



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

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date:	May 20, 2021	Effective Date:	August 17, 2023
Revision Date:	August 17, 2023	Expiration Date:	May 19, 2026
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: 46-00200

Synthetic Minor

Federal Tax Id - Plant Code: 26-2178507-1

Owner Information

Name: JOHN MIDDLETON CO
Mailing Address: PO BOX 85108
RICHMOND, VA 23285-5108

Plant Information

Plant: JOHN MIDDLETON CO/KING OF PRUSSIA
Location: 46 Montgomery County 46955 Upper Merion Township
SIC Code: 2121 Manufacturing - Cigars

Operator

Name: KYLE H GREEN [If different from owner]
Mailing Address: ALTERNATE RESPONSIBLE OFFICIAL
PO BOX 85108
RICHMOND, VA 23285

Responsible Official

Name: CHARLES P EPPS
Title: SR DIR CIGAR MFG
Phone: (804) 385 - 9001 Email: Charles.P.Epps@johnMiddletonco.com

Permit Contact Person

Name: PATRICK J MCFADDEN
Title: SR. ENV. ENGR.
Phone: (610) 792 - 8047 Email: Patrick.J.McFadden@pmusa.com

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



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

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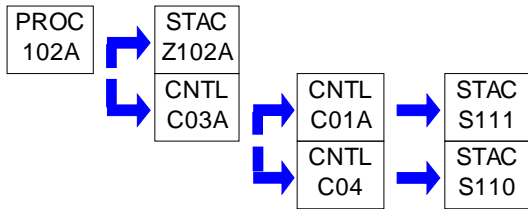
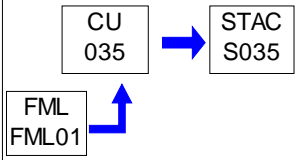
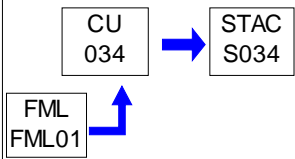
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput		Fuel/Material
034	350 HP BOILER	14.288	MMBTU/HR	
		14.000	MCF/HR	Natural Gas
035	500 HP BOILER	20.670	MMBTU/HR	
		20.700	MCF/HR	Natural Gas
102A	TOP DRESSING APPLICATION			
103A	DRYERS (2)		N/A	RAW TOBACCO
105	HUMECTANT APPLICATION		N/A	RAW TOBACCO
201A	TOBACCO CONDITIONING		N/A	RAW TOBACCO
202A	CASING PREPARATION		N/A	CASING MATERIAL
203A	CASING APPLICATION		N/A	RAW TOBACCO
208A	TOBACCO TREATMENT		N/A	RAW TOBACCO
300A	SIZING EQUIPMENT		N/A	RAW TOBACCO
301	SEPARATOR		N/A	RAW TOBACCO
302	TOBACCO BLENDING		N/A	RAW TOBACCO
400	SPECIALTY PROCESS		N/A	ETHANOL IN TOP DRESS
			N/A	RAW TOBACCO
			N/A	CASING MATERIAL
C01A	REGENERATIVE THERMAL OXIDIZER (RTO) 2	5,000.000	CF/HR	NATURAL GAS
C03A	PERMANENT TOTAL ENCLOSURE			
C04	REGENERATIVE THERMAL OXIDIZER (RTO) 1	870.000	CF/HR	NATURAL GAS
C05	BAGHOUSE 1 (SEPARATOR)		N/A	RAW TOBACCO
C07	BAGHOUSE 2 (TOBACCO BLENDING)		N/A	RAW TOBACCO
FML01	NATURAL GAS SUPPLY			
S034	350 HP BOILER STACK			
S035	500HP BOILER 035 STACK			
S05	BAGHOUSE 1 STACK (SEPARATOR)			
S110	RTO 1 STACK			
S111	RTO 2 STACK			
S13	BAGHOUSE 2 STACK (TOBACCO BLENDING)			
S201A	TOBACCO CONDITIONING STACK			
S203A	CASING APPLICATION STACK			
S208A	TOBACCO TREATMENT STACK			
Z102A	FUGITIVE EMISSIONS			
Z105	HUMECTANT APPLICATION FUGITIVES			
Z202A	FUGITIVES EMISSIONS			
Z203A	FUGITIVES EMISSIONS			
Z208A	FUGITIVE EMISSIONS			
Z300A	FUGITIVE EMISSIONS			

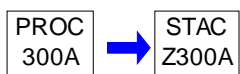
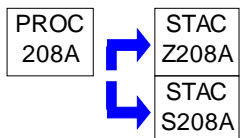
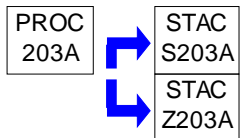
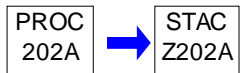
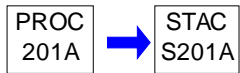
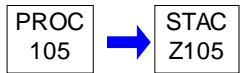
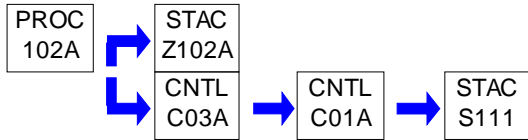
PERMIT MAPS

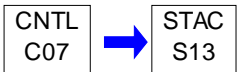
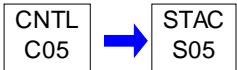
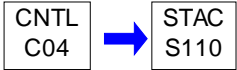
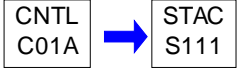
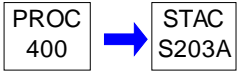
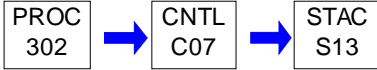
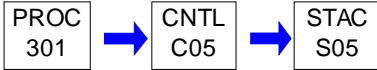


PERMIT MAPS



Alternative Operation:



**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 §121.7]****Prohibition of air pollution.**

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

002 [25 Pa. Code §123.1]**Prohibition of certain fugitive emissions**

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

- (a) Construction or demolition of buildings or structures;
- (b) Grading, paving and maintenance of roads and streets;
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets;
- (d) Clearing of land;
- (e) stockpiling of materials;
- (f) Open burning operations, as specified in 25 Pa. Code § 129.14; and
- (g) Sources and classes of sources other than those identified in (a) - (f), 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:
 - (1) the emissions are of minor significance with respect to causing air pollution; and
 - (2) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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

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)(1)-(9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]**Limitations**

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

005 [25 Pa. Code §123.41]**Limitations**

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

- (a) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour.
- (b) Equal to or greater than 60% at any time.

006 [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:

**SECTION C. Site Level Requirements**

- (a) When the presence of uncombined water is the only reason for failure 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)(1)-(9) (relating to prohibition of certain fugitive emissions).

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

The permittee shall ensure that the total volatile organic compounds (VOC) emissions from the facility shall not exceed 24.9 ton per year, as a twelve (12) month rolling sum.

008 [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.

II. TESTING REQUIREMENTS.**# 009 [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 and the most current version of the DEP Source Testing Manual, 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.

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

- (a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region
RA-EPSEstacktesting@pa.gov

**SECTION C. Site Level Requirements**

Central Office
RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.

1. Test Date(s)

- a. For protocols, provide the proposed date on which testing will commence or "TBD"
- b. For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF Id under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

4. Testing Requirements (all that apply)

- a. Plan approval number(s)
- b. Operating permit number
- c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- d. Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

III. MONITORING REQUIREMENTS.**# 011 [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.

012 [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, complaints, monitoring results, and/or Department findings.

[Note: On 6/15/2004, DEP consented to the company's request for once-a-week monitoring for malodors, fugitive, and visible emissions.]

[Note: On 11/23/2004, DEP consented to the company's request for once-a-month monitoring for malodors, fugitive, and visible emissions.]

IV. RECORDKEEPING REQUIREMENTS.**# 013 [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.

The permittee may maintain these records electronically in a format approved by the Department.

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

The permittee shall maintain records of all liquid raw materials purchased and their volatile organic compound (VOC) content.

The permittee shall calculate and maintain records of the total VOC emissions from the facility on a monthly basis and as a 12-month rolling sum.

The permittee shall maintain records of the amount of top dressing material used at the facility on a monthly basis and as a 12-month sum.

015 [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.

V. REPORTING REQUIREMENTS.**# 016 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

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,

**SECTION C. Site Level Requirements**

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:
 - (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.

**SECTION C. Site Level Requirements**

(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.

VI. WORK PRACTICE REQUIREMENTS.**# 019 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified 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.

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

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

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

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

022 [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

**SECTION C. Site Level Requirements**

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

VII. ADDITIONAL REQUIREMENTS.

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following individual has been approved by the Department as an additional responsible official for the facility:

Kyle H. Green
Director, Processing of the King of Prussia facility

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: 034

Source Name: 350 HP BOILER

Source Capacity/Throughput: 14.288 MMBTU/HR

14.000 MCF/HR Natural Gas

Conditions for this source occur in the following groups: GRP 2

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

The permittee shall ensure that the sulfur oxides (SO_x) emissions from the 350 Hp Boiler (Source ID: 034) shall not exceed 0.11 tons per year, as a 12-month rolling sum.

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

The permittee shall ensure that the particulate matter (PM) emissions from the 350 Hp Boiler (Source ID: 034) shall not exceed 0.63 tons per year, as a 12-month rolling sum.

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

The permittee shall ensure that the volatile organic compound (VOC) emissions from from the 350 Hp Boiler (Source ID: 034) shall not exceed 0.25 tons per year, as a 12-month rolling sum.

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

The permittee shall ensure that:

(a) carbon monoxide (CO) emissions from the 350 Hp Boiler (Source ID: 034) shall not exceed 50 ppm_{dv} at 3% O₂ when firing natural gas at 50% or more of the boiler rated capacity.

(b) carbon monoxide (CO) emission from the 350 Hp Boiler (Source ID: 034) shall not exceed 150 ppm_{dv} at 3% O₂ when firing natural gas at less than 50% of the boiler rated capacity.

(c) carbon monoxide (CO) emissions from the 350 Hp Boiler (Source ID: 034) shall not exceed 3.37 tons per year, as a 12-month rolling sum basis.

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

The permittee shall ensure that the nitrogen oxides (NO_x) emissions from the 350 Hp Boiler (Source ID: 034) shall not exceed 2.25 tons per year, as a 12-month rolling sum and shall not exceed a concentration of 30 ppm_{dv} at 3% O₂ when firing natural gas.

II. TESTING REQUIREMENTS.

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

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

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

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

(a) The permittee shall calculate and maintain records of carbon monoxide (CO), nitrogen oxides (NO_x), sulfur oxides (SO_x), volatile organic compounds (VOC) and particulate matter (PM) emissions, monthly and as a 12-month rolling sum.

(b) The following is applicable when firing natural gas in the 350 Hp Boiler (Source ID: 034) and using manufacturer data for emissions calculations of CO:

(1) an emission rate of 0.11 lb/MMBtu shall be used when operating at less than 50% of boiler capacity on a monthly basis

(2) an 0.04 lb/MMBtu emission rate of 0.04 lb/MMBtu shall be used when operating at 50% or more of boiler capacity on a monthly basis.

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

The permittee shall install and maintain a fuel meter in order to monitor the amount of natural gas combusted on a daily or monthly basis.

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

The permittee shall ensure that the 350 Hp Boiler (Source ID: 034) and associated equipment is operated and maintained in accordance with manufacturer's specifications and good air pollution control practices. Flue Gas Recirculation (FGR) at the 30 ppm NO_x performance level is considered to be an integral part of the boiler design. No modification to the vendor design shall be carried out by the owner/operator.

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

(a) In order to demonstrate compliance with the restrictions of carbon monoxide (CO), nitrogen oxides (NO_x), volatile organic compounds (VOC) and particulate matter (PM) emissions, the permittee shall keep manufacturer test data and guarantees approved by the Department.

(b) If at any time, the Department has cause to believe that the manufacturer test data may not represent the actual emissions of the boiler, the permittee shall conduct tests deemed necessary by the Department to determine the actual emission rates.

(c) These tests may include either of:

(1) performance stack testing in accordance with the applicable provisions of 25 Pa. Code Chapter 139

(2) portable analyzers approved by the Department.

**SECTION D. Source Level Requirements**

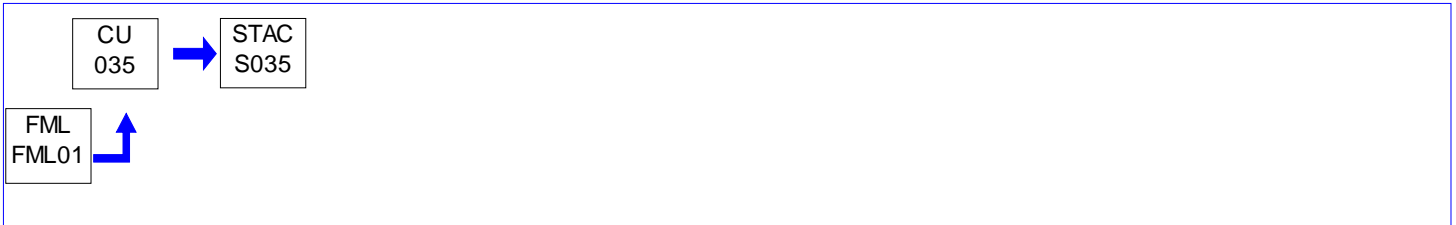
Source ID: 035

Source Name: 500 HP BOILER

Source Capacity/Throughput: 20.670 MMBTU/HR

20.700 MCF/HR Natural Gas

Conditions for this source occur in the following groups: GRP 2

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

The permittee shall ensure that emissions from the 500 Hp Boiler (Source ID: 035) shall not exceed the following:

- (a) 30 ppm_dv nitrogen oxides (NO_x) at 3% oxygen;
- (b) 300 ppm_dv carbon monoxide (CO) at 3% oxygen.

II. TESTING REQUIREMENTS.**# 002 [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 CO and NO_x. Tests shall be conducted in accordance with the provisions of EPA Test Methods 10 and 7E 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) (unless a more stringent regulatory requirement applies), an electronic copy 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.

**SECTION D. Source Level Requirements****III. MONITORING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor carbon monoxide (CO), nitrogen oxides (NO_x), sulfur oxides (SO_x), volatile organic compounds (VOC) and particulate matter (PM) emissions from the 500 Hp Boiler (Source ID: 035), monthly and as a 12-month rolling sum.

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

The permittee shall calculate and maintain records of carbon monoxide (CO), nitrogen oxides (NO_x), sulfur oxides (SO_x), volatile organic compounds (VOC) and particulate matter (PM) emissions from the 500 Hp Boiler (Source ID: 035), monthly and as a 12-month rolling sum.

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

(a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region
RA-EPSEstacktesting@pa.gov

Central Office
RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.

1. Test Date(s)

- a. For protocols, provide the proposed date on which testing will commence or "TBD"
- b. For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

4. Testing Requirements (all that apply) engineer: edit as necessary, be specific if it helps

- a. Plan approval number(s)
- b. Operating permit number
- c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- d. Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

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

The permittee shall install and maintain a fuel meter in order to monitor the amount of natural gas combusted on a daily or monthly basis.

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

The 500 Hp Boiler (Source ID: 035) is a Unilux Model ZF2000HS-205, rated at 20.67 MMBtu/hr, equipped with flue gas recirculation (FGR) and a low-NOx burner.

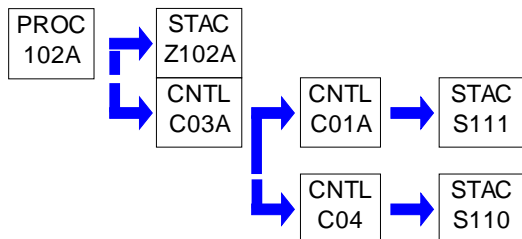
**SECTION D. Source Level Requirements**

Source ID: 102A

Source Name: TOP DRESSING APPLICATION

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GRP 3



This source occurs in alternate operation 102A TO RTO 2

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

The permittee shall ensure that the total pollutant emissions from the Top Dressing Application (Source 102A) shall not exceed the following:

Pollutant	lb/hr	ton/yr (12-month rolling sum)
Particulate Matter (PM) (filterable)	0.0087	0.038
Nitrogen Oxides (NOx)	0.087	0.38
Carbon Monoxide (CO)	0.073	0.32
Sulfur Oxide (SOx)	0.002	---
Volatile Organic Compounds (VOC) (total)	11.85	14.93
VOC stack emissions (Source ID: S110)	1.70	2.15
VOC fugitive emissions (Source ID: Z102A)	10.15	12.78

II. TESTING REQUIREMENTS.

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

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

(a) The permittee shall monitor the throughput of raw tobacco and ethanol in the top dressing, on an hourly and monthly basis and as a 12-month rolling sum.

(b) The permittee shall monitor and calculate the PM (filterable), NOx, CO and VOC emissions from the Top Dressing Application on an hourly and monthly basis and as a 12-month rolling sum.

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

(a) The permittee shall maintain records of the throughput of raw tobacco and ethanol in the top dressing, on an hourly and monthly basis and as a 12-month rolling sum.

**SECTION D. Source Level Requirements**

(b) The permittee shall maintain records of the PM (filterable), NO_x, CO and VOC emissions from the Top Dressing Application on an hourly and monthly basis and as a 12-month rolling sum.

(c) The permittee shall maintain a record of the emissions factors and associated data used in the calculations.

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.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) Top dressing cannot be applied in the flavor cylinder 2 (FC0201) until the Regenerative Thermal Oxidizer 1 (Source Source ID: C04) reaches the minimum operating temperature of 1,610 °F unless emissions from flavor cylinder 2 (FC0201) are being routed to Regenerative Thermal Oxidizer 2 (C01A) under the alternative operating scenario, in which case top dressing cannot be applied in the flavor cylinder 2 (FC0201) until the Regenerative Thermal Oxidizer 2 (Source ID: C01A) reaches the minimum operating temperature of 1,610 °F.

(b) The minimum RTO operating temperature may be revised by the Department pursuant to a compliant stack test for VOCs and VOC destruction efficiency conducted in accordance with Department approved methodology.

(c) An interlock shall be installed between the flavor cylinder 2 (FC0201) and the regenerative thermal oxidizer and shall be utilized so that the flavor cylinder 2 (FC0201) cannot operate until the Regenerative Thermal Oxidizer 1 (Source ID: C04) has reached the minimum operating temperature unless emissions from flavor cylinder 2 (FC0201) are being routed to Regenerative Thermal Oxidizer 2 (Source ID: C01A) under the alternative operating scenario, in which case top dressing cannot be applied in the flavor cylinder 2 (FC0201) until the Regenerative Thermal Oxidizer 2 (Source ID: C01A) has reached the minimum operating temperature..

(d) The Top Dressing Application shall be shut off whenever the regenerative thermal oxidizer (Source ID: C04) shuts down unless emissions from flavor cylinder 2 (FC0201) are being routed to Regenerative Thermal Oxidizer 2 (ID: C01A) under the alternative operating scenario, in which case top dressing application shall be shut off whenever the regenerative thermal oxidizer 2 (Source ID: C01A) shuts down.

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 103A

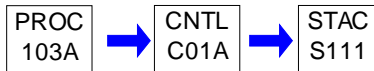
Source Name: DRYERS (2)

Source Capacity/Throughput:

N/A

RAW TOBACCO

Conditions for this source occur in the following groups: GRP 3

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

The permittee shall ensure that the total pollutant emissions from the Dryers (Source ID: 103A) shall not exceed the following:

Pollutant	lb/hr	ton/yr (12-month rolling sum)
Particulate Matter (PM) (filterable)	0.58	0.90
Nitrogen Oxides (NO _x)	0.50	2.19
Carbon Monoxide (CO)	0.42	1.84
Volatile Organic Compounds (VOC)	0.41	0.68

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor and calculate the PM (filterable), NO_x, CO and VOC emissions from the Dryers (Source ID: 103A) on an hourly and monthly basis and as a 12-month rolling sum.

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

(a) The permittee shall maintain records of the PM (filterable), NO_x, CO and VOC emissions from the Dryers (Source ID: 103A) on an hourly and monthly basis and as a 12-month rolling sum.

(b) The permittee shall maintain a record of the emissions factors and associated data used in the calculations.

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).

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

- (a) The Dryers (Source ID: 103A) shall not be started before the Regenerative Thermal Oxidizer 2 (Source ID: C01A) combustion chamber temperature reaches a minimum of 1610 °F.
- (b) The minimum RTO operating temperature may be revised by the Department pursuant to a compliant stack test for VOCs and VOC destruction efficiency, conducted in accordance with Department approved methodology.
- (c) A hard-wired interlock shall shut down the Dryers (Source ID:103A) when the combustion chamber temperature drops below 1610 F, or other minimum temperature determined by the Department.
- (d) The temperature of Regenerative Thermal Oxidizer 2 (Source ID: C01A) must be maintained above the minimum temperature for 30 minutes after the dryers are turned off.

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

A COMAS cyclone is associated with the rotary dryer included in this source and shall operate when the rotary dryer does.

**SECTION D. Source Level Requirements**

Source ID: 105

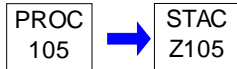
Source Name: HUMECTANT APPLICATION

Source Capacity/Throughput:

N/A

RAW TOBACCO

Conditions for this source occur in the following groups: GRP 3

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the total VOC emissions from Humectant Application (Source ID: 105) shall not exceed 0.86 lbs/hr and 1.26 ton/yr, as a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall monitor the throughput of raw tobacco throughput in the Humectant Application (Source ID: 105) on an hourly and monthly basis and as a 12-month rolling sum.

(b) The permittee shall monitor and calculate the VOC emissions from the Humectant Application (Source ID: 105) on an hourly and monthly basis and as a 12-month rolling sum.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall record the throughput of raw tobacco throughput in the Humectant Application (Source ID: 105) on an hourly and monthly basis and 12-month rolling sum.

(b) The permittee shall maintain records of the VOC emissions from the Humectant Application (Source ID: 105) on an hourly and monthly basis and 12-month rolling sum.

(c) The permittee shall maintain a record of the emissions factors and associated data used in the calculations.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

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

This source comprises the FC0101 operation.

**SECTION D. Source Level Requirements**

Source ID: 201A

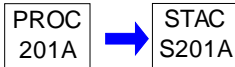
Source Name: TOBACCO CONDITIONING

Source Capacity/Throughput:

N/A

RAW TOBACCO

Conditions for this source occur in the following groups: GRP 3

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

The permittee shall ensure that the total pollutant emissions from the Tobacco Conditioning (Source ID: 201A) shall not exceed the following:

Pollutant	ton/yr (12-month rolling sum)
Particulate Matter (PM) (filterable)	0.06
Volatile Organic Compounds (VOC)	0.05

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor and calculate the PM (filterable) and VOC emissions from Tobacco Conditioning (Source ID: 201A) on an hourly and monthly basis and 12-month rolling sum.

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

(a) The permittee shall maintain records of the PM (filterable) and VOC emissions from Tobacco Conditioning (Source ID: 201A) on an hourly and monthly basis and as a 12-month rolling sum basis.

(b) the permittee shall maintain a record of the emissions factors and associated data used in the calculations.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 202A

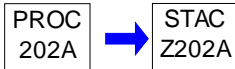
Source Name: CASING PREPARATION

Source Capacity/Throughput:

N/A

CASING MATERIAL

Conditions for this source occur in the following groups: GRP 3

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the total VOC emissions from Casing Preparation (Source ID: 202A) shall not exceed 1.45 lbs/hr and 1.78 tons/yr, as a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall:

- (a) monitor the weight of casing material mixed on a monthly basis; and
- (b) monitor and calculate the VOC emissions from Casing Preparation (Source ID: 202A) on an hourly and monthly basis and as a 12-month rolling sum.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall:

- (a) maintain records of the weight of casing material mixed on a monthly basis; and,
- (b) maintain records of the VOC emissions from Casing Preparation (Source ID: 202A) on an hourly and monthly basis and as a 12-month rolling sum.
- (c) maintain a record of the emissions factors and associated data used in the calculations.

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).

**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) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 203A

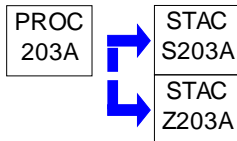
Source Name: CASING APPLICATION

Source Capacity/Throughput:

N/A

RAW TOBACCO

Conditions for this source occur in the following groups: GRP 3

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

The permittee shall ensure that the total VOC emissions from Casing Application (Source ID: 203A) shall not exceed 1.16 lbs/hr and 1.69 tpy, as a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor and calculate the VOC emissions from Casing Application (Source ID: 203A) on an hourly and monthly basis and as a 12-month rolling sum.

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

(a) The permittee shall maintain records of the VOC emissions from Casing Application (Source ID: 203A) on an hourly and monthly basis and as a 12-month rolling sum.

(b) The permittee shall maintain a record of the emissions factors and associated data used in the calculations.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 208A

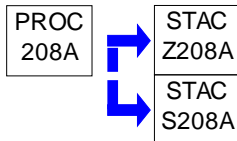
Source Name: TOBACCO TREATMENT

Source Capacity/Throughput:

N/A

RAW TOBACCO

Conditions for this source occur in the following groups: GRP 3

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

The permittee shall ensure that the total pollutant emissions from the Tobacco Treatment (Source ID: 208A) shall not exceed the following:

Pollutant	lb/hr	ton/yr (12-month rolling sum)
Particulate Matter (PM) (filterable)	0.06	0.06
Volatile Organic Compounds (VOC)	0.24	0.86

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor and calculate the PM (filterable) and VOC emissions from Tobacco Treatment (Source ID: 208A) on an hourly and monthly basis and as a 12-month rolling sum.

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

(a) The permittee shall maintain records of the PM (filterable) and VOC emissions from Tobacco Treatment (Source ID: 208A) on an hourly and monthly basis and as a 12-month rolling sum.

(b) The permittee shall maintain a record shall of the emissions factors and associated data used in the calculations.

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).



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) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 300A

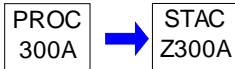
Source Name: SIZING EQUIPMENT

Source Capacity/Throughput:

N/A

RAW TOBACCO

Conditions for this source occur in the following groups: GRP 3

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the total VOC emissions from the Sizing Equipment (Source ID: 300A) shall not exceed 0.04 lb/hour and 0.05 tons/year, as a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor and calculate the VOC emissions from the Sizing Equipment (Source ID: 300A) on an hourly and monthly basis and as a 12-month rolling sum.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain records of the VOC emissions from the Sizing Equipment (Source ID: 300A) on an hourly and monthly basis and as a 12-month rolling sum.

(b) The permittee shall maintain a record of the emissions factors and associated data used in the calculations.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 301

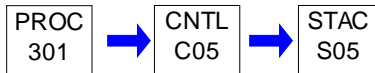
Source Name: SEPARATOR

Source Capacity/Throughput:

N/A

RAW TOBACCO

Conditions for this source occur in the following groups: GRP 3

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

The permittee shall ensure that the total pollutant emissions from the Separator (Source ID: 301) shall not exceed the following:

Pollutant	lb/hr	ton/yr (12-month rolling sum)
Particulate Matter (PM) (filterable)	0.35	1.55
Volatile Organic Compounds (VOC)	0.24	0.39

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor and calculate the PM (filterable) and VOC emissions from the Separator (Source ID: 301) on an hourly and monthly basis and as a 12-month rolling sum.

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

(a) The permittee shall maintain records of the PM (filterable) and VOC emissions from the Separator (Source ID: 301) on an hourly and monthly basis and as a 12-month rolling sum basis.

(b) The permittee shall maintain a record of the emissions factors and associated data used in the calculations.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

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

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

**SECTION D. Source Level Requirements**

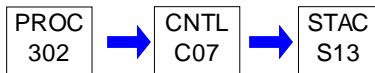
Source ID: 302

Source Name: TOBACCO BLENDING

Source Capacity/Throughput:

N/A

RAW TOBACCO

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

The permittee shall ensure that the total pollutant emissions from Tobacco Blending (Source ID: 302) shall not exceed the following:

Pollutant	lb/hr	ton/yr (12-month rolling sum)
Particulate Matter (PM) (filterable)	0.35	1.55
Volatile Organic Compounds (VOC)	0.56	0.82

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 and calculate the PM (filterable) and VOC emissions from Tobacco Blending (Source ID: 302) on an hourly and monthly basis and as a 12-month rolling sum.

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

(a) The permittee shall maintain records of the PM (filterable) and VOC emissions from this source on an hourly and monthly basis and as a 12-month rolling sum.

(b) The permittee shall maintain a record shall of the emissions factors and associated data used in the calculations.

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.**

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

**SECTION D. Source Level Requirements**

Source ID: 400

Source Name: SPECIALTY PROCESS

Source Capacity/Throughput:

N/A

ETHANOL IN TOP DRESSING

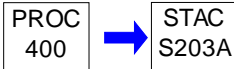
N/A

RAW TOBACCO

N/A

CASING MATERIAL

Conditions for this source occur in the following groups: GRP 3

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the total VOC emissions from the Specialty Process (Source ID: 400) shall not exceed 15.98 lbs/hr and 0.43 tons/yr, as a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor and calculate the VOC emissions from the Specialty Process (Source ID: 400) on an hourly and monthly basis and as a 12-month rolling sum.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain records of the VOC emissions from the Specialty Process (Source ID: 400) on an hourly and monthly basis and as a 12-month rolling sum.

(b) The permittee shall maintain a record of the emissions factors and associated data used in the calculations.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

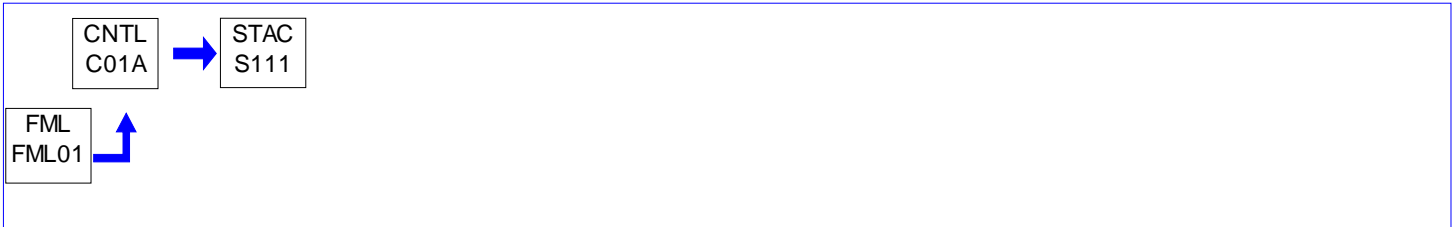
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: C01A

Source Name: REGENERATIVE THERMAL OXIDIZER (RTO) 2

Source Capacity/Throughput: 5,000.000 CF/HR NATURAL GAS

Conditions for this source occur in the following groups: GRP 3
GRP 4**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall ensure that the pollutant emissions from the RTO 2 Stack (Source ID: S111) during normal operation shall not exceed the limits for the Dryers (Source ID: 103A) in Section D, Condition #001.

(b) During alternate operation, the permittee shall ensure that the pollutant emissions from the Top Dressing Application (Source ID: 102A), shall not exceed the limits for the Regenerative Thermal Oxidizer (Source ID: C01A) in Condition #001, Section F.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

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

The Regenerative Thermal Oxidizer 2 (Source ID: C01A) shall not be bypassed, at any time, when the Dryers (Source ID 103A) are operating.

**SECTION D. Source Level Requirements****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The Regenerative Thermal Oxidizer 2 (Source ID: C01A) shall be set to maintain a combustion chamber temperature of at least 1,610 °F, or other minimum temperature established by the Department, pursuant to Condition #004(b) for Source ID: 103A.

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

The Regenerative Thermal Oxidizer 2 (Source ID: C01A) shall be used to control VOC emissions from the Dryers (Source ID: 103A), and as an alternative operation, may be used to control VOC emissions from Top Dressing Application (Source ID: 102A).

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

(a) The Regenerative Thermal Oxidizer 2 (Source ID: C01A) is manufactured by Adwest Technologies, model CP-101 6.4 RTO-95.

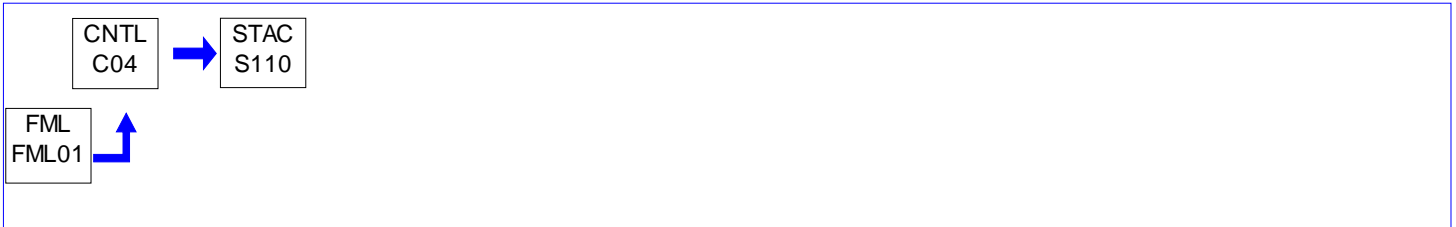
(b) The burner has a heat input capacity rating of 5.0 MMBtu/hr capacity.

**SECTION D. Source Level Requirements**

Source ID: C04

Source Name: REGENERATIVE THERMAL OXIDIZER (RTO) 1

Source Capacity/Throughput: 870.000 CF/HR NATURAL GAS

Conditions for this source occur in the following groups: GRP 3
GRP 4**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The Regenerative Thermal Oxidizer 1 (Source ID: C04) shall be set to maintain a combustion chamber temperature of at least 1,610 °F.

(b) The minimum RTO operating temperature may be revised by the Department pursuant to a compliant stack test for VOCs and VOC destruction efficiency, conducted in accordance with Department approved methodology.

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

The Regenerative Thermal Oxidizer 1 (Source ID: C04) shall not be bypassed, at any time, when Top Dressing is applied in flavor cylinder 2 (FC0201), except as an alternate operation, the Regenerative Thermal Oxidizer 2 (Source ID: C01A) is used to control the process emissions instead of the Regenerative Thermal Oxidizer 1 (Source ID: C04).

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The Regenerative Thermal Oxidizer 1 (Source ID: C04) shall be used to control VOC emissions from flavor cylinder 2 (FC0201) and a box filling station (BC0101) in the Top Dressing Application (Source ID: 102A).

**SECTION D. Source Level Requirements**

Source ID: C05

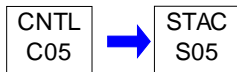
Source Name: BAGHOUSE 1 (SEPARATOR)

Source Capacity/Throughput:

N/A

RAW TOBACCO

Conditions for this source occur in the following groups: GRP 1
GRP 3

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Baghouse 1 (Separator) (Source ID: C05) is manufactured by COMAS, model FPTM-FE/1.5/36-2.

**SECTION D. Source Level Requirements**

Source ID: C07

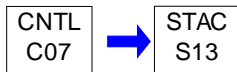
Source Name: BAGHOUSE 2 (TOBACCO BLENDING)

Source Capacity/Throughput:

N/A

RAW TOBACCO

Conditions for this source occur in the following groups: GRP 1
GRP 3

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Baghouse 2 (Tobacco Blending) (Source ID: C07) is manufactured by COMAS, model FPTM-FE/1.5/36-2.

**SECTION E. Source Group Restrictions.**

Group Name: GRP 1

Group Description: Baghouses Conditions

Sources included in this group

ID	Name
C05	BAGHOUSE 1 (SEPARATOR)
C07	BAGHOUSE 2 (TOBACCO BLENDING)

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

No person may permit the emission into the outdoor atmosphere of particulate matter from each baghouse in excess of 0.02 grains per dry standard cubic feet (gr/dscf).

[Compliance with this more stringent requirement also assures compliance with 25 Pa. Code § 123.13(c)(1)(i).]

002 [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 (PM). Tests shall be conducted in accordance with the provisions of EPA Test Method 17 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) (unless a more stringent regulatory requirement applies), one paper copy plus an electronic copy 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.

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

The permittee shall ensure that the differential pressure across each baghouse shall be continuously monitored with a differential pressure gauge, when operating.

**SECTION E. Source Group Restrictions.****IV. RECORDKEEPING REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the differential pressure across each baghouse shall be recorded daily, when operating.

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

The permittee shall keep records of the inspection performed on each baghouse, including the date and results of the inspection and corrective action taken, if any.

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

(a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region
RA-EPSEstacktesting@pa.gov

Central Office
RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.

1. Test Date(s)

- a. For protocols, provide the proposed date on which testing will commence or "TBD"
- b. For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

4. Testing Requirements (all that apply)

- a. Plan approval number(s)
- b. Operating permit number
- c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- d. Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

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

The permittee shall perform a visible inspection of each baghouse for visible and fugitive particulate matter emissions on a daily basis, when operating.

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

The permittee shall keep spare bags on hand for each baghouse for replacement purposes.

**SECTION E. Source Group Restrictions.****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that a differential pressure of 0.20 - 2.0 inches water column (w.c.) shall be maintained across each baghouse.

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

The permittee shall perform a visible inspection of the bags for holes, tears, and gaps, on a monthly basis.

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: GRP 2

Group Description: Boilers Conditions

Sources included in this group

ID	Name
034	350 HP BOILER
035	500 HP BOILER

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

001 [25 Pa. Code §123.11]

Combustion units

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

002 [25 Pa. Code §123.22]

Combustion units

A person may not permit the emissions into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from a combustion unit in excess of 1.0 pound per million Btu of heat input, in accordance with 25 Pa. Code § 123.22(e)(1).

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use only natural gas as fuel for this combustion unit.

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.

004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.48c]

Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units Reporting and recordkeeping requirements.

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

Except as provided under paragraphs (g)(2) and (g)(3) of 40 CFR § 60.48c, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

The owner or operator of an affected source that combust natural gas may elect to record and maintain records of the type and amount of fuel and the amount combusted during each calendar month, in accordance with 40 CFR § 60.48c(g)(2).

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 E. Source Group Restrictions.****VI. WORK PRACTICE REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall perform an annual tune-up on the combustion process for this source. The annual tune-up shall consist of, at a minimum, the following:

- (1) inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer;
- (2) inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO_x, and to the extent practicable, minimize the emissions of CO; and
- (3) inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

(b) The annual combustion tune-up shall be made in accordance with EPA document "Combustion Efficiency Optimization Manual for Operators of Oil and Gas-fired Boilers," September 1983 (EPA-340/1-83-023) or equivalent procedures approved by the Department in writing.

VII. ADDITIONAL REQUIREMENTS.**# 006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11195]****SUBPART JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources****Are any boilers not subject to this subpart?**

Pursuant to 40 CFR § 63.11195(e), a "gas-fired" boiler as defined in the subpart is not subject to the subpart and any requirements in this subpart.

Pursuant to 40 CFR § 63.11237, this boiler is defined as a "gas-fired" boiler.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11225]**SUBPART JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources****What are my notification, reporting, and recordkeeping requirements?**

If the owner operator switches fuels or makes a physical change to the boiler and the fuel switch or change results in the applicability of a different subcategory within Subpart JJJJJJ, in the boiler becoming subject to Subpart JJJJJJ, or in the boiler switching out of Subpart JJJJJJ due to a change to 100 percent natural gas or takes a permit limit that results in the boiler being subject to Subpart JJJJJJ, the owner/operator must provide notice to the Administrator of the date upon which the fuels were switched, the physical change was made, or the permit limit was taken within 30 days of the change. The notification must identify:

(a) The name of the owner or operator of the affected source, the location of the source, the boiler that switched fuels, was physically changed, or took a permit limit, and the date of the notice.

(b) The date upon which the fuel switch, physical change, or permit limit occurred.

**SECTION E. Source Group Restrictions.**

Group Name: GRP 3

Group Description: Particulate Matter Emissions Limit for Processes

Sources included in this group

ID	Name
102A	TOP DRESSING APPLICATION
103A	DRYERS (2)
105	HUMECTANT APPLICATION
201A	TOBACCO CONDITIONING
202A	CASING PREPARATION
203A	CASING APPLICATION
208A	TOBACCO TREATMENT
300A	SIZING EQUIPMENT
301	SEPARATOR
400	SPECIALTY PROCESS
C01A	REGENERATIVE THERMAL OXIDIZER (RTO) 2
C04	REGENERATIVE THERMAL OXIDIZER (RTO) 1
C05	BAGHOUSE 1 (SEPARATOR)
C07	BAGHOUSE 2 (TOBACCO BLENDING)

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this source in excess of 0.04 grains per dry standard cubic feet (gr/dscf), pursuant to 25 Pa. Code § 123.13(c)(1)(i).

[Note: The permittee shall comply with a more stringent limitation for an individual source established pursuant to Best Available Technology, 25 Pa. Code Section 127.12(a)(5).]

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 E. Source Group Restrictions.****VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION E. Source Group Restrictions.**

Group Name: GRP 4

Group Description: RTO Conditions

Sources included in this group

ID	Name
C01A	REGENERATIVE THERMAL OXIDIZER (RTO) 2
C04	REGENERATIVE THERMAL OXIDIZER (RTO) 1

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that each RTO shall burn only natural gas as fuel.

Control Device Efficiency Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that a VOC destruction efficiency of at least 98%, or an outlet concentration of 25 ppmv, dry basis, as measured by Method 25A, shall be maintained across each RTO, whichever is least stringent.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The stack test for Regenerative Thermal Oxidizer (RTO) 1 (Source ID: C04) with the VOC emission limits set for the Top Dressing Application (Source ID: 102A) and the VOC destruction efficiency set for RTO 1 (Source ID: C04).

The permittee shall also perform and submit for DEP review a Permanent Total Enclosure (PTE) verification for the Top Dressing Application (Source ID: 102A) only, during this permit term, using EPA Method 204 in the same timeframe and under the same operating conditions as the stack test.

The stack test for Regenerative Thermal Oxidizer (RTO) 2 (Source ID: C01A) shall be performed to show compliance with the emission limits set for the Dryers (Source ID: 103A) and Stack 111. Compliance shall also be demonstrated with the allowable PM (filterable) limitation of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region
RA-EPSEstacktesting@pa.govCentral Office
RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.

1. Test Date(s)

- For protocols, provide the proposed date on which testing will commence or "TBD"
- For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also

**SECTION E. Source Group Restrictions.**

include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

4. Testing Requirements

- a. Plan approval number(s)
- b. Operating permit number
- c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- d. Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL"

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor on a weekly basis, the amount and type of fuel used for each Regenerative Thermal Oxidizer (RTO).

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the starting and ending times for each Regenerative Thermal Oxidizer (RTO) on a daily basis, when operating.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall continuously monitor and maintain records of the temperature of the combustion chamber of each Regenerative Thermal Oxidizer (RTO), while operating.

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of any recommendations of the manufacturer regarding thermocouple replacement.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the starting and ending times for each Regenerative Thermal Oxidizer (RTO) on a daily basis, when operating.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records, on a weekly basis, of the amount and type of fuel, used for each Regenerative Thermal Oxidizer (RTO).

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.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The thermocouples in the combustion chamber of each regenerative thermal oxidizer (RTO) shall be replaced once per year or on another schedule recommended by the manufacturer.

**SECTION E. Source Group Restrictions.****# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the combustion chamber of each Regenerative Thermal Oxidizer (RTO) is equipped with thermocouples to continuously indicate the combustion chamber temperature.

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.**

Alternative Operation Name: 102A TO RTO 2

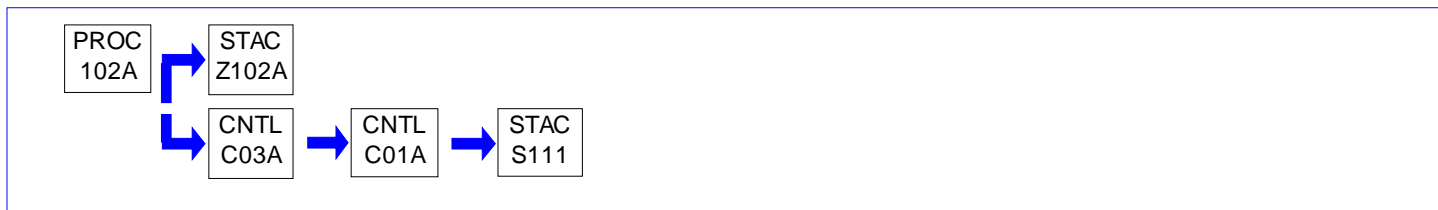
#001 CHANGES FROM NORMAL OPERATION

The Top Dressing Application (source ID: 102A) may also vent to RTO 2 (Source ID C01A).

Sources included in this Alternative Operation:

ID	Name	Source Type
102A	TOP DRESSING APPLICATION	Process

Alternative Operation Map:

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

The permittee shall ensure that the total pollutant emissions from Stack S111 during alternate operation shall not exceed the following:

Pollutant	lb/hr	ton/yr (12-month rolling sum)
Particulate Matter (PM) (filterable)	0.58	0.90
Nitrogen Oxides (NO _x)	0.50	2.19
Carbon Monoxide (CO)	0.42	1.84
Volatile Organic Compounds (VOC)	2.10	2.81

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor the starting and ending times for the alternate operation on a daily basis, when operating in this mode.

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

The permittee shall monitor and calculate the PM (filterable), NO_x, CO and VOC emissions from S111 on an hourly and monthly basis and as a 12-month rolling sum, if the alternate operation is used in a 12-month rolling period.

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

The permittee shall maintain records of the starting and ending times of operation for the alternate operation on a daily basis, when operating in this mode.

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



SECTION F. Alternative Operation Requirements.

(a) The permittee shall maintain records of the PM (filterable), NO_x, CO and VOC emissions from Stack S111 on an hourly and monthly basis and as a 12-month rolling sum if the alternate operation is used in a 12-month rolling period.

(b) The permittee shall maintain a record of the emissions factors and associated data used in the calculations.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION G. Emission Restriction Summary.**

Source Id	Source Descriptor		
034	350 HP BOILER		
Emission Limit			Pollutant
3.370	Tons/Yr		CO
50.000	PPMV		CO
150.000	PPMV	dry, @ 3% O2 when firing natural gas at less than 50% of rated boiler capacity	CO
2.250	Tons/Yr		NOX
30.000	PPMV	dry, @ 3% O2	NOX
0.110	Tons/Yr		SOX
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU	particulate matter	TSP
0.630	Tons/Yr		TSP
0.250	Tons/Yr		VOC
035	500 HP BOILER		
Emission Limit			Pollutant
300.000	PPMV	dry, at 3% oxygen	CO
30.000	PPMV	dry, at 3% oxygen	NOX
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU	particulate matter	TSP
102A	TOP DRESSING APPLICATION		
Emission Limit			Pollutant
0.073	Lbs/Hr		CO
0.320	Tons/Yr	12-month rolling sum	CO
0.087	Lbs/Hr		NOX
0.380	Tons/Yr	12-month rolling sum	NOX
0.002	Lbs/Hr		SOX
0.009	Lbs/Hr	particulate matter	TSP
0.038	Tons/Yr	particulate matter	TSP
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
1.700	Lbs/Hr	stack emissions (Source ID: S110)	VOC
2.150	Tons/Yr	stack emissions (Source ID: S110)	VOC
10.150	Lbs/Hr	fugitive emissions (Source ID: Z102A)	VOC
11.850	Lbs/Hr	total	VOC
12.780	Tons/Yr	fugitive emissions (Source ID: Z102A)	VOC
14.930	Tons/Yr	12-month rolling sum	VOC
103A	DRYERS (2)		
Emission Limit			Pollutant
0.420	Lbs/Hr		CO
1.840	Tons/Yr	12-month rolling sum	CO
0.500	Lbs/Hr		NOX
2.190	Tons/Yr	12-month rolling sum	NOX
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP

**SECTION G. Emission Restriction Summary.**

Source Id	Source Descriptor		
0.580	Lbs/Hr	particulate matter	TSP
0.900	Tons/Yr	12-month rolling sum	TSP
0.410	Lbs/Hr		VOC
0.680	Tons/Yr	12-month rolling sum	VOC
105	HUMECTANT APPLICATION		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
0.860	Lbs/Hr		VOC
1.260	Tons/Yr	12-month rolling sum	VOC
201A	TOBACCO CONDITIONING		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
0.060	Tons/Yr	12-month rolling sum	TSP
0.050	Tons/Yr	12-month rolling sum	VOC
202A	CASING PREPARATION		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
1.450	Lbs/Hr		VOC
1.780	Tons/Yr	12-month rolling sum	VOC
203A	CASING APPLICATION		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
1.160	Lbs/Hr		VOC
1.690	Tons/Yr	12-month rolling sum	VOC
208A	TOBACCO TREATMENT		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
0.060	Lbs/Hr		TSP
0.060	Tons/Yr	12-month rolling sum	TSP
0.240	Lbs/Hr		VOC
0.860	Tons/Yr	12-month rolling sum	VOC
300A	SIZING EQUIPMENT		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP

**SECTION G. Emission Restriction Summary.**

Source Id	Source Descriptor		
0.040	Lbs/Hr		VOC
0.050	Tons/Yr	12-month rolling sum	VOC
301	SEPARATOR		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
0.350	Lbs/Hr	particulate matter	TSP
1.550	Tons/Yr	12-month rolling sum	TSP
0.240	Lbs/Hr		VOC
0.390	Tons/Yr	12-month rolling sum	VOC
302	TOBACCO BLENDING		
Emission Limit		Pollutant	
0.350	Lbs/Hr	particulate matter	TSP
1.550	Tons/Yr	12-month rolling sum	TSP
0.560	Lbs/Hr		VOC
0.820	Tons/Yr	12-month rolling sum	VOC
400	SPECIALTY PROCESS		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
0.430	Tons/Yr	12-month rolling sum	VOC
15.980	Lbs/Hr		VOC
C01A	REGENERATIVE THERMAL OXIDIZER (RTO) 2		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
C04	REGENERATIVE THERMAL OXIDIZER (RTO) 1		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
C05	BAGHOUSE 1 (SEPARATOR)		
Emission Limit		Pollutant	
0.020	gr/DRY FT3	particulate matter	TSP
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP
C07	BAGHOUSE 2 (TOBACCO BLENDING)		
Emission Limit		Pollutant	
0.020	gr/DRY FT3	particulate matter	TSP
0.040	gr/DRY FT3	any source, filterable PM, unless more stringent is specified	TSP

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description

Site Emission Restriction Summary

Emission Limit		Pollutant
24.900 Tons/Yr	12-month rolling sum	VOC

Alternative Operation Emission Restriction Summary

Source Id	Source Description
102A	TOP DRESSING APPLICATION
Emission Limit	Pollutant
0.420 Lbs/Hr	CO
0.500 Lbs/Hr	NOX
0.580 Lbs/Hr	particulate matter TSP
0.900 Lbs/Hr	SOX
0.900 Tons/Yr	12-month rolling sum TSP
1.840 Tons/Yr	12-month rolling sum CO
2.100 Lbs/Hr	VOC
2.190 Tons/Yr	12-month rolling sum NOX
2.810 Tons/Yr	12-month rolling sum VOC
4.380 Tons/Yr	12-month rolling sum SOX

**SECTION H. Miscellaneous.**

(a) The following sources have been determined by the Department to be insignificant sources of air emissions, and therefore do not require additional limitations, monitoring, or recordkeeping. They are still subject to any applicable Federal, State, and Local regulations that may apply, including the Site Level Requirements (Section C) of this permit and the emission inventory reporting requirements (25 Pa. Code Chapter 135).

- (i) Wastewater Tank (RFD: 46-A01-2015)
- (ii) Unit #210 Solvent Cleaner (RFD: 46-A01-2017)
- (iii) Top Dressing and Humectant Storage
- (iv) Tobacco Storage Area
- (v) Solvent Cleaner
- (vi) QA Lab

(b) The data listed in Section A, Site Inventory List, for Capacity/Throughput and Fuel/Material and the source capacity descriptions in Section D, are for descriptive purpose(s) and are not considered as maximum source capacities or design limitations.

(c) The State Only Operating Permit (APS No. 643805, Auth ID: 725704) has been renewed and administratively amended to facilitate a change of ownership (e.g., Altria Enterprises LLC) and a facility name change (e.g., John Middleton Company).

(d) The State only Operating Permit (APS No. 643805, Auth ID: 787834) has been administratively amended to incorporate the requirements of Plan Approval 46-0200A, delete a 200 hp boiler (Source ID 032) removed from the facility and indicate the client as John Middleton Co. (Tax Id 26-2178507). John Middleton Co. is an Altria (Tax ID 26-1476015) company.

(e) May 2012. APS: 643805, AUTH: 880311. Administrative amendment to incorporate plan approval, number 46-0200B.

(f) October 2014 APS:643805, AUTH: 980832. The Operating Permit is renewed and the requirements of GP1-46-0239 for a 500 hp boiler are incorporated.

The following changes are made in the renewed Operating Permit. Conditions numbers below, refer to the June 26, 2012 issuance of the Operating Permit.

Cover Page

Mailing address is corrected to PO Box 85108, Richmond VA 23285

The "Operator Name" is changed to Ronald L Hackett and Cynthia L. Logan.

Mr. Hackett and Ms. Logan were designated as an alternate Responsible Officials by Responsible Official Garrick D Wagner.

Section A

The following Sources are removed from the Site Inventory and Permit Maps, since they have been removed from the facility, or are regulated by Plan Approval 46-0200E.

- 102 - Top Dressing Application
- 103 - Dryer 1
- 104 - Dryer 2
- 110 - Top Dressing Drum
- C01-Thermal Oxidizer
- C03 - Permanent Total Enclosure
- C04 - Regenerative Thermal Oxidizer
- S03 - Thermal Oxidizer Stack
- S031 - Waste Heat Boiler Stack
- S110 - RTO Stack
- Z203A - fugitive emissions

Throughputs of natural gas and No. 2 fuel oil at boiler capacity are added for Source ID 034.

[No. 2 fuel was subsequently removed in Auth 1166733 part (i)]

Section C

The following conditions are reworded to reflect current DEP guidelines:

- Condition #002
- Condition #009
- Condition #010

**SECTION H. Miscellaneous.**

Condition #012
Condition #013
Condition #015
Condition #017
Condition #019
Condition #020
Condition #022 – also moved to the Restrictions section

Condition #011
The condition is reworded to require recordkeeping of the top dressing throughput and VOC emissions from the facility on both a monthly and 12-month rolling basis.

Condition #018
The condition describing exceptions to visible emissions limitations is moved to the Restrictions section.

Condition #023
The list of alternate responsible officials is updated.

Section D
Source ID 034

Condition #002
The streamlining condition for 25 Pa. Code Section 122(e)(1) is removed. Streamlining only applies to fuel that may be used before June 30, 2016.

Condition #007
The requirements of 25 Pa. Code Section 123.22 are updated.

Condition #012
The condition is clarified by adding the phrase "and record" to the condition.

Condition #014
The condition is updated to reflect the February, 2012 revision of 40 CFR Part 60, Subpart Dc. Part (b) of the condition is updated to specify ASTM D396 as the defining test for No. 2 fuel oil. Part (c) is updated to allow the maximum sulfur content on the fuel oil certification required by the Subpart.

Condition #015
The EPA mailing address is corrected. A notation is included indicating that electronic submittals be made through EPA's Compliance and Reporting Interface, if required by the Subpart for which the reporting is taking place.

Condition #016
The condition is updated to indicate the 6-month reporting periods that have been in use. Due dates for the reports required pursuant to 40 CFR 60.48c (j) are July 30 and January 30.

Condition #028
The condition is re-worded to indicate applicability of 40 CFR Part 63 Subpart JJJJJJ only if the boiler is operated as a oil fired boiler pursuant to the Subpart.

Additional

- *The fuel recordkeeping requirements of 25 Pa. Code Section 122(g)(5) are added.
- *The requirements of 40 CFR Part 63 Subpart JJJJJJ are included for the case in which the 350 hp boiler would operate as a oil fired boiler under the Subpart.
- *The conditions for exemption from Subpart JJJJJJ by operation as a gas fired boiler are included.

Source ID 101
Condition #001
The requirements of 25 Pa. Code Section 123.13(c)(1)(i) are moved to Section C.

Conditions #002, #003

**SECTION H. Miscellaneous.**

Monthly monitoring and recording of throughput and VOC emissions is added to the conditions requiring throughput and VOC emissions monitoring and recording on a 12-month rolling basis.

Condition #004

The wording "annual compliance statement" is clarified to "Annual Emission Inventory."

Section G

The following minor sources are removed:

Top Dressing Area (RFD: 46-A01-2059)

Top Dressing Area (RFD: 46-A01-2060)

Tobacco Conditioning Area

Casing Kettles

Casing Dip Tank

Portable Casing Unit

Cutting and Steaming

Screening and Sizing Equipment

Humectant Application

(Finished)Product Storage Cleaner

(g) June 2016 APS:643805, AUTH: 1136103. The Operating Permit was amended to incorporate the requirements of Plan Approval 46-0200E for a new regenerative thermal oxidizer and a modified tobacco conditioning and flavoring process. In addition a fuel restriction was taken to operate the 350 hp boiler as a "gas-fired" boiler pursuant to Part 63 Subpart JJJJJJ.

The following changes in the Operating Permit were made with the amended permit. Condition numbers refer to the October 20, 2014 issuance of the Operating Permit.

Section A

FML02 was renamed #2 Fuel Oil Supply since the permanent fuel storage tank was removed.

The capacity was removed from Source ID 101.

Section C**Condition #003**

A condition was added that a more stringent particulate grain loading limit is applicable if established pursuant to BAT.

Condition #012

The standard facility monitoring condition was revised per current Department guidelines.

Section D**Source ID 034****Condition #008 (currently #010)**

The restriction was taken to operate the boiler as a "gas-fired boiler" as defined in 40 CFR Section 63.11237.

Conditions #002, #003 (currently #004, #005)

The references to 25 Pa. Code Sections 123.22(e)(1) and 123.11(a)(1) were removed and replaced with conditions containing the SO_x and PM emissions limitations of the regulations.

Source ID 035**Additional Emissions Restrictions Conditions**

The SO_x and PM limitations of 25 Pa. Code Sections 123.22(e)(1) and 123.11(a)(1) were included.

Conditions #017, #018, #019, #020, #026, #027, #028 were removed as no longer applicable with the "gas- only" restriction.

(h) The following changes were made to Plan Approval 46-0200E with the incorporation. Conditions refer to the April 30, 2015 issuance of the Plan Approval.

Section C

Condition #001 was combined with Section C Condition #003.

Conditions #002 and #003 were removed as redundant with the Operating Permit.

**SECTION H. Miscellaneous.**

Section D

Source IDs 102A, 103A, 201A, 208A, 301, 302, C01A, C04

PM was specified as PM (filterable) in conditions in which it appears.

Section D

Source ID 102A, 103A

Condition #004

and

Section E

Source ID 102A

Condition #001

The minimum RTO operating temperature was set as 1610 F.

A condition was included indicating that the Department may revise the minimum operating temperature pursuant to a compliant stack test for VOC and VOC destruction efficiency using Department approved methodology.

Section D

Source 102A

Condition #001

The VOC emissions limit was divided into stack emissions and fugitive emissions limits.

Condition #004(a), (c), (d)

The conditions were revised to specify that the flavor cylinder may operate when its emissions are sent to RTO 2, rather than RTO 1, in the alternate operation, indicated in Section E of the Operating Permit.

Section D

Source ID 103A

Additional Condition

A cyclone, which is associated with the rotary dryer included in the source, was noted and required to be operated when the rotary dryer is.

Section D

Source ID 400

Condition #001

The Source ID referenced was corrected.

Section D

Source ID C01A

Condition #004

*Stack testing was set as once in 5-years for normal operation.

*Stack testing in alternate configuration would be required if it was used 30% of the time or more in a 12-month rolling period.

*VOC were indicated to be expressed as the dominant expected component, or blend of 2 dominant components, based on primary operation of the dryers and upstream processing at the time of the stack test. The Department may approve an alternate formulation as the basis of the VOC determination.

Section D

Source ID C01A

Condition #017

and

Source ID C04

Source ID C01A

Condition #011 (now #012)

The minimum RTO operating temperature was set as 1610 F, or other minimum operating temperature set by the Department.

Source ID C01A

Condition #019

The Model No. of the RTO was updated to CP-101 6.4 RTO-95.

Source ID C04

Condition #003

**SECTION H. Miscellaneous.**

*Stack testing was set in a once in 5-year period for VOC and VOC destruction efficiency only, unless specifically requested by the Department.

* Conditions were added for a Department reviewed permanent total enclosure Method 204 verification with the stack testing for the current permit term.

* VOC shall be expressed as the dominant expected component, or blend of 2 dominant components, based on primary operation of the top dressing application and upstream processing at the time of the stack test. The Department may approve an alternate formulation as the basis of the VOC determination.

Additional Recordkeeping

A condition was added to require the keeping of any manufacturer information on replacement of thermocouples.

Condition #013 (now #014)

*The condition was revised to allow the following of manufacturer recommendations for thermocouple replacement, for consistency with RTO C01A.

Source IDs C05, C07**Condition #002**

*Stack testing for PM (filterable) was set for once in a 5-year period

(i) July 2016 APS: 643805 AUTH: 1147728

A Cover Page was issued, correcting the Issue Date of AUTH: 1136103.

(j) February 2017 APS: 643805, Auth: 1166733

The Operating Permit is opened for cause by the Department to remove No. 2 fuel oil as an approved fuel for the 350 hp boiler and both RTOs as the fuel oil tank was removed.

Requirements of 40 CFR Part 60 Subpart Dc and 25 Pa. Code Section 123.22 pertaining to the use of fuel oil were removed.

Emission limits were changed, were applicable, to reflect use of natural gas only from information provided with Plan Approvals 46-0200A and 46-0200E. SOx limits and associated monitoring and recordkeeping were removed from source requirements for sources for which minimal SOx emissions were calculated.

(k) The State Only Operating Permit No. 46-00200 (APS ID: 643805, AUTH ID: 1263183) was renewed.

(l) The State Only Operating Permit No. 46-00200 (APS ID: 643805, AUTH ID: 1444532) has been administratively amended to incorporate conditions from Plan Approval 46-0200E and to identify a change in the name and other information of the Responsible Official identified in the permit.



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