to an existing nuisance dust collector and emissions from the Minox sieve vent to a dust collector. (RFD: 23-A01-922)

(f) APS: 788804 AUTH #: 939152

This operating permit has been renewed.

The facility is subject to 40 CFR 63 Subpart BBBB - National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry. Conditions have been added to the permit to comply with this regulation.

***** October 2018 *****

(g) APS: 788804 AUTH: 1193826, Renewal

- 1) Stack testing requirements have been updated for Souce IDs 104, 105 and 106.

APS: 788804 AUTH: 1244953, Minor Modification

- 1) Removed baghouse PM removal efficiency requirement from Source ID 104; compliance must continue to be demonstrated to 0.02 gr/dscf PM restriction.
- 2) Changed pressure drop range across Source ID 104 baghouse filter from 0.5 to 4.0 inches of water to 0.3 to 4.0 inches of water.
- 3) Added the statement that the presssure drop requirement for Source ID 104 only applies when the source is operating.



SECTION H. Miscellaneous.

***** August 2021 *****

(h) Administrative Amendment being processed under APS: 788804, AUTH ID: 1365925, PF ID: 240648. The following change has been made:

This amendment changes the Responsible Official from Mr. Chad Pope to Mr. John Hanson.

***** October 2022 *****

(i) Administrative Amendment is being processed under APS: 788804, AUTH ID: 1408238, PF ID 240648. The following change has been made:

This amendment establishes a combustion temperature lower limit and monitoring and recordkeeping requirements.

***** October 2023 *****

(j) This Operating Permit is being renewed under APS No. 788804; AUTH ID 1442585; PF ID 240648. No significant changes have taken place since the permit was last issued/amended in October 2022. The Responsible Official has been changed to Mr. Greg Couves, Director Plant Operations.

The following sources/activities are being noted and are determined to be insignificant/exempt:

- eRFD #7400, approved on December 10, 2018, for a like-kind replacement of the C03 fabric filter and installation of an additional cyclone collection device in series and upstream of the fabric filter.
- eRFD #7412, approved on November 29, 2018, for construction of a repackaging area to conduct manual repackaging of powder product and venting to the existing C02 dust collector.
- eRFD #9472, approved on January 13, 2022, for quantification of emissions from three existing electrical fiberglass powder bake-off ovens using lab test data and vented inside the room.
- One (1) 3.25 kW portable gasoline-fired emergency electric generator, manufactured by Powermate, Model PM013250.02, model year 2014.
- The central vacuum system of Source ID 105 is equipped with a secondary filter that is not considered a control device. The secondary filter serves as a back up to the primary filter, prevents any particles from reaching the turbine blower, and serves as a warning indicator for any deterioration in performance of the primary filter.



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