

# **RACT III PROPOSAL**

## **Initial Notification & Case-by-Case RACT Proposal**

**Silberline Manufacturing Co Inc / Lincoln Dr Plant**

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# TABLE OF CONTENTS

<b>1. EXECUTIVE SUMMARY</b>	<b>1-1</b>
<b>2. INITIAL NOTIFICATION</b>	<b>2-1</b>
2.1 Emission Unit and RACT III Compliance Strategy .....	2-1
2.2 Source Descriptions and Applicable Limits .....	2-2
2.2.1 Source ID 101: Milling/Screening .....	2-2
2.2.2 Source ID 102: Filter Presses.....	2-2
2.2.3 Source ID 103: Mixing And Loadout Process .....	2-3
2.2.4 Source ID 104: Vacuum Distillation Of Used Solvent.....	2-3
2.2.5 Source ID 105: Mineral Spirit Storage Tanks .....	2-3
2.2.6 Source ID 106: Large Boiler.....	2-3
2.2.7 Source ID 107: Small Boiler .....	2-4
2.2.8 Source ID GEN 1: Emergency Generator 1.....	2-4
2.3 Actual VOC Emissions .....	2-4
<b>3. CASE-BY-CASE RACT ANALYSIS</b>	<b>3-1</b>
3.1 Case-by-Case RACT Determination.....	3-1
3.2 Top-Down Methodology.....	3-2
3.2.1 Step 1: Identify All Control Technologies .....	3-2
3.2.2 Step 2: Eliminate Technically Infeasible Options.....	3-2
3.2.3 Step 3: Rank Remaining Control Technologies by Control Effectiveness .....	3-2
3.2.4 Step 4: Evaluate Most Effective Controls and Document Results .....	3-2
3.2.5 Step 5: Select RACT.....	3-3
3.3 VOC RACT Assessment for Source ID 101 and 102.....	3-3
3.3.1 Step 1: Identify All Control Technologies for VOC.....	3-4
3.3.2 Review of Potentially Applicable VOC Control Technologies .....	3-4
3.3.3 Step 2: Eliminate Technically Infeasible Options for VOC Control.....	3-4
3.3.4 Step 3: Rank Remaining Control Technologies by Control Effectiveness .....	3-5
3.3.5 Step 4: Evaluate Most Effective Controls and Document Results .....	3-5
3.3.6 Step 5: Select RACT.....	3-5
<b>4. RACT PROPOSAL</b>	<b>4-1</b>
<b>APPENDIX A. RBLC SEARCH</b>	<b>A-1</b>
<b>APPENDIX B. CASE-BY-CASE COST EFFECTIVENESS ANALYSES</b>	<b>B-1</b>
<b>APPENDIX C. TITLE V SIGNIFICANT MODIFICATION FORMS</b>	<b>C-1</b>
<b>APPENDIX D. COMPLIANCE REVIEW FORM</b>	<b>D-1</b>
<b>APPENDIX E. MUNICIPAL NOTIFICATIONS</b>	<b>E-1</b>
<b>APPENDIX F. AIR QUALITY FEE SCHEDULE</b>	<b>F-1</b>
<b>APPENDIX G. GENERAL INFORMATION FORM</b>	<b>G-2</b>

# 1. EXECUTIVE SUMMARY

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Silberline Manufacturing Co Inc (Silberline) owns and operates the Lincoln Drive aluminum pigment manufacturing facility (Lincoln Drive Facility) in Rush Township, Schuylkill County, Pennsylvania. The Lincoln Drive Facility is currently permitted under Title V Operating Permit #54-00041, issued on March 20, 2019 and revised March 16, 2020. The facility is a major VOC emitting facility and minor NO<sub>x</sub> emitting facility as defined in Title 25 of the Pennsylvania Code, Chapter 121.1 (25 Pa Code 121.1).

The Pennsylvania Department of Environmental Protection (PADEP) published 25 Pa Code, Chapter 129: Additional RACT Requirements for Major Sources of NO<sub>x</sub> and VOCs for the 2015 Ozone NAAQS (the "RACT III Rule") in the Pennsylvania Bulletin on November 12, 2022 (52 Pennsylvania Bulletin 6960). RACT is defined in 25 Pa Code 121.1 as "the lowest emission limit for VOC or NO<sub>x</sub> that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility." The RACT III standards apply to existing major NO<sub>x</sub> and major VOC emitting facilities throughout Pennsylvania. Existing major facilities include those facilities which are major sources of NO<sub>x</sub> and/or VOC that commenced operation on or before August 3, 2018, and existing minor facilities which become major sources of NO<sub>x</sub> and/or VOC after August 3, 2018. The RACT III Regulation provides three options for compliance, as applicable:

- ▶ Compliance Option 1: Presumptive RACT pursuant to 25 Pa Code §129.112;
- ▶ Compliance Option 2: Facility-wide or system-wide NO<sub>x</sub> averaging pursuant to 25 Pa Code §129.113; and
- ▶ Compliance Option 3: Alternative RACT proposal pursuant to 25 Pa Code §129.114.

Silberline is submitting this application to satisfy all notification and reporting requirements required for the Lincoln Drive Facility per 25 Pa Code, Chapter 129: Additional RACT Requirements for Major Sources of NO<sub>x</sub> and VOCs for the 2015 Ozone NAAQS (the "RACT III Rule").

As part of this report, Lincoln Drive is submitting a Case-by-Case RACT analysis for Source IDs 101 (Milling & Screening) and 102 (Filter Press). These are processes at the facility that produce aluminum pigment from ball milling, screening, and filter pressing. A RACT II Case-by-Case analysis was submitted for these units in February 2020 in which it was determined that RACT for the units was to install, maintain and operate these sources in accordance with manufacturers specifications and good air pollution control practices.

No presumptive limits for these sources were determined per RACT II. Additionally, cost analyses for certain controls during the RACT II evaluation did not yield costs per ton VOC above \$12,000. For this reason, Silberline is submitting a Case-by-Case analysis per Section 129.114(d) for source IDs 101 and 102 (including the Mini System). The case-by-Case analysis used can be found in Section 3 of this report.

This application report is organized into the following sections to address the appropriate requirements:

- ▶ Section 2 – Initial Notification
- ▶ Section 3 – Case-by-Case RACT Analysis
- ▶ Section 4 – RACT Proposal

The following attachments are enclosed with this application:

- ▶ Appendix A – RBLC Search Results

- ▶ Appendix B – Cost Effectiveness Analyses
- ▶ Appendix C – Significant Operating Permit Modification Title V Application Forms
- ▶ Appendix D – Compliance Review Form
- ▶ Appendix E – Municipal Notifications
- ▶ Appendix F – Air Quality Fee Schedule
- ▶ Appendix G – General Information Form

The required \$4,000 Title V Significant Modification fee will be submitted to the Department under a separate cover.

## 2. INITIAL NOTIFICATION

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This section of the report serves as the written notification, specified in 25 Pa Code §129.115(a), that describes how Lincoln Drive proposes to comply with the requirements of 25 Pa Code §129.111-129.115. This report is being submitted to the appropriate regional manager by December 31<sup>st</sup>, 2022 to satisfy the requirements of 25 Pa Code §129.115(a)(1).

### 2.1 Emission Unit and RACT III Compliance Strategy

As stated previously, the Lincoln Drive Facility is currently permitted under Title V Operating Permit #54-00041, issued on March 20, 2019 and revised March 16, 2020. The permitted emission sources in the permit at the Lincoln Drive Facility include boilers, various aluminum pigment processes, tanks, and an emergency generator. In accordance with 25 Pa Code §129.111(a)(1), sources are subject to RACT III requirements if they commenced operation prior to August 3, 2018. All sources at the Lincoln Drive Facility were installed prior to this date and hence those sources are subject to RACT. The proposed RACT III VOC compliance strategy for each emission unit at the Lincoln Drive Facility is provided in Table 2-1. This table serves to identify the air contamination sources at Lincoln Drive and identify the applicable RACT requirements or exemption status as specified in 25 Pa Code §129.115(a).

Lincoln Drive Facility is submitting the following information as part of the RACT III initial notification requirements:

- ▶ 25 Pa Code §129.115(a)(1) – Submit the initial notification by December 31, 2022.
  - This initial notification has been submitted prior to December 31, 2022.
- ▶ 25 Pa Code §129.115(a)(2) – Identify the air contamination sources in 25 Pa Code §129.111(a) as subject to a RACT requirement or exempt.
  - See Table 2-1 below.
- ▶ 25 Pa Code §129.115(a)(3) – Identify the air contamination sources in 25 Pa Code §129.111(b) as subject to a RACT requirement or exempt.
  - Not applicable, Lincoln Drive is an existing major source of VOC.
- ▶ 25 Pa Code §129.115(a)(4) – Identify the air contamination sources in 25 Pa Code §129.111(c) which are exempt
  - Not applicable. All sources emit >1 tpy VOC.
- ▶ 25 Pa Code §129.115(a)(5) – Provide a description of each air contamination source listed in 25 Pa Code §129.115(a)(2) including, description, make, model and location, applicable RACT requirement, how the unit will comply with RACT III, and reason for exemption (if applicable).
  - See Table 2-1 below and the source descriptions in Section 2.2.
- ▶ 25 Pa Code §129.115(a)(6) – Provide a description of each air contamination source listed in 25 Pa Code §129.115(a)(3) including, description, make, model and location, applicable RACT requirement, how the unit will comply with RACT III, and reason for exemption (if applicable).
  - Not applicable, Lincoln Drive is an existing major source of VOC and is not subject to (a)(3).

- ▶ 25 Pa Code §129.115(a)(7) – Provide a description of each air contamination source listed in (a)(4) including, description, make, model and location and information sufficient to demonstrate that the source has a PTE less than 1 tpy of NO<sub>x</sub> or 1 tpy of VOC, as applicable.
  - Not applicable. All sources emit >1 tpy VOC.

**Table 2-1. Emission Sources at the Lincoln Drive Facility**

<b>Emission Source ID From the Permit</b>	<b>Source Description</b>	<b>RACT III Rule Compliance Strategy <sup>a</sup></b>
101	MILLING/SCREENING	Alternative VOC RACT Proposal (Case-by-Case) per §129.114(d)
102	FILTER PRESSES	Alternative VOC RACT Proposal (Case-by-Case) per §129.114(d)
103	MIXING AND LOADOUT PROCESS	Presumptive RACT per §129.112(c)(2)
104	VAC DISTILLATION OF USED SOLVENT	Presumptive RACT per §129.112(c)(2)
105	MINERAL SPIRIT STORAGE TANKS	Presumptive RACT per §129.112(c)(2)
106	LARGE BOILER	Presumptive RACT per §129.112(c)(4)
107	SMALL BOILER	Presumptive RACT per §129.112(c)(4)
GEN 1	EMERGENCY GENERATOR 1	Presumptive RACT per §129.112(c)(6)

<sup>a</sup> Compliance with the presumptive limits must begin on January 1, 2023

## 2.2 Source Descriptions and Applicable Limits

The following section provides source descriptions for each unit at the Lincoln Drive Facility as well as the applicable Presumptive RACT III emission limits. The information provided in this section is required under 25 Pa Code §129.115(a)(5), §129.115(a)(6), and §129.115(a)(7). Each source listed in Table 2-1 is located within the Lincoln Drive Facility at 130 Lincoln Drive, Tamaqua, PA 18252.

### 2.2.1 Source ID 101: Milling/Screening

Source ID 101 is aluminum pigment milling and screening process at the facility which is controlled by a carbon adsorption unit. Make and model are not applicable to this source. This source was modified in early 2011 to also include a Mini System per Plan Approval No. 54-399-045.

As specified in Table 2-1 and the executive summary, this source does not have any presumptive RACT III VOC limits and has a potential to emit of greater than 2.7 tpy VOC. As such, Silberline will be submitting for an alternative RACT III compliance (Case-by-Case) proposal as specified in 25 Pa Code §129.114(d). The petition detailing this can be found in the subsequent section of this report.

### 2.2.2 Source ID 102: Filter Presses

Source ID 102 is aluminum pigment filter press processes at the facility which is controlled by a carbon adsorption unit. Make and model are not applicable to this source. This source was modified in early 2011 to also include a Mini System per Plan Approval No. 54-399-045.

As specified in Table 2-1 and the executive summary, this source does not have any presumptive RACT III VOC limits and has a potential to emit of greater than 2.7 tpy VOC. As such, Silberline will be submitting for an alternative RACT III compliance (Case-by-Case) proposal as specified in 25 Pa Code §129.114(d). The petition detailing this can be found in the subsequent section of this report.

### **2.2.3 Source ID 103: Mixing And Loadout Process**

Source ID 103 is a mixing and loadout process at the facility. Make and model are not applicable to this source.

As specified in Table 2-1, this source is subject to the presumptive VOC limitations specified in 25 Pa Code §129.112(c)(2). The process is currently limited to less than 2.7 tpy as specified in Section E, Group 4, Condition #001 of the current Title V Operating Permit. As such the Lincoln Drive facility “shall install, maintain and operate the source in accordance with the manufacturer’s specifications and with good operating practices” per Condition #001.

### **2.2.4 Source ID 104: Vacuum Distillation Of Used Solvent**

Source ID 104 is a vacuum distillation process at the facility for used solvents. Make and model are not applicable to this source.

As specified in Table 2-1, this source is subject to the presumptive VOC limitations specified in 25 Pa Code §129.112(c)(2). The process is currently limited to less than 2.7 tpy VOC as specified in Section E, Group 4, Condition #001 of the current Title V Operating Permit. As such the Lincoln Drive facility “shall install, maintain and operate the source in accordance with the manufacturer’s specifications and with good operating practices” per Condition #001.

### **2.2.5 Source ID 105: Mineral Spirit Storage Tanks**

Source ID 105 is for mineral spirit storage tanks located at Lincoln Drive Facility. Make and model are not applicable to this source.

As specified in Table 2-1, these tanks are subject to the presumptive VOC limitations specified in 25 Pa Code §129.112(c)(2). The source is currently limited to less than 2.7 tpy VOC as specified in Section E, Group 4, Condition #001 of the current Title V Operating Permit. As such the Lincoln Drive facility “shall install, maintain and operate the source in accordance with the manufacturer’s specifications and with good operating practices” per Condition #001.

### **2.2.6 Source ID 106: Large Boiler**

Source ID 106 is a boiler located at the Lincoln Drive facility. This boiler is authorized to fire No. 2 fuel oil or propane and has a capacity of 12.6 MMBtu/hr. Make and model are not applicable to this source.

As specified in Table 2-1, this boiler is subject to the presumptive RACT limitations specified in 25 Pa Code §129.112(c)(4). As specified in the unit description of the permit, this boiler has a gross heat input less than 20 MMBtu/hr. As such Silberline “shall install, maintain and operate the source in accordance with the manufacturer’s specifications and with good operating practices for the control of the VOC emissions from the combustion unit” per Section E, Group 4, Condition #001.

### 2.2.7 Source ID 107: Small Boiler

Source ID 106 is a boiler located at the Lincoln Drive facility. This boiler is authorized to fire No. 2 fuel oil or propane and has a capacity of 10.5 MMBtu/hr. Make and model are not applicable to this source.

As specified in Table 2-1, this boiler is subject to the presumptive RACT limitations specified in 25 Pa Code §129.112(c)(4). As specified in the unit description of the permit, this boiler has a gross heat input less than 20 MMBtu/hr. As such Silberline “shall install, maintain and operate the source in accordance with the manufacturer’s specifications and with good operating practices for the control of the VOC emissions from the combustion unit” per Section E, Group 4, Condition #001.

### 2.2.8 Source ID GEN 1: Emergency Generator 1

Source ID GEN 1 is as ONAN, Model 6CTAA8.3-G3 emergency generator located at the Lincoln Drive Facility. This is a diesel fired heater with a capacity of 317 bhp.

As specified in Table 2-1, this generator is subject to the presumptive RACT specified in 25 Pa Code §129.112(c)(6). The Title V unit description specifies that the engine is < 500 bhp. As such, this source will comply with the requirements of 25 Pa Code §129.112(c) where Lincoln Drive “shall install, maintain and operate the source in accordance with the manufacturer’s specifications and with good operating practices.”

## 2.3 Actual VOC Emissions

Actual VOC emissions from Source IDs 101 and 102 are submitted to PADEP annually for emission inventory reports. Per the requirements of 25 Pa Code 129.92(a)(4), the following table provides actual emissions for each source submitting a Case-by-Case RACT proposal.

Table 2-2. Actual Annual VOC Data

Period	Annual VOC Emissions (tpy)
	Source IDs 101 and 102
Annual 2012 VOC Emissions	131.2
Annual 2013 VOC Emissions	66.8
Annual 2014 VOC Emissions	46.8
Annual 2015 VOC Emissions	54.5
Annual 2016 VOC Emissions	50.4
Annual 2017 VOC Emissions	22.4
Annual 2018 VOC Emissions	23.7
Annual 2019 VOC Emissions	13.9
Annual 2020 VOC Emissions	20.2
Annual 2021 VOC Emissions	34.6



### 3. CASE-BY-CASE RACT ANALYSIS

As an existing major source of VOC, the Lincoln Facility is subject to Pennsylvania’s RACT regulations. As discussed in the Executive Summary of this report, the milling/screening process (Source ID 101) and the filter press process (Source ID 102) to not have presumptive RACT III limitations and have the potential to emit greater than 2.7 tpy VOC. Therefore, Silberline is electing to submit a case-by-case RACT determination. This section provides details on the methodology used to determine the proposed RACT.

#### 3.1 Case-by-Case RACT Determination

For sources which are unable to meet presumptive RACT limits and do not participate in facility or system-wide averaging, and sources which do not qualify for one of the source categories that have presumptive RACT limits, the third option for RACT compliance applies. Under this third option, facilities must propose an alternative RACT emission limitation or requirement (i.e., a “case-by-case RACT limit”) on a case-by-case basis for each such source. The milling/screening process (Source ID 101) and the filter press process (Source ID 102) at the Facility are subject to case-by-case VOC RACT determinations. These sources cannot submit case-by-case RACT proposals under the streamlined requirements in 25 Pa. Code 129.114(i) because the units had cost effectiveness for VOC controls less than \$12,000 per ton when submitting a Case-by-Case RACT proposal for RACT II under 25 Pa Code §129.99(d).

Pursuant to 25 Pa Code 129.114(b) and 25 Pa. Code 129.114(d), the case-by-case RACT limit proposal must include each of the elements required under 25 Pa Code 129.92(a)(1)-(5),(b). Table 3-1 includes a cross reference for the location of these requirements in this RACT proposal for the Facility.

**Table 3-1. Case-by-Case RACT Proposal Requirements**

Regulatory Requirement		Location in Document
25 Pa Code 129.92 (a)(1)	A list of each source subject to the RACT requirements	Section 2.1
25 Pa Code 129.92 (a)(2)	The size or capacity of each affected source and types of fuel combusted or the types and quantities of materials processed or produced in each source.	Sections 2.2 and 4
25 Pa Code 129.92 (a)(3)	A physical description of each source and its operating characteristics.	Sections 2.2 and 4
25 Pa Code 129.92 (a)(4)	Estimates of the potential and actual VOC emissions from each affected source and associated supporting documentation.	Section 2.3
25 Pa Code 129.92 (a)(5)	A RACT analysis which meets the requirements of subsection (b), including technical and economic support documentation for each affected source.	Section 3
25 Pa Code 129.114(d)(6)	The testing, monitoring, recordkeeping and reporting procedures proposed to demonstrate compliance with RACT.	Section 4
25 Pa Code 129.114(d)(2)	An application for an operating permit amendment or application to incorporate the provisions of the RACT proposal.	Appendix A

## 3.2 Top-Down Methodology

Case-by-case RACT determinations for VOC emissions are traditionally based on a top-down methodology. PADEP has outlined the required elements of a RACT analysis and determination in 25 Pa Code 129.114(d) and 129.92(b). Presented below are the five basic steps of the top-down RACT review as identified by PADEP.

### 3.2.1 Step 1: Identify All Control Technologies

Under Step 1, all available control technologies are identified for each emission unit in question. The following methods may be used to identify potential technologies:

- ▶ Researching the RACT/BACT/LAER Clearinghouse (RBLC) database;
- ▶ Surveying regulatory agencies;
- ▶ Drawing from previous engineering experience;
- ▶ Surveying air pollution control equipment vendors; and
- ▶ Surveying available literature.

Once identified, the control technologies are ranked in descending order of expected control effectiveness.

### 3.2.2 Step 2: Eliminate Technically Infeasible Options

After control technologies are identified under Step 1, an analysis is conducted to eliminate technically infeasible options. A control option is eliminated from consideration if there are process-specific conditions that prohibit the implementation of the control technology or if the highest control efficiency of the option would result in an emission level that is higher than any applicable regulatory limits, such as a New Source Performance Standard (NSPS) or National Emission Standard for Hazardous Air Pollutants (NESHAP).

### 3.2.3 Step 3: Rank Remaining Control Technologies by Control Effectiveness

In Step 3, remaining control technology options are ranked based on their control effectiveness, from highest to lowest control efficiency. This list must identify, at a minimum, the baseline emissions of VOC before implementation of each control option, the estimated reduction potential or control efficiency of each control option, the estimated emissions after the application of each control option and the economic impacts.

### 3.2.4 Step 4: Evaluate Most Effective Controls and Document Results

Beginning with the highest-ranked control technology option from Step 3, detailed economic, energy, and environmental impact evaluations are performed in Step 4. If a control option is determined to be economically feasible without adverse energy or environmental impacts, it is not necessary to evaluate the remaining options with lower control efficiencies.

The economic evaluation centers on the cost effectiveness of the control option. Costs of installing and operating control technologies are estimated and annualized following the methodologies outlined in the

U.S. EPA's Office of Air Quality Planning and Standards (OAQPS) Control Cost Manual (CCM) and other industry resources.<sup>1</sup>

### 3.2.5 Step 5: Select RACT

Using the result of the prior steps to determine the appropriate control technology, the final step is to determine the emission limit that represents the RACT limit.

## 3.3 VOC RACT Assessment for Source ID 101 and 102

Source IDs 101 and 102 are aluminum pigment milling, screening, and filter press processes at the Lincoln Drive facility. Ball mills are used to reduce the aluminum into a small, uniform particle size in a slurry form with D40 Solvent for viscosity. The slurry is transferred to vibratory screens that separate all large particles from the slurry. That slurry is then pumped to a filter press which separates the D40 from the filter-cake. The cake is then made into the final product for customers. These mills, screens, and presses are in large production departments that are the majority of this facility's plant area.

As stated previously, there are no presumptive VOC limits in RACT III for aluminum pigment milling, screening, and filter press processes. In addition, VOC emissions from each of these sources exceeds 2.7 tpy. In February 2020, Silberline submitted a Case-by-Case analysis for these sources. From this analysis, the following RACT was determined for the sources:

- 1) *Each source shall be inspected, operated, and maintained as pre manufacturer's specifications and good air pollution control practices.*
- 2) *All mixer covers remain closed, except when production, sampling, maintenance, or inspection procedures require access.*
- 3) *The permittee shall follow the visual leak and inspection maintenance plan which shall include, at minimum, the following:*
  - a. *An inspection schedule;*
  - b. *Method for documenting the date and results of each inspection and any repairs that were made; and*
  - c. *The time frame between identifying a leak and making the repair, which shall adhere to the following:*
    - i. *A first attempt at repairs, including tightening of packing glands, shall be made no later than five (5) working days after the leak is detected.*
    - ii. *Final repair shall be made within fifteen (15) days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within (3) months.*

These were added to the current Title V operating permit following the modification submitted with this Case-by-Case analysis. These are found in Section E, Group 2. These sources cannot submit case-by-case RACT proposals under the streamlined requirements in 25 Pa §Code 129.114(i) because the units had cost effectiveness for VOC controls less than \$12,000 per ton when submitting this Case-by-Case RACT proposal for RACT II under 25 Pa Code §129.99(d). As such, Silberline is submitting a Case-by-Case analysis to comply with the requirements of 25 Pa Code §129.114(d).

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<sup>1</sup> OAQPS, *U.S. EPA Air Pollution Control Cost Manual*, Sixth Edition, EPA 452-02-001 (<http://www.epa.gov/ttn/catc/products.html#cccinfo>), Daniel C. Mussatti & William M. Vatauvuk, January 2002.

### 3.3.1 Step 1: Identify All Control Technologies for VOC

Based on reviews of the U.S. Environmental Protection Agency's (EPA's) RACT/BACT/LAER Clearinghouse (RBLC) database and knowledge of the industry, Table 3-2 contains a list of the various technologies that were identified as being theoretically applicable to Source IDs 101 and 102. The results of the RBLC search can be found in Appendix A.

**Table 3-2: Potentially Available VOC Control Technologies for Aluminum Pigment Processes**

<b>Potentially Applicable VOC Control Technologies</b>
Carbon Adsorption
Regenerative Thermal Oxidizer (RTO)
Recuperative Oxidizer
Catalytic Oxidizer
Good Operating Practices

### 3.3.2 Review of Potentially Applicable VOC Control Technologies

The following section provides a discussion of each potentially applicable technology identified above as it might be applied to Source IDs 101 and 102 at the facility.

#### 3.3.2.1 Carbon Adsorption

Carbon adsorption involves the use of activated carbon and its adsorption properties in order to remove VOCs from exhaust streams. A carbon adsorption system (Source ID C01) is already installed and used to control VOC from Source IDs 101 and 102 at the Lincoln Drive facility.

#### 3.3.2.2 Regenerative Thermal Oxidizer (RTO)

Regenerative thermal oxidizers (RTOs) use combustion at high temperatures in order to destroy VOCs in exhaust air.

#### 3.3.2.3 Recuperative Oxidizer

Recuperative Oxidizers work using the same principle of high combustion temperatures to destroy VOCs. Where the technology differs in in the heat recovery process.

#### 3.3.2.4 Catalytic Oxidizer

Catalytic oxidizers used a catalyst to promote the oxidation of VOCs in exhaust streams. These operate at lower temperatures than thermal oxidizers.

#### 3.3.2.5 Good Operating Practices

Good operating practices means instituting standards, practices, methods, and procedures that result in the minimization of VOC emissions to air.

### 3.3.3 Step 2: Eliminate Technically Infeasible Options for VOC Control

All technologies identified in Step 1 were determined to be technically feasible to control Source IDs 101 and 102 at the Lincoln Drive facility.

### 3.3.4 Step 3: Rank Remaining Control Technologies by Control Effectiveness

Typical control efficiencies for the remaining control technologies are as follows:

**Table 3-3: VOC Control Efficiencies for Technically Feasible Controls**

<b>Technology</b>	<b>VOC Control Efficiency</b>
Regenerative Thermal Oxidizer (RTO)	98%
Recuperative Oxidizer	95%
Catalytic Oxidizer	95%
Carbon Adsorption	95%
Good Operating Practices	N/A

### 3.3.5 Step 4: Evaluate Most Effective Controls and Document Results

Silberline has performed a cost effectiveness analysis for the controls identified in Table 3-3, as shown in Appendix B to this letter. The cost effectiveness was determined to be approximately as follows:

**Table 3-3: Cost Effectiveness for Technically Feasible Controls**

<b>Technology</b>	<b>Cost Effectiveness (\$/ton VOC)</b>
Carbon Adsorption	Installed
Regenerative Thermal Oxidizer (RTO)	\$12,781.99
Recuperative Oxidizer	\$32,638.66
Catalytic Oxidizer	\$20,655.03
Good Operating Practices	N/A

Based on the results of these analyses, RTO, recuperative oxidizer, and catalytic oxidizer, are not considered economically feasible as RACT for Source IDs 101 and 102. The \$1,500 carbon adsorption system (Source ID C01) at the facility does not have an incurred cost due to the technology already being installed and implemented. As such, this control is considered feasible as RACT. As good operating practices is considered technically feasible, does not have an identifiable cost, and is already implemented by the facility, it is considered feasible as RACT.

### 3.3.6 Step 5: Select RACT

Based on this analysis, Silberline identified Carbon Adsorption and Good Operating Practices as RACT. All other control technologies assessed were of equal control effectiveness and not considered economically feasible. As a carbon adsorption system is currently installed and used to control VOCs at the facility and as good operating practices are already implemented, Silberline will continue to utilize these controls to minimize VOC from Source IDs 101 and 102. Silberline will also continue to follow all emission limitation, testing, monitoring, recordkeeping, reporting, and work practice requirements present in the current Title V Operating Permit.

## 4. RACT PROPOSAL

Based on the analysis provided by Silberline, the Lincoln Drive facility proposed RACT and related monitoring, testing, recordkeeping and reporting are summarized in Table 4-1 below. Carbon Adsorption and Good Operating Practices were identified as RACT for Source IDs 101 and 102. As these controls are already installed and implemented at the facility, Silberline is proposing to continue to comply with the current Title V Operating Permit conditions related to these sources and controls.

**Table 4-1. Lincoln Drive Facility Proposed RACT Summary**

<b>Emission Source ID(s):</b>	Milling/Screening, Filter Press, and Mini System; Title V Source IDs 101 and 102
<b>Source Description(s):</b>	<ul style="list-style-type: none"> <li>▶ Source ID 101: Milling/Screening               <ul style="list-style-type: none"> <li>• Aluminum pigment milling and screening</li> <li>• Controlled by:                   <ul style="list-style-type: none"> <li>◆ Carbon Adsorption</li> </ul> </li> </ul> </li> <li>▶ Source ID 102: Filter Press               <ul style="list-style-type: none"> <li>• Aluminum pigment filter press</li> <li>• Controlled by:                   <ul style="list-style-type: none"> <li>◆ Carbon Adsorption</li> </ul> </li> </ul> </li> </ul>
<b>Description of RACT:</b>	<p>Case-by-case</p> <ul style="list-style-type: none"> <li>▶ Per Section 3 of this report, no additional controls were determined to be technically or economically feasible. Lincoln Drive is proposing to continue to implement the carbon adsorption system and comply with good operating practices per Section E, Group 2 and Group 3, of the current Title V Operating Permit.</li> <li>▶ Silberline will comply with the proposed case-by-case RACT effective January 1, 2023.</li> </ul>
<b><u>Proposed Emission Limitation:</u></b>	
<ul style="list-style-type: none"> <li>▶ <b>Per Section E, Group 2, Condition #001 of the current permit:</b> The VOC emissions from the Mini System shall not exceed 7.8 TPY based on a 12-month rolling sum.</li> <li>▶ <b>Per Section E, Group 3, Condition #001 of the current permit:</b> Outlet VOC concentration from the carbon adsorber shall be less than or equal to 20 ppm as propane.</li> </ul>	
<b><u>Proposed Monitoring:</u></b>	
<ul style="list-style-type: none"> <li>▶ <b>Per Section E, Group 2, Condition #002 of the current permit:</b> The permittee shall maintain a visual leak inspection and maintenance plan which shall include, at minimum, the following:           <ul style="list-style-type: none"> <li>• An inspection schedule,</li> <li>• Methods for documenting the date and results of each inspection and any repairs that were made, and</li> <li>• The time frame between identifying a leak and making the repair, which shall adhere to the following:               <ul style="list-style-type: none"> <li>◆ A first attempt at repairs, including tightening of packing glands, shall be made no later than five (5) working days after the leak is detected.</li> <li>◆ Final repairs shall be made within fifteen (15) working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three (3) months.</li> </ul> </li> </ul> </li> </ul>	

- ▶ **Per Section E, Group 3, Condition #002 of the current permit:** The VOC concentration in the outlet gas shall be monitored continuously.

**Proposed Testing:**

- ▶ N/A

**Proposed Recordkeeping:**

- ▶ **Per Section E, Group 2, Condition #003 of the current permit:** The permittee shall maintain records in accordance with Site Level Condition #013. The data recorded shall include but not be limited to:
  - The monthly throughput of mineral spirits,
  - The calculations of estimated VOC emissions in tons.
- ▶ **Per Section E, Group 3, Condition #003 of the current permit:** The permittee shall maintain records of the quarterly gas analyzer calibration.

**Proposed Reporting:**

- ▶ **Per Section E, Group 2, Condition #004 of the current permit:** The permittee shall, on quarterly basis, compile a report for submission to the Department of the hours of operation and the VOCs emission data in accordance to Site Level Condition #013. This report shall include, but not be limited to the following data concerning the previous quarter:
  - The monthly mass balance of VOC emissions.

**Proposed Work Practice Requirements:**

- ▶ **Per Section E, Group 2, Condition #006 of the current permit:** The permittee shall operate Source ID 101 and 102 in accordance with the following work practice requirements:
  - Each source shall be inspected, operated and maintained as per manufacturers specification and good air pollution control practices.
  - All mixer covers remain closed, except when production, sampling, maintenance, or inspection procedures require access.
  - The permittee shall maintain a visual leak inspection and maintenance plan which shall include, at minimum, the following:
    - ◆ An inspection schedule,
    - ◆ Methods for documenting the date and results of each inspection and any repairs that were made, and
    - ◆ The time frame between identifying a leak and making the repair, which shall adhere to the following:
      - A first attempt at repairs, including tightening of packing glands, shall be made no later than five (5) working days after the leak is detected.
      - Final repairs shall be made within fifteen (15) working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three (3) months.
- ▶ **Per Section E, Group 3, Condition #004 of the current permit:** A spare gas analyzer for the carbon adsorber shall be kept on site.
- ▶ **Per Section E, Group 3, Condition #005 of the current permit:** The operational gas analyzer shall be calibrated at least once per calendar quarter.

## APPENDIX A. RBLC SEARCH

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**NOTE: Draft determinations are marked with a " \* " beside the RBLC ID.  
Required fields are denoted by "+".**

Report Date: 12/16/2022 Control Technology Determinations (Freeform)

---

Facility Information: PPG INDUSTRIES, INC.

---

RBLC ID: IN-0348  
+Corporate/Company Name: PPG INDUSTRIES, INC.  
+Facility Name: PPG INDUSTRIES, INC.  
Facility County: CLAY  
Facility State: IN  
Facility ZIP Code: 47834  
Facility Country: USA  
Facility Contact Name: JASON NOWAK  
Facility Contact Phone: (248) 408-8354  
Facility Contact Email:  
EPA Region: 5  
Agency Code: IN001  
Agency Name: INDIANA DEPT OF ENV MGMT, OFC OF AIR  
Agency Contact: MR. MATT STUCKEY  
Agency Phone: (317) 233-0203  
Agency Email: mstuckey@idem.in.gov  
Other Agency Contact Info:  
+Permit Number: 021-45156-00061  
+SIC Code: 2851  
NAICS Code: 325510  
Facility Registry System Number: 110040629291  
Application Accepted Received Date: 02/28/2022 ACT  
Permit Issuance Date: 05/06/2022 ACT  
Date determination entered in RBLC: 05/13/2022  
Date determination last updated: 08/16/2022  
Permit Type: C: Modify process at existing facility  
Permit URL: <https://permits.air.idem.in.gov/45156f.pdf>  
Facility Description:  
Permit Notes: BACT was reopened to add Tank washing unit.

---

Affected Boundaries: PPG INDUSTRIES, INC.

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Facility-wide Emissions: PPG INDUSTRIES, INC.

---

+Pollutant Name: Carbon Monoxide  
Facility-wide Emissions  
Increase: 1.1100 (Tons/Year)  
+Pollutant Name: Nitrogen Oxides (NOx)  
Facility-wide Emissions  
Increase: 2.5300 (Tons/Year)  
+Pollutant Name: Particulate Matter (PM)  
Facility-wide Emissions  
Increase: 156.8000 (Tons/Year)  
+Pollutant Name: Sulfur Oxides (SOx)  
Facility-wide Emissions  
Increase: 0.0100 (Tons/Year)  
+Pollutant Name: Volatile Organic Compounds (VOC)  
Facility-wide Emissions  
Increase: 99.1300 (Tons/Year)

---

Process Information: PPG INDUSTRIES, INC.

---

+Process Name: Large, small, and bulk batch lines, spray fill line, big blue, tank washing unit  
+Process Type: 49.009  
Primary Fuel:  
Throughput: 0  
Throughput Unit:  
Process Notes:

---

Pollutant Information: PPG INDUSTRIES, INC. - Large, small, and bulk batch lines, spray fill line, big blue, tank washing unit

---

+Pollutant Name Volatile Organic Compounds (VOC)  
Pollutant Group(s): ( Volatile Organic Compounds (VOC) )  
+CAS Number: VOC  
Test Method: Unspecified  
+Control Method Code: A  
+Control Method  
Description: Thermal oxidizer (RTO)  
Emission Limit 1: 0.0004  
Emission Limit 1 Unit: LB VOC/ LB VOC USED  
Emission Limit 1 Avg.  
Time/Condition:  
Emission Limit 2: 0.0200  
Emission Limit 2 Unit: LB VOC/ LB VOC USED  
Emission Limit 2 Avg.  
Time/Condition:

Standard Emission Limit: 0  
 Standard Emission Limit Unit:  
 Standard Limit Avg. Time/Condition:  
 +Case-by-Case Basis: OTHER CASE-BY-CASE  
 Other Applicable Requirements:  
 Did factors, other than air pollution technology considerations influence the BACT decisions?: U  
 +Percent Efficiency: 98.000  
 Compliance Verified: Unknown  
 Cost Effectiveness: Incremental Cost Effectiveness:  
 Cost Verified (Y/N)?: No  
 Dollar Year Used In Cost Estimates:  
 Pollutants/Compliance Notes: The VOC emissions from the Large Batch Line, Small Batch Line, Bulk Batch Line, Spray Fill Line, Tank Washing Unit, and Big Blue emission units shall be controlled by a thermal oxidizer. The overall control efficiency, including capture and destruction efficiency, shall be at least 98%. The emissions from the Large Batch Line, Small Batch Line, Bulk Batch Line, Spray Fill Line, and Big Blue emission units shall not exceed 0.0004 pound of VOC per pound of VOC used. The emissions from the Tank Washing Unit shall not exceed 0.02 pound of VOC per pound of VOC used.

Previous Page

**NOTE: Draft determinations are marked with a " \* " beside the RBLC ID.  
 Required fields are denoted by "+".**

Report Date: 12/16/2022      Control Technology Determinations (Freeform)

---

Facility Information: PPG INDUSTRIES, INC.

---

RBLC ID: IN-0322  
 +Corporate/Company Name: PPG INDUSTRIES, INC.  
 +Facility Name: PPG INDUSTRIES, INC.  
 Facility County: CLAY  
 Facility State: IN  
 Facility ZIP Code: 47834  
 Facility Country: USA  
 Facility Contact Name: JUSTIN HADDON

Facility Contact Phone: 812-442-5080  
Facility Contact Email:  
EPA Region: 5  
Agency Code: IN001  
Agency Name: INDIANA DEPT OF ENV MGMT, OFC OF AIR  
Agency Contact: MR. MATT STUCKEY  
Agency Phone: (317) 233-0203  
Agency Email: mstuckey@idem.in.gov  
Other Agency Contact Info: Permit Writer: Tamara Havics 317-232-8219 THavics@IDEM.IN.GOV  
Section Chief: Ghassan Shalabi 317-233-7622 GShalabi@IDEM.IN.GOV  
+Permit Number: 021-42620-00061  
+SIC Code: 2851  
NAICS Code: 325510  
Facility Registry System  
Number: Not Found  
Application Accepted  
Received Date: 05/29/2020 ACT  
Permit Issuance Date: 07/02/2020 ACT  
Date determination  
entered in RBLC: 03/30/2021  
Date determination last  
updated: 05/26/2021  
Permit Type: C: Modify process at existing facility  
Permit URL: <https://permits.air.idem.in.gov/42620f.pdf>  
Facility Description: Industrial Coatings Manufacturing facility  
Permit Notes:

---

Affected Boundaries: PPG INDUSTRIES, INC.

---

---

Facility-wide Emissions: PPG INDUSTRIES, INC.

---

+Pollutant Name: Carbon Monoxide  
Facility-wide Emissions  
Increase: 0.8700 (Tons/Year)  
+Pollutant Name: Nitrogen Oxides (NOx)  
Facility-wide Emissions  
Increase: 1.0300 (Tons/Year)  
+Pollutant Name: Particulate Matter (PM)  
Facility-wide Emissions  
Increase: 44.7800 (Tons/Year)  
+Pollutant Name: Sulfur Oxides (SOx)  
Facility-wide Emissions  
Increase: 0.0100 (Tons/Year)  
+Pollutant Name: Volatile Organic Compounds (VOC)  
Facility-wide Emissions  
Increase: 393.9500 (Tons/Year)

---

Process Information: PPG INDUSTRIES, INC.

---

+Process Name: Large, small, and bulk batch lines, spray fill line, big blue  
+Process Type: 49.009  
Primary Fuel:  
Throughput: 0  
Throughput Unit:  
Process Notes:

---

Pollutant Information: PPG INDUSTRIES, INC. - Large, small, and bulk batch lines, spray fill line, big blue

---

+Pollutant Name Volatile Organic Compounds (VOC)  
Pollutant Group(s): ( Volatile Organic Compounds (VOC) )  
+CAS Number: VOC  
Test Method: Unspecified  
+Control Method Code: A  
+Control Method  
Description: thermal oxidizer  
Emission Limit 1: 98.0000  
Emission Limit 1 Unit: % OVERALL CONTROL  
Emission Limit 1 Avg.  
Time/Condition:  
Emission Limit 2: 0.0004  
Emission Limit 2 Unit: LB / LB OF VOC USED  
Emission Limit 2 Avg.  
Time/Condition:  
Standard Emission  
Limit: 0  
Standard Emission  
Limit Unit:  
Standard Limit Avg.  
Time/Condition:  
+Case-by-Case Basis: OTHER CASE-BY-CASE  
Other Applicable  
Requirements:  
Did factors, other than  
air pollution technology  
considerations influence  
the BACT decisions?: U  
+Percent Efficiency: 98.000  
Compliance Verified: Unknown  
Cost Effectiveness:  
Incremental Cost  
Effectiveness:  
Cost Verified (Y/N)?: No

Dollar Year Used In  
Cost Estimates:  
Pollutants/Compliance  
Notes:

State BACT

[Previous Page](#)

## **APPENDIX B. CASE-BY-CASE COST EFFECTIVENESS ANALYSES**

---

**Silberline - Lincoln Dr Facility**  
**Cost Effectiveness Calculations**  
**ENCLOSURE NO. 1**

EPA's 5-Point Criteria for 100% Capture Efficiency

- 1) All natural draft openings must be at least four (4) equivalent opening diameters from each VOC-emitting point.
- 2) Any exhaust point from the enclosure must be at least four (4) equivalent duct diameters from each NDO.
- 3) The total area of all NDO's must not exceed 5% of the room enclosures surface areas (4 walls, floor, and ceiling).
- 4) The air velocity through all NDO's must be at least 200 FPM.
- 5) All exhausts from the enclosure must be discharged to a control device.



**Silberline - Lincoln Dr Facility**  
**Cost Effectiveness Calculations**  
**ENCLOSURE NO. 2**

Silberline Annual Interest Rate (i)	12.00%
Equipment Life Yrs (n)	10.00

	<b>RTO</b> (2 @ 35K CFM) 98% DRE 95% HR	<b>Recup</b> (2 @ 35K) 95% DRE 70% HR	<b>Oxidative Catalyst</b> (2 @ 35K) 95% DRE 70% HR	<b>Notes</b>
<u>1) Direct Costs</u>				
a) Purchased Equipment	\$ 2,000,000.00	\$ 1,080,000.00	\$ 1,600,000.00	
b) Capture System	\$ 1,235,000.00	\$ 1,235,000.00	\$ 1,235,000.00	
c) Infrastructure	\$ 1,300,000.00	\$ 1,300,000.00	\$ 1,300,000.00	
d) NG Tanks	\$ 250,000.00	\$ 250,000.00	\$ 250,000.00	
<u>2) Indirect Costs</u>	\$ 325,000.00	\$ 325,000.00	\$ 325,000.00	
<b>Total Capital Investment (TCI)</b>	<b>\$ 5,110,000.00</b>	<b>\$ 4,190,000.00</b>	<b>\$ 4,710,000.00</b>	
<b>Capital Recovery Factor (CRF)</b>	<b>0.177</b>	<b>0.177</b>	<b>0.177</b>	$i(1+i)^n / (1+i)^n - 1 =$ Where n = Equipment Life and i = Interest Rate

<u>Annual Operating Expenses</u>				
a) Electricity	\$ 247,000.00	\$ 247,000.00	\$ 247,000.00	
b) Propane	\$ 550,000.00	\$ 3,300,000.00	\$ 1,596,000.00	
c) Maintenance	\$ 40,000.00	\$ 20,000.00	\$ 50,000.00	
d) Capital Recovery Cost	\$ 904,470.00	\$ 741,630.00	\$ 833,670.00	CFR * TCI
<b>Total Annual Cost</b>	<b>\$ 1,741,470.00</b>	<b>\$ 4,308,630.00</b>	<b>\$ 2,726,670.00</b>	

<b>VOC Reduction Per Year (tpy)</b>	<b>136.244</b>	<b>132.01</b>	<b>132.01</b>	
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<b>Cost per ton of VOC Removed (TAC/Pollutant Removed)</b>	<b>\$ 12,781.99</b>	<b>\$ 32,638.66</b>	<b>\$ 20,655.03</b>	
--	---------------------	---------------------	---------------------	--

**Silberline - Lincoln Dr Facility**  
**Cost Effectiveness Calculations**  
**ENCLOSURE NO. 3**

**EQUIPMENT COSTS**

25,000 CFM OXIDIZER OPTIONS

	<u>Purchased Equipment Cost</u>	<u>GIA Factor</u>	
	<u>1988 \$</u> <sup>①</sup>		<u>2020 \$</u>
<u>0% Thermal Oxidizer (TO)</u>	\$120K	x 2 =	\$240K
35% Recup	\$185K	x 2 =	\$370K
50% Recup	\$225K	x 2 =	\$450K
70% Recup	\$270K	x 2 =	\$540K
95% Recup	\$500K	x 2 =	\$1,000K
 <u>Fixed Bed Catalytic Oxidizer</u>			
0% Hr	\$330K	x 2 =	\$600K
35% Hr	\$250K	x 2 =	\$500K
50% Hr	\$350K	x 2 =	\$700K
70% Hr	\$400K	x 2 =	\$800K
 <u>Fluid Bed Catalytic Oxidizer</u>			
0% Hr	\$400K	x 2 =	\$800K
35% Hr	\$480K	x 2 =	\$960K
50% Hr	\$550K	x 2 =	\$1,100K
70% Hr	\$700K	x 2 =	\$1,400K

<sup>①</sup> From OAQPS Cost Control Manual, Chapter 3

**DIRECT COSTS**

A) Equipment Costs – See Enclosure No. 7: 1/3/2019 Adwest RTO Proposal for \$2,000K

B) Capture Systems – Costs

Rooftop exhaust ductwork & exhaust fans/department under room pressure controls

	21 rooftop ducts & supports, bypass safety dampers, EXP vent panels	\$800K
Exhaust Fans:	5 fans inline centrifugal with VFD's (3 - 20 & 2 - 30 HP)	\$100K
Paragon:	Room pressure indicating/controllers (6) & 6 CFM indicators	\$100K
	PLC with paperless recorder	\$ 75K
Electrical:	Control wiring	<u>\$160K</u>
	Sub-total for Capture System:	\$1,235K

C) Infrastructure Costs

1.	Equipment Pad – Concrete	\$ 80K
2.	Electrical Power Wiring (New Service)	\$250K
3.	Equipment Erection (Crane & Millwright)	\$ 50K
4.	Pneumatics & Desiccant Dryer	\$ 80K
5.	Permanent Total Enclosures (6) @ \$80K ea. for soft walls, epoxy paint	\$480K
6.	Structural Steel	\$ 10K
7.	Fourteen (14) Rapid Doors @ \$25K each	\$350K

D) Cost of 2 Propane Storage Vessels on Pads with Underground Services \$250K - Oxidizers only  
 Sub-total for Infrastructure: \$1,550K

E) **INDIRECT COSTS**

-Engineering	\$200K
-Performance Test	\$ 25K
-Contingencies	<u>\$100K</u>
Sub-total of Indirect Costs:	<u>\$325K</u>

TOTAL INSTALLED COST: \$5,110K

		<u># of EF's</u>
Attached drawing of Hometown shows:	2 Mill Rooms	6
	2 Press Rooms	10
	1 Mixing Room	3
	1 Mini System Room	<u>2</u>
		21 Exhaust Fans

Attachment: Drawing



*6 Depts  
21 Rooftop EF's with Solvent Laden Air*

ANNUAL OPERATING EXPENSES

A) Electrical Costs

Rooftop Fans: 3 – 20 HP 420 HP x 0.7457 kW/HP = 313 kW  
2 – 30 HP  
ID Fan for RTO: 2 – 150 HP

313 kW x \$0.09/kWH x 8760 Hr/Yr = \$247,000/Yr

B) Cost of Natural Gas (delivered): \$10/MCF via CNG delivery trucks

-For a Standard Thermal Oxidizer:

Btuh = 1.085 (CFM)(°F delta T)  
= 1.085 (35,000 CFM)(1650°F) = 62.7 x 10<sup>6</sup> Btuh  
SCF/Yr = 62.7 x 10<sup>6</sup> Btuh x 8760 Hrs/Yr x 1 SCF/1000 Btuh = 548.9 x 10<sup>6</sup> SCF

Cost/Yr = 548.9 x 10<sup>6</sup> SCF x \$10/10<sup>3</sup> SCF  
= \$5,490,000/Yr per one (1) Standard Thermal Oxidizer size for 35,000 CFM  
(2 needed)

-For an RTO with 95% Heat Recovery, the annual cost of natural gas is expected to be:  
\$5,490,000/Yr x 5% = \$275,000/Yr/RTO

-For a Recuperative Oxidizer with 70% Heat Recovery, the annual cost of natural gas is expected to be: \$5,490,000/Yr x 30% = \$1,647,000/Yr/Recup

-For a Catalytic Oxidizer, the destruction temperature can be reduced to 800°F at the inlet to the catalyst. To save operating expense, it is best to use 70% Heat Recovery.

Btuh: 1.085(35,000 CFM)(800°F) = 30.4 x 10<sup>6</sup> Btuh

$$\frac{30.4 \times 10^6 \text{ Btu}}{\text{Hr}} \times \frac{8760 \text{ Hr}}{\text{Yr}} \times \frac{1 \text{ ft}^3}{1000 \text{ Btu}} = 266.1 \times 10^6 \text{ SCF/Yr}$$

266.1 x 10<sup>6</sup> SCF/Yr x \$10/10<sup>3</sup> SCF x 30% Ineff. = \$798,000/Yr/CTO (2 needed)

## **APPENDIX C. TITLE V SIGNIFICANT MODIFICATION FORMS**

---



<b>FOR OFFICIAL USE ONLY</b>
OP #: _____
Date: _____

### OPERATING PERMIT MODIFICATION APPLICATION

<b>Section 1 – General Information</b>			
<b>1.1 Application Type</b>			
Type of permit for which application is made:			
<input type="checkbox"/> Minor Modification	<input type="checkbox"/> State-Only Operating Permit		
<input checked="" type="checkbox"/> Significant Modification	<input checked="" type="checkbox"/> Title V Operating Permit		
Existing Operating Permit No: <u>54-00041</u>			
<b>1.2 Facility Information</b>			
Firm Name:	<u>SILBERLINE MFG CO</u>	Federal Tax ID:	<u>35-1273539-1</u>
Facility Name:	<u>Lincoln Drive Plant</u>	Plant Code:	_____
NAICS Code:	<u>325130</u>	SIC Code:	<u>2816</u>
Description of NAICS Code:	<u>Synthetic Dye and Pigment Manufacturing</u>		
Description of SIC Code:	<u>Manufacturing - Inorganic Pigments</u>		
County:	<u>Schuylkill</u>	Municipality:	<u>Rush Township</u>
Latitude:	<u>40 deg, 49 min, 42.8844 sec N</u>	Longitude:	<u>-75 deg, 59 min, 26.3364 sec W</u>
Horizontal Reference Datum:	<u>North American Datum of 1983</u>	Horizontal Collection Method:	<u>NTDEP</u>
		Reference Point:	<u>ENTGN</u>
<b>1.3 Permit Contact Information</b>			
Name:	<u>Mary Kate Thomas</u>	Title:	<u>HSE Manager</u>
Address:	<u>130 Lincoln Drive</u>		
City:	<u>Tamaqua</u>	State:	<u>PA</u>
Telephone:	<u>570-668-8485</u>	ZIP:	<u>18252</u>
Email:	<u>thomasm@silberline.com</u>		

**1.4 Small Business Question**

Are you a small business as defined by the Pennsylvania Air Pollution Control Act?  Yes  No

Are you a small business as defined by the U.S. Small Business Administration?  Yes  No

**1.5 Request for Confidentiality**

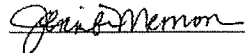
Do you request any information on this application to be treated as "Confidential"?  Yes  No

Place confidential information on separate page(s) marked "Confidential".

In order to request confidential treatment for information in any document, you must submit a redacted version of the relevant document with the confidential information blacked out (and thus suitable for public disclosure), along with a letter of request containing a table identifying the page and line number of each redaction, along with a justification for each redacted item as to why it should be deemed confidential under the specific criteria allowed under 25 Pa. Code §127.12(d) and Section 13.2 of the APCA.

**1.6 Certification of Truth, Accuracy and Completeness by a Responsible Official**

I certify that, subject to the penalties of Title 18 Pa. C.S.A. Section 4904 and 35 P.S. Section 4009(b)(2), I am the responsible official having primary responsibility for the design and operation of the facilities to which this application applies and that the information provided in this application is true, accurate, and complete to the best of my knowledge, information, and belief formed after reasonable inquiry.

(Signed) \_\_\_\_\_  \_\_\_\_\_ Date: 12/28/2022  
Name (Typed): Jennifer Mermon Title: Vice President, Operations - Americas  
Telephone: (570) 668-6050  
Email: mermonj@silberline.com



<b>Section 2 – Inventory of Units Being Modified</b>		
Unit ID No.	Unit Name	Unit Type
101	Milling/Screening	Process
102	Filter Presses	Process
C01	Carbon Adsorption System	Control
S05	Carbon Adsorption Stack	Stack

**Section 3 – Facility Changes – Not Applicable**

**Complete this section ONLY if the changes are for the entire facility. If changes are for a source or sources, skip this Section and complete Section 4 for each Source in which a change is proposed.**

3.1 Describe all proposed changes to this facility:

3.2 If the proposed facility changes involve any changes in actual emissions, please complete the following table. Attach another table if needed.

Pollutant Name	CAS Number	Change in Actual Emissions (+ or -)

3.3 Anticipated date on which proposed change is scheduled to occur: \_\_\_\_\_

3.4 List the proposed revision language for the operating permit conditions. This includes all changes to the emissions, monitoring, testing, record-keeping, reporting requirements and work practice standard requirements. Write in the type of applicable requirements in the column provided. Attach another table if needed.

Citation Number	Type of Applicable Requirement	Existing Operating Permit Condition or Condition Number	Proposed Language for Permit Condition

3.5 Provide a listing of all changes in chronological order (additions and subtractions) made at a facility since the last submittal and attach it to this application. For example:

3.6 For renewals, please review the current operating permit. If you are proposing any changes to the conditions of the permit, please provide the condition number, the requested change, and justification for the requested change.

<b>Section 4 – Unit Information (duplicate this section for each unit as needed)</b>			
<b>4.1 Unit Type:</b> <input type="checkbox"/> Combustion <input type="checkbox"/> Incinerator <input checked="" type="checkbox"/> Process <input type="checkbox"/> Control Device			
<b>4.2 General Source Information (Combustion/Incinerator/Process)</b>			
a. Source ID:	<u>101</u>	b. Source Name:	<u>Milling/Screening</u>
c. Manufacturer:	<u>N/A</u>	d. Model No.:	<u>N/A</u>
e. Source Description: <u>Milling/Screening Process</u>			
f. Rated Capacity (for engines use BHP):	_____	g. Installation Date:	_____
h. Rated Power/Electric Output: _____			
i. Exhaust Temperature:	_____ Units: _____	j. Exhaust % Moisture:	_____
		k. Exhaust Flow Volume:	_____ SCFM
<b>4.3 General Control Device Information</b>			
a. Unit ID:	<u>C01</u>	b. Unit Name:	<u>Carbon Adsorption System</u>
c. Used by Sources: <u>101 &amp; 102</u>			
d. Type: <u>Carbon Adsorption</u>			
e. Pressure Drop (in. H <sub>2</sub> O):	_____	f. Capture Efficiency:	_____
g. Flow Rate (specify unit): _____			
h. Manufacturer:	_____	i. Model No.:	_____
j. Installation Date: _____			

**4.4 Proposed Changes to Unit**

a. Describe all proposed changes to this unit:  
Silberline is submitting the attached Case-by-Case RACT Determination for Source ID 101 in order to comply with the requirements of RACT III.

b. If the proposed unit changes involve any changes in actual emissions, please complete the following table. Attach another table if needed.

Pollutant Name	CAS Number	Change in Actual Emissions (+ or -)

c. Anticipated date on which proposed change is scheduled to occur: In accordance with the RACT III compliance date of January 1, 2023.

d. List the proposed revision language for the operating permit condition. This includes all changes to the emission, monitoring, testing, record-keeping, reporting requirements and work practice standard requirement. Write in the type of applicable requirements in the column provided. Attach another table if needed.

Citation Number	Type of Applicable Requirement	Existing Operating Permit Condition or Condition Number	Proposed Language for Permit Condition
RACT III 25 Pa. Code 129.114	Emission, Monitoring, Recordkeeping, Reporting, and Work Practice	N/A	See Table 4-1 in the Case-by-Case RACT Determination for the proposed permit language.



<b>Section 4 – Unit Information (duplicate this section for each unit as needed)</b>			
<b>4.1 Unit Type:</b> <input type="checkbox"/> Combustion <input type="checkbox"/> Incinerator <input checked="" type="checkbox"/> Process <input type="checkbox"/> Control Device			
<b>4.2 General Source Information (Combustion/Incinerator/Process)</b>			
a. Source ID: <u>102</u>	b. Source Name: <u>Filter Presses</u>		
c. Manufacturer: <u>N/A</u>	d. Model No.: <u>N/A</u>		
e. Source Description: <u>Filter Press Processes</u>			
f. Rated Capacity (for engines use BHP): _____		g. Installation Date: _____	
h. Rated Power/Electric Output: _____			
i. Exhaust Temperature: _____	Units: _____	j. Exhaust % Moisture: _____	k. Exhaust Flow Volume: _____ SCFM
<b>4.3 General Control Device Information</b>			
a. Unit ID: <u>C01</u>	b. Unit Name: <u>ABB LNCFS LEVEL III LOW NOX BURNERS</u>		
c. Used by Sources: <u>101 &amp; 102</u>			
d. Type: <u>Carbon Adsorption</u>			
e. Pressure Drop (in. H <sub>2</sub> O): _____		f. Capture Efficiency: _____	
g. Flow Rate (specify unit): _____			
h. Manufacturer: _____		i. Model No.: _____	
j. Installation Date: _____			

**4.4 Proposed Changes to Unit**

a. Describe all proposed changes to this unit:  
Silberline is submitting the attached Case-by-Case RACT Determination for Source ID 102 in order to comply with the requirements of RACT III.

b. If the proposed unit changes involve any changes in actual emissions, please complete the following table. Attach another table if needed.

Pollutant Name	CAS Number	Change in Actual Emissions (+ or -)

c. Anticipated date on which proposed change is scheduled to occur: In accordance with the RACT III compliance date of January 1, 2023.

d. List the proposed revision language for the operating permit condition. This includes all changes to the emission, monitoring, testing, record-keeping, reporting requirements and work practice standard requirement. Write in the type of applicable requirements in the column provided. Attach another table if needed.

Citation Number	Type of Applicable Requirement	Existing Operating Permit Condition or Condition Number	Proposed Language for Permit Condition
RACT III 25 Pa. Code 129.114	Emission, Monitoring, Recordkeeping, Reporting, and Work Practice	N/A	See Table 4-1 in the Case-by-Case RACT Determination for the proposed permit language.



<b>Section 5 – Compliance Plan for the Facility</b>			
		Yes	No
5.1	Will your facility be in compliance with all applicable requirements at the time of permit issuance and continue to comply with these requirements during the permit duration?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.2	Will your facility be in compliance with all applicable requirements presently scheduled to take effect during the term of the permit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## APPENDIX D. COMPLIANCE REVIEW FORM

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COMMONWEALTH OF PENNSYLVANIA  
 DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 BUREAU OF AIR QUALITY

**AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW FORM**

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

**Type of Compliance Review Form Submittal (check all that apply)**

- |  |   |
|--|---|
| <input type="checkbox"/> Original Filing           | Date of Last Compliance Review Form Filing:     |
| <input checked="" type="checkbox"/> Amended Filing | <u>5/16/2016 – RACT II Application;</u>         |
|  | <u>11/30/2022- P.A. #54-00041C Extension #6</u> |

**Type of Submittal**

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> New Plan Approval                             | <input type="checkbox"/> New Operating Permit | <input type="checkbox"/> Renewal of Operating Permit   |
| <input type="checkbox"/> Extension of Plan Approval                    | <input type="checkbox"/> Change of Ownership  | <input type="checkbox"/> Periodic Submission (@ 6 mos) |
| <input checked="" type="checkbox"/> Other: <u>RACT III Application</u> |   |  |

**SECTION A. GENERAL APPLICATION INFORMATION**

**Name of Applicant/Permittee/("applicant")**  
 (non-corporations-attach documentation of legal name)

Silberline Manufacturing Co., Inc.

**Address** 130 Lincoln Drive  
Tamaqua, PA 18252

**Telephone** 570-668-6050      **Taxpayer ID#** 35-1273539-1

**Permit, Plan Approval or Application ID#** TVOP #54-00041 (Hometown Facility)

**Identify the form of management under which the applicant conducts its business (check appropriate box)**

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Individual                     | <input type="checkbox"/> Syndicate           | <input type="checkbox"/> Government Agency                      |
| <input type="checkbox"/> Municipality                   | <input type="checkbox"/> Municipal Authority | <input type="checkbox"/> Joint Venture                          |
| <input type="checkbox"/> Proprietorship                 | <input type="checkbox"/> Fictitious Name     | <input type="checkbox"/> Association                            |
| <input type="checkbox"/> Public Corporation             | <input type="checkbox"/> Partnership         | <input type="checkbox"/> Other Type of Business, specify below: |
| <input checked="" type="checkbox"/> Private Corporation | <input type="checkbox"/> Limited Partnership |   |

**Describe below the type(s) of business activities performed.**

Manufacture of Aluminum Pigments

**SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"**

If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
Silberline Manufacturing Co., Inc.	Tamaqua, PA	Indiana	35-1273539-1	Same

**SECTION C. SPECIFIC INFORMATION REGARDING APPLICANT AND ITS "RELATED PARTIES"**

**Pennsylvania Facilities.** List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of applicant and all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Address	County and Municipality	Telephone No.	Relationship to Applicant
Silberline Manufacturing Co., Inc.	130 Lincoln Drive Tamaqua, PA 18252	Schuylkill County Rush Township	570-668-6050	Same
Silberline Manufacturing Co., Inc.	36 Progress Avenue Tamaqua, PA 18252	Schuylkill County Rush Township	570-668-2773	Same

Provide the names and business addresses of all general partners of the applicant and parent and subsidiary corporations, if any.

Name	Business Address
NONE	

**List the names and business address of persons with overall management responsibility for the process being permitted (i.e. plant manager).**

Name	Business Address
Jennifer Mermon Vice President, Operations - Americas	130 Lincoln Drive, Tamaqua, PA 18252
Mary Kate Thomas, HSE Manager	130 Lincoln Drive, Tamaqua, PA 18252

**Plan Approvals or Operating Permits.** List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time 5 years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

Air Contamination Source	Plan Approval/ Operating Permit#	Location	Issuance Date	Expiration Date
Aluminum Pigment Manufacturing Process	TV-OP 54-00041 With RACT II Modification	130 Lincoln Drive Tamaqua, PA 18252	3/20/2019	3/19/2024
Aluminum Pigment Manufacturing Process	SOP-54-00066	36 Progress Avenue Tamaqua, PA 18252	2/4/2020	2/17/2025
Waterborne Pigment Line	Plan Approval 54-00041A	130 Lincoln Drive Tamaqua, PA 18252	3/8/2016	9/4/2016; Relinquished 7/13/2017
Waterborne Pigment Line	Plan Approval 54-00041B	130 Lincoln Drive Tamaqua, PA 18252	1/14/2019	12/15/2022*
Waterborne Mod. Silbercoat Boiler No. 3	Plan Approval #54-00041C	130 Lincoln Drive Tamaqua, PA 18252	1/13/2020	12/28/2022*

\* Extensions have been submitted on 11/30/2022

**Compliance Background.** (Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.) List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing/Continuing or Corrected/Date	Dollar Amount Penalty
11/23/2021	Hometown	TVOP #54-00041	Late Compliance Certification Statement	NOV	4/29/2021 Submittal	\$ -0-
4/19/2019	Hometown	RACT II	Late Application	NOV	Submitted 5/16/2019	\$7,200
3/26/2018	Hometown	TVOP #54-00041	Late Compliance Certification Statement	NOV	4/11/2018 Submittal	\$2,500

List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Litigation Existing/Continuing Or Corrected/Date
SEMI-ANNUAL DEVIATION REPORTS ARE SUBMITTED				

**CONTINUING OBLIGATION.** Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional deviations occur between the date of submission and Department action on the application.

**VERIFICATION STATEMENT**

Subject to the penalties of Title 18 Pa.C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I verify under penalty of law that I am authorized to make this verification on behalf of the Applicant/Permittee. I further verify that the information contained in this Compliance Review Form is true and complete to the best of my belief formed after reasonable inquiry. I further verify that reasonable procedures are in place to ensure that “documented conduct” and “deviations” as defined in 25 Pa Code Section 121.1 are identified and included in the information set forth in this Compliance Review Form.



Signature

10/3/22

Date

Jennifer Mermon

Name (Print or Type)

Vice President, Operations - Americas

Title

## APPENDIX E. MUNICIPAL NOTIFICATIONS

---





*Guzek Associates, Inc.*

*Mechanical, Electrical, Structural,  
Environmental, and Architectural Engineering*

*Phone: (570) 586-9700  
Fax: (570) 586-6728  
Email: guzekassoc@aol.com*

*401 DAVIS STREET  
CLARKS SUMMIT, PA 18411-1837*

August 15, 2022

Schuylkill County Board of Commissioners  
401 North Second Street  
Pottsville, PA 17901

Reference: Silberline Manufacturing Company, Inc., Tamaqua, PA  
DEP Plan Approval Application for RACT III Analyses

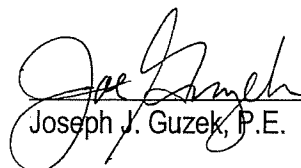
Dear Commissioners:

In compliance with 25 PA §129.92, we wish to advise you that Silberline Manufacturing Company, Inc., located at 130 Lincoln Drive, Tamaqua, PA, is submitting a Plan Approval Application to the PA Department of Environmental Protection (PA DEP) for a RACT III analysis of its manufacturing processes at its Hometown manufacturing facility.

Please note that there is a 30-day comment period which begins upon receipt of this notice by the municipality and county.

Should you have any questions on our proposed Application, please feel free to contact Ms. Mary Kate Thomas of Silberline at 570/668-8485, or this writer.

Very truly yours,

  
\_\_\_\_\_  
Joseph J. Guzek, P.E.

E-cc: Mary Kate Thomas – Silberline Manufacturing Company, Inc.

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED #7022 0410 0002 7512 5105**



*Guzek Associates, Inc.*

---

*Mechanical, Electrical, Structural,  
Environmental, and Architectural Engineering*

*Phone: (570) 586-9700  
Fax: (570) 586-6728  
Email: guzekassoc@aol.com*

*401 DAVIS STREET  
CLARKS SUMMIT, PA 18411-1837*

August 15, 2022

Rush Township Board of Supervisors  
104 Mahanoy Avenue  
Tamaqua, PA 18252

Reference: Silberline Manufacturing Company, Inc., Tamaqua, PA  
DEP Plan Approval Application for RACT III Analyses

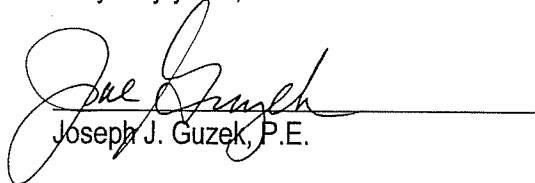
Dear Supervisors:

In compliance with 25 PA §129.92, we wish to advise you that Silberline Manufacturing Company, Inc., located at 130 Lincoln Drive, Tamaqua, PA, is submitting a Plan Approval Application to the PA Department of Environmental Protection (PA DEP) for a RACT III analysis of its manufacturing processes at its Hometown manufacturing facility.

Please note that there is a 30-day comment period which begins upon receipt of this notice by the municipality and county.

Should you have any questions on our proposed Application, please feel free to contact Ms. Mary Kate Thomas of Silberline at 570/668-8485, or this writer.

Very truly yours,

  
Joseph J. Guzek, P.E.

E-cc: Mary Kate Thomas – Silberline Manufacturing Company, Inc.

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED #7022 0410 0002 7512 5099**

7022 0410 0002 7512 5105

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Certified Mail Fee \$

Extra Services & Fees (check box, add fee as appropriate)

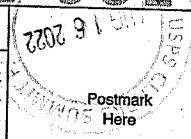
Return Receipt (hardcopy) \$

Return Receipt (electronic) \$

Certified Mail Restricted Delivery \$

Adult Signature Required \$

Adult Signature Restricted Delivery \$



Postage \$

Total Postage and Fees \$

Sent To  
Schuylkill County Board of Commissioners  
Street and Apt. No., or PO Box No.  
401 N Second St  
City/State, ZIP+4®  
Pottsville PA 17901

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7022 0410 0002 7512 5099

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Extra Services & Fees (check box, add fee as appropriate)

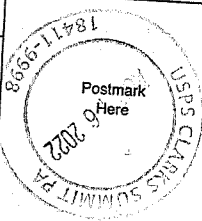
Return Receipt (hardcopy) \$

Return Receipt (electronic) \$

Certified Mail Restricted Delivery \$

Adult Signature Required \$

Adult Signature Restricted Delivery \$



Postage \$

Total Postage and Fees \$

Sent To  
Rush Township Board of Supervisors  
Street and Apt. No., or PO Box No.  
104 Mahanoy Ave  
City/State, ZIP+4®  
Tamaqua PA 18252-4000

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
Schuylkill County Board of Commissioners  
401 N Second St  
Pottsville PA 17901



9590 9402 7368 2028 2293 00

COMPLETE THIS SECTION ON DELIVERY

A. Signature  
 Agent  
 Addressee  
*Anda Deatrich*

B. Received by (Printed Name)  
*Linda Deatrich*

C. Date of Delivery  
*8-19-22*

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type

Adult Signature

Adult Signature Restricted Delivery

Certified Mail®

Certified Mail Restricted Delivery

Collect on Delivery

Collect on Delivery Restricted Delivery

Priority Mail Express®

Registered Mail™

Registered Mail Restricted Delivery

Signature Confirmation™

Signature Confirmation Restricted Delivery

7022 0410 0002 7512 5105

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
Rush Township Board of Supervisors  
104 Mahanoy Ave  
Tamaqua PA 18252-4000



9590 9402 7368 2028 2293 17

COMPLETE THIS SECTION ON DELIVERY

A. Signature  
 Agent  
 Addressee  
*Bob Franko*

B. Received by (Printed Name)  
*Bob Franko*

C. Date of Delivery  
*8-18-22*

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type

Adult Signature

Adult Signature Restricted Delivery

Certified Mail®

Certified Mail Restricted Delivery

Collect on Delivery

Collect on Delivery Restricted Delivery

Priority Mail Express®

Registered Mail™

Registered Mail Restricted Delivery

Signature Confirmation™

Signature Confirmation Restricted Delivery

7022 0410 0002 7512 5099

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

## **APPENDIX F. AIR QUALITY FEE SCHEDULE**

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## AIR QUALITY FEES FOR TITLE V OPERATING PERMIT

Company Information				
Federal Tax ID: 35-1273539-1		Firm Name: SILBERLINE MFG CO		
Permit # (If any): 54-00041		Facility Name: LINCOLN DR PLT		
Municipality: Rush Township		County: Schuylkill County		
Contact Person Name: Mary Kate Thomas		Telephone Number: (570) 668 - 8485		
E-mail: thomasm@silberline.com				
Title V Operating Permit				
Line #	Check the appropriate box below	Type of Authorization	Fee 2021 - 2025	Total Fees
1	<input type="checkbox"/>	New Application, Subchapter G	\$5,000	
2	<input type="checkbox"/>	Renewal	\$4,000	
3	<input type="checkbox"/>	Minor Modification	\$1,500	
4	<input checked="" type="checkbox"/>	Significant Modification	\$4,000	\$4,000
5	<input type="checkbox"/>	Administrative Amendment / Change of Ownership	\$1,500	
6	<input type="checkbox"/>	Plantwide Applicability Limit (PAL) for NSR regulated pollutants or PAL for PSD regulated pollutants or both	\$10,000	

Pay maximum amount of fee when one or more authorizations are requested. For example, when a renewal application and a change of ownership forms are submitted, please pay only the highest amount of fee (\$4,000).

THIS DOCUMENT HAS A COLORED BACKGROUND AND MICROPRINTING. THE REVERSE SIDE INCLUDES AN ARTIFICIAL WATERMARK.

CLEAN AIR GROUP, INC

401 Davis Street  
Clarks Summit, PA 18411

PNC BANK  
State St  
Clarks Summit, PA 18411

27571

Date 12/28/2022

60-1/313

Pay to the  
Order of

Commonwealth of PA - Clean Air Fund

\$4,000.<sup>00</sup>

Four thousand and no/100

Dollars

Memo

Silberline Hometown  
RACT III Application Fee



Joseph J. Goyke

⑆031300012⑆ 9230069653⑈ 27571

CLEAN AIR GROUP, INC

27571

DIL(H) 22505

RACT 3 Application Fee

CLEAN AIR GROUP, INC

27571

## APPENDIX G. GENERAL INFORMATION FORM

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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**GENERAL INFORMATION FORM – AUTHORIZATION APPLICATION**

Before completing this General Information Form (GIF), read the step-by-step instructions provided in this application package. This form is used by the Department of Environmental Protection (DEP) to inform our programs regarding what other DEP permits or authorizations may be needed for the proposed project or activity. This version of the General Information Form (GIF) must be completed and returned with any program-specific application being submitted to the DEP.

<b>Related ID#s (If Known)</b> Client ID# _____ APS ID# _____ Site ID# _____ Auth ID# _____ Facility ID# _____		<b>DEP USE ONLY</b> Date Received & General Notes
---	--	--

**CLIENT INFORMATION**

<b>DEP Client ID#</b> 81932	<b>Client Type / Code</b> PACOR	<b>Dun &amp; Bradstreet ID#</b> 00-23-0284	
<b>Legal Organization Name or Registered Fictitious Name</b> Silberline Manufacturing Company, Inc.		<b>Employer ID# (EIN)</b> 35-1273539-1	<b>Is the EIN a SSN?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> NO
<b>State of Incorporation or Registration of Fictitious Name</b> Indiana		<input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> LLP <input type="checkbox"/> LP <input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Association/Organization <input type="checkbox"/> Estate/Trust <input type="checkbox"/> Other	
<b>Individual Last Name</b>	<b>First Name</b>	<b>MI</b>	<b>Suffix</b>
<b>Additional Individual Last Name</b>	<b>First Name</b>	<b>MI</b>	<b>Suffix</b>
<b>Mailing Address Line 1</b> 130 Lincoln Drive		<b>Mailing Address Line 2</b>	
<b>Site Address Last Line – City</b> Tamaqua	<b>State</b> PA	<b>ZIP+4</b> 18252	<b>Country</b> USA
<b>Client Contact Last Name</b> Thomas	<b>First Name</b> Mary Kate	<b>MI</b>	<b>Suffix</b>
<b>Client Contact Title</b> HSE Manager	<b>Phone</b> 570/668-8485	<b>Ext</b>	<b>Cell Phone</b>
<b>Email Address</b> thomasm@silberline.com		<b>FAX</b>	

**SITE INFORMATION**

<b>DEP Site ID#</b>	<b>Site Name</b> Silberline Manufacturing Company, Inc.		
<b>EPA ID#</b> PAD981044704	<b>Estimated Number of Employees to be Present at Site</b>		50
<b>Description of Site</b> Hometown Facility			
<b>Tax Parcel ID(s):</b> N/A			
<b>County Name(s)</b> Schuylkill	<b>Municipality(ies)</b> Rush Township	<b>City</b> <input type="checkbox"/>	<b>Boro</b> <input type="checkbox"/>
		<input type="checkbox"/>	<b>Twp</b> <input checked="" type="checkbox"/>
			<b>State</b> PA
<b>Site Location Line 1</b> 130 Lincoln Drive		<b>Site Location Line 2</b>	
<b>Site Location Last Line – City</b> Tamaqua	<b>State</b> PA	<b>ZIP+4</b> 18252	
<b>Detailed Written Directions to Site</b>			



<b>Site Contact Last Name</b> Thomas	<b>First Name</b> Mary Kate	<b>MI</b>	<b>Suffix</b>
<b>Site Contact Title</b> HSE Manager		<b>Site Contact Firm</b> Silberline Manufacturing Company, Inc.	
<b>Mailing Address Line 1</b> 130 Lincoln Drive		<b>Mailing Address Line 2</b>	
<b>Mailing Address Last Line - City</b> Tamaqua		<b>State</b> PA	<b>ZIP+4</b> 18252
<b>Phone</b> 570/668-8485	<b>Ext</b>	<b>FAX</b>	<b>Email Address</b> thomasm@silberline.com
<b>NAICS Codes</b> (Two- & Three-Digit Codes - List All That Apply) 32			<b>6-Digit Code</b> (Optional) 325131: Inorganic Dye & Pigment Mfg.
<b>Client to Site Relationship</b> OWNOP			

**FACILITY INFORMATION**

<b>Modification of Existing Facility</b>	<b>Yes</b>	<b>No</b>
1. Will this project modify an existing facility, system, or activity?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Will this project involve an addition to an existing facility, system, or activity?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>If "Yes", check all relevant facility types and provide DEP facility identification numbers below.</i>		

Facility Type	DEP Fac ID#	Facility Type	DEP Fac ID#
<input checked="" type="checkbox"/> Air Emission Plant	TVOP #54-00041	<input type="checkbox"/> Industrial Minerals Mining Operation	
<input type="checkbox"/> Beneficial Use (water)		<input type="checkbox"/> Laboratory Location	
<input type="checkbox"/> Blasting Operation		<input type="checkbox"/> Land Recycling Cleanup Location	
<input type="checkbox"/> Captive Hazardous Waste Operation		<input type="checkbox"/> Mine Drainage Treatment / Land Recycling Project Location	
<input type="checkbox"/> Coal Ash Beneficial Use Operation		<input type="checkbox"/> Municipal Waste Operation	
<input type="checkbox"/> Coal Mining Operation		<input type="checkbox"/> Oil & Gas Encroachment Location	
<input type="checkbox"/> Coal Pillar Location		<input type="checkbox"/> Oil & Gas Location	
<input type="checkbox"/> Commercial Hazardous Waste Operation		<input type="checkbox"/> Oil & Gas Water Poll Control Facility	
<input type="checkbox"/> Dam Location		<input type="checkbox"/> Public Water Supply System	
<input type="checkbox"/> Deep Mine Safety Operation -Anthracite		<input type="checkbox"/> Radiation Facility	
<input type="checkbox"/> Deep Mine Safety Operation -Bituminous		<input type="checkbox"/> Residual Waste Operation	
<input type="checkbox"/> Deep Mine Safety Operation -Ind Minerals		<input type="checkbox"/> Storage Tank Location	
<input type="checkbox"/> Encroachment Location (water, wetland)		<input type="checkbox"/> Water Pollution Control Facility	
<input type="checkbox"/> Erosion & Sediment Control Facility		<input type="checkbox"/> Water Resource	
<input type="checkbox"/> Explosive Storage Location		<input type="checkbox"/> Other:	

<b>Latitude/Longitude Point of Origin</b>	<b>Latitude</b>			<b>Longitude</b>		
	<b>Degrees</b>	<b>Minutes</b>	<b>Seconds</b>	<b>Degrees</b>	<b>Minutes</b>	<b>Seconds</b>
Front Door	40	49	42.8844	75	59	26.3364
<b>Horizontal Accuracy Measure</b>	Feet	--or--		Meters		
<b>Horizontal Reference Datum Code</b>	<input type="checkbox"/> North American Datum of 1927 <input checked="" type="checkbox"/> North American Datum of 1983 <input type="checkbox"/> World Geodetic System of 1984					
<b>Horizontal Collection Method Code</b>	NTDEP					
<b>Reference Point Code</b>	ENTGN					
<b>Altitude</b>	Feet	1,180	--or--		Meters	
<b>Altitude Datum Name</b>	<input type="checkbox"/> The National Geodetic Vertical Datum of 1929 <input checked="" type="checkbox"/> The North American Vertical Datum of 1988 (NAVD88)					
<b>Altitude (Vertical) Location Datum Collection Method Code</b>	TOPO					
<b>Geometric Type Code</b>	POINT					
<b>Data Collection Date</b>	8/16/2022					
<b>Source Map Scale Number</b>	1	Inch(es)	=	2,000	Feet	
	--or--				Centimeter(s)	=
					Meters	

**PROJECT INFORMATION**

**Project Name**

RACT III Application

**Project Description**

RACT III Application

**Project Consultant Last Name**

Guzek

**First Name**

Joseph

**MI**

J

**Suffix**

**Project Consultant Title**

Consulting Environmental Engineer

**Consulting Firm**

Guzek Associates, Inc.

**Mailing Address Line 1**

401 Davis Street

**Mailing Address Line 2**

**Address Last Line – City**

Clarks Summit

**State**

PA

**ZIP+4**

18411-1837

**Phone**

570-586-9700

**Ext**

**FAX**

570-586-6728

**Email Address**

guzekassoc@aol.com

**Time Schedules**

NA

**Project Milestone (Optional)**

NA

1. Is the project located in or within a 0.5-mile radius of an Environmental Justice community as defined by DEP?  Yes  No

To determine if the project is located in or within a 0.5-mile radius of an environmental justice community, please use the online [Environmental Justice Areas Viewer](#).

2. Have you informed the surrounding community prior to submitting the application to the Department?  Yes  No

**Method of notification:** Letters of Notification to County & Municipality

3. Have you addressed community concerns that were identified?  Yes  No  N/A

If no, please briefly describe the community concerns that have been expressed and not addressed.

4. Is your project funded by state or federal grants?  Yes  No

**Note:** If "Yes", specify what aspect of the project is related to the grant and provide the grant source, contact person and grant expiration date.

Aspect of Project Related to Grant

Grant Source: \_\_\_\_\_

Grant Contact Person: \_\_\_\_\_

Grant Expiration Date: \_\_\_\_\_

5. Is this application for an authorization on Appendix A of the Land Use Policy? (For referenced list, see Appendix A of the Land Use Policy attached to GIF instructions)  Yes  No

**Note:** If "No" to Question 5, the application is not subject to the [Land Use Policy](#).

If "Yes" to Question 5, the application is subject to this policy and the Applicant should answer the additional questions in the **Land Use Information** section.

**LAND USE INFORMATION**

**Note:** Applicants should submit copies of local land use approvals or other evidence of compliance with local comprehensive plans and zoning ordinances.

1.	Is there an adopted county or multi-county comprehensive plan?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.	Is there a county stormwater management plan?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
3.	Is there an adopted municipal or multi-municipal comprehensive plan?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
4.	Is there an adopted county-wide zoning ordinance, municipal zoning ordinance or joint municipal zoning ordinance?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
<p><b>Note:</b> If the Applicant answers "No" to either Questions 1, 3 or 4, the provisions of the PA MPC are not applicable and the Applicant does not need to respond to questions 5 and 6 below. If the Applicant answers "Yes" to questions 1, 3 and 4, the Applicant should respond to questions 5 and 6 below.</p>					
5.	Does the proposed project meet the provisions of the zoning ordinance or does the proposed project have zoning approval? If zoning approval has been received, attach documentation.	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
6.	Have you attached Municipal and County Land Use Letters for the project?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No

**COORDINATION INFORMATION**

**Note:** The PA Historical and Museum Commission must be notified of proposed projects in accordance with DEP Technical Guidance Document 012-0700-001 utilizing the Project Review Form.

If the activity will be a mining project (i.e., mining of coal or industrial minerals, coal refuse disposal and/or the operation of a coal or industrial minerals preparation/processing facility), respond to questions 1.0 through 2.5 below.

If the activity will not be a mining project, skip questions 1.0 through 2.5 and begin with question 3.0.

1.0	Is this a coal mining project? If "Yes", respond to 1.1-1.6. If "No", skip to Question 2.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
1.1	Will this coal mining project involve coal preparation/ processing activities in which the total amount of coal prepared/processed will be equal to or greater than 200 tons/day?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.2	Will this coal mining project involve coal preparation/ processing activities in which the total amount of coal prepared/processed will be greater than 50,000 tons/year?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.3	Will this coal mining project involve coal preparation/ processing activities in which thermal coal dryers or pneumatic coal cleaners will be used?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.4	For this coal mining project, will sewage treatment facilities be constructed and treated waste water discharged to surface waters?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.5	Will this coal mining project involve the construction of a permanent impoundment meeting one or more of the following criteria: (1) a contributory drainage area exceeding 100 acres; (2) a depth of water measured by the upstream toe of the dam at maximum storage elevation exceeding 15 feet; (3) an impounding capacity at maximum storage elevation exceeding 50 acre-feet?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.6	Will this coal mining project involve underground coal mining to be conducted within 500 feet of an oil or gas well?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.0	Is this a non-coal (industrial minerals) mining project? If "Yes", respond to 2.1-2.6. If "No", skip to Question 3.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
2.1	Will this non-coal (industrial minerals) mining project involve the crushing and screening of non-coal minerals other than sand and gravel?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.2	Will this non-coal (industrial minerals) mining project involve the crushing and/or screening of sand and gravel with the exception of wet sand and gravel operations (screening only) and dry sand and gravel operations with a capacity of less than 150 tons/hour of unconsolidated materials?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No

2.3	Will this non-coal (industrial minerals) mining project involve the construction, operation and/or modification of a portable non-metallic (i.e., non-coal) minerals processing plant under the authority of the General Permit for Portable Non-metallic Mineral Processing Plants (i.e., BAQ-PGPA/GP-3)?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.4	For this non-coal (industrial minerals) mining project, will sewage treatment facilities be constructed and treated waste water discharged to surface waters?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.5	Will this non-coal (industrial minerals) mining project involve the construction of a permanent impoundment meeting one or more of the following criteria: (1) a contributory drainage area exceeding 100 acres; (2) a depth of water measured by the upstream toe of the dam at maximum storage elevation exceeding 15 feet; (3) an impounding capacity at maximum storage elevation exceeding 50 acre-feet?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
3.0	Will your project, activity, or authorization have anything to do with a well related to oil or gas production, have construction within 200 feet of, affect an oil or gas well, involve the waste from such a well, or string power lines above an oil or gas well? If "Yes", respond to 3.1-3.3. If "No", skip to Question 4.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
3.1	Does the oil- or gas-related project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a watercourse, floodway or body of water (including wetlands)?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
3.2	Will the oil- or gas-related project involve discharge of industrial wastewater or stormwater to a dry swale, surface water, ground water or an existing sanitary sewer system or storm water system? If "Yes", discuss in <i>Project Description</i> .	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
3.3	Will the oil- or gas-related project involve the construction and operation of industrial waste treatment facilities?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
4.0	Will the project involve a construction activity that results in earth disturbance? If "Yes", specify the total disturbed acreage.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
4.0.1	Total Disturbed Acreage				
4.0.2	Will the project discharge or drain to a special protection water (EV or HQ) or an EV wetland?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
4.0.3	Will the project involve a construction activity that results in earth disturbance in the area of the earth disturbance that are contaminated at levels exceeding residential or non-residential medium-specific concentrations (MSCs) in 25 Pa. Code Chapter 250 at residential or non-residential construction sites, respectively?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.0	Does the project involve any of the following: water obstruction and/or encroachment, wetland impacts, or floodplain project by the Commonwealth/political subdivision or public utility? If "Yes", respond to 5.1-5.7. If "No", skip to Question 6.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
5.1	Water Obstruction and Encroachment Projects – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a watercourse, floodway or body of water?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.2	Wetland Impacts – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a wetland?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.3	Floodplain Projects by the Commonwealth, a Political Subdivision of the Commonwealth or a Public Utility – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a floodplain?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.4	Is your project an interstate transmission natural gas pipeline?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No

5.5	Does your project consist of linear construction activities which result in earth disturbance in two or more DEP regions AND three or more counties?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.6	Does your project utilize Floodplain Restoration as a best management practice for Post Construction Stormwater Management?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.7	Does your project utilize Class V Gravity / Injection Wells as a best management practice for Post Construction Stormwater Management?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
6.0	Will the project involve discharge of construction related stormwater to a dry swale, surface water, ground water or separate storm water system?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
6.1	Will the project involve discharge of industrial waste stormwater or wastewater from an industrial activity or sewage to a dry swale, surface water, ground water or an existing sanitary sewer system or separate storm water system?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
7.0	Will the project involve the construction and operation of industrial waste treatment facilities?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
8.0	Will the project involve construction of sewage treatment facilities, sanitary sewers, or sewage pumping stations? If "Yes", indicate estimated proposed flow (gal/day). Also, discuss the sanitary sewer pipe sizes and the number of pumping stations/treatment facilities/name of downstream sewage facilities in the <i>Project Description</i> , where applicable.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<b>8.0.1 Estimated Proposed Flow (gal/day)</b>				
9.0	Will the project involve the subdivision of land, or the generation of 800 gpd or more of sewage on an existing parcel of land or the generation of an additional 400 gpd of sewage on an already-developed parcel, or the generation of 800 gpd or more of industrial wastewater that would be discharged to an existing sanitary sewer system?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<b>9.0.1 Was Act 537 sewage facilities planning submitted and approved by DEP? If "Yes" attach the approval letter. Approval required prior to 105/NPDES approval.</b>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
10.0	Is this project for the beneficial use of biosolids for land application within Pennsylvania? If "Yes" indicate how much (i.e. gallons or dry tons per year).	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<b>10.0.1 Gallons Per Year (residential septage)</b> _____				
	<b>10.0.2 Dry Tons Per Year (biosolids)</b> _____				
11.0	Does the project involve construction, modification or removal of a dam? If "Yes", identify the dam.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<b>11.0.1 Dam Name</b> _____				
12.0	Will the project interfere with the flow from, or otherwise impact, a dam? If "Yes", identify the dam.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<b>12.0.1 Dam Name</b> _____				
13.0	Will the project involve operations (excluding during the construction period) that produce air emissions (i.e., NOX, VOC, etc.)?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
	<b>13.0.1</b> If "Yes", is the operation subject to the agricultural exemption in 35 P.S. § 4004.1? <input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No	
	<b>13.0.2</b> If the answer to 13.0.1 is "No", identify each type of emission followed by the estimated amount of that emission. <b>Enter all types &amp; amounts of emissions; separate each set with semicolons.</b> This is a RACT III Application for Title V Operating Permit #54-00041.				

14.0	Does the project include the construction or modification of a drinking water supply to serve 15 or more connections or 25 or more people, at least 60 days out of the year? If "Yes", check all proposed sub-facilities.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
14.0.1	Number of Persons Served _____				
14.0.2	Number of Employee/Guests _____				
14.0.3	Number of Connections _____				
14.0.4	Sub-Fac: Distribution System	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.5	Sub-Fac: Water Treatment Plant	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.6	Sub-Fac: Source	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.7	Sub-Fac: Pump Station	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.8	Sub Fac: Transmission Main	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.9	Sub-Fac: Storage Facility	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
15.0	Will your project include infiltration of storm water or waste water to ground water within one-half mile of a public water supply well, spring or infiltration gallery?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
16.0	Is your project to be served by an existing public water supply? If "Yes", indicate name of supplier and attach letter from supplier stating that it will serve the project.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
16.0.1	Supplier's Name _____				
16.0.2	Letter of Approval from Supplier is Attached	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
17.0	Will this project be served by on-lot drinking water wells?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
18.0	Will this project involve a new or increased drinking water withdrawal from a river, stream, spring, lake, well or other water bod(ies)? If "Yes", reference Safe Drinking Water Program.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
18.0.1	Source Name _____				
19.0	Will the construction or operation of this project involve treatment, storage, reuse, or disposal of waste? If "Yes", indicate what type (i.e., hazardous, municipal (including infectious & chemotherapeutic), residual) and the amount to be treated, stored, re-used or disposed.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
19.0.1	Type & Amount _____				
20.0	Will your project involve the removal of coal, minerals, contaminated media, or solid waste as part of any earth disturbance activities?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
21.0	Does your project involve installation of a field constructed underground storage tank? If "Yes", list each Substance & its Capacity. <b>Note:</b> Applicant may need a Storage Tank Site Specific Installation Permit.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
21.0.1	Enter all substances & capacity of each; separate each set with semicolons.				
22.0	Does your project involve installation of an aboveground storage tank greater than 21,000 gallons capacity at an existing facility? If "Yes", list each Substance & its Capacity. <b>Note:</b> Applicant may need a Storage Tank Site Specific Installation Permit.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
22.0.1	Enter all substances & capacity of each; separate each set with semicolons.				
23.0	Does your project involve installation of a tank greater than 1,100 gallons which will contain a highly hazardous substance as defined in DEP's Regulated Substances List, 2570-BK-DEP2724? If "Yes", list each Substance & its Capacity. <b>Note:</b> Applicant may need a Storage Tank Site Specific Installation Permit.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
23.0.1	Enter all substances & capacity of each; separate each set with semicolons.				

24.0 Does your project involve installation of a storage tank at a new facility with a total AST capacity greater than 21,000 gallons?  Yes  No  
"Yes", list each Substance & its Capacity. **Note:** Applicant may need a Storage Tank Site Specific Installation Permit.

24.0.1 Enter all substances & capacity of each; separate each set with semicolons.

**NOTE:** If the project includes the installation of a regulated storage tank system, including diesel emergency generator systems, the project may require the use of a Department Certified Tank Handler. For a full list of regulated storage tanks and substances, please go to [www.dep.pa.gov](http://www.dep.pa.gov) search term storage tanks

25.0 Will the intended activity involve the use of a radiation source?  Yes  No

### CERTIFICATION

I certify that I have the authority to submit this application on behalf of the applicant named herein and that the information provided in this application is true and correct to the best of my knowledge and information.

For applicants supplying an EIN number: I am applying for a permit or authorization from the Pennsylvania Department of Environmental Protection (DEP). As part of this application, I will provide DEP with an accurate EIN number for the applicant entity. By filing this application with DEP, I hereby authorize DEP to confirm the accuracy of the EIN number provided with the Pennsylvania Department of Revenue. As applicant, I further consent to the Department of Revenue discussing the same with DEP prior to issuance of the Commonwealth permit or authorization.

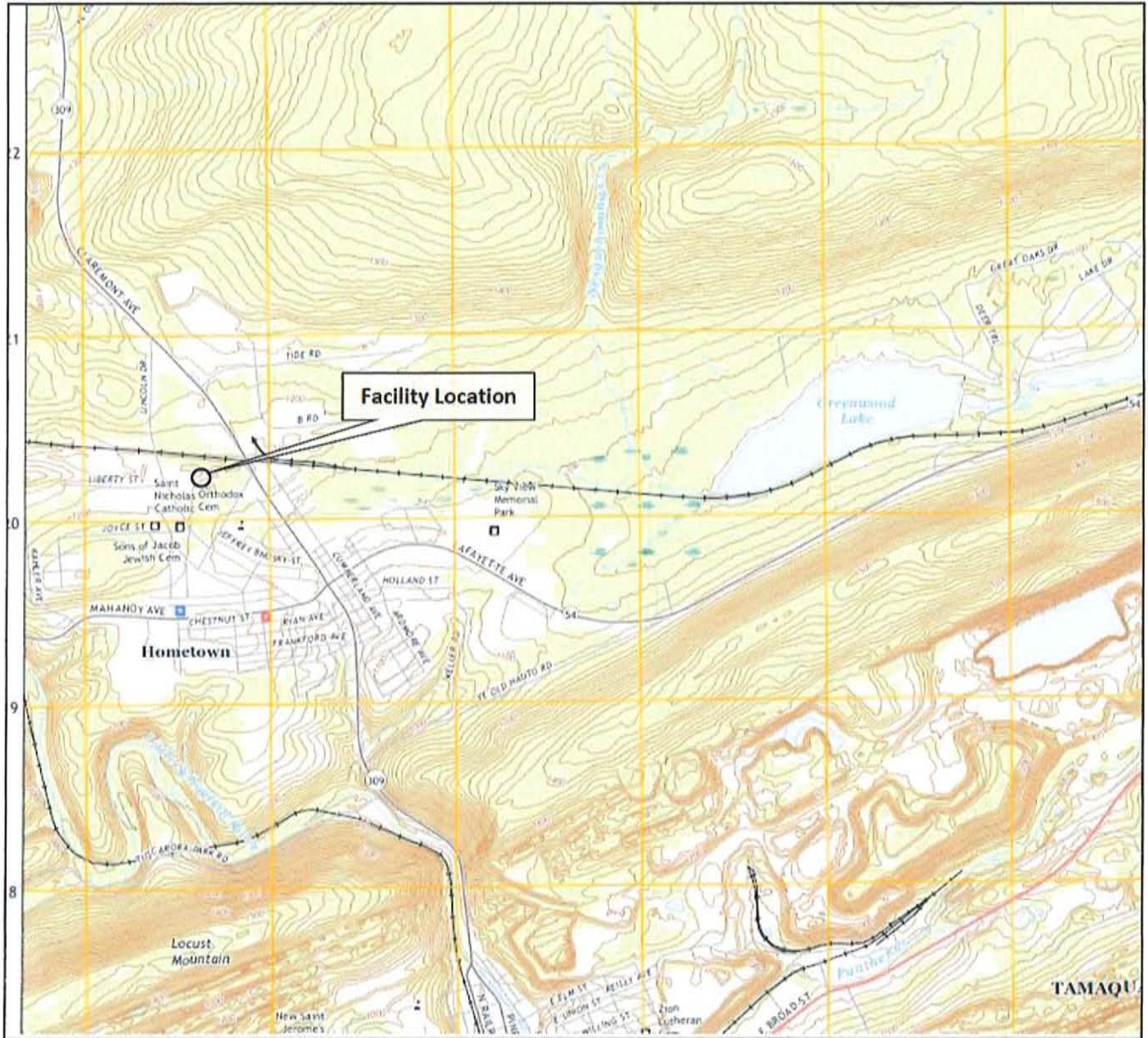
Type or Print Name Joseph J. Guzek, P.E.

Consulting Environmental Engineer

Signature 

Title

Date 8/22/2022



**FIGURE 1: FACILITY LOCATION MAP**

**Silberline Manufacturing Company, Inc. – HOMETOWN FACILITY**

130 Lincoln Drive  
 Tamaqua, Rush Township, PA 18252

SOURCE: USGS 7.5 Minute Series - Tamaqua, PA Quadrangle (2019)  
 SCALE: NTS

Available at: [www.usgs.gov](http://www.usgs.gov)

