



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

**TITLE V/STATE OPERATING PERMIT**

Issue Date:	April 16, 2019	Effective Date:	November 2, 2023
Revision Date:	November 2, 2023	Expiration Date:	April 16, 2024
Revision Type:	Modification		

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

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

**TITLE V Permit No: 46-00299**

Federal Tax Id - Plant Code: 82-2997133

**Owner Information**

Name: INNOVATION 411 FEE OWNER LLC  
Mailing Address: 411 SWEDELAND RD  
KING OF PRUSSIA, PA 19406-2787

**Plant Information**

Plant: INNOVATION 411/UPPER MERION  
Location: 46 Montgomery County 46955 Upper Merion Township  
SIC Code: 6552 Fin, Ins & Real Est - Subdividers And Developers, Nec

**Operator**

Name: CBRE, INC [If different from owner]  
Mailing Address: 411 SWEDELAND RD  
KING OF PRUSSIA, PA 19406

**Responsible Official**

Name: RICHARD HEANY  
Title: PRESIDENT  
Phone: (610) 992 - 5864 Email: rheany@mlpventures.com

**Permit Contact Person**

Name: HOLLY ST. ONGE  
Title: GENERAL MANAGER  
Phone: (860) 549 - 6626 Email: Holly.StOnge@cbre.com

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



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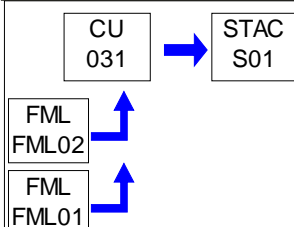
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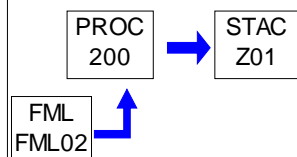
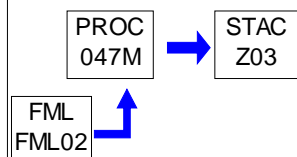
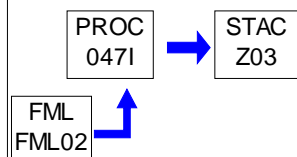
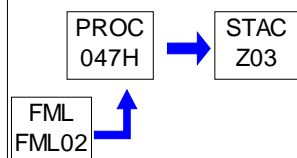
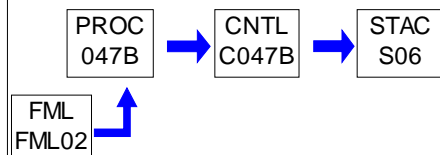
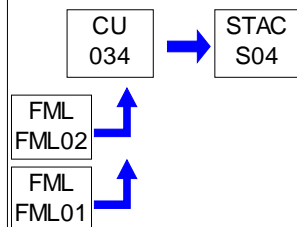
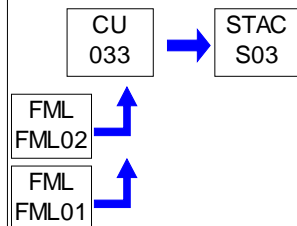
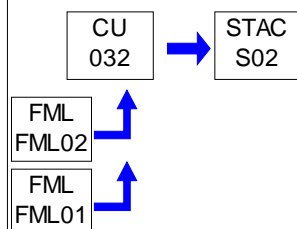
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	CLEAVER BROOKS BOILER 1 (BLDG 20)	25.000 MMBTU/HR	
		25.000 MCF/HR	Natural Gas
		N/A	#2 Oil
032	CLEAVER BROOKS BOILER 2 (BLDG 20)	49.000 MMBTU/HR	
		327.000 Gal/HR	#2 Oil
		49.000 MCF/HR	Natural Gas
033	CLEAVER BROOKS BOILER 3 (BLDG 20)	49.000 MMBTU/HR	
		327.000 Gal/HR	#2 Oil
		49.000 MCF/HR	Natural Gas
034	CLEAVER BROOKS BOILER 4 (BLDG 20)	25.000 MMBTU/HR	
		N/A	#2 Oil
		25.000 MCF/HR	Natural Gas
048	BOILER MACT FOR FUEL OIL BOILERS		
047B	THREE (3) DETROIT DIESEL GENERATORS (BLDG. 32)	15.500 MMBTU/HR	
		555.000 Gal/HR	#2 Oil
047H	BLDG. 24 1,500-KW EMERGENCY GENERATOR (GEN 24-1A)	N/A	#2 Oil
047I	BLDG. 24 750-KW EMERGENCY GENERATOR (GEN 24-1)	N/A	#2 Oil
047M	BLDG. 20 900-KW EMERGENCY GENERATOR (EG 20-1)	N/A	#2 Oil
200	FUEL OIL TANKS (TANK 2A, BLDG. 32 & TANK 7A, BLDG. 20)	N/A	NO. 2 FUEL OIL
C047B	BLDG. 32 EGEN CATALYSTS (3)		
FML01	NATURAL GAS		
FML02	#2 FUEL OIL		
S01	CB BOILER 1 STACK		
S02	CB BOILER 2 STACK		
S03	CB BOILER 3 STACK		
S04	CB BOILER 4 STACK		
S06	(3) DETROIT DIESEL NON-EMERGENCY GENERATORS STACKS		
Z01	FUEL OIL STORAGE TANK VENTS (BLDGS. 34 AND 20)		
Z03	NO. 2 OIL EMERGENCY GENERATORS STACKS		

**PERMIT MAPS**



## PERMIT MAPS





**PERMIT MAPS**

CNTL  
C047B



STAC  
S06

**SECTION B. General Title V Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

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

**#002 [25 Pa. Code § 121.7]****Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the act.

**#003 [25 Pa. Code § 127.512(c)(4)]****Property Rights**

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

**#004 [25 Pa. Code § 127.446(a) and (c)]****Permit Expiration**

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

**#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e), 127.503 & 127.704(b)]****Permit Renewal**

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.

(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

**#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]****Transfer of Ownership or Operational Control**

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

- (1) The Department determines that no other change in the permit is necessary;
- (2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by

**SECTION B. General Title V Requirements**

the Department.

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

**#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]****Inspection and Entry**

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

- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

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

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

**#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]****Compliance Requirements**

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

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

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

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

**#009 [25 Pa. Code § 127.512(c)(2)]****Need to Halt or Reduce Activity Not a Defense**

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



**SECTION B. General Title V Requirements****#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]****Duty to Provide Information**

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

**#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]****Reopening and Revising the Title V Permit for Cause**

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

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

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

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

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

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

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

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

**#012 [25 Pa. Code § 127.543]****Reopening a Title V Permit for Cause by EPA**

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

**#013 [25 Pa. Code § 127.522(a)]****Operating Permit Application Review by the EPA**

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

**SECTION B. General Title V Requirements****#014 [25 Pa. Code § 127.541]****Significant Operating Permit Modifications**

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

**#015 [25 Pa. Code §§ 121.1 & 127.462]****Minor Operating Permit Modifications**

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

**#016 [25 Pa. Code § 127.450]****Administrative Operating Permit Amendments**

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

**#017 [25 Pa. Code § 127.512(b)]****Severability Clause**

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

**#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]****Fee Payment**

(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). 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.

(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.

(c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.

**SECTION B. General Title V Requirements**

(d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

(e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.

- (1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.
- (2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.
- (3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

**#019 [25 Pa. Code §§ 127.14(b) & 127.449]****Authorization for De Minimis Emission Increases**

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

- (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

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

- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NO<sub>x</sub> from a single source during the term of the permit and 5 tons of NO<sub>x</sub> at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM<sub>10</sub> from a single source during the term of the permit and 3.0 tons of PM<sub>10</sub> at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

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

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
- (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

**SECTION B. General Title V Requirements**

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

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

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

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

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

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

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

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

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

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).

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

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

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

**#020 [25 Pa. Code §§ 127.11a & 127.215]****Reactivation of Sources**

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

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

**#021 [25 Pa. Code §§ 121.9 & 127.216]****Circumvention**

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the

**SECTION B. General Title V Requirements**

phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

**#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]****Submissions**

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager  
PA Department of Environmental Protection  
(At the address given on the permit transmittal letter, or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Enforcement & Compliance Assurance Division  
Air, RCRA and Toxics Branch (3ED21)  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2852

The Title V compliance certification shall be emailed to EPA at R3\_APD\_Permits@epa.gov.

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]****Sampling, Testing and Monitoring Procedures**

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

**#024 [25 Pa. Code §§ 127.511 & Chapter 135]****Recordkeeping Requirements**

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

- (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.

**SECTION B. General Title V Requirements**

(5) The results of the analyses.

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

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

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

**#025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]****Reporting Requirements**

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

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

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

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

**#026 [25 Pa. Code § 127.513]****Compliance Certification**

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

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

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3\_APD\_Permits@epa.gov.

**SECTION B. General Title V Requirements****#027 [25 Pa. Code § 127.3]****Operational Flexibility**

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

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

**#028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]****Risk Management**

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

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

- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
  - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
  - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

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

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

- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.



**SECTION B. General Title V Requirements**

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

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

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

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

**#029 [25 Pa. Code § 127.512(e)]****Approved Economic Incentives and Emission Trading Programs**

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

**#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]****Permit Shield**

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

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

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

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

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

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

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

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

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

**#031 [25 Pa. Code §135.3]****Reporting**

(a) 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 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.

**#032 [25 Pa. Code §135.4]****Report Format**

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;
- (g) blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting;
- (h) coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in 25 Pa. Code §§ 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations); and
- (i) sources and classes of sources other than those identified in (a)-(h), 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 minutes in any 1 hour; or
- (b) equal to or greater than 60% at any time.

**SECTION C. Site Level Requirements****# 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 either of the following instances:

- (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.
- (b) when the emission results from the sources specified in 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.**

- (a) The permittee must ensure the aggregate NOx emissions from this facility to not exceed 99.99 tons per year calculated as a 12-month rolling sum.
- (b) If the aggregate NOx emissions from this facility exceed the applicability threshold of 100.00 tons per year then the permittee will be subject to the provisions of 25 Pa. Code §§ 129.96 - 129.100.

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

The permittee shall limit the total facility wide HAP emissions to less than the following, calculated as a 12-month rolling sum:

- (a) less than 10 tons per year for any single HAP and
- (b) less than 25 tons per year for any combination of HAP's.

**# 009 [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; or
- (g) a fire set solely for cooking food.

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

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

**SECTION C. Site Level Requirements**

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

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139.139 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.

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

(a) The permittee shall submit one paper copy plus one electronic copy of 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 (mail and 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.

(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) Mail all paper submissions to both the PSIMS Administrator and the Air Quality Program Manager for the Southeast Regional Office. Mailing addresses are provided below.

Central Office  
 Pennsylvania Department of Environmental Protection  
 Attn: PSIMS Administrator  
 P.O. Box 8468  
 Harrisburg, PA 17105-8468

Southeast Region  
 Pennsylvania Department of Environmental Protection  
 Attn: Air Quality Program Manager  
 2 East Main Street  
 Norristown, PA 19401

(d) Eliminate shading, color ink for data emphasis, small font size, and color saturation as the scanning to create an electronic file is done in black and white. Shading and color emphasis do not scan well and make the electronic copies difficult to read.

(e) Email all electronic submissions to both the PSIMS Administrator in Central Office and the Air Quality Program Manager

**SECTION C. Site Level Requirements**

for the Southeast Regional Office. Email addresses are provided below.

Central Office  
RA-EPstacktesting@pa.gov

Southeast Region  
RA-EPSEstacktesting@pa.gov

(f) The Department limits emails to 15 MB and PSIMS has a file size limitation of 100 MB for electronic files. Submit just one electronic file (convert any Microsoft Word or Excel files to an Adobe PDF format and combine them with the report or protocol), unless the submission contains CONFIDENTIAL information.

(g) 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.****# 012 [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.

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

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

- (a) The permittee shall monitor the facility, once per 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.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification (if applicable), complaints, monitoring results, and/or Department findings.

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

- (a) The permittee shall monitor the facility wide aggregate NOx emissions on a monthly basis and as a 12-month rolling sum.

**SECTION C. Site Level Requirements**

(b) The permittee shall monitor the total facility wide HAP emissions on a monthly basis and as a 12-month rolling sum.

**IV. RECORDKEEPING REQUIREMENTS.****# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

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

- (a) date, time, and location of the incident(s);
- (b) the cause of the event; and
- (c) the corrective action taken, if necessary, to abate the situation and prevent future occurrences.

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

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

- (a) emissions increase of minor significance without notification to the Department.
- (b) de minimis increases with notification to the Department, via letter.
- (c) increases resulting from a Request for Determination (RFD) to the Department.
- (d) increases resulting from the issuance of a plan approval and subsequent operating permit.

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

- (a) The permittee shall calculate and maintain records of the total facility wide NO<sub>x</sub> emissions on a monthly basis and as a 12-month rolling sum.
- (b) The permittee shall calculate and maintain records of the total facility wide HAP emissions on a monthly basis and as a 12-month rolling sum.

**V. REPORTING REQUIREMENTS.****# 018 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

- (a) The permittee shall, within two (2) hours of discovery of any occurrence, notify the Department, at (484) 250-5920, of any malfunction of the source(s) or associated air pollution control devices listed in Section A, of this permit, which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit, or of a regulation contained in 25 Pa. Code Article III.
- (b) Malfunction(s) which occur at this facility, and pose(s) an imminent danger to public health, safety, welfare and the environment, and would violate permit conditions if the source were to continue to operate after the malfunction, shall immediately be reported to the Department by telephone at the above number.
- (c) A written report shall be submitted to the Department within two (2) working days following the notification of the incident, and shall describe the following:

**SECTION C. Site Level Requirements**

(1) The malfunction(s).

(2) The emission(s).

(3) The duration.

(4) Any corrective action taken.

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

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

The permittee shall submit the following:

(a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit. . The annual certificate of compliance shall be submitted to the Department in paper form, and EPA Region III in electronic form at the following email address: R3\_APD\_Permits@epa.gov

(b) A semi-annual deviation report, due by October 1, of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the obligation for the second deviation reporting period (July 1 through December 31 of the previous year).

**# 020 [25 Pa. Code §135.21]****Emission statements**

The permittee shall submit by March 1, of each year, an annual emission statement for the preceding calendar year.

**# 021 [25 Pa. Code §135.3]****Reporting**

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

If the permittee has been previously advised by the Department to submit a source report, the permittee shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from all 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, including those sources listed in the Miscellaneous Section of this permit.

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

**VI. WORK PRACTICE REQUIREMENTS.****# 022 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in 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; and

(d) prompt removal of earth or other material from paved streets onto which earth or other material has been transported by

**SECTION C. Site Level Requirements**

trucking or earth moving equipment, erosion by water, or by other means.

**# 023 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

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

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

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

The permittee may not modify any air contaminant system identified in this permit, prior to obtaining Department approval, except those modifications authorized by Condition #017(g), of Section B, of this permit.

**# 025 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

**# 026 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6]****Subpart A--General Provisions****Compliance with standards and maintenance requirements.**

Operation and maintenance requirements.

(a) At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.

(b) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan required.

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

**VII. ADDITIONAL REQUIREMENTS.****# 027 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Reporting address for client Compliance Certifications, NSPS, NESHAPs, MACT & federal standards (both Title V & State Only):

Associate Director, Office of Air Enforcement and Compliance Assistance (3AP20)

U.S. EPA, Region III

1650 Arch Street

Philadelphia, PA 19103-2029

Region III e-mail box for electronic compliance certifications: R3\_APD\_Permits@epa.gov

NSPS and MACT reports that are submitted electronically to EPA's Central Data Exchange: <https://cdx.epa.gov/>

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**# 028 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6580]**

**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

**What is the purpose of subpart ZZZZ?**

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations

**VIII. COMPLIANCE CERTIFICATION.**

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

**IX. COMPLIANCE SCHEDULE.**

No compliance milestones exist.

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



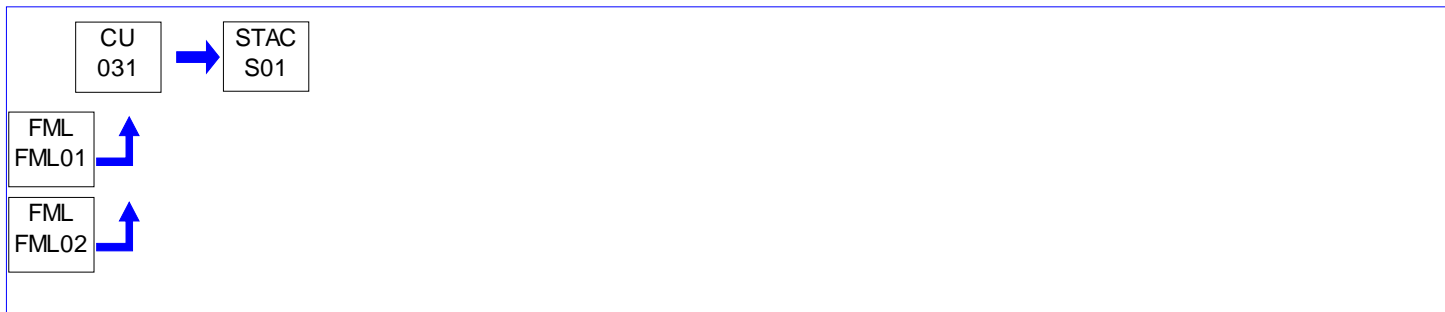
**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: CLEAVER BROOKS BOILER 1 (BLDG 20)

Source Capacity/Throughput:	25.000	MMBTU/HR	
	25.000	MCF/HR	Natural Gas
		N/A	#2 Oil

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

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.96 - 129.100]

The permittee shall ensure that the throughput of natural gas for the Cleaver Brooks 1 Boiler (Bldg. 20) shall not exceed 219,000 MCF per year, as a twelve (12) month rolling sum.

[Compliance with this fuel throughput limit assures compliance with the aggregate NOx emissions limit of 99.99 tons per 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 (Title V 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 (Title V 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 (Title V 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 (Title V 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

**# 002 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The Cleaver Brooks Boiler 1 (Bldg. 20) (Source ID: 031) is a dual fuel-fired (natural gas and No. 2 oil) boiler manufactured by Cleaver Brooks, model number: CB400-600, serial number: 1-75522. It is site designated as "BLR-20-1".

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

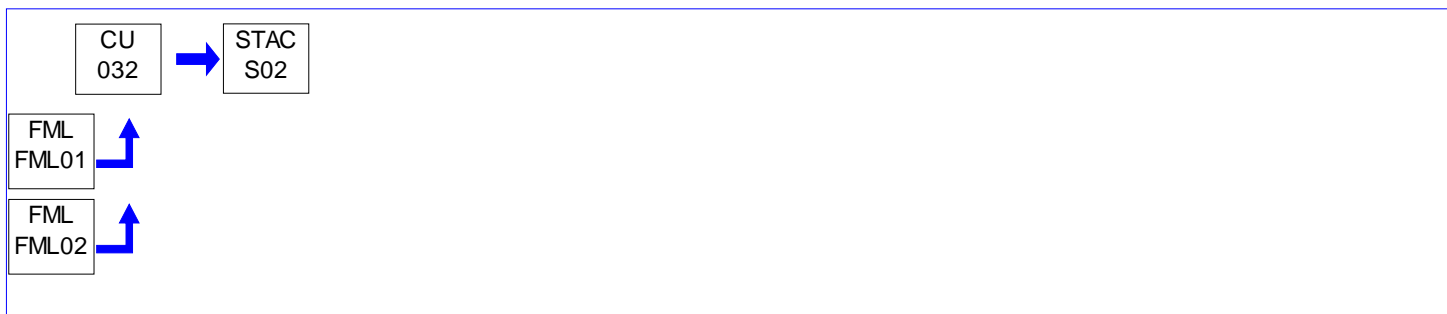
**SECTION D. Source Level Requirements**

Source ID: 032

Source Name: CLEAVER BROOKS BOILER 2 (BLDG 20)

Source Capacity/Throughput:	49.000	MMBTU/HR	
	327.000	Gal/HR	#2 Oil
	49.000	MCF/HR	Natural Gas

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91 - 129.95]

The permittee shall ensure that the fuel throughputs for the Cleaver Brooks Boiler 2 (Bldg. 20) (Source ID: 032) shall not exceed the following:

(a) The flow rate of the Number 2 fuel oil shall not exceed 327 gallons per hour.

(a) The flow rate of the natural gas shall not exceed 49,000 cubic feet per hour.

[Compliance with these fuel throughput limits assures compliance with the aggregate NOx emissions limit of 99.99 tons per 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 (Title V 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 (Title V 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 (Title V 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 (Title V 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

**# 002 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The Cleaver Brooks Boiler 2 (Bldg. 20) (Source ID: 032) is a dual fuel-fired (natural gas and No. 2 oil) boiler manufactured by Cleaver Brooks, model number: DL-52, unit number: WL-3085. It is site designated as "BLR-20-2".

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

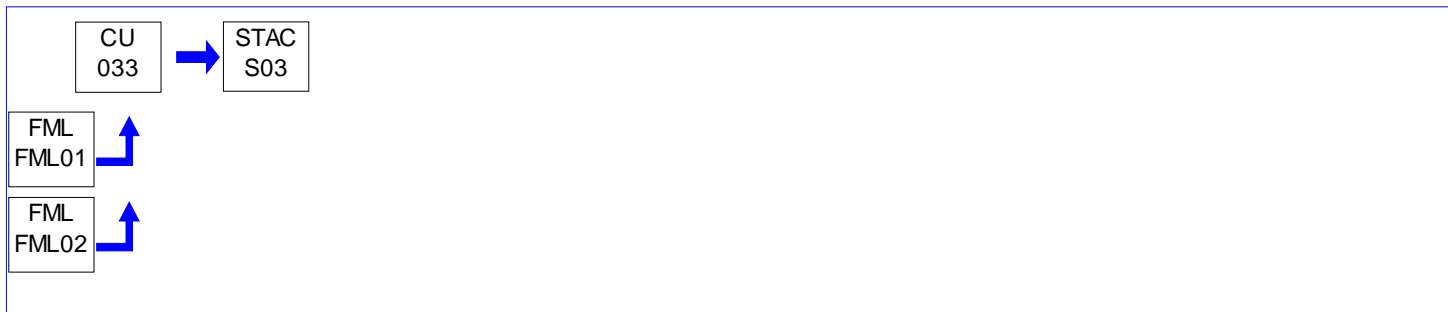
**SECTION D. Source Level Requirements**

Source ID: 033

Source Name: CLEAVER BROOKS BOILER 3 (BLDG 20)

Source Capacity/Throughput:	49.000	MMBTU/HR	
	327.000	Gal/HR	#2 Oil
	49.000	MCF/HR	Natural Gas

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91 - 129.95]

The permittee shall ensure that the fuel throughputs for the Cleaver Brooks Boiler 3 (Bldg. 20) (Source ID: 033) shall not exceed the following:

(a) The flow rate of Number 2 fuel oil shall not exceed 327 gallons per hour.

(a) The flow rate of the natural gas shall not exceed 49,000 cubic feet per hour.

[Compliance with these fuel throughput limits assures compliance with the aggregate NOx emissions limit of 99.99 tons per 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 (Title V 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 (Title V 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 (Title V 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 (Title V 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

**# 002 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The Cleaver Brooks Boiler 3 (Bldg. 20) (Source ID: 033) is a dual fuel-fired (natural gas and No. 2 oil) boiler manufactured by Cleaver Brooks, model number: DL-52, unit number: WL-3239. It is site designated as "BLR-20-3".

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

**SECTION D. Source Level Requirements**

Source ID: 034

Source Name: CLEAVER BROOKS BOILER 4 (BLDG 20)

Source Capacity/Throughput: 25.000 MMBTU/HR

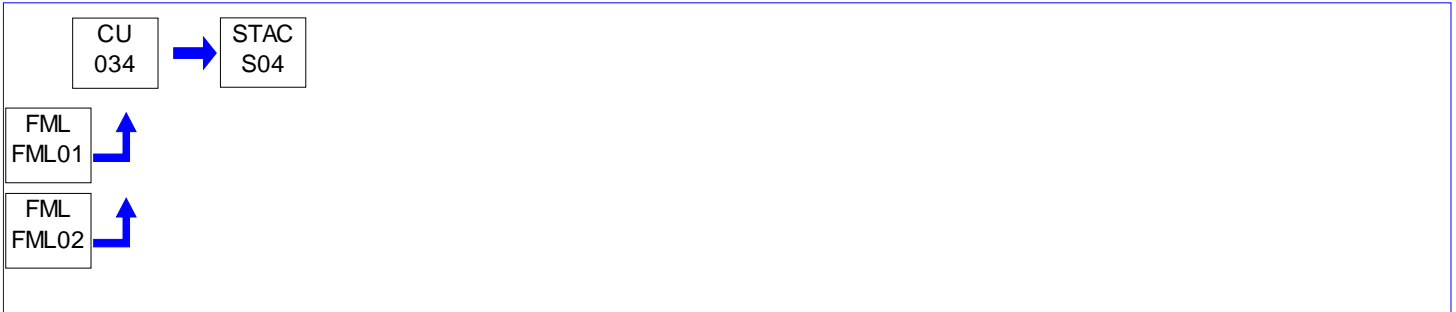
N/A

#2 Oil

25.000 MCF/HR

Natural Gas

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.96 - 129.100]

The permittee shall ensure that the fuel throughput for the Cleaver Brooks Boiler 4 (Bldg. 20) shall not exceed 219,000 MCF per year of natural gas, as a twelve (12) month rolling sum.

[Compliance with this fuel throughput limit assures compliance with the aggregate NOx emissions limit of 99.99 tons per 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 (Title V 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 (Title V 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 (Title V 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 (Title V 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

**# 002 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The Cleaver Brooks Boiler 4 (Bldg. 20) (Source ID: 032) is a dual fuel-fired (natural gas and No. 2 oil) boiler manufactured by Cleaver Brooks, model number: CB400-600, serial number: 1-78033. It is site designated as "BLR-20-4".

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



**SECTION D. Source Level Requirements**

Source ID: 048

Source Name: BOILER MACT FOR FUEL OIL BOILERS

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

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

[Additional Authority for this permit condition is also derived from 40 C.F.R. 63.11225(c)]

- (1) The permittee must keep a copy of each notification and report that is submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status submitted.
- (2) Keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 C.F.R. § 63.11214 and § 63.11223 as specified in paragraphs (2)(i) through (ii) of this condition.
  - (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
  - (ii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.
- (3) Keep records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- (4) Keep records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- (5) Keep records of all inspection and monitoring data required by § 63.11221 and 63.11222, and the information identified in paragraphs (i) through (vi) of this condition for each required inspection or monitoring.
  - (i) The date, place, and time of the monitoring event.
  - (ii) Person conducting the monitoring.
  - (iii) Technique or method used.
  - (iv) Operating conditions during the activity.
  - (v) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that monitoring indicated proper operation.
  - (vi) Maintenance or corrective action taken (if applicable).

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

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

**VI. WORK PRACTICE REQUIREMENTS.**

**# 002 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

[Additional Authority for this permit condition is also derived from 40 C.F.R. 63.11223(b)(1-7) and 63.11223(c)]

a. Boilers with an oxygen trim system that maintain an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up must conduct a tune-up of the boiler every 5 years as specified in paragraphs (1) through (7) of this condition. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up.

b. Existing oil-fired boilers with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio shall conduct an initial tune-up as specified in paragraphs (1) through (7) of this condition, and conduct a tune-up of the boiler biennially as specified in § 63.11223. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

(1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

(2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

(3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.

(4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

(5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

(6) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (6)(i) through (iii) of this condition.

(i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.

(ii) A description of any corrective actions taken as a part of the tune-up of the boiler.

(iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

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

The conditions listed under this Source ID: 048, (Boiler MACT for Fuel Oil Boilers) are applicable to Source IDs: 031 - 034.

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

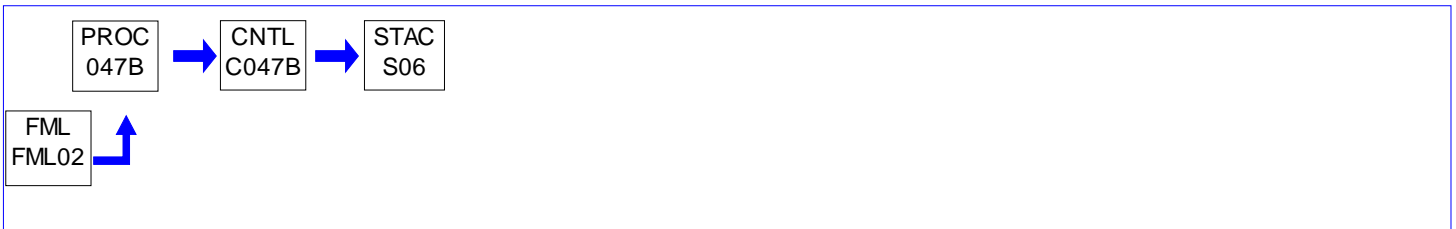
**SECTION D. Source Level Requirements**

Source ID: 047B

Source Name: THREE (3) DETROIT DIESEL GENERATORS (BLDG. 32)

Source Capacity/Throughput: 15.500 MMBTU/HR

555.000 Gal/HR #2 Oil

**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 any of the five (5) generators at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

**# 002 [25 Pa. Code §123.21]****General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from any of the five (5) generators in a manner that the concentration of the sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 ppmvd.

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

The total, combined pollutant emissions from the Five (5) Detroit Diesel Generators (Bldg. 32) (Source ID: 047B) shall not exceed the following limits:

NO<sub>x</sub>: 439 lbs/hr or 24.2 tons per year as a 12-month rolling sum.

CO: 181 lbs/hr or 9.96 tons per year as a 12-month rolling sum.

SO<sub>x</sub>: 23 lbs/hr or 1.27 tons per year as a 12-month rolling sum.

PM: 6.96 lbs/hr or 0.38 tons per year as a 12-month rolling sum.

NMHC: 3.64 lbs/hr or 0.20 tons per year as a 12-month rolling sum.

**# 004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6600]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of**

In accordance with 40 C.F.R. § 63.6606(d), Tables 2c, the permittee shall limit the concentration of CO in the stationary RICE exhaust to 23 ppmvd or less, corrected to 15% oxygen; or reduce CO emissions by 70 percent or more.

**Fuel Restriction(s).****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall ensure that only No. 2 fuel oil or diesel fuel shall be used for the Five (5) Detroit Diesel Generators (Bldg. 32).

(b) The permittee shall ensure that no reclaimed waste oil or other waste materials shall be added to the fuel.

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

The sulfur content of the No. 2 fuel oil or diesel fuel fired in the Five (5) Detroit Diesel Generators (Bldg. 32) engines shall not, at any time, exceed 15 ppm (by weight).

[Compliance with this condition assures compliance with 25 Pa. Code § 123.21]

**SECTION D. Source Level Requirements****# 007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6604]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What fuel requirements must I meet if I own or operate an existing stationary CI RICE?**

[Additional Authority for this permit condition is also derived from 40 C.F.R. Part 80 § 80.510(b)]

The permittee shall ensure that all diesel fuel complies with the following per-gallon standards:

1. Sulfur content less than 15 ppm

[Compliance with this condition assures compliance with 25 Pa. Code § 123.21]

2. Cetane index or aromatic content, as follows:
  - a. A minimum cetane index of 40; or
  - b. A maximum aromatic content of 35 volume percent.

**Throughput Restriction(s).****# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall ensure that the total No. 2 Fuel Oil usage for the Five (5) Detroit Diesel Generators (Bldg. 32) (Source ID: 047B) shall not exceed 555.0 gallons per hour.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.96 - 129.100]

(b) The permittee shall ensure that the total combined No. 2 Fuel Oil usage for the Five (5) Detroit Diesel Generators (Bldg. 32) (Source ID: 047B) shall not exceed 61,050 gallons per year, calculated as a 12-month rolling sum.

[Compliance with these fuel throughput limits assures compliance with the aggregate NOx emissions limit of 99.99 tons per year, as a 12-month rolling sum.]

**II. TESTING REQUIREMENTS.****# 009 [25 Pa. Code §139.16]****Sulfur in fuel oil.**

(a) The following are applicable to tests for the analysis of commercial fuel oil:

(1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).

(3) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

(b) The testing requirements in subpart (a), above, shall be waived in the event that a delivery receipt from the supplier, showing the maximum percent sulfur in the fuel, is obtained each time a fuel oil delivery is made.

**# 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6615]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****When must I conduct subsequent performance tests?**

[Additional Authority for this permit condition is also derived from 25 Pa. Code § 127.12b and 40 C.F.R. 63 § 63.6610]

(a) The permittee shall perform an initial performance test in accordance with 40 C.F.R. 63 Subpart ZZZZ, Table 4 no later

**SECTION D. Source Level Requirements**

than October 30, 2013.

(b) Subsequent performance testing in accordance with 40 C.F.R. Subpart ZZZZ, Table 3 (Item 4) shall be performed every 8760 operating hours or three (3) years, whichever comes first.

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

The permittee shall monitor and calculate the total, combined NO<sub>x</sub>, CO, SO<sub>x</sub>, PM and NMHC emissions from the Five (5) Detroit Diesel Generators (Bldg. 32) on a monthly basis and as a 12-month rolling sum.

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

The permittee shall monitor the operating hours and fuel usage for each of the Five (5) Detroit Diesel Generators (Bldg. 32) on a monthly basis, using a Department approved method.

**# 013 [25 Pa. Code §129.203]****Stationary internal combustion engines.**

(a) For stationary internal combustion engines rated greater than 1,000 horsepower, the permittee shall calculate the difference between the actual emissions from the unit during the period from May 1 through September 30 and the allowable emissions for that period.

(b) The permittee shall calculate allowable emissions by multiplying the cumulative hours of operations for the unit for the period by the horsepower rating of the unit and by the applicable emission rate set forth in paragraph (1).

(1) For a compression ignition stationary internal combustion engine firing diesel fuel or a combination of diesel fuel and natural gas, 2.3 grams of NO<sub>x</sub> per brake horsepower-hour.

**# 014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?**

The permittee shall monitor the following on a daily basis while each engine is operating:

(a) Collecting the catalyst inlet temperature data according to 40 C.F.R. 63 § 63.6625; and

(b) Measuring the pressure drop across the catalyst and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test.

**IV. RECORDKEEPING REQUIREMENTS.****# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain records of the operating hours of the Five (5) Detroit Diesel Generators (Bldg. 32) during PJM programs, as well as active load management (ALM), load shedding, emergency use, and while performing routine testing, repairs, and preventive maintenance activities to ensure compliance with the No. 2 fuel oil throughput limit of 61,050 gallons, as a 12-month rolling sum.

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

The permittee shall maintain records of the total, combined NO<sub>x</sub>, CO, SO<sub>x</sub>, PM and NMHC emissions from the Five (5) Detroit Diesel Generators (Bldg. 32) on a monthly basis and as a 12-month rolling sum.

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

**SECTION D. Source Level Requirements**

The permittee shall obtain from the fuel oil supplier, a delivery receipt that certifies the sulfur content, by weight, is less than or equal to 15 ppm and the receipt should show the cetane index or aromatic content, each time a delivery is made.

In the event that a delivery is made, and no receipt is obtained, the permittee shall perform testing in accordance with 25 Pa. Code § 139.16.

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

(a) When operating the permittee shall maintain records of the days and hours of operation, reason for operation, fuel usage, calculated on a monthly basis and as a 12-month rolling sum.

(b) The permittee shall maintain records of any inspections, adjustments and breakdowns.

**# 019 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What records must I keep?**

The permittee shall maintain records of the following:

(a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status.

(b) Records of the occurrence and duration of each malfunction of the control or monitoring equipment and the corrective action taken.

(c) Records of the fuel supplier receipts, indicating the sulfur content meets the requirements of 40 C.F.R. 80.510(b).

(d) Records of the maintenance conducted on the engine in order to demonstrate the engine and control device was operated and maintained in accordance with the manufacturer's specifications or the permittee's maintenance plan.

(e) Records of the performance test and test results.

(f) Records of the catalyst inlet temperature, and

(g) Records of the pressure drop across the catalyst.

**V. REPORTING REQUIREMENTS.****# 020 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6650]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What reports must I submit and when?**

[Additional Authority for this permit condition was also derived from 25 Pa. Code 127.12b and 40 C.F.R. 63, Subpart ZZZZ, Table 7]

(a) The first semi-annual compliance report shall be completed as part of the Permittee's Title V semi-annual deviation report and shall cover the period from the compliance date through the end of the calendar half (May 3, 2013 through June 30, 2013).

(1) The report shall contain the description of each malfunction, including the number, duration, and causes of deviations from an emission limit or operating limitation, and the corrective action taken. If no deviations occurred during the reporting period, the report must state this.

(b) Notification of performance tests and their results shall follow the same procedures as PADEP's stack testing guidelines.

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 021 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the Five (5) Detroit Diesel Generators (Bldg. 32) (Source ID: 047B) are only used during electrical power failures, electrical system/grid emergencies (as part of PJM's curtailment programs such as Reliability Pricing Model and Synchronized Reserve, as revised, their successor programs, and future PJM reserve programs) as well as active load management (ALM), load shedding, emergency use, and to perform routine testing, repairs, and preventive maintenance.

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

[Additional Authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-95]

- (a) The permittee shall operate and maintain these engines in accordance with the manufacturer's specifications.
- (b) The permittee shall install, operate and maintain the oxidation catalyst in accordance with the manufacturer's specifications.

**# 023 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that each of the Five (5) Detroit Diesel Generators (Bldg. 32) engines shall be controlled by an oxidation catalyst.

**# 024 [25 Pa. Code §129.204]****Emission accountability.**

- (a) The permittee shall determine actual emissions in accordance with one of the following:
  - (1) If the permittee is required to monitor NO<sub>x</sub> emissions with a CEMS operated and maintained in accordance with a permit or State or Federal regulation, the CEMS data reported to the Department to comply with the monitoring and reporting requirements of this article shall be used. Any data invalidated under Chapter 139 (relating to sampling and testing) shall be substituted with data calculated using the potential emission rate for the unit or, if approved by the Department in writing, an alternative amount of emissions that is more representative of actual emissions that occurred during the period of invalid data.
  - (2) If the permittee is not required to monitor NO<sub>x</sub> emissions with a CEMS, one of the following shall be used to determine actual emissions of NO<sub>x</sub>:
    - (i) The 1-year average emission rate calculated from the most recent permit emission limit compliance demonstration test data for NO<sub>x</sub>.
    - (ii) The maximum hourly allowable NO<sub>x</sub> emission rate contained in the permit or the higher of the following:
      - (A) The highest rate determined by use of the emission factor for the unit class contained in the most up-to date version of the EPA publication, "AP-42 Compilation of Air Pollution Emission Factors."
      - (B) The highest rate determined by use of the emission factor for the unit class contained in the most up-to date version of EPA's "Factor Information Retrieval (FIRE)" data system.
    - (iii) CEMS data, if the owner or operator elects to monitor NO<sub>x</sub> emissions with a CEMS. The owner or operator shall monitor emissions and report the data from the CEMS in accordance with Chapter 139 or Chapter 145 (relating to interstate pollution transport reduction). Any data invalidated under Chapter 139 shall be substituted with data calculated using the potential emission rate for the unit or, if approved by the Department in writing, an alternative amount of emissions that is more representative of actual emissions that occurred during the period of invalid data.
    - (iv) An alternate calculation and recordkeeping procedure based upon emissions testing and correlations with operating parameters. The operator of the unit shall demonstrate that the alternate procedure does not underestimate actual emissions throughout the allowable range of operating conditions. The alternate calculation and recordkeeping



**SECTION D. Source Level Requirements**

procedures must be approved by the Department, in writing, prior to implementation.

(b) The permittee shall surrender to the Department one CAIR NOx allowance and one CAIR NOx Ozone Season allowance, as defined in 40 CFR §§ 96.102 and 96.302 (relating to definitions), for each ton of NOx by which the combined actual emissions exceed the allowable emissions of the units subject to this section at a facility from May 1 through September 30. The surrendered NOx allowances shall be of current year vintage. For the purpose of determining the amount of allowances to surrender, any remaining fraction of a ton equal to or greater than 0.50 ton is deemed to equal 1 ton and any fraction of a ton less than 0.50 ton is deemed to equal zero tons.

(c) If the combined allowable emissions from units subject to this section at a facility from May 1 through September 30 exceed the combined actual emissions from units during the same period, the permittee may deduct the difference or any portion of the difference from the amount of actual emissions from units subject to this section at the permittee's other facilities.

(d) By November 1 of each year, the permittee shall surrender the required NOx allowances to the Department's designated NOx allowance tracking system account and provide to the Department, in writing, the following:

- (1) The serial number of each NOx allowance surrendered.
- (2) The calculations used to determine the quantity of NOx allowances required to be surrendered.

(e) If the permittee fails to comply with (e), above, the permittee shall by December 31 surrender three NOx allowances of the current or later year vintage for each NOx allowance that was required to be surrendered by November 1 of that year.

(f) The surrender of NOx allowances under (f), above, does not affect the liability of the permittee for any fine, penalty or assessment, or an obligation to comply with any other remedy for the same violation, under the CAA or the act.

(1) For purposes of determining the number of days of violation, if a facility has excess emissions for the period May 1 through September 30, each day in that period (153 days) constitutes a day in violation unless the permittee demonstrates that a lesser number of days should be considered.

- (2) Each ton of excess emissions is a separate violation.

**# 025 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6600]**

**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

**What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?**

In accordance with 40 C.F.R. § 63.6600(d), Table 2b, the permittee shall:

(a) Maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst that was measured during the initial performance test, except for periods of start up which may not exceed 30 minutes, and

(b) Maintain the temperature of your stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1350 °F, except for periods of start up which may not exceed 30 minutes.

**# 026 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6605]**

**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

**What are my general requirements for complying with this subpart?**

The engine must be in compliance with the requirements of Subpart ZZZZ at all times and must operate and maintain the source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

**SECTION D. Source Level Requirements****# 027 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What are my monitoring, installation, operation, and maintenance requirements?**

(a) The permittee shall minimize each engine's time spent at idle during startup, and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed thirty (30) minutes.

(b) The permittee must either install a closed crankcase ventilation system or install an open crankcase filtration emission control system on the engine. Manufacturer specified maintenance requirements must be followed or an alternate maintenance program can be proposed and approved by the Administrator.

**VII. ADDITIONAL REQUIREMENTS.****# 028 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The source group, Five (5) Detroit Diesel Generators (Bldg. 32), is comprised of the following diesel-fired non-emergency generator engines:

Unit	Model Number	Serial Number
32-GEN-01	743FSM4368	WA-501846-1095
32-GEN-02	743FSM4368	WA-499010-1195
32-GEN-03	743FSM4368	WA-501166-1095
32-GEN-04	743FSM4368	WA-501496-1095
32-GEN-05	743FSM4368	WA-501847-1095

(b) Each of the generator engines has an individual rated output power capacity of 1,600-kW (2,145.6-hp).

**# 029 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6585]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****Am I subject to this subpart?**

(a) The owner or operator of a stationary reciprocating internal combustion engine (RICE) at a major or area source of hazardous air pollutants (HAPs) is subjected to this regulation.

(b) Based on its potential to emit, Merion Innovation I & III LLC is an area or minor source of HAP emissions and the existing five (5) 1,600-kW diesel fuel-fired generators engines (Source ID: 047B) are subject to the provisions of 40 CFR § 63, Subpart ZZZZ.

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

**SECTION D. Source Level Requirements**

Source ID: 047H

Source Name: BLDG. 24 1,500-KW EMERGENCY GENERATOR (GEN 24-1A)

Source Capacity/Throughput:

N/A

#2 Oil

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

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall ensure the pollutant emissions from the Bldg. 24, 1,500-kW Emergency Generator (Source ID: 047H) shall not exceed the following:

- (1) Carbon Monoxide (CO): 1.15 tons per year as a 12-month rolling sum.
- (2) Particulate Matter (PM): 0.1 ton per year as a 12-month rolling sum.
- (3) Nitrogen Oxide (NOx): 3.82 tons per year as a 12-month rolling sum.

**Fuel Restriction(s).**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall only use non-road (NR) diesel fuel to fire this generator.

**Operation Hours Restriction(s).**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-129.95]

The permittee shall not operate the Bldg. 24, 1,500-kW Emergency Generator (Source ID: 047H) more than 500 hours per year as a twelve (12) month rolling sum.

[Compliance with this operating hour restriction limit assures compliance with the source-level pollutant emission limits in Condition #001]

[Compliance with this condition assures compliance with 25 Pa. Code § 129.97(c)(8)]

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

# 004 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall monitor and calculate the CO, PM and NOx emissions for the Bldg. 24, 1,500-kW Emergency Generator

**SECTION D. Source Level Requirements**

(Source ID: 047H) on a monthly basis and as a 12-month rolling sum.

**IV. RECORDKEEPING REQUIREMENTS.**

**# 005 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall maintain records of the CO, PM and NOx emissions for the Bldg. 24, 1,500-kW Emergency Generator (Source ID: 047H) on a monthly basis and as a 12-month rolling sum.

**V. REPORTING REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

**# 006 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The Bldg. 24, 1,500-kW Emergency Generator (Source ID: 047H) is manufactured by Caterpillar, model number 3512B, serial number 8830-21. The unit has a power output rating of 2,011.5-hp. The company's designation for this unit is GEN 24-1A.

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

**SECTION D. Source Level Requirements**

Source ID: 0471

Source Name: BLDG. 24 750-KW EMERGENCY GENERATOR (GEN 24-1)

Source Capacity/Throughput:

N/A

#2 Oil

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

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.96-129.100]

The permittee shall ensure that the nitrogen oxide (NOx) emissions from Bldg. 24, 750-kW Emergency Generator (Source ID: 0471) shall not exceed 3.0 tons per year as a twelve (12) month rolling sum.

[Compliance with this emission restriction limit assures compliance with the aggregate NOx emissions limit of 99.99 tons per year, as a 12-month rolling sum.]

**Fuel Restriction(s).**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall only use non-road (NR) diesel fuel to fire this generator.

**Operation Hours Restriction(s).**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-129.95]

The permittee shall not operate the Bldg. 24, 750-kW Emergency Generator (Source ID: 0471) more than 500 hours per year as a twelve (12) month rolling sum.

[Compliance with this operating hour restriction limit assures compliance with the aggregate NOx emissions limit of 99.99 tons per year, as a 12-month rolling sum.]

[Compliance with this condition assures compliance with 25 Pa. Code § 129.97(c)(8)]

**II. TESTING REQUIREMENTS.**

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

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

**# 004 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The Bldg. 24, 750-kW Emergency Generator (Source ID: 047I) is manufactured by Detroit Diesel, model number 8165-7407, serial number 8665133. The unit has a power output rating of 1,005.8-hp. The company's designation for this unit is GEN 24-1.

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

**SECTION D. Source Level Requirements**

Source ID: 047M

Source Name: BLDG. 20 900-KW EMERGENCY GENERATOR (EG 20-1)

Source Capacity/Throughput:

N/A

#2 Oil

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

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-129.95]

The permittee shall ensure that the nitrogen oxide (NOx) emissions from Bldg. 20, 900-kW Emergency Generator (Source ID: 047M) shall not exceed 3.0 tons per year as a twelve (12) month rolling sum.

[Compliance with this emission restriction limit assures compliance with the aggregate NOx emissions limit of 99.99 tons per year, as a 12-month rolling sum.]

**Fuel Restriction(s).**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall only use non-road (NR) diesel fuel to fire this generator.

**Operation Hours Restriction(s).**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91-129.95]

The permittee shall not operate the Bldg. 20, 900-kW Emergency Generator (Source ID: 047M) more than 500 hours per year as a twelve (12) month rolling sum.

[Compliance with this operating hour restriction limit assures compliance with the source-level pollutant emission limits in Condition #003]

[Compliance with this condition assures compliance with 25 Pa. Code § 129.97(c)(8)]

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

# 004 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall monitor the NOx emissions, in tons, for the Bldg. 20, 900-kW Emergency Generator (Source ID: 047M)

**SECTION D. Source Level Requirements**

on a monthly basis and as a 12-month rolling sum.

**IV. RECORDKEEPING REQUIREMENTS.**

**# 005 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall maintain records of the NOx emissions, in tons, for the Bldg. 20, 900-kW Emergency Generator (Source ID: 047M) on a monthly basis and as a 12-month rolling sum.

**V. REPORTING REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

**# 006 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The Bldg. 20, 900-kW Emergency Generator (Source ID: 047M) is manufactured by Spectrum Detroit Diesel, model number 900DS60, serial number 371000. The unit has a power output rating of 1,206.9-hp. The company's designation for this unit is EG 20-1.

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



**SECTION D. Source Level Requirements**

Source ID: 200

Source Name: FUEL OIL TANKS (TANK 2A, BLDG. 32 &amp; TANK 7A, BLDG. 20)

Source Capacity/Throughput:

N/A

NO. 2 FUEL OIL

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

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

The permittee shall limit the maximum throughput of fuel oil, for each of the following tanks:

- (a) Tank 2A (Bldg. 32): 65,000 gallons of No. 2 fuel oil per year, as a twelve (12) month rolling sum.
- (b) Tank 7A (Bldg. 20): 1,200,000 gallons of No. 2 fuel oil per year, as a twelve (12) month rolling sum.

**II. TESTING REQUIREMENTS.**

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

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

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

The permittee shall monitor the following of each tank:

- (a) the throughputs,
- (b) the type of fuel oil stored.

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

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

The permittee shall keep records of the following of each tank:

- (a) the throughputs on a twelve (12) month rolling basis,
- (b) the type of fuel oil stored and its true vapor pressure, and
- (c) the results of the inspections conducted.

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

[Additional authority for this permit condition is also derived from 40 CFR § 60.116(b)]

(a) The permittee shall keep records showing the dimension of each of the storage tanks and an analysis showing the capacity of each of the storage tanks.

(b) These records shall be readily accessible to the Department upon request.

**V. REPORTING REQUIREMENTS.**

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

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

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

The permittee shall conduct routine monthly inspections of each tank to ensure that there are no visible holes or leaks.

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

The source group is comprised of the following sources:

Tank 2A (Bldg. 32): 20,000 gallon (cap.) No. 2 fuel oil tank

Tank 7A (Bldg. 20): 29,800 gallon (cap.) No. 2 fuel storage tank

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

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 1

Group Description: Boiler Conditions

Sources included in this group

ID	Name
031	CLEAVER BROOKS BOILER 1 (BLDG 20)
032	CLEAVER BROOKS BOILER 2 (BLDG 20)
033	CLEAVER BROOKS BOILER 3 (BLDG 20)
034	CLEAVER BROOKS BOILER 4 (BLDG 20)

**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**

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO<sub>2</sub>, from any combustion unit, in the Southeast Air Basin, in excess of 1.0 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

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

The following condition applies to the following boilers:

- Cleaver Brooks Boiler #1 (Bldg. 20)
- Cleaver Brooks Boiler #2 (Bldg. 20)
- Cleaver Brooks Boiler #3 (Bldg. 20)
- Cleaver Brooks Boiler #4 (Bldg. 20)

(a) In the event that one of the boilers listed above experiences a malfunction such that the steam load is required to be replaced, then the company is allowed to install a rental boiler that is the same capacity, or less.

(b) The rental boiler shall combust the same type(s) of fuel or a more refined fuel oil as the boiler that it is replacing.

(c) The rental boiler is only authorized to operate for a maximum of six months.

(d) Sufficient data shall be recorded so that compliance with [this condition] can be determined. Records shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

(i) The company shall keep a record of the date and cause of the malfunction.

(ii) The company shall keep a record of the emissions from the rental boiler on a monthly basis.

(iii) The company shall keep a record of the number of days of operation of the rental boiler.

(e) The company shall notify the Department, by telephone at 484-250-5920, within 24 hours of a malfunction that requires obtaining a rental boiler. The company shall submit to the Department, within five working days, a written notification that a rental boiler has been temporarily installed. In addition, the written notification shall include the rated capacity of the rental boiler.

(f) The identity and capacity of the boiler that malfunctioned, the type of the fuel that the rental boiler will be combusting and the expected amount of time that the rental boiler will be on-site.

**SECTION E. Source Group Restrictions.**

(g) This rental boiler will be subject to Subpart Dc of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 40 CFR Section 60.4 requires submission of copies of all requests, reports, applications, submittals and other communications to both EPA and the Department. The EPA copies shall be forwarded to:

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

**Fuel Restriction(s).**

**# 004 [25 Pa. Code §123.22]**

**Combustion units**

(a) A person may not offer for sale, deliver for use, exchange in trade or permit the use of commercial fuel oil in a combustion unit in the Southeast Pennsylvania air basin if the commercial fuel oil contains sulfur in excess of 0.0015% by weight, sulfur content for No. 2 fuel oil, pursuant to 25 Pa. Code § 123.22(e)(2)(i), except as described in 25 Pa. Code § 123.22(e)(2)(ii) and (iii).

[Compliance with this condition assures compliance with 25 Pa. Code § 123.22(e)(1)]

(b) Commercial fuel oil that was stored in the Commonwealth by the ultimate consumer prior to September 1, 2020, which met the applicable maximum allowable sulfur content for commercial fuel oil through August 31, 2020, in subparagraph (a) at the time it was stored, may be used by the ultimate consumer in this Commonwealth on and after September 1, 2020.

**Throughput Restriction(s).**

**# 005 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.96 - 129.100]

The permittee shall ensure that the throughput of No. 2 fuel oil for the four (4) Cleaver Brooks boilers (Source ID(s): 031, 032, 033 and 034) shall not exceed 2,399,000 gallons per year, as a twelve (12) month rolling sum.

[Compliance with this fuel throughput limit assures compliance with the aggregate NOx emissions limit of 99.99 tons per year, as a twelve (12) month rolling sum.]

**II. TESTING REQUIREMENTS.**

**# 006 [25 Pa. Code §123.22]**

**Combustion units**

(a) The actual sulfur content of commercial fuel oil shall be determined:

(1) in accordance with the sample collection, test methods and procedures specified under 25 Pa. Code § 139.16 (relating to sulfur in fuel oil); or

(2) by other methods developed or approved by the Department or the Administrator of the EPA, or both.

(b) A person other than the ultimate consumer that accepts a shipment of commercial fuel oil from a refinery or other transferor, shall sample, test, and calculate the actual sulfur content of the commercial fuel oil in accordance with (a), above, if the shipment lacks the records required by 25 Pa. Code § 123.22(g)(1).

**# 007 [25 Pa. Code §139.16]**

**Sulfur in fuel oil.**

(a) The following are applicable to the analysis of commercial fuel oil:

(1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon

**SECTION E. Source Group Restrictions.**

the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) Test methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).

(3) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

(b) The requirements in subpart (a), above, shall be waived in the event that a delivery receipt from the supplier, showing the maximum percent sulfur in the fuel, is obtained each time a fuel oil delivery is made.

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

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

The permittee shall monitor the following this boiler:

(a) the hours of operation on a monthly basis,

(b) the amount and type of fuel consumed on a monthly basis and as a twelve (12) month rolling sum.

**IV. RECORDKEEPING REQUIREMENTS.****# 009 [25 Pa. Code §123.22]****Combustion units**

The permittee shall maintain in electronic or paper format the record provided by the transferor for the shipment of commercial fuel oil as it changed hands to the permittee (ultimate consumer). This record must legibly and conspicuously contain the following information, in accordance with 25 Pa. Code § 123.22(g)(1) and (5):

(a) The date of the sale or transfer.

(b) The name and address of the transferor.

(c) The name and address of the transferee.

(d) The volume of commercial fuel oil being sold or transferred.

(e) The identification of the sulfur content of the shipment of commercial fuel oil, determined using the sampling and testing methods specified in 25 Pa. Code § 123.22(f)(1) and § 139.16, expressed as the following statements for a shipment of No. 2 commercial fuel oil: "The sulfur content of this shipment is 15 ppm or below."

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

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

The permittee shall maintain records of the following this boiler:

(a) the hours of operation on a monthly basis,

(b) the amount and type of fuel consumed on a monthly basis and as a twelve (12) month rolling sum.

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

[Additional authority of this permit condition is also derived from 25 Pa. Code §§ 129.91-129.95]

The permittee shall maintain records of the annual tune-up for each boiler in a binder located on-site and/or in a equivalent electronic format, which include but not limited to:

(a) the date of the tuning procedure,

**SECTION E. Source Group Restrictions.**

- (b) the name of the service company and technicians,
- (c) the final operating rate or load,
- (d) the final CO and NOx emission rates, and
- (e) the final excess oxygen rate.

[Compliance with this condition assures compliance with 25 Pa. Code § 129.97(b)(1)]

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

The permittee shall maintain the following records of the following when this combustion unit burns No. 2 Fuel Oil:

- (a) The date and duration of burning No. 2 fuel oil, recorded in hours;
- (b) The reason for burning No. 2 fuel oil; and,
- (c) The hours per calendar year that No. 2 fuel oil was used for periodic testing of liquid fuels.

**V. REPORTING REQUIREMENTS.****# 013 [25 Pa. Code §139.16]****Sulfur in fuel oil.**

Results of the fuel oil sulfur test shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

**VI. WORK PRACTICE REQUIREMENTS.****# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

The permittee shall operate and maintain the boiler in accordance with manufacturer's specifications to maintain compliance with the sulfur oxides and particulate matter limitations.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91 - 129.95]

The permittee shall conduct an annual tune-up for each boiler associated with this Source ID which shall consist of the following:

[Compliance with this condition also assures compliance with 25 Pa. Code § 129.97(b)(1)]

- (a) Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
- (b) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of Nitrogen Oxides (NOx), and to the extent practicable, minimize the emissions of Carbon Monoxide (CO).
- (c) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91 - 129.95]

The permittee shall ensure that the emissions of the volatile organic compounds (VOC) shall be minimized by annual combustion tuning and/or good operating practices.

**SECTION E. Source Group Restrictions.****# 017 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.91 - 129.95]

The annual adjustment 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 in writing by the Department.

**VII. ADDITIONAL REQUIREMENTS.****# 018 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is also derived from 40 C.F.R. § 63.11193]

(a) In accordance with 40 C.F.R. § 63.11200, this boiler is categorized as "oil-fired", as long as it continues to operate in accordance with the definition of a "oil-fired boiler".

(b) Oil subcategory includes any boiler that burns any liquid fuel and is not in either the biomass or coal subcategories. Gas-fired boilers that burn liquid fuel only during periods of gas curtailment, gas supply interruptions, startups, or for periodic testing are not included in this definition. Periodic testing on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

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

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 2

Group Description: Bldg 20 &amp; 24 Emergency Generator Conditions

Sources included in this group

ID	Name
047H	BLDG. 24 1,500-KW EMERGENCY GENERATOR (GEN 24-1A)
047I	BLDG. 24 750-KW EMERGENCY GENERATOR (GEN 24-1)
047M	BLDG. 20 900-KW EMERGENCY GENERATOR (EG 20-1)

**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 at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

**# 002 [25 Pa. Code §123.21]****General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 ppmvd.

**II. TESTING REQUIREMENTS.****# 003 [25 Pa. Code §139.16]****Sulfur in fuel oil.**

(a) The following are applicable to the analysis of commercial fuel oil:

(1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) Test methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).

(b) The requirements in subpart (a), above, shall be waived in the event that a delivery receipt from the supplier, showing the maximum percent sulfur in the fuel, is obtained each time a fuel oil delivery is made.

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

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

The permittee shall monitor the amount of fuel consumed and the hours of operation for this generator on a monthly basis and as a 12-month rolling sum.

**# 005 [25 Pa. Code §129.203]****Stationary internal combustion engines.**

(a) For stationary internal combustion engines rated greater than 1,000 horsepower, the permittee shall calculate the difference between the actual emissions from the unit during the period from May 1 through September 30 and the allowable emissions for that period.

(b) The permittee shall calculate allowable emissions by multiplying the cumulative hours of operations for the unit for the period by the horsepower rating of the unit and by the applicable emission rate set forth in paragraph (1).

(1) For a compression ignition stationary internal combustion engine firing diesel fuel or a combination of diesel fuel and natural gas, 2.3 grams of NO<sub>x</sub> per brake horsepower-hour.



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

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

The permittee shall maintain records of the amount of fuel consumed and the hours of operation for this generator on a monthly basis and as a 12-month rolling sum.

**V. REPORTING REQUIREMENTS.**

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

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

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

The permittee shall operate and maintain this generator in accordance with manufacturer's specifications to maintain compliance with the emission limitations.

**# 008 [25 Pa. Code §129.204]****Emission accountability.**

(a) The permittee shall determine actual emissions in accordance with one of the following:

(1) If the permittee is required to monitor NO<sub>x</sub> emissions with a CEMS operated and maintained in accordance with a permit or State or Federal regulation, the CEMS data reported to the Department to comply with the monitoring and reporting requirements of this article shall be used. Any data invalidated under Chapter 139 (relating to sampling and testing) shall be substituted with data calculated using the potential emission rate for the unit or, if approved by the Department in writing, an alternative amount of emissions that is more representative of actual emissions that occurred during the period of invalid data.

(2) If the permittee is not required to monitor NO<sub>x</sub> emissions with a CEMS, one of the following shall be used to determine actual emissions of NO<sub>x</sub>:

(i) The 1-year average emission rate calculated from the most recent permit emission limit compliance demonstration test data for NO<sub>x</sub>.

(ii) The maximum hourly allowable NO<sub>x</sub> emission rate contained in the permit or the higher of the following:

(A) The highest rate determined by use of the emission factor for the unit class contained in the most up-to date version of the EPA publication, "AP-42 Compilation of Air Pollution Emission Factors."

(B) The highest rate determined by use of the emission factor for the unit class contained in the most up-to date version of EPA's "Factor Information Retrieval (FIRE)" data system.

(iii) CEMS data, if the owner or operator elects to monitor NO<sub>x</sub> emissions with a CEMS. The owner or operator shall monitor emissions and report the data from the CEMS in accordance with Chapter 139 or Chapter 145 (relating to interstate pollution transport reduction). Any data invalidated under Chapter 139 shall be substituted with data calculated using the potential emission rate for the unit or, if approved by the Department in writing, an alternative amount of emissions that is more representative of actual emissions that occurred during the period of invalid data.

(iv) An alternate calculation and recordkeeping procedure based upon emissions testing and correlations with operating parameters. The operator of the unit shall demonstrate that the alternate procedure does not underestimate actual emissions throughout the allowable range of operating conditions. The alternate calculation and recordkeeping procedures must be approved by the Department, in writing, prior to implementation.

(b) The permittee shall surrender to the Department one CAIR NO<sub>x</sub> allowance and one CAIR NO<sub>x</sub> Ozone Season allowance,

**SECTION E. Source Group Restrictions.**

as defined in 40 CFR §§ 96.102 and 96.302 (relating to definitions), for each ton of NO<sub>x</sub> by which the combined actual emissions exceed the allowable emissions of the units subject to this section at a facility from May 1 through September 30. The surrendered NO<sub>x</sub> allowances shall be of current year vintage. For the purpose of determining the amount of allowances to surrender, any remaining fraction of a ton equal to or greater than 0.50 ton is deemed to equal 1 ton and any fraction of a ton less than 0.50 ton is deemed to equal zero tons.

(c) If the combined allowable emissions from units subject to this section at a facility from May 1 through September 30 exceed the combined actual emissions from units during the same period, the permittee may deduct the difference or any portion of the difference from the amount of actual emissions from units subject to this section at the permittee's other facilities.

(d) By November 1 of each year, the permittee shall surrender the required NO<sub>x</sub> allowances to the Department's designated NO<sub>x</sub> allowance tracking system account and provide to the Department, in writing, the following:

(1) The serial number of each NO<sub>x</sub> allowance surrendered.

(2) The calculations used to determine the quantity of NO<sub>x</sub> allowances required to be surrendered.

(e) If the permittee fails to comply with (e), above, the permittee shall by December 31 surrender three NO<sub>x</sub> allowances of the current or later year vintage for each NO<sub>x</sub> allowance that was required to be surrendered by November 1 of that year.

(f) The surrender of NO<sub>x</sub> allowances under (f), above, does not affect the liability of the permittee for any fine, penalty or assessment, or an obligation to comply with any other remedy for the same violation, under the CAA or the act.

(1) For purposes of determining the number of days of violation, if a facility has excess emissions for the period May 1 through September 30, each day in that period (153 days) constitutes a day in violation unless the permittee demonstrates that a lesser number of days should be considered.

(2) Each ton of excess emissions is a separate violation.

**VII. ADDITIONAL REQUIREMENTS.****# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart ZZZZ Table 2d]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions**

The owner or operator of existing emergency stationary CI RICE located at area sources of HAP emissions must meet the following requirement:

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

(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and

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

[Note: Sources have the option to utilize an oil analysis program as described in 40 CFR §§ 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.]

**# 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6585]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****Am I subject to this subpart?**

(a) The owner or operator of a stationary reciprocating internal combustion engine (RICE) at a major or area source of hazardous air pollutants (HAPs) is subjected to this regulation.

(b) Based on its potential to emit, Merion Innovation I & III LLC is an area or minor source of HAP emissions and the existing emergency generator engine is subject to the provisions of 40 CFR § 63, Subpart ZZZZ.

**SECTION E. Source Group Restrictions.****# 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6603]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?**

The owner or operator of an existing stationary RICE located at an area source of HAP emissions must comply with the requirements in Table 2d to Subpart ZZZZ and the operating limitations in Table 2b to Subpart ZZZZ that apply to you.

**# 012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6605]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What are my general requirements for complying with this subpart?**

(a) The owner or operator of a stationary RICE must be in compliance with the applicable emission limitations and operating limitations in this subpart that apply at all times.

(b) At all times the owner or operator of a stationary RICE must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

(c) The determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**# 013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What are my monitoring, installation, operation, and maintenance requirements?**

The owner or operator of an existing emergency stationary RICE located at an area source of HAP emissions must:

(1) Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions,

(2) Install a non-resettable hour meter if one is not already installed.

**# 014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?**

(a) The permittee shall operate the emergency stationary R.I.C.E. according to the requirements in the most recent version of 40 C.F.R. Section 63.6640(f).

(b) If the permittee does not operate the engine according to the requirements of 40 C.F.R. Section 63.6640(f), the engine will not be considered an emergency engine under 40 C.F.R. Part 63 Subpart ZZZZ and must meet all requirements for non-emergency engines.

**# 015 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What records must I keep?**

(a) The owner or operator of an existing stationary RICE located at an area source of HAP emissions must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter.

(b) The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

**SECTION E. Source Group Restrictions.**

(c) The owner or operator of an existing stationary RICE must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the unit and any after-treatment control device was operated and maintained according to your own maintenance plan.

**# 016 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6660]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****In what form and how long must I keep my records?**

The owner or operator must keep each record readily accessible in hard copy or electronic form for at least five (5) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR § 63.10(b)(1).

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



## SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Descriptor		
031	CLEAVER BROOKS BOILER 1 (BLDG 20)		
<b>Emission Limit</b>			
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU	particulate matter	TSP
032	CLEAVER BROOKS BOILER 2 (BLDG 20)		
<b>Emission Limit</b>			
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU	particulate matter	TSP
033	CLEAVER BROOKS BOILER 3 (BLDG 20)		
<b>Emission Limit</b>			
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU	particulate matter	TSP
034	CLEAVER BROOKS BOILER 4 (BLDG 20)		
<b>Emission Limit</b>			
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU	particulate matter	TSP
047B	THREE (3) DETROIT DIESEL GENERATORS (BLDG. 32)		
<b>Emission Limit</b>			
9.960	Tons/Yr	12-month rolling sum	CO
23.000	PPMV	dry, correct 15% Oxygen	CO
181.000	Lbs/Hr	combined 5 Egens	CO
0.200	Tons/Yr	12-month rolling sum	NMHC
3.640	Lbs/Hr	combined 5 Egens	NMHC
24.200	Tons/Yr	12-month rolling sum	NOX
439.000	Lbs/Hr	combined 5 Egens	NOX
1.270	Tons/Yr	12-month rolling sum	SOX
23.000	Lbs/Hr	combined 5 Egens	SOX
500.000	PPMV	dry basis	SOX
0.040	gr/DRY FT3	particulate matter	TSP
0.380	Tons/Yr	12-month rolling sum	TSP
6.960	Lbs/Hr	combined 5 Egens	TSP
047H	BLDG. 24 1,500-KW EMERGENCY GENERATOR (GEN 24-1A)		
<b>Emission Limit</b>			
1.150	Tons/Yr	12-month rolling sum	CO
3.820	Tons/Yr	12-month rolling sum	NOX
500.000	PPMV	dry basis	SOX
0.040	gr/DRY FT3	particulate matter	TSP
0.100	Tons/Yr	12-month rolling sum	TSP

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
047I	BLDG. 24 750-KW EMERGENCY GENERATOR (GEN 24-1)		
Emission Limit		Pollutant	
3.000 Tons/Yr	12-month rolling sum	NOX	
500.000 PPMV	dry basis	SOX	
0.040 gr/DRY FT3	particulate matter	TSP	
047M	BLDG. 20 900-KW EMERGENCY GENERATOR (EG 20-1)		
Emission Limit		Pollutant	
3.000 Tons/Yr	12-month rolling sum	NOX	
500.000 PPMV	dry basis	SOX	
0.040 gr/DRY FT3	particulate matter	TSP	

**Site Emission Restriction Summary**

Emission Limit		Pollutant
99.990 Tons/Yr	12-month rolling sum	NOX
10.000 Tons/Yr	any single HAP	Hazardous Air Pollutants
25.000 Tons/Yr	total combined HAPs	Hazardous Air Pollutants

**SECTION H. Miscellaneous.**

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

- (1) Miscellaneous storage tanks containing:
- (2) No. 2 Fuel Oil tanks with capacity less than 5,000 gallons
- (3) Phosphoric Acid Sodium Molybdate
- (4) Sylther/Dowtherm
- (5) Aqueous Waste
- (6) Sulfuric acid, or NaH<sub>2</sub>SO<sub>4</sub>
- (7) Sodium hydroxide, or NaOH
- (8) Miscellaneous (non-VOC) substances
- (9) Sources that use regulated amounts of CFCs
- (10) 1,850 Gallon Aboveground Hydrochloric Acid Tank (T6A)
- (11) Bench-scale laboratory equipment used for kinetic studies, mass/energy transport studies, chemical synthesis and physical or chemical analysis, which may or may not be handled in laboratory fume hoods

(b) The following previously issued operating permit serve as the basis for certain terms and conditions set forth in this Title V Permit:

- (1) OP 46-00035, 46-313-114 (revised 8/29/01),
- (2) 46-399-093 (revised 8/29/01)
- (3) 46-313-131
- (4) 46-313-113.

(c) The Department has approved the Reporting Schedule below:

**COMPLIANCE CERTIFICATION**

	Due Date	Period of Coverage
Initial Submission	12/28/2002	2/1/2002 to 11/30/2002
Second Submission	12/28/2003	12/1/2002 to 11/30/2003

(Follow the same schedule until permit is renewed)

**REPORTING OF DEVIATIONS**

	Due Date	Period of Coverage
Initial Submission	7/1/2002	2/1/2002 to 5/30/2002
Second Submission	12/28/2002	6/1/2002 to 11/30/2002
Third Submission	7/1/2003	12/1/2002 to 5/30/2003
Fourth Submission	12/28/2003	6/1/2003 to 11/30/2003

(Follow the same schedule until permit is renewed)

(d) 11/06/13, APS: 346698, AUTH: 959005, Renewal with the following changes:

(1) Incorporated applicable regulations from 40 C.F.R. 60 Subpart IIII, 40 C.F.R. 63 Subpart ZZZZ and 40 C.F.R. 63 Subpart DDDDD to appropriate sources.

(2) Source ID 044 (Clever Brook 5, bldg 5) and Source ID 045 (Clever Brook 6, bldg 5) each boiler rated at 10.5 MMBTU/HR, were permanently shutdown and the source ID's were removed from the permit.

(3) The following generators that were listed under Source ID 047A have been removed:

- (i) Penske emergency generator 3-1 identified as 047A
- (ii) Penske emergency generator 3-2 identified as 047B
- (iii) Caterpillar emergency generator 38-1 identified as 047j
- (iv) Onan emergency generator, 150 kW at bldg 17 was replaced with a Onan 100 kW

(4) The following generators were added to Source ID 047A through an RFD:

- (i) Emergency generator 38-3, bldg 38, 1500 kW, RFD # 1834
- (ii) Caterpillar emergency generator 3-3, bldg 3, 2500 kW, RFD # 1245



**SECTION H. Miscellaneous.**

- (e) 12/04/13, APS: 346698, AUTH: 1049370, Amendment to incorporate PA 46-0035H for installation of oxidation catalyst on five existing emergency generators - Source ID 047B and remove the 110 hr/yr limit on each generator into an annual fuel usage limit; also increased the throughput of diesel/No. 2 fuel oil in Tank 2A from 25,000 to 65,000 gal/yr.
- (f) 04/02/15, APS: 346698, AUTH: 1061358, minor modification established a site wide HAP emission limit of less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPS calculated on a 12-month rolling sum. By taking this limit, GSK is now an Area Source for HAPS not a Major Source. Therefore, all references to 40 C.F.R. 63 Subpart DDDDD have been removed from the permit.
- (1) By removing all conditions for the boilers pertaining to 40 C.F.R. 63 Subpart DDDDD, the boilers are now subject to the applicable requirements in 40 C.F.R. 63 Subpart JJJJJ for an Area Source of HAP's.
- (g) 04/05/16, APS: 346698, AUTH: 1130230, Modified to remove 3 underground storage tanks from Source ID 200 (Tanks 7, 8 and 9) and install a new above ground storage tank (Tank 7A) approved under RFD # 5208 on August 14, 2015. Source ID 200 was renamed from Fuel Oil Storage Tanks (5) to Fuel Oil Storage Tanks (3).
- (h) 12/01/16, APS: 346698, AUTH: 114510, Modification to add a facility wide NOx emission limit not to exceed 99.99 tons per year in lieu of conducting a presumptive or case-by-case RACT II analysis at this site.
- (i) 02/01/17, APS: 346698, AUTH:1161663, Significant Modification to incorporate 40 CFR Part 63 Subpart GGG regulations.
- (j) The Title V Operating Permit No. 46-00299 (APS ID: 946860, AUTH ID: 1222947) was issued to GlaxoSmithKline LLC (Upper Merion - West).
- (k) Specifically, for each ozone season beginning after January 1, 2015, the Department intends to accept the surrender of annual and ozone season TR NOx allowances as a compliance alternative to the surrender of annual and ozone season CAIR NOx allowances if the TR allowances are surrendered for compliance purposes in a manner consistent with the surrender provisions for CAIR allowances set forth in the applicable sections specified in this notice. The Department consulted with staff in the United States Environmental Protection Agency (EPA) Region III Office in developing an alternative allowance surrender approach for compliance with the applicable SIP-approved requirements. To this end, the EPA has confirmed, in writing, that TR NOx allowances may be surrendered as set forth in the applicable regulations in 25 Pa. Code Chapters 129 and 145. A detailed notice was published in the PA bulletin on April 4, 2015 [45 Pa.B. 1687]
- (l) The Title V Operating Permit 46-00299 (APS ID: 980782, AUTH ID: 1251715) has been issued as an administrative amendment for the change of ownership (COO) for Merion Innovation I LLC & Merion Innovation III LLC.
- (m) The Title V Operating Permit 46-00299 (APS ID: 1029872, AUTH ID: 1338674) has been issued as administrative amendment for the change of ownership (COO) for Innovation 411 Fee Owner LLC.
- (n) The Title V Operating Permit 46-00299 (APS ID: 980782, Auth ID: 1456195) had been modified to allow the conversion of the four existing boilers (Source ID(s) 031, 032, 033 and 034) from burning natural gas/No. 6 fuel oil to burning natural gas/No. 2 fuel oil.



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

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