



**AIR QUALITY PROGRAM**  
**836 Fulton Street**  
**Pittsburgh, PA 15233-2124**

**Title V Operating Permit**  
**& Federally Enforceable State Operating Permit**

<b><u>Issued To:</u></b>	Neville Chemical Company	<b><u>ACHD Permit #:</u></b>	0060-OP24
<b><u>Facility:</u></b>	Neville Chemical Company 2800 Neville Road Neville Township, PA 15225-1496	<b><u>Date of Issuance:</u></b>	Month 00, 2023
		<b><u>Expiration Date:</u></b>	Month 00, 2028
		<b><u>Renewal Date:</u></b>	expiration date – 6mo.
<b><u>Issued By:</u></b>	_____ JoAnn Truchan, P.E. Section Chief, Engineering	<b><u>Prepared By:</u></b>	_____ Helen O. Gurvich Air Quality Engineer

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### AMENDMENTS:

DATE	SECTION(S)
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## I. CONTACT INFORMATION

**Facility Location:** Neville Chemical Company  
2800 Neville Road  
Neville Township, PA 15225-1496

**Permittee/Owner:** Neville Chemical Company  
2800 Neville Road  
Neville Township, PA 15225-1496

**Permittee/Operator:** same as owner  
(if not Owner)

**Responsible Official:** Daniel D. Kokoski  
**Title:** Vice-President - Manufacturing  
**Company:** Neville Chemical Company  
**Address:** 2800 Neville Road  
Neville Township, PA 15225-1496  
**Telephone Number:** (412) 777-4201  
**Fax Number:** (412) 777-6729

**Facility Contact:** Jeffrey Milhoan  
**Title:** Environmental Manager  
**Telephone Number:** (412) 777-4265  
**Fax Number:** (412) 777-6729  
**E-mail Address:** [jmilhoan@nevchem.com](mailto:jmilhoan@nevchem.com)

### AGENCY ADDRESSES:

**ACHD Engineer:** Helen O. Gurvich  
**Title:** Air Quality Engineer  
**Telephone Number:** 412-578-8105  
**Fax Number:** 412-578-8144  
**E-mail Address:** [helen.gurvich@alleghenycounty.us](mailto:helen.gurvich@alleghenycounty.us)

**ACHD Contact:** Chief Engineer  
Allegheny County Health Department  
Air Quality Program  
836 Fulton Street  
Pittsburgh, PA 15233-2124  
[aqpermits@alleghenycounty.us](mailto:aqpermits@alleghenycounty.us)

**EPA Contact:** Enforcement Programs Section (3AP12)  
USEPA Region III  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2852

## II. FACILITY DESCRIPTION

Neville Chemical Company, located at 2800 Neville Road, Pittsburgh (Neville Township), manufactures synthetic hydrocarbon resins, plasticizers, and plasticizing oils. The facility also operates a groundwater remediation system and wastewater treatment system. Also located at the facility are three resin flaking and packaging centers, a 49.4 MMBtu/hr, and a 29.5 MMBtu/hr natural gas-fired boiler.

The facility is a major source of volatile organic compounds (VOCs); and a minor source of particulate matter (PM), particulate matter <10 µm in diameter (PM<sub>10</sub>), particulate matter <2.5 µm in diameter (PM<sub>2.5</sub>), nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), and hazardous air pollutants (HAPs), as defined in §2102.20 of Article XXI. The facility is also a minor source of greenhouse gas emissions (CO<sub>2</sub>e) as defined in the U.S. EPA Greenhouse Gas Tailoring Rule. The plant is subject to VOC Reasonable Available Control Technology (VOC RACT).

The emission units regulated by this permit are summarized in Table II-1:

**TABLE II-1: Emission Unit Identification**

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
<b>Heat Polymerization Stills</b>					
P001	Heat Polymerization Still - #15				
	Reactor	18.9 MMBtu/hr thermal oxidizer	18,000,000 lb/yr	resin-forming feedstock, additives	S101
	Two – Distillate Receivers	thermal oxidizer			
	Two – Ejector Vents	thermal oxidizer			
	Decanter	thermal oxidizer			
P001	Heat Polymerization Still - #16				
	Reactor	18.9 MMBtu/hr thermal oxidizer	21,000,000 lb/yr	resin-forming feedstock, additives	S101
	Two – Distillate Receivers	thermal oxidizer			
	Vacuum Pump	thermal oxidizer			
	Decanter (shared with #18 & #19)	thermal oxidizer			
P001	Heat Polymerization Still - #18				
	Reactor	18.9 MMBtu/hr thermal oxidizer	26,280,000 lb/yr	resin-forming feedstock, additives	S101
	Two – Distillate Receivers	thermal oxidizer			
	Vacuum Pump	thermal oxidizer			
	Decanter (shared with #16 & #19)	thermal oxidizer			

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
P001	Heat Polymerization Still - #19				
	Reactor	18.9 MMBtu/hr thermal oxidizer	25,000,000 lb/yr	resin-forming feedstock, additives	S101
	Two – Distillate Receivers	thermal oxidizer			
	Vacuum Pump	thermal oxidizer			
	Decanter (shared with #16 & #18)	thermal oxidizer			
P001	Heat Polymerization Still - #43				
	Reactor	18.9 MMBtu/hr thermal oxidizer	25,000,000 lb/yr	resin-forming feedstock, additives	S101
	Two – Distillate Receivers	thermal oxidizer			
	Two – Ejector Vents	thermal oxidizer			
	Decanter	thermal oxidizer			
<b>Catalytic Resin and Polyoil Neutralization</b>					
P006	Unit #20/21 – Scenario #1				
	U20 Reactor	packed bed scrubber	66,600,000 lb/yr	ethylene-cracking products, resin-forming feedstock, additives	S020, S021
	U20 Holding Tank	packed bed scrubber			
	Neutralization Mix Tank	none			
	Neutralization Decanter	none			
	Rinse Mix Tank	none			
	Rinse Decanter	none			
	#4 Aqueous Treater	none			S025a
P006	Unit #20/21 – Scenario #2				
	U20 Reactor	packed bed scrubber	66,600,000 lb/yr	ethylene-cracking products, resin-forming feedstock, additives	S020, S021
	U20 Holding Tank	packed bed scrubber			
	#10 & #11 Aqueous Treaters	none			S025b, c

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
P006	Unit #20/21 – Scenario #3				
	U20 Reactor	packed bed scrubber	66,600,000 lb/yr	ethylene-cracking products, resin-forming feedstock, additives	S020, S021
	Holding Tanks #1 & #2	none			
	Final Holding Tank #171	none			
	Neutralization Mix Tank	none			
	Neutralization Decanter	none			
	Rinse Mix Tank	none			
	Rinse Decanter	none			
	#4 Aqueous Treater	none			S025a
P006	Unit #20/21 – Scenario #4				
	U20 Reactor	packed bed scrubber	66,600,000 lb/yr	ethylene-cracking products, resin-forming feedstock, additives	S020, S021
	Holding Tanks #1 & #2	none			
	Final Holding Tank #171	none			
	#10 & #11 Aqueous Treaters	none			S025b, c
<b>Continuous Still</b>					
P008	#3 Continuous Still				
	Tray Tower	none	67,200,000 lb/yr	polyoil, resin-forming feedstock, additives	--
	Distillate Condenser	none			--
	Decanter	none			S026
	Batch/Flush Tank	none			--
	Sidestream Oil Tank (T-85)	none			--
<b>Flaking and Packaging</b>					
P011	#2 Packaging Center				

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
	Seven – Drain Kettles	none	12,500 lb/hr 87,600,000 lb/yr	liquid hydrocarbon resins	S042-S048
	Flaking Belt	none		liquid hydrocarbon resins	S050a
	Packaging Station	baghouse		solid flaked hydrocarbon resins	S051
P012	#3 Packaging Center				
	Seven – Drain Kettles	none	122,600,000 lb/yr	liquid hydrocarbon resins	S054-S060
	Flaking Belt	none	48,000,000 lb/yr	liquid hydrocarbon resins	S061a, b, c
	Packaging Station	baghouse	122,600,000 lb/yr	solid flaked hydrocarbon resins	S062
	Pouring Station	none	122,600,000 lb/yr	liquid hydrocarbon resins	S063
P013	#5 Packaging Center				
	Three – Drain Kettles	none	78,800,000 lb/yr	liquid hydrocarbon resins	S065-S067
	Flaking Belt	none		liquid hydrocarbon resins	S068a, b, c
	Packaging Station	fabric filter		solid flaked hydrocarbon resins	S069
<b>Other Processes</b>					
P014	Wastewater Collection, Conveyance, and Treatment				
	Three – Surge Tanks (#5001, #5251, #1004)	none	105,000,000 gal/yr (total for system)	wastewater	--
	Three – Batch Tanks (#2011, #2012, #2013)	none		wastewater	S071-S073
	Equalization Tank (#5002)	none		wastewater	
	Two – Biological Treatment / Aeration Tanks (TA-2, TA-3)	none		wastewater	S074-S075
	Two – Clarifier Tanks (TA-4, TA-5)	none		wastewater	
	Effluent Tank (TA-7)	none		wastewater	S076
	Sludge Tank (#2010)	none		wastewater	S077
	Rotary Vacuum Filter	vented to #6 Boiler		wastewater	
	Oil/Water Separator	none		wastewater	S078



I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
	Aerobic Digester Tank (TA-6)	none		wastewater	S078a
P016	Final Product Loading				
	LX-830 Fuel Oil Barge Loading	none	6,000,000 gal/yr	petroleum hydrocarbon resins, distillate fuel oils, distillate oils	--
	Final Product Tankcar & Tankwagon Loading	none	24,300,000 gal/yr	petroleum hydrocarbon resins, distillate fuel oils, distillate oils	--
P017	Groundwater Remediation System				
	Seven – Groundwater Wells	none	165,000 gal/yr (recovered oil)	groundwater, recovered oils	--
	Seven – Oil Recovery Wells	none	165,000 gal/yr (recovered oil)	groundwater, recovered oils	--
	#2 Drywell pump and Treat System	none	165,000 gal/yr (recovered oil)	groundwater, recovered oils	--
	Old #8 Water Well Pump and Treat System	none	165,000 gal/yr (recovered oil)	groundwater, recovered oils	--
<b>Still Process Heaters</b>					
B001	#15 Still Process Heater	none	7.5 MMBtu/hr	natural gas	S001
B002	#16 Still Process Heater	none	6.1 MMBtu/hr	natural gas	S006
B003	#18 Still Process Heater	none	7.21 MMBtu/hr	natural gas	S009
B004	#19 Still Process Heater	none	7.5 MMBtu/hr	natural gas	S012
B015	Unit #43 Process Heater	none	7.5 MMBtu/hr	natural gas	S104
B006	#3 Continuous Still Process Heater	none	5.25 MMBtu/hr	natural gas	S027
<b>Packaging Center Heaters</b>					
B009	#2 Packaging Center Heater	none	5.0 MMBtu/hr	natural gas	S053
B010	#3 Packaging Center Heater	none	3.91 MMBtu/hr	natural gas	S064
B011	#5 Packaging Center Heater	none	3.0 MMBtu/hr	natural gas	S070
<b>Boilers and Generators</b>					
B013	#6 Boiler	none	49.4 MMBtu/hr	natural gas	S099

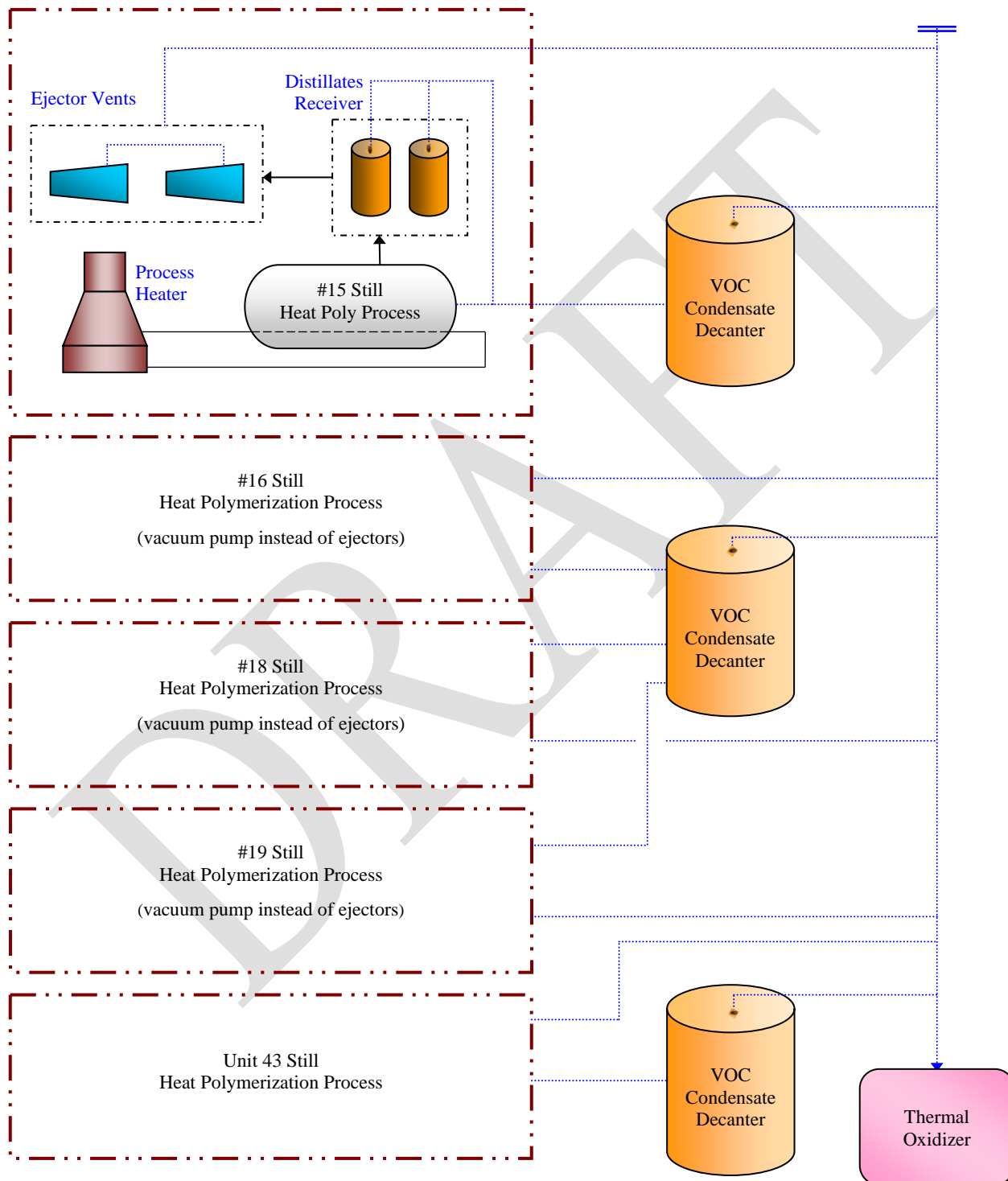
I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
B012	#8 Boiler	low-NO <sub>x</sub> burners, induced flue gas recirc.	29.5 MMBtu/hr	natural gas	S098
--	Eight - Emergency Generators	none		natural gas	--
<b>Storage Tanks</b>					
D001	1001-1002, 1017	none	100,980 gal. ea.	Catalytic & Misc. Polymer Oil	--
	174	none	20,350 gal.	Catalytic & Misc. Polymer Oil	--
D002	9	none	2,256 gal.	Distillates, Low VP	--
	12	none	19,320 gal.	Distillates, Low VP	--
	13-14	none	20,305 gal. ea.	Distillates, Low VP	--
	69	none	9,568 gal.	Distillates, Low VP	--
	80	none	15,100 gal.	Distillates, Low VP	--
	Three Still Wash	none	3,900 gal.	Distillates, Low VP	--
	85	none	3,900 gal.	Distillates, Low VP	--
	178	none	16,120 gal.	Distillates, Low VP	--
	273-278	none	26,004 gal. ea.	Distillates, Low VP	--
	307-309, 314-315	none	30,050 gal. ea.	Distillates, Low VP	--
	342	none	34,750 gal.	Distillates, Low VP	
	8501, 8503	none	845,968 gal. ea.	Distillates, Low VP	
D003	601	none	60,914 gal.	Distillates, Medium VP	
	2108	none	217,336 gal.	Distillates, Medium VP	
D004	176-177	none	16,120 gal. ea.	Heat Poly Charge Stock	--
	205-206	none	20,305 gal. ea.	Heat Poly Charge Stock	--
	1014	none	100,651 gal.	Heat Poly Charge Stock	--
	2104, 2109	none	217,336 gal. ea.	Heat Poly Charge Stock	--
D005	252	none	24,052 gal.	Miscellaneous	-
	76	none	7,614 gal.	Miscellaneous	--

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
	60SC	none	6,016 gal.	Miscellaneous	--
	9 Agitator	none	1,980 gal.	Miscellaneous	--
D006	1, 2	none	19,320 gal. ea.	Naphthenic/Ink/ Vegetable Oil	--
	4	none	17,626 gal.	Naphthenic/Ink/ Vegetable Oil	--
	10	none	20,850 gal.	Naphthenic/Ink/ Vegetable Oil	--
	68	none	9,568 gal.	Naphthenic/Ink/ Vegetable Oil	--
	81	none	10,000 gal.	Naphthenic/Ink/ Vegetable Oil	--
	100	none	10,450 gal.	Naphthenic/Ink/ Vegetable Oil	--
	102	none	10,000 gal.	Naphthenic/Ink/ Vegetable Oil	--
	108	none	10,450 gal.	Naphthenic/Ink/ Vegetable Oil	--
	112	none	9,107 gal.	Naphthenic/Ink/ Vegetable Oil	--
	145	none	1,763 gal.	Naphthenic/Ink/ Vegetable Oil	--
	202-204	none	20,082 gal. ea.	Naphthenic/Ink/ Vegetable Oil	--
	302-303	none	30,050 gal. ea.	Naphthenic/Ink/ Vegetable Oil	--
D007	82-83	none	10,000 gal. ea.	NEVCHEM LR	--
D008	1008	none	100,980 gal.	Recovered Oil	
D009	1012	none	100,651 gal.	Resin Former	--
	1015	none	100,980 gal.	Resin Former	
	5003	none	497,277 gal.	Resin Former	--
	8502, 8504-8506	none	845,968 gal. ea.	Resin Former	--
	6301-6302	none	630,000 gal. ea.	Resin Former	--
D010	135	none	2,010 gal.	Resin Solutions	--
	304-305, 312-313, 316-317	none	30,050 gal. ea.	Resin Solutions	--
	320	none	22,438 gal.	Resin Solutions	--
	330-334	none	30,913 gal. ea.	Resin Solutions	--

I.D.	Source Description	Control Device(s)	Maximum Capacity	Fuel/Raw Material	Stack I.D.
D011	271-272	none	26,004 gal. ea.	Unit #20/21 Feed Blend	--
	341	none	34,750 gal.	Unit #20/21 Feed Blend	
	2105-2106	none	217,336 gal. ea.	Unit #20/21 Feed Blend	--
<b>Miscellaneous Sources</b>					
F001	Roads and Vehicles	none	n/a	n/a	--
G001	Hydrolaser Water Blasting	none		pressurized water	--
G002	Parts Washing	none	2,500 gal/yr	degreasing materials	--
G003	R&D Laboratory Hoods	none			
G004	Tank Cleaning and Painting	none	2,000 gal/yr	sandblasting agents, primer, coatings	--

Process Flow Diagrams

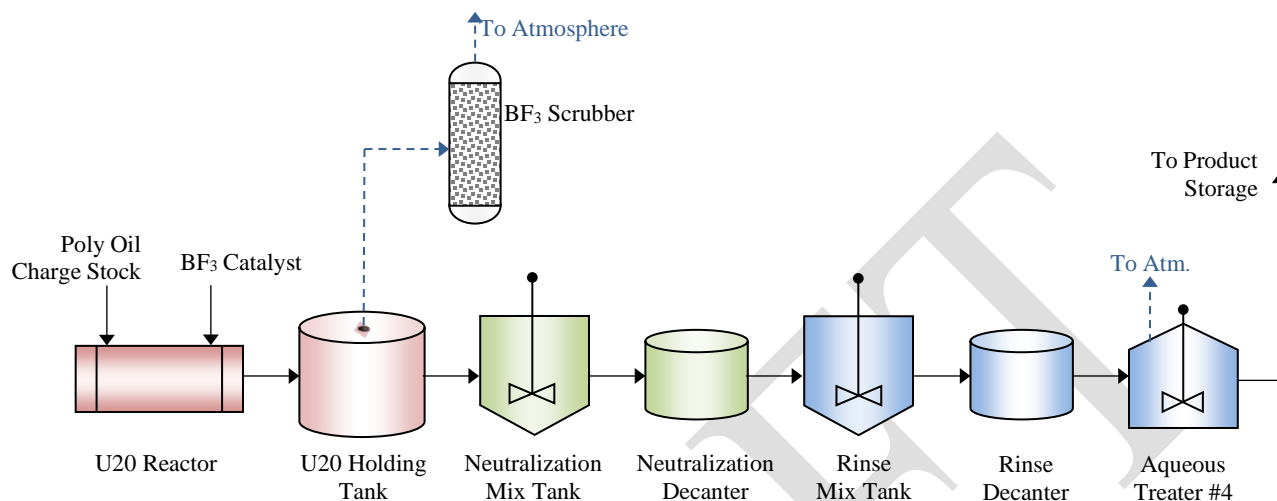
Heat Polymerization Stills  
Section V.A.



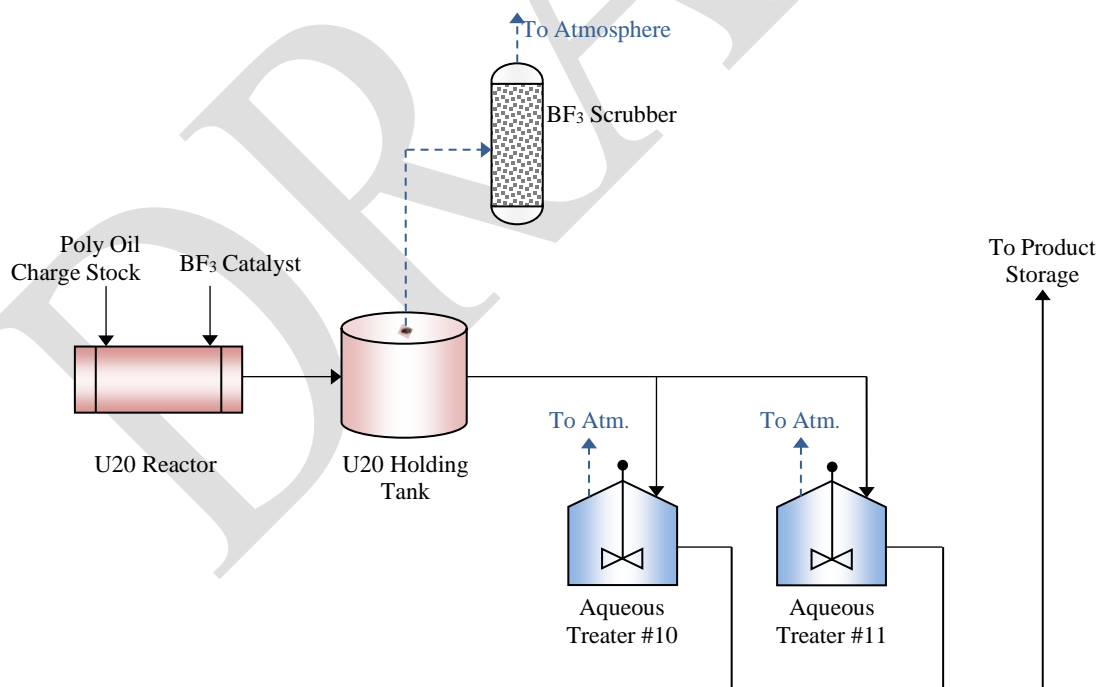
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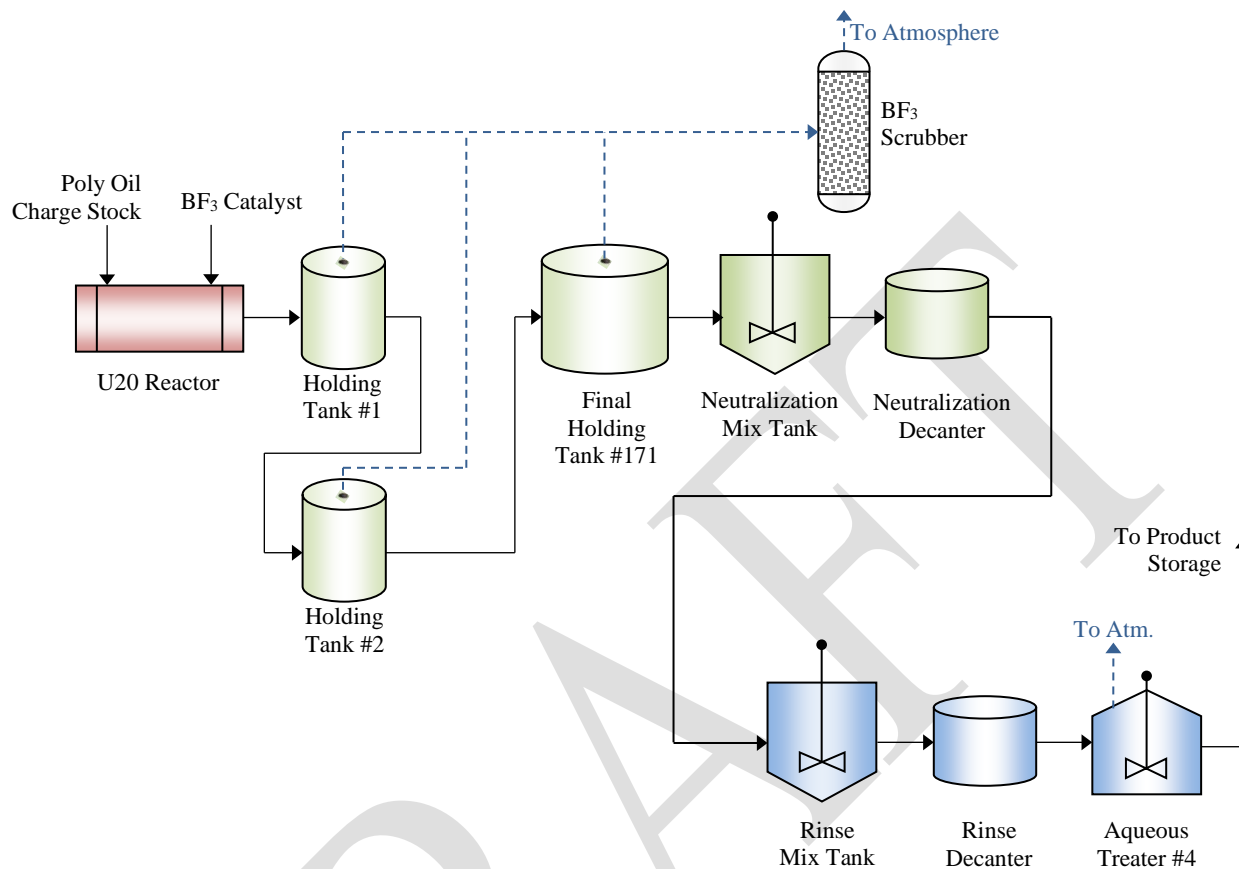
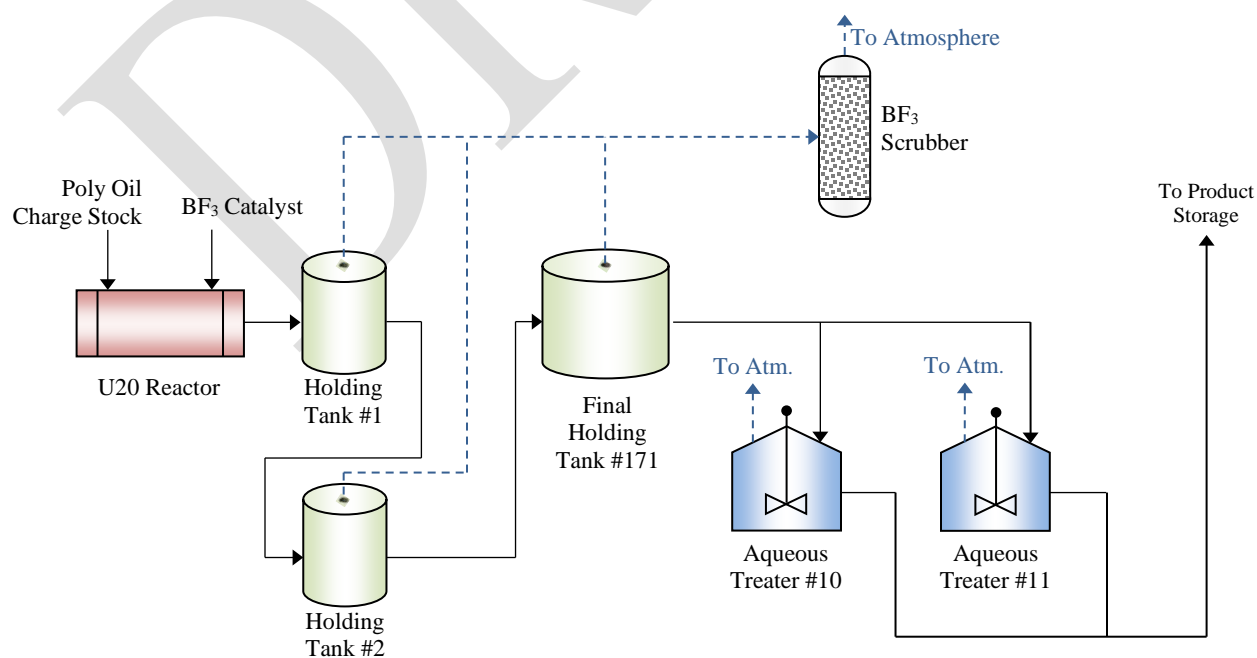
Section V.B.

Scenario #1: Continuous, through U20 Holding Tank

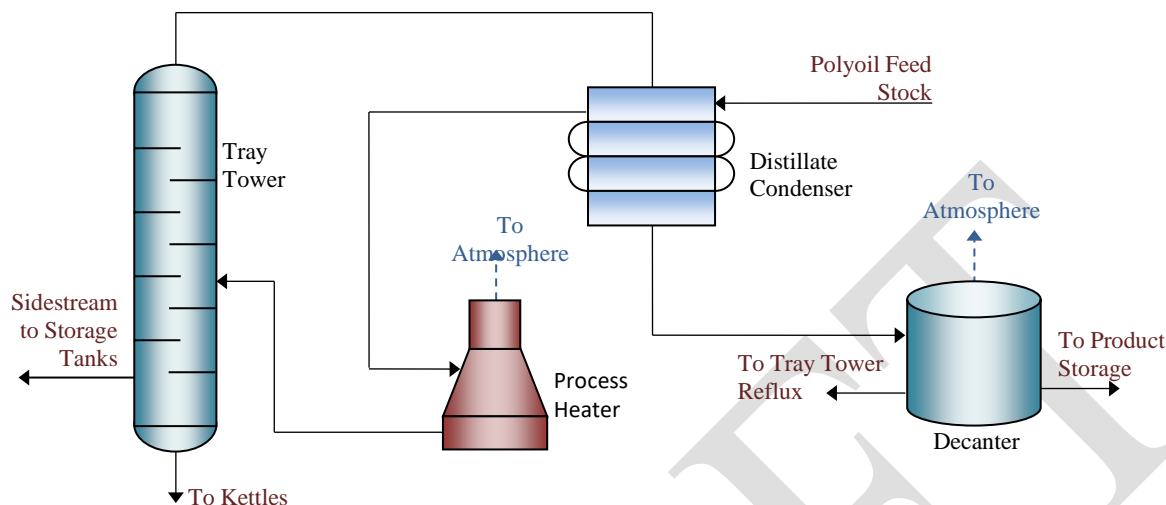


Scenario #2: Batch, through U20 Holding Tank

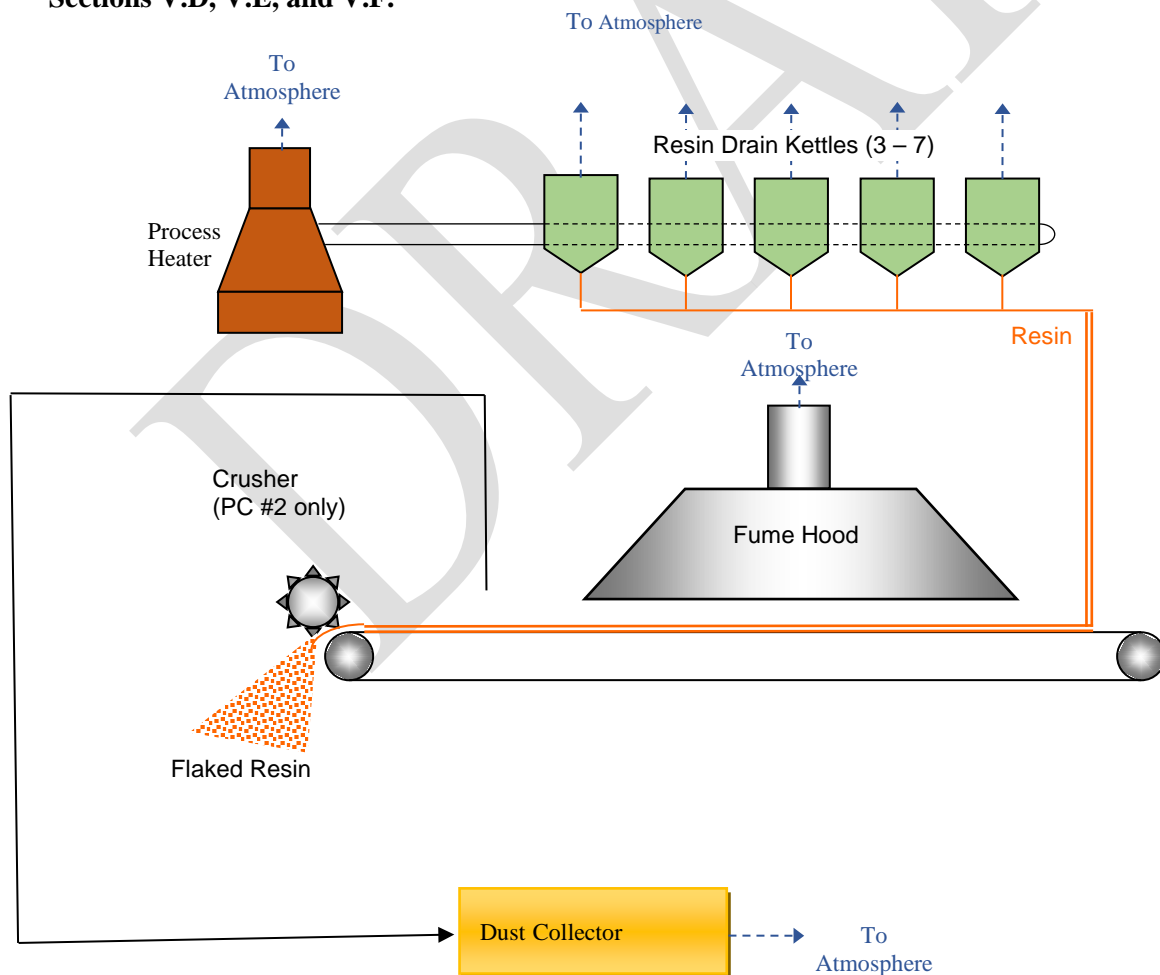


**Scenario #3: Continuous, through Holding Tank Nos. 1 and 2****Scenario #4: Batch, through Holding Tank Nos. 1 and 2**

**#3 Continuous Still  
Section V.C.**

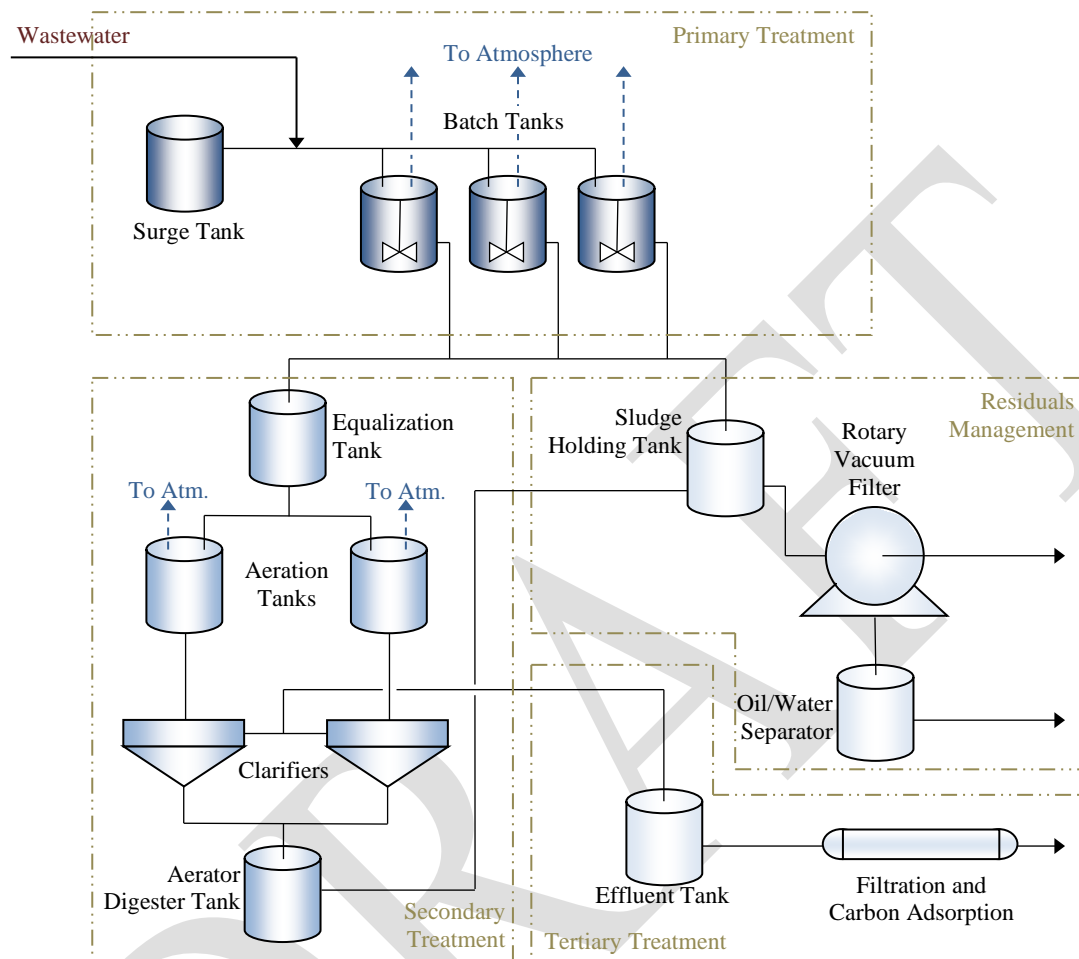


**Packaging Centers  
Sections V.D, V.E, and V.F.**

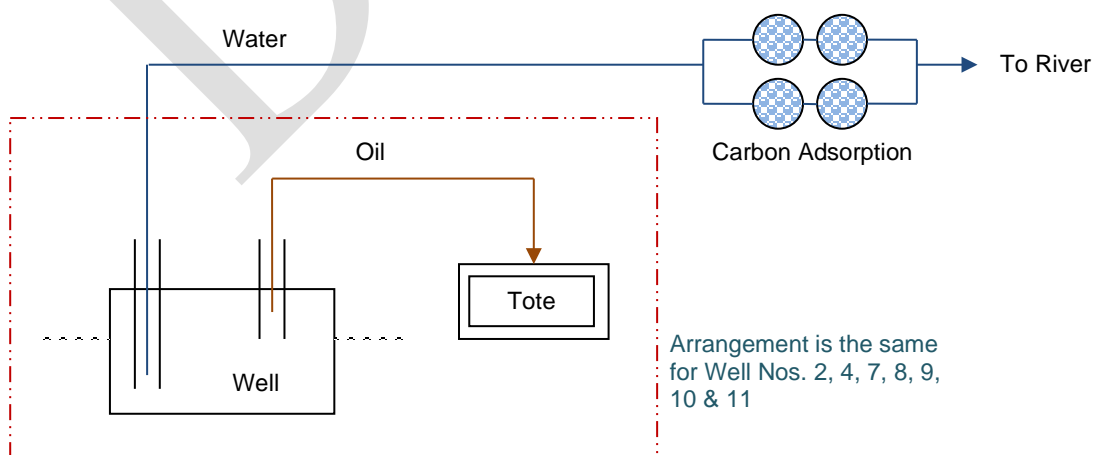




## Wastewater Collection, Conveyance, and Treatment Section V.G.



## Groundwater Remediation System Section VI.A.



**DECLARATION OF POLICY**

*Pollution prevention is recognized as the preferred strategy (over pollution control) for reducing risk to air resources. Accordingly, pollution prevention measures should be integrated into air pollution control programs wherever possible, and the adoption by sources of cost-effective compliance strategies, incorporating pollution prevention, is encouraged. The Department will give expedited consideration to any permit modification request based on pollution prevention principles.*

**The permittee is subject to the terms and conditions set forth below. These terms and conditions constitute provisions of Allegheny County Health Department Rules and Regulations, Article XXI Air Pollution Control. The subject equipment has been conditionally approved for operation. The equipment shall be operated in conformity with the plans, specifications, conditions, and instructions which are part of your application, and may be periodically inspected for compliance by the Department. In the event that the terms and conditions of this permit or the applicable provisions of Article XXI conflict with the application for this permit, these terms and conditions and the applicable provisions of Article XXI shall prevail. Additionally, nothing in this permit relieves the permittee from the obligation to comply with all applicable Federal, State and Local laws and regulations.**

**III. GENERAL CONDITIONS – Major Source****1. Prohibition of Air Pollution (§2101.11)**

- a. It shall be a violation of this permit to fail to comply with, or to cause or assist in the violation of, any requirement of this permit, or any order or permit issued pursuant to authority granted by Article XXI. The permittee shall not willfully, negligently, or through the failure to provide and operate necessary control equipment or to take necessary precautions, operate any source of air contaminants in such manner that emissions from such source:
  - 1) Exceed the amounts permitted by this permit or by any order or permit issued pursuant to Article XXI;
  - 2) Cause an exceedance of the ambient air quality standards established by Article XXI §2101.10;
  - or
  - 3) May reasonably be anticipated to endanger the public health, safety, or welfare.
- b. It shall be a violation of this permit to operate, or allow to be operated, any source in such manner as to allow the release of air contaminants into the open air or to cause air pollution as defined in Article XXI, except as is explicitly permitted by this permit or Article XXI.

**2. Definitions (§2101.20)**

- a. Except as specifically provided in this permit, terms used retain the meaning accorded them under the applicable provisions and requirements of Article XXI or the applicable federal or state regulation. Whenever used in this permit, or in any action taken pursuant to this permit, the words and phrases shall have the meanings stated, unless the context clearly indicates otherwise.
- b. Unless specified otherwise in this permit or in the applicable regulation, the term “year” shall mean any twelve (12) consecutive months.

**3. Conditions (§2102.03.c)**

It shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02, for any person to fail to comply with any terms or conditions set forth in this permit.

**4. Certification (§2102.01)**

Any report, or compliance certification submitted under this permit shall contain written certification by a responsible official as to truth, accuracy, and completeness. This certification and any other certification required under this permit shall be signed by a responsible official of the source, and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**5. Transfers (§2102.03.e)**

This permit shall not be transferable from one person to another, except in accordance with Article XXI §2102.03.e and in cases of change-in-ownership which are documented to the satisfaction of the Department, and shall be valid only for the specific sources and equipment for which this permit was issued. The transfer of permits in the case of change-in-ownership may be made consistent with the administrative permit amendment procedure of Article XXI §2103.14.b. The required documentation and fee must be received by the Department at least 30 days before the intended transfer date.

**6. Term (§2103.12.e, §2103.13.a)**

- a. This permit shall remain valid for five (5) years from the date of issuance, or such other shorter period if required by the Clean Air Act, unless revoked. The terms and conditions of an expired permit shall automatically continue pending issuance of a new operating permit provided the permittee has submitted a timely and complete application and paid applicable fees required under Article XXI Part C, and the Department through no fault of the permittee is unable to issue or deny a new permit before the expiration of the previous permit.
- b. Expiration. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with the requirements of Article XXI Part C.

**7. Need to Halt or Reduce Activity Not a Defense (§2103.12.f.2)**

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

**8. Property Rights (§2103.12.f.4)**

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

**9. Duty to Provide Information (§2103.12.f.5)**

- a. The permittee shall furnish to the Department in writing within a reasonable time, any information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of any records required to be kept by the permit.

- b. Upon cause shown by the permittee the records, reports, or information, or a particular portion thereof, claimed by the permittee to be confidential shall be submitted to the Department in accordance with the requirements of Article XXI, §2101.07.d.4. Information submitted to the Department under a claim of confidentiality, shall be available to the US EPA and the PADEP upon request and without restriction. Upon request of the permittee the confidential information may be submitted to the USEPA and PADEP directly. Emission data or any portions of any draft, proposed, or issued permits shall not be considered confidential.

**10. Modification of Section 112(b) Pollutants which are VOCs or PM<sub>10</sub> (§2103.12.f.7)**

Except where precluded under the Clean Air Act or federal regulations promulgated under the Clean Air Act, if this permit limits the emissions of VOCs or PM<sub>10</sub> but does not limit the emissions of any hazardous air pollutants, the mixture of hazardous air pollutants which are VOCs or PM<sub>10</sub> can be modified so long as no permit emission limitations are violated. A log of all mixtures and changes shall be kept and reported to the Department with the next report required after each change.

**11. Right to Access (§2103.12.h.2)**

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized Department and other federal, state, county, and local government representatives to:

- a. Enter upon the permittee's premises where a permitted source is located or an emissions-related activity is conducted, or where records are or should be kept under the conditions of the permit;
- b. Have access to, copy and remove, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by either Article XXI or the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

**12. Certification of Compliance (§2103.12.h.5,)**

- a. The permittee shall submit on an annual basis, certification of compliance with all terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification of compliance shall be made consistent with General Condition III.4 above and shall include the following information at a minimum:
  - 1) The identification of each term or condition of the permit that is the basis of the certification;
  - 2) The compliance status;
  - 3) Whether any noncompliance was continuous or intermittent;
  - 4) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with the provisions of this permit; and
  - 5) Such other facts as the Department may require to determine the compliance status of the source.
- b. All certification of compliance forms must be submitted to the Administrator as well as the

Department by March 1 of each year for the time period beginning January 1 of the previous year and ending December 31 of the same year. The first report shall be due March 16, 2023 for the time period beginning on the issuance date of this permit through December 31, 2022. Written notice required by condition III.12a should be submitted online through the ACHD Air Quality Regulated Entities Portal (REP). If REP is not available, written notice should be sent to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us).

**13. Record Keeping Requirements (§2103.12.j.1)**

- a. The permittee shall maintain records of required monitoring information that include the following:
  - 1) The date, place as defined in the permit, and time of sampling or measurements;
  - 2) The date(s) analyses were performed;
  - 3) The company or entity that performed the analyses;
  - 4) The analytical techniques or methods used;
  - 5) The results of such analyses; and
  - 6) The operating parameters existing at the time of sampling or measurement.
- b. The permittee shall maintain and make available to the Department, upon request, records including computerized records that may be necessary to comply with the reporting and emission statements in Article XXI §2108.01.e. Such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

**14. Retention of Records (§2103.12.j.2)**

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

**15. Reporting Requirements (§2103.12.k)**

- a. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the Responsible Official.
- b. Prompt reporting of deviations from permit requirements is required, including those attributable to upset conditions as defined in this permit and Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.
- c. All reports submitted to the Department shall comply with the certification requirements of General Condition III.4 above.
- d. Semiannual reports required by this permit shall be submitted to the Department as follows:
  - 1) One semiannual report is due by July 31 of each year for the time period beginning January 1 and ending June 30.

- 2) One semiannual report is due by January 31 of each year for the time period beginning July 1 and ending December 31.

e. Reports should be submitted online through the ACHD Air Quality Regulated Entities Portal (REP). If REP is not available, written notice should be sent to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us).

**16. Severability Requirement (§2103.12.l)**

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

**17. Existing Source Reactivations (§2103.13.d)**

The permittee shall not reactivate any source that has been out of operation or production for a period of one year or more unless the permittee has submitted a reactivation plan request to, and received a written reactivation plan approval from, the Department. Existing source reactivations shall meet all requirements of Article XXI §2103.13.d.

**18. Administrative Permit Amendment Procedures (§2103.14.b)**

An administrative permit amendment may be made consistent with the procedures of Article XXI §2103.14.b and §2103.24.b. Administrative permit amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations there under.

**19. Revisions and Minor Permit Modification Procedures (§2103.14.c)**

Sources may apply for revisions and minor permit modifications on an expedited basis in accordance with Article XXI §2103.14.c and §2103.24.a.

**20. Significant Permit Modifications (§2103.14.d)**

Significant permit modifications shall meet all requirements of the applicable subparts of Article XXI, Part C, including those for applications, fees, public participation, review by affected States, and review by EPA, as they apply to permit issuance and permit renewal. The approval of a significant permit modification, if the entire permit has been reopened for review, shall commence a new full five (5) year permit term. The Department shall take final action on all such permits within nine (9) months following receipt of a complete application.

**21. Duty to Comply (§2103.12.f.1)**

The permittee shall comply with all permit conditions and all other applicable requirements at all times. Any permit noncompliance constitutes a violation of the Clean Air Act, the Air Pollution Control Act, and Article XXI and is grounds for any and all enforcement action, including, but not limited to, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

**22. Renewals (§2103.13.b.)**

Renewal of this permit is subject to the same fees and procedural requirements, including those for public



participation and affected State and EPA review, that apply to initial permit issuance. The application for renewal shall be submitted at least six (6) months but not more than eighteen (18) months prior to expiration of this permit. The application shall also include submission of a supplemental compliance review as required by Article XXI §2102.01.

**23. Reopenings for Cause (§2103.12.f.3, §2103.25.a)**

- a. This permit shall be reopened and reissued under any of the following circumstances:
- 1) Additional requirements under the Clean Air Act become applicable to a major source with a remaining permit term of three (3) or more years. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended solely due to the failure of the Department to act on a permit renewal application in a timely fashion.
  - 2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.
  - 3) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
  - 4) The Administrator or the Department determines that this permit must be reissued or revoked to assure compliance with the applicable requirements.
- b. This permit may be modified; revoked, reopened, and reissued; or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in this permit.

**24. Reopenings for Cause by the EPA (§2103.25.b)**

This permit may be modified, reopened and reissued, revoked or terminated for cause by the EPA in accordance with procedures specified in Article XXI §2103.25.b.

**25. Annual Operating Permit Administration Fee (§2103.40)**

In each year during the term of this permit, on or before the last day of the month in which the application for this permit was submitted, the permittee shall submit to the Department, in addition to any other applicable administration fees, an Annual Operating Permit Administration Fee in accordance with §2103.40. by check or money order payable to the “Allegheny County Air Pollution Control Fund” in the amount specified in the fee schedule applicable at that time.

**26. Annual Major Source Emissions Fees Requirements (§2103.41)**

No later than September 1 of each year, the permittee shall pay an annual emission fee in accordance with Article XXI §2103.41 for each ton of a regulated pollutant (except for carbon monoxide) actually emitted from the source. The permittee shall not be required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant. The emission fee shall be increased in each year after 1995 by the

percentage, if any, by which the Consumer Price Index for the most recent calendar year exceeds the Consumer Price Index for the previous calendar year.

**27. Other Requirements not Affected (§2104.08, §2105.02)**

Compliance with the requirements of this permit shall not in any manner relieve any person from the duty to fully comply with any other applicable Federal, State, or County statute, rule, regulation, or the like, including but not limited to the odor emission standards under Article XXI §2104.04, any applicable NSPSs, NESHAPs, MACTs, or Generally Achievable Control Technology (GACT) standards now or hereafter established by the EPA, and any applicable requirements of BACT or LAER as provided by Article XXI, any condition contained in any applicable Installation or Operating Permit and/or any additional or more stringent requirements contained in an order issued to such person pursuant to Article XXI Part I.

**28. Termination of Operation (§2108.01.a)**

In the event that operation of any source of air contaminants is permanently terminated, the person responsible for such source shall so report, in writing, to the Department within 60 days of such termination.

**29. Tests by the Department (§2108.02.d)**

Notwithstanding any tests conducted pursuant to Article XXI §2108.02, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the person responsible for such source or equipment shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.

**30. Other Rights and Remedies Preserved (§2109.02.b)**

Nothing in this permit shall be construed as impairing any right or remedy now existing or hereafter created in equity, common law or statutory law with respect to air pollution, nor shall any court be deprived of such jurisdiction for the reason that such air pollution constitutes a violation of this permit.

**31. Enforcement and Emergency Orders (§2109.03, §2109.05)**

- a. The person responsible for this source shall be subject to any and all enforcement and emergency orders issued to it by the Department in accordance with Article XXI §2109.03, §2109.04 and §2109.05.
- b. Upon request, any person aggrieved by an Enforcement Order or Emergency Order shall be granted a hearing as provided by Article XXI §2109.03.d; provided however, that an Emergency Order shall continue in full force and effect notwithstanding the pendency of any such appeal.
- c. Failure to comply with an Enforcement Order or immediately comply with an Emergency Order shall be a violation of this permit thus giving rise to the remedies provided by Article XXI §2109.02.

**32. Penalties, Fines, and Interest (§2109.07.a)**

A source that fails to pay any fee required under this permit when due shall pay a civil penalty of 50% of



the fee amount, plus interest on the fee amount computed in accordance with Article XXI §2109.06.a.4 from the date the fee was required to be paid. In addition, the source may have this permit revoked for failure to pay any fee required.

**33. Appeals (§2109.10)**

In accordance with State Law and County regulations and ordinances, any person aggrieved by an order or other final action of the Department issued pursuant to Article XXI or any unsuccessful petitioner to the Administrator under Article XXI Part C, Subpart 2, shall have the right to appeal the action to the Director in accordance with the applicable County regulations and ordinances.

**34. Risk Management (§2104.08, 40 CFR Part 68)**

This source, as defined in 40 CFR Part 68.3, is subject to Part 68. This stationary source shall submit a risk management plan (RMP) by the date specified in Part 68.10. This stationary source shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by General Condition III.12 above.

**35. Operational Flexibility (§2103.14.a)**

- a. The owner or operator shall not make any changes at this source, including trades of increases and decreases in emissions within the permitted source, without first obtaining a permit revision for such changes, unless:
  - 1) The changes do not require an Installation Permit under §2102.04 of this Article or violate the terms of an Operating Permit or an Installation Permit;
  - 2) The permit specifically allows for changes that do not cause specific emissions increases greater than a de minimis emission increase, and the changes do not exceed such emissions increase allowed under the permit, in accordance with General Condition III.36 below;
  - 3) The changes do not violate major source applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements; and
  - 4) By no later than seven (7) days prior to the date on which the implementation of the proposed change is commenced, a written notification is submitted to the Department, for attachment to the Department's copy of the relevant permit, which includes:
    - a) A brief description of the change within the permitted source;
    - b) The date on which the change will occur;
    - c) The pollutants emitted; and
    - d) Any change in emissions.

**36. De Minimis Emission Increases (§2103.14.e)**

- a. The Department may allow, as a condition of an Operating Permit, *de minimis* emission increases from a new or existing source up to the amounts authorized in condition III.36.d below.
- b. A *de minimis* increase may not occur at a source if it either:
  - 1) Increases the emissions of a pollutant regulated under Section 112 of the Clean Air Act (42 U.S.C.A. §7412) except as authorized in conditions III.36.d.4) and 5) below;

- 2) Subjects the source to the permit requirements of Article XXI, §§2102.05, 2102.06, or 2102.07 (relating to prevention of significant deterioration of air quality and major new source and major modification review); or
  - 3) Violates an applicable requirement of this Article, the state Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under the Air Pollution Control Act or the Clean Air Act.
- c. The permittee shall provide the Department with 7 days prior written notice of any *de minimis* emission increase. The notice shall identify and describe the pollutants that will be emitted as a result of the *de minimis* emissions increase and provide emission rates in tons/year and in terms necessary to establish compliance consistent with any applicable requirement. The Department may disapprove or condition the *de minimis* emission increase at any time.
- d. Except as provided in condition III.36.e below, the maximum *de minimis* emission rate increases, as measured in tons/year, that may be authorized in the permit during the term of the permit are:
- 1) Four tons of carbon monoxide from an emissions unit during the term of the permit and 20 tons of carbon monoxide at the source during the term of the permit;
  - 2) One ton of NO<sub>x</sub> from an emissions unit during the term of the permit and 5 tons of NO<sub>x</sub> at the source during the term of the permit;
  - 3) One and six-tenths tons of oxides of sulfur from an emissions unit during the term of the permit and 8.0 tons of oxides of sulfur at the source during the term of the permit;
  - 4) Six-tenths of a ton of PM<sub>10</sub> from an emissions unit during the term of the permit and 3.0 tons of PM<sub>10</sub> at the source during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder, or Article XXI; and
  - 5) One ton of VOC's from an emissions unit during the term of the permit and 5 tons of VOC's at the source during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder, or Article XXI.
- e. The Department may allow, as a condition of an operating permit, installation of the minor sources exempted under §2102.04.a.5 of Article XXI.
- f. *De minimis* emission threshold levels cannot be met by offsetting emission increases with emission decreases at the same emissions unit.

**37. Permit Shield (§2103.22)**

- a. The permittee's compliance with the conditions of this permit shall be deemed compliance with all major source applicable requirements as of the date of permit issuance, provided that:
- 1) Such major source applicable requirements are included and are specifically identified in the permit; or
  - 2) The Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

- b. Nothing in Article XXI §2103.22.e or the Title V Permit shall alter or affect the following:
  - 1) The provisions of Section 303 of the Clean Air Act and the provisions of Article XXI regarding emergency orders, including the authority of the Administrator and the Department under such provisions;
  - 2) The liability of any person who owns, operates, or allows to be operated, a source in violation of any major source applicable requirements prior to or at the time of permit issuance;
  - 3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or
  - 4) The ability of the EPA or the County to obtain information from the permittee pursuant to Section 114 of the Clean Air Act, the provisions of Article XXI and State law.
- c. Unless precluded by the Clean Air Act or regulations therein, final action by the Department on administrative amendments, minor and significant permit modifications, and operational flexibility changes shall be covered by the permit shield provided such amendments, modifications and changes meet the relevant requirements of Article XXI.
- d. The permit shield authorized under Article XXI §2103.22 is in effect for the permit terms and conditions as identified in this permit.

**38. Circumvention (§2101.14)**

For purposes of determining compliance with the provisions of this permit and Article XXI, no credit shall be given to any person for any device or technique, including but not limited to the operation of any source with unnecessary amounts of air, the combining of separate sources except as specifically permitted by Article XXI and the Department, the use of stacks exceeding Good Engineering Practice height as defined by regulations promulgated by the US EPA at 40 CFR §§51.100 and 51.110 and Subpart I, and other dispersion techniques, which without reducing the amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise violate the provisions of this Article; except that, for purposes of determining compliance with Article §2104.04 concerning odors, credit for such devices or techniques, except for the use of a masking agent, may be given.

**39. Duty to Supplement and Correct Relevant Facts (§2103.11.d.2)**

- a. The permittee shall provide additional information as necessary to address requirements that become applicable to the source after the date it files a complete application but prior to the Department taking action on the permit application.
- b. The permittee shall provide supplementary fact or corrected information upon becoming aware that incorrect information has been submitted or relevant facts were not submitted.
- c. Except as otherwise required by this permit and Article XXI, the Clean Air Act, or the regulations thereunder, the permittee shall submit additional information as necessary to address changes occurring at the source after the date it files a complete application but prior to the Department taking action on the permit application.
- d. The applicant shall submit information requested by the Department which is reasonably necessary to evaluate the permit application.

**40. Effect (§2102.03.g.)**

- a. Except as specifically otherwise provided under Article XXI, Part C, issuance of a permit pursuant to Article XXI Part B or Part C shall not in any manner relieve any person of the duty to fully comply with the requirements of this permit, Article XXI or any other provision of law, nor shall it in any manner preclude or affect the right of the Department to initiate any enforcement action whatsoever for violations of this permit or Article XXI, whether occurring before or after the issuance of such permit. Further, except as specifically otherwise provided under Article XXI Part C the issuance of a permit shall not be a defense to any nuisance action, nor shall such permit be construed as a certificate of compliance with the requirements of this permit or Article XXI.

**41. Installation Permits (§2102.04.a.1.)**

It shall be a violation of this permit giving rise to the remedies set forth in Article XXI Part I for any person to install, modify, replace, reconstruct, or reactivate any source or air pollution control equipment which would require an installation permit or permit modification in accordance with Article XXI Part B or Part C.

*~PERMIT SHIELD IN EFFECT~*

#### IV. SITE LEVEL TERMS AND CONDITIONS

##### 1. Reporting of Upset Conditions (§2103.12.k.2)

The permittee shall promptly report all deviations from permit requirements, including those attributable to upset conditions as defined in Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.

##### 2. Visible Emissions (§2104.01.a)

Except as provided for by Article XXI §2108.01.d pertaining to a cold start, no person shall operate, or allow to be operated, any source in such manner that the opacity of visible emissions from a flue or process fugitive emissions from such source, excluding uncombined water:

- a. Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or,
- b. Equal or exceed an opacity of 60% at any time.

##### 3. Odor Emissions (§2104.04) (*County-only enforceable*)

No person shall operate, or allow to be operated, any source in such manner that emissions of malodorous matter from such source are perceptible beyond the property line of such source. In addition, the Department may pursue the remedies provided by §2109.02 for any violation of this Section.

##### 4. Materials Handling (§2104.05)

The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line.

##### 5. Operation and Maintenance (§2105.03)

All air pollution control equipment required by this permit or any order under Article XXI, and all equivalent compliance techniques approved by the Department, shall be properly installed, maintained, and operated consistently with good air pollution control practice.

##### 6. Open Burning (§2105.50)

No person shall conduct, or allow to be conducted, the open burning of any material, except where the Department has issued an Open Burning Permit to such person in accordance with Article XXI §2105.50 or where the open burning is conducted solely for the purpose of non-commercial preparation of food for human consumption, recreation, light, ornament, or provision of warmth for outside workers, and in a manner which contributes a negligible amount of air contaminants.

##### 7. Shutdown of Control Equipment (§2108.01.b)

- a. In the event any air pollution control equipment is shut down for reasons other than a breakdown, the person responsible for such equipment shall report, in writing, to the Department the intent to shut down such equipment at least 24 hours prior to the planned shutdown. Notwithstanding the submission of such report, the equipment shall not be shut down until the approval of the

Department is obtained; provided, however, that no such report shall be required if the source(s) served by such air pollution control equipment is also shut down at all times that such equipment is shut down.

- b. The Department shall act on all requested shutdowns as promptly as possible. If the Department does not take action on such requests within ten (10) calendar days of receipt of the notice, the request shall be deemed denied, and upon request, the owner or operator of the affected source shall have a right to appeal in accordance with the provisions of Article XI.
- c. The prior report required by Site Level Condition IV.7.a above shall include:
  - 1) Identification of the specific equipment to be shut down, its location and permit number (if permitted), together with an identification of the source(s) affected;
  - 2) The reasons for the shutdown;
  - 3) The expected length of time that the equipment will be out of service;
  - 4) Identification of the nature and quantity of emissions likely to occur during the shutdown;
  - 5) Measures, including extra labor and equipment, which will be taken to minimize the length of the shutdown, the amount of air contaminants emitted, or the ambient effects of the emissions;
  - 6) Measures which will be taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impracticable to shut down or curtail the affected source(s) during the shutdown; and
  - 7) Such other information as may be required by the Department.
- d. Written notice required by this condition should be submitted online through the ACHD Air Quality Regulated Entities Portal (REP). If REP is not available, written notice should be sent to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us).

**8. Breakdowns (§2108.01.c)**

- a. In the event that any air pollution control equipment, process equipment, or other source of air contaminants breaks down in such manner as to have a substantial likelihood of causing the emission of air contaminants in violation of this permit, or of causing the emission into the open air of potentially toxic or hazardous materials, the person responsible for such equipment or source shall immediately, but in no event later than sixty (60) minutes after the commencement of the breakdown, notify the Department of such breakdown and shall, as expeditiously as possible but in no event later than seven (7) days after the original notification, provide written notice to the Department.
- b. To the maximum extent possible, all oral and written notices required shall include all pertinent facts, including:
  - 1) Identification of the specific equipment which has broken down, its location and permit number (if permitted), together with an identification of all related devices, equipment, and other sources which will be affected.
  - 2) The nature and probable cause of the breakdown.
  - 3) The expected length of time that the equipment will be inoperable or that the emissions will continue.
  - 4) Identification of the specific material(s) which are being, or are likely to be emitted, together with a statement concerning its toxic qualities, including its qualities as an irritant, and its potential for causing illness, disability, or mortality.



- 5) The estimated quantity of each material being or likely to be emitted.
  - 6) Measures, including extra labor and equipment, taken or to be taken to minimize the length of the breakdown, the amount of air contaminants emitted, or the ambient effects of the emissions, together with an implementation schedule.
  - 7) Measures being taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impractical to shut down the source(s), or any part thereof, during the breakdown.
- c. Notices required shall be updated, in writing, as needed to advise the Department of changes in the information contained therein. In addition, any changes concerning potentially toxic or hazardous emissions shall be reported immediately. All additional information requested by the Department shall be submitted as expeditiously as practicable.
  - d. Unless otherwise directed by the Department, the Department shall be notified whenever the condition causing the breakdown is corrected or the equipment or other source is placed back in operation by no later than 9:00 AM on the next County business day. Within seven (7) days thereafter, written notice shall be submitted pursuant to Paragraphs a and b above.
  - e. Breakdown reporting shall not apply to breakdowns of air pollution control equipment which occur during the initial startup of said equipment, provided that emissions resulting from the breakdown are of the same nature and quantity as the emissions occurring prior to startup of the air pollution control equipment.
  - f. In no case shall the reporting of a breakdown prevent prosecution for any violation of this permit or Article XXI.
  - g. Written notice required by this condition should be submitted online through the ACHD Air Quality Regulated Entities Portal (REP). If REP is not available, written notice should be sent to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us).

#### 9. Cold Start (§2108.01.d)

In the event of a cold start on any fuel-burning or combustion equipment, except stationary internal combustion engines and combustion turbines used by utilities to meet peak load demands, the person responsible for such equipment shall report in writing to the Department the intent to perform such cold start at least 24 hours prior to the planned cold start. Such report shall identify the equipment and fuel(s) involved and shall include the expected time and duration of the startup. Upon written application from the person responsible for fuel-burning or combustion equipment which is routinely used to meet peak load demands and which is shown by experience not to be excessively emissive during a cold start, the Department may waive these requirements and may instead require periodic reports listing all cold starts which occurred during the report period. The Department shall make such waiver in writing, specifying such terms and conditions as are appropriate to achieve the purposes of Article XXI. Such waiver may be terminated by the Department at any time by written notice to the applicant. Written notice should be submitted online through the ACHD Air Quality Regulated Entities Portal (REP). If REP is not available, written notice should be sent to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us).

#### 10. Emissions Inventory Statements (§2108.01.e & g)

- a. Emissions inventory statements in accordance with Article XXI §2108.01.e shall be submitted to the Department by March 15 of each year for the preceding calendar year. The Department may require more frequent submittals if the Department determines that more frequent submissions are

required by the EPA or that analysis of the data on a more frequent basis is necessary to implement the requirements of Article XXI or the Clean Air Act.

- b. The failure to submit any report or update within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

**11. Emissions Inventory Statements (§2108.01.e & g)**

- a. Emissions inventory statements in accordance with Article XXI §2108.01.e shall be submitted to the Department by March 15 of each year for the preceding calendar year. The Department may require more frequent submittals if the Department determines that more frequent submissions are required by the EPA or that analysis of the data on a more frequent basis is necessary to implement the requirements of Article XXI or the Clean Air Act.
- b. The failure to submit any report or update within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

**12. Orders (§2108.01.f)**

In addition to meeting the requirements of General Condition III.28 and Site Level Conditions IV.7 through IV.11 above, inclusive, the person responsible for any source shall, upon order by the Department, report to the Department such information as the Department may require in order to assess the actual and potential contribution of the source to air quality. The order shall specify a reasonable time in which to make such a report.

**13. Violations (§2108.01.g)**

The failure to submit any report or update thereof required by General Condition III.28 and Site Level Conditions IV.7 through IV.12 above, inclusive, within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

**14. Emissions Testing (§2108.02)**

- a. **Orders:** The person responsible for any source shall, upon order by the Department, conduct, or cause to be conducted, such emissions tests as specified by the Department within such reasonable time as is specified by the Department. Test results shall be submitted in writing to the Department within 20 days after completion of the tests, unless a different period is specified in the Department's order. Emissions testing shall comply with all applicable requirements of Article XXI §2108.02.e.
- b. **Tests by the Department:** Notwithstanding any tests conducted pursuant to this permit, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.
- c. **Testing Requirements:** No later than 45 days prior to conducting any tests required by this permit,



the person responsible for the affected source shall submit for the Department's approval a written test protocol explaining the intended testing plan, including any deviations from standard testing procedures, the proposed operating conditions of the source during the test, calibration data for specific test equipment and a demonstration that the tests will be conducted under the direct supervision of persons qualified by training and experience satisfactory to the Department to conduct such tests. In addition, at least 30 days prior to conducting such tests, the person responsible shall notify the Department in writing of the time(s) and date(s) on which the tests will be conducted and shall allow Department personnel to observe such tests, record data, provide pre-weighed filters, analyze samples in a County laboratory and to take samples for independent analysis. Test results shall be comprehensively and accurately reported in the units of measurement specified by the applicable emission limitations of this permit.

- d. Test methods and procedures shall conform to the applicable reference method set forth in this permit or Article XXI Part G, or where those methods are not applicable, to an alternative sampling and testing procedure approved by the Department consistent with Article XXI §2108.02.e.2.
- e. **Violations:** The failure to perform tests as required by this permit or an order of the Department, the failure to submit test results within the time specified, the knowing submission of false information, the willful failure to submit complete results, or the refusal to allow the Department, upon presentation of a search warrant, to conduct tests, shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

**15. Abrasive Blasting (§2105.51)**

- a. Except where such blasting is a part of a process requiring an operating permit, no person shall conduct or allow to be conducted, abrasive blasting or power tool cleaning of any surface, structure, or part thereof, which has a total area greater than 1,000 square feet unless such abrasive blasting complies with all applicable requirements of Article XXI §2105.51.
- b. In addition to complying with all applicable provisions of §2105.51, no person shall conduct, or allow to be conducted, abrasive blasting of any surface unless such abrasive blasting also complies with all other applicable requirements of Article XXI unless such requirements are specifically addressed by §2105.51.

**16. Asbestos Abatement (§2105.62, §2105.63)**

In the event of removal, encasement, or encapsulation of Asbestos-Containing Material (ACM) at a facility or in the event of the demolition of any facility, the permittee shall comply with all applicable provisions of Article XXI §2105.62 and §2105.63.

**17. Protection of Stratospheric Ozone (40 CFR Part 82)**

- a. Permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - 1) All containers in which a Class I or Class II substance is stored or transported, all products containing a Class I substance, and all products directly manufactured with a process that uses a Class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106;

- 2) The placement of the required warning statement must comply with the requirements pursuant to §82.108;
  - 3) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110; and
  - 4) No person may modify, remove or interfere with the required warning statement except as described in §82.112.
- b. Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F:
- 1) Persons opening appliances for maintenance, service, repair or disposal must comply with the prohibitions and required practices pursuant to §82.154 and §82.156;
  - 2) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158;
  - 3) Persons maintaining, servicing, repairing or disposing of appliances, must be certified by an approved technician certification program pursuant to §82.161;
  - 4) Persons maintaining, servicing, repairing or disposing of appliances must certify to the Administrator of the U.S. Environmental Protection Agency pursuant to §82.162;
  - 5) Persons disposing of small appliances, motor vehicle air conditioners (MVAC) and MVAC-like appliances, must comply with the record keeping requirements pursuant to §82.166;
  - 6) Owners of commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156; and
  - 7) Owners or operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- c. If the permittee manufactures, transforms, destroys, imports or exports a Class I or Class II substance, the Permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A (Production and Consumption Controls).
- d. If the permittee performs a service on a motor vehicle that involves an ozone-depleting substance, refrigerant or regulated substitute substance in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B (Servicing of Motor Vehicle Air Conditioners).
- e. The permittee may switch from any ozone-depleting substance to any alternative that is listed as acceptable in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G.

**18. Volatile Organic Compound Storage Tanks (§2105.12.a)**

No person shall place or store, or allow to be placed or stored, a volatile organic compound having a vapor pressure of 1.5 psia or greater under actual storage conditions in any aboveground stationary storage tank having a capacity equal to or greater than 2,000 gallons but less than or equal to 40,000 gallons, unless there is in operation on such tank pressure relief valves which are set to release at the higher of 0.7 psig of pressure or 0.3 psig of vacuum or at the highest possible pressure and vacuum in accordance with State or local fire codes, National Fire Prevention Association guidelines, or other national consensus standard approved in writing by the Department. Petroleum liquid storage vessels that are used to store produced crude oil and condensate prior to lease custody transfer are exempt from these requirements.

**19. Permit Source Premises (§2105.40)**

- a. **General:** No person shall operate, or allow to be operated, any source for which a permit is required by Article XXI Part C in such manner that emissions from any open land, roadway, haul road, yard, or other premises located upon the source or from any material being transported within such source or from any source-owned access road, haul road, or parking lot over five (5) parking spaces:
- 1) Are visible at or beyond the property line of such source;
  - 2) Have an opacity of 20% or more for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or
  - 3) Have an opacity of 60% or more at any time.
- b. **Deposition on Other Premises:** Visible emissions from any solid or liquid material that has been deposited by any means from a source onto any other premises shall be considered emissions from such source within the meaning of Site Level Condition IV.19.a above.

**20. Parking Lots and Roadways (§2105.42)**

- a. The permittee shall not maintain for use, or allow to be used, any parking lot over 50 parking spaces or used by more than 50 vehicles in any day or any other roadway carrying more than 100 vehicles in any day or 15 vehicles in any hour in such manner that emissions from such parking lot or roadway:
- 1) Are visible at or beyond the property line;
  - 2) Have an opacity of 20% or more for a period or periods aggregating more than three (3) minutes in any 60 minute period; or
  - 3) Have an opacity of 60% or more at any time.
- b. Visible emissions from any solid or liquid material that has been deposited by any means from a parking lot or roadway onto any other premises shall be considered emissions from such parking lot or roadway.
- c. Site Level Condition IV.20.a above shall apply during any repairs or maintenance done to such parking lot or roadway.
- d. Notwithstanding any other provision of this permit, the prohibitions of Site Level Condition IV.20 may be enforced by any municipal or local government unit having jurisdiction over the place where such parking lots or roadways are located. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violations of Site Level Condition IV.20.

**21. Permit Source Transport (§2105.43)**

- a. No person shall transport, or allow to be transported, any solid or liquid material outside the boundary line of any source for which a permit is required by Article XXI Part C in such manner that there is any visible emission, leak, spill, or other escape of such material during transport.
- b. Notwithstanding any other provision of this permit, the prohibitions of Site Level Condition IV.21 may be enforced by any municipal or local government unit having jurisdiction over the place where such visible emission, leak, spill, or other escape of material during transport occurs. Such

enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violation of Site Level Condition IV.21.

**22. Construction and Land Clearing (§2105.45)**

- a. No person shall conduct, or allow to be conducted, any construction or land clearing activities in such manner that the opacity of emissions from such activities:
  - 1) Equal or exceed 20% for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or
  - 2) Equal or exceed 60% at any time.
- b. Notwithstanding any other provision of this permit, the prohibitions of Site Level Condition IV.22 may be enforced by any municipal or local government unit having jurisdiction over the place where such construction or land clearing activities occur. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violations of Site Level Condition IV.22.

**23. Mining (§2105.46)**

No person shall conduct, or allow to be conducted, any mining activities in such manner that emissions from such activities:

- a. Are visible at or beyond the property line;
- b. Have an opacity of 20% or more for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or,
- c. Have an opacity of 60% or more at any time.

**24. Demolition (§2105.47)**

- a. No person shall conduct, or allow to be conducted, any demolition activities in such manner that the opacity of the emissions from such activities equal or exceed 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period.
- b. Notwithstanding any other provisions of this permit, the prohibitions of Site Level Condition IV.24 may be enforced by any municipal or local government unit having jurisdiction over the place where such demolition activities occur. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violations of Site Level Condition IV.24.

**25. Fugitive Emissions (§2105.49)**

The person responsible for a source of fugitive emissions, in addition to complying with all other applicable provisions of this permit shall take all reasonable actions to prevent fugitive air contaminants from becoming airborne. Such actions may include, but are not limited to:

- a. The use of asphalt, oil, water, or suitable chemicals for dust control;
- b. The paving and maintenance of roadways, parking lots and the like;
- c. The prompt removal of earth or other material which has been deposited by leaks from transport, erosion or other means;
- d. The adoption of work or other practices to minimize emissions;
- e. Enclosure of the source; and
- f. The proper hooding, venting, and collection of fugitive emissions.

**26. Episode Plans (§2106.02)**

The permittee shall upon written request of the Department, submit a source curtailment plan, consistent with good industrial practice and safe operating procedures, designed to reduce emissions of air contaminants during air pollution episodes. Such plans shall meet the requirements of Article XXI §2106.02.

**27. New Source Performance Standards (§2105.05)**

- a. It shall be a violation of this permit giving rise to the remedies provided by §2109.02 of Article XXI for any person to operate, or allow to be operated, any source in a manner that does not comply with all requirements of any applicable NSPS now or hereafter established by the EPA, except if such person has obtained from EPA a waiver pursuant to Section 111 or Section 129 of the Clean Air Act or is otherwise lawfully temporarily relieved of the duty to comply with such requirements.
- b. Any person who operates, or allows to be operated, any source subject to any NSPS shall conduct, or cause to be conducted, such tests, measurements, monitoring and the like as is required by such standard. All notices, reports, test results and the like as are required by such standard shall be submitted to the Department in the manner and time specified by such standard. All information, data and the like which is required to be maintained by such standard shall be made available to the Department upon request for inspection and copying.

**28. National Emission Standards for Hazardous Air Pollutants (§2104.08)**

- a. The permittee shall comply with each applicable emission limitation, work practice standard, and operation and maintenance requirement of 40 CFR Part 61, Subpart FF – *National Emission Standard for Benzene Waste Operations*.
- b. The permittee shall comply with each applicable emission limitation, work practice standard, and operation and maintenance requirement of 40 CFR Part 63, Subpart ZZZZ – *National Emission Standards for Hazardous Air Pollutants: Stationary Reciprocating Internal Combustion Engines*.
- c. The permittee shall comply with each applicable emission limitation, work practice standard, and operation and maintenance requirement of 40 CFR Part 63, Subpart GGGGG – *National Emission Standards for Hazardous Air Pollutants: Site Remediation*.



**29. Greenhouse Gas Reporting (40 CFR Part 98)**

If the facility emits 25,000 metric tons or more of carbon dioxide equivalent (CO<sub>2</sub>e) in any 12-month period, the facility shall submit reports to the US EPA in accordance with 40 CFR Part 98.

**30. Benzene Waste Operations – 40 CFR Part 61, Subpart FF (§2104.08)**

- a. The total annual benzene quantity from facility waste is the sum of the annual benzene quantity for each waste stream at the facility that has a flow-weighted annual average water content greater than 10 percent or that is mixed with water, or other wastes, at any time and the mixture has an annual average water content greater than 10 percent. The benzene quantity in a waste stream is to be counted only once without multiple counting if other waste streams are mixed with or generated from the original waste stream. Other specific requirements for calculating the total annual benzene waste quantity are as follows: [§61.342(a)(2)-(4)]
  - 1) The benzene in a material subject to 40 CFR Part 61, Subpart FF that is sold is included in the calculation of the total annual benzene quantity if the material has an annual average water content greater than 10 percent. [§61.342(a)(2)]
  - 2) Benzene in wastes generated by remediation activities conducted at the facility, such as the excavation of contaminated soil, pumping and treatment of groundwater, and the recovery of product from soil or groundwater, is not included in the calculation of total annual benzene quantity for that facility.
  - 3) The total annual benzene quantity is determined based upon the quantity of benzene in the waste before any waste treatment occurs to remove the benzene.
- b. Compliance with 40 CFR Part 61, Subpart FF will be determined by review of facility records and results from tests and inspections using methods and procedures specified in §61.355(a)-(c) of Subpart FF. [§61.342(g)]
- c. If the total annual benzene quantity from facility waste is less than 1 Mg/yr (1.1 ton/yr), then the permittee shall: [§61.355(a)(5)]
  - 1) Comply with the recordkeeping requirements of condition IV.29.d and reporting requirements of condition IV.29.e below; and
  - 2) Repeat the determination of total annual benzene quantity from facility waste whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr (1.1 ton/yr) or more.
  - 3) The permittee shall calculate the total annual benzene quantity from facility waste according to the procedures outlined in 40 CFR Part 61, Subpart FF, §61.355(b) and (c).
- d. The permittee shall maintain records that identify each waste stream at the facility subject to 40 CFR Part 61, Subpart FF, and indicate whether or not the waste stream is controlled for benzene emissions. In addition, the permittee shall maintain the following records: [§61.356(b)(1)]
  - 1) For each waste stream not controlled for benzene emissions, the records shall include all test results, measurements, calculations, and other documentation used to determine the following information for the waste stream: waste stream identification, water content, whether or not the waste stream is a process wastewater stream, annual waste quantity, range of benzene

concentrations, annual average flow-weighted benzene concentration, and annual benzene quantity.

- e. If the total annual benzene quantity from facility waste is less than 1 Mg/yr (1.1 ton/yr), then the permittee shall submit to the Department a report that updates the information listed in the following paragraphs whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr (1.1 ton/yr) or more. [§61.357(b); §61.357(a)(3)(i)-(vi)]
- 1) Whether or not the water content of the waste stream is greater than 10 percent;
  - 2) Whether or not the waste stream is a process wastewater stream, product tank drawdown, or landfill leachate;
  - 3) Annual waste quantity for the waste stream;
  - 4) Range of benzene concentrations for the waste stream;
  - 5) Annual average flow-weighted benzene concentration for the waste stream; and
  - 6) Annual benzene quantity for the waste stream.

### 31. Leak Detection and Repair (§2105.06)

- a. The permittee shall conduct a Leak Detection and Repair (LDAR) program at the facility at all times when facility operations may result in fugitive emissions of VOCs. Such LDAR program shall consist of the following: [RACT OP #0060-OP17d, IV.30.a; 25 Pa Code §129.114]
- 3) Components applicable to the LDAR program shall be all accessible valves, pumps, and safety pressure relief valves in light oil service.
  - 4) The subject components shall be monitored visually and with a VOC analyzer, and shall be tagged or labeled using Neville's component identification system.
  - 5) Initially, each non difficult/unsafe subject component shall be monitored on a monthly basis. Any component for which a leak is not detected for two successive months shall be monitored on a quarterly basis. Any component for which a leak is not detected for two successive quarters shall then be monitored on an annual basis. Difficult/unsafe components shall be monitored annually.
  - 6) Visual leaks are determined if the component is visually leaking or dripping product from the component. Leaks determined using the analytical test method are an instrument reading exceeding 10,000 parts per million by volume.
  - 7) If a component is designated as leaking by either the visual or analytical method, the component will not be designated as a "leaker". Instead:
    - a) A first attempt of repair of the component will be performed for the purposes of stopping or reducing leakage, using best available practices, until the component can achieve non-leaking status.
    - b) Should this attempt fail, the component will be repaired or replaced and the monitoring will revert to the previous inspection schedule. Two successful monitoring events will allow the new or repaired component to again move up the progression of monthly, quarterly, and annual inspection frequency.
  - 8) Recordkeeping of labeled or tagged monitoring components will be maintained, and include the type of component with available specifications, dates of monitoring, instrument readings, and location of the component.
- b. The permittee shall maintain all appropriate records to demonstrate compliance with the requirements of both §2105.06 of Article XXI and RACT Order #230. Such records shall provide



sufficient data to clearly demonstrate that all requirements of both §2105.06 of Article XXI and RACT Order #230 are being met. [RACT OP #0060-OP17d, IV.30.b; 25 Pa Code §129.115]

- c. The facility shall retain all records required by both §2105.06 of Article XXI and RACT Order #230 for at least 2 years, and shall make the same available to the Department upon request. [RACT OP #0060-OP17d, IV.30.c; 25 Pa Code §129.115]

### 32. HAP LDAR Implementation (§2103.20.b.4)

- a. Upon issuance of this permit the permittee shall continue to implement a Hazardous Air Pollutant Leak Detection and Repair (HAP LDAR) program to monitor equipment in HAP service throughout the facility. Such HAP LDAR program shall consist of the following:
- 1) The permittee shall maintain an electronic registry to identify all components in HAP service.
  - 2) Monitoring shall be conducted on a different set of one-third of all components every 12-month period, in accordance with condition IV.32.b below. All components shall be tested at least once every three (3) years.
  - 3) If, for each component type where the average percent leaking value is greater than or equal to 2%, the facility shall increase the monitoring frequency for that component type to once every 12-month period for all components of that type. This monitoring frequency shall be maintained until the leak rate for that component type is demonstrated to be less than 2% over a 24-month period, at which time the permittee may return to the monitoring schedule in condition IV.32.a.2) above.
  - 4) For each type of component, a leak is defined as follows:
    - a) valves: 500 ppm<sub>v</sub>
    - b) pump seals: 1,000 ppm<sub>v</sub>
    - c) pressure relief valves: 500 ppm<sub>v</sub>
    - d) agitator seals: 10,000 ppm<sub>v</sub>
    - e) flanges: 500 ppm<sub>v</sub>
    - f) screw connectors: 500 ppm<sub>v</sub>
    - g) manways: 500 ppm<sub>v</sub>
    - h) gauge hatches: 500 ppm<sub>v</sub>
    - i) instruments: 500 ppm<sub>v</sub>
    - j) open-ended lines: 500 ppm<sub>v</sub>
- b. Monitoring of all components shall be conducted in accordance with Method 21 of 40 CFR Part 60, Appendix A.
- 1) The detection instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21;
  - 2) Monitoring shall be performed when the applicable equipment is in HAP material service.
- c. When a leak is detected, the permittee shall attach a weatherproof and readily visible identification to the leaking component. The identification may be removed after the component has been repaired and the component is demonstrated as having no leak.
- d. The permittee shall repair each leak detected as soon as practical, but not later than 15 calendar days after it is detected, except as provided in condition IV.32.e below. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.

- e. The permittee may delay repair of leaking components under the following conditions:
  - 1) It is technically infeasible to repair the leak without a process unit or facility shutdown, in which case the leak shall be repaired during the next shutdown;
  - 2) The equipment is isolated from the process and does not remain in regulated material service;
  - 3) The permittee determines that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair;
  - 4) The component is designated unsafe-to-repair.
- f. Mass emissions of HAP shall be calculated using the *Correlation Approach* methods in the US EPA document "Protocol for Equipment Leak Emissions Estimates", EPA-453/R-95-017, November 1995, with an applied calculated HAP content (as a percent of total VOC), or other method approved by the Department.
- g. For each leak detected, the following information shall be recorded:
  - 1) The date of first attempt to repair the leak.
  - 2) The date of successful repair of the leak.
  - 3) Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A at the time the leak is successfully repaired or determined to be nonrepairable.
  - 4) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak as specified in conditions a) and b) below:
    - a) The permittee may develop a written procedure that identifies the conditions that justify a delay of repair as outlined in condition IV.32.e above.
    - b) If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
  - 5) Dates of shutdowns that occur while the equipment is unrepaired.
- h. The permittee shall keep records of the number and types of components subject to the HAP LDAR program.
- i. The permittee shall report the following HAP LDAR information for any monitoring event conducted during the applicable period in the semiannual report required under General Condition III.15 above:
  - 1) For each type of equipment listed under condition IV.32.a.4) above, report in a summary format by equipment type, the number of components for which leaks were detected and for valves, pumps and connectors show the percent leakers, and the total number of components monitored. Also include the number of leaking components that were not repaired as required by condition IV.32.d above, and for valves and connectors, identify the number of components that are determined to be nonrepairable.
  - 2) Where any delay of repair is utilized pursuant to condition IV.32.e above, report that delay of repair has occurred and report the number of instances of delay of repair.
  - 3) The estimated fugitive HAP emissions as determined under condition IV.32.f above.

**~PERMIT SHIELD IN EFFECT~**

**V. EMISSION UNIT LEVEL TERMS AND CONDITIONS****A. Process P001: Heat Polymerization Still Nos. 15, 16, 18, 19 & Unit #43**

**Process Description:** Heat Polymerization Units  
**Facility ID:** Heat Poly Still Nos. 15, 16, 18, 19, and Unit #43  
**Raw Materials:** resin-forming feedstock, additives  
**Control Device:** 18.9 MMBtu/hr natural gas-fired thermal oxidizer (AEI Econ-Abator System)

As identified above, Process P001 consists of the equipment listed under the heading “Heat Polymerization Stills” in Table II-1 in the Facility Description, Section II.

**1. Restrictions:**

- a. The permittee shall not operate, or allow to be operated, Still Nos. 15, 16, 18, and 19 and Unit #43 unless all vapors from the ejector stack or vacuum pump vent, the two receiver vents, and the barometric sump vent are piped to the thermal oxidizer. [IP #0060-I006, V.A.1.a; §2103.12.a.2.D; §129.112(c)(2); RACT OP #0060-OP17d, V.A.1.a]
- b. The thermal oxidizer shall be properly operated and maintained according to good engineering practices, manufacturer’s recommendations, and the following conditions at all times while treating process emissions: [IP #0060-I001, V.A.1.b-d; IP #0060-I006, V.A.1.c; §2103.12.a.2.D; RACT OP #0060-OP17d, V.A.1.b; §129.112(c)(2)]
  - 1) The minimum VOC and HAP destruction efficiency shall be 98% by weight;
  - 2) The minimum residence time shall be 0.5 seconds;
  - 3) The minimum operating temperature shall be always 1,400 °F.
- c. Emissions from the thermal oxidizer stack S101 shall not exceed the emissions limitations in Table V-A-1 below: [IP #0060-I001, V.A.1.a; OP #4051008-000-42507; OP #4051008-000-42505; OP #4051008-000-76201; OP #4051008-000-76202; §129.112(c)(2)]

**TABLE V-A-1: Thermal Oxidizer Emission Limitations**

Pollutant	Short-term Limits (lb/hr)	Long-term Limits (tpy <sup>1</sup> )
Particulate Matter <sup>2</sup>	0.15	0.66
Particulate Matter <10 µm (PM <sub>10</sub> ) <sup>2</sup>	0.15	0.66
Particulate Matter <2.5 µm (PM <sub>2.5</sub> ) <sup>2</sup>	0.15	0.66
Nitrogen Oxides (NO <sub>x</sub> )	2.13	9.33
Sulfur Oxides (SO <sub>x</sub> )	0.02	0.06
Carbon Monoxide (CO)	1.79	7.84
Volatile Organic Compounds (VOC)	2.91	4.34
Hazardous Air Pollutants (HAP)	0.10	0.28

<sup>1</sup>A year is defined as any consecutive 12-month period.

<sup>2</sup>All particulate matter emission limits are for filterable particulate.

- d. The permittee shall not operate, nor allow to be operated, the thermal oxidizer using a fuel other than utility-grade natural gas, except in the case of emergencies when propane may be used. [IP #0060-I006, V.A.1.d; §2103.12.a.2.D; RACT OP #0060-OP17d, V.A.1.d; §129.112(c)(2)]

## 2. Testing Requirements:

- a. Sufficient test ports shall be installed and located in the ductwork from each unit to the thermal oxidizer, such that the emissions from each process unit (Unit Nos. 15, 16, 18, 19, and 43) may be sampled separately in accordance with Article XXI §2108.02 procedures. The permittee may propose an alternate method of determining the emissions from an individual unit for Department approval. If the alternate method is insufficient to determine emissions due to operation of a specific unit, then the test ports must be installed. [IP #0060-I006, V.A.2.a; RACT OP #0060-OP17d, V.A.2.a; §2103.12.h.1]
- b. No later than 45 days prior to conducting the compliance test, a written test protocol shall be submitted for the Department's approval explaining the intended testing plan, in accordance with the requirements of Article XXI, §2108.02.e, including any deviations from standard testing procedures. In addition, at least 30 days prior to conducting such test, the Department shall be notified in writing of the time(s) and date(s) on which the compliance testing will be conducted. The Department shall be allowed to observe such tests, record data, provide pre-weighted filters, analyze samples in a County laboratory, and to take samples for independent analysis. [IP #0060-I001, V.A.1.e.2; §2108.02.e; RACT OP #0060-OP17d, V.A.2.b; §129.112(c)(2)]
- c. Emissions testing shall be performed once every five years in accordance with Site Level Condition IV.14 ("Emissions Testing") and §2108.02, as follows: [IP #0060-I006, V.A.1.e.4; IP #0060-I006, V.A.2.b-c; §2103.12.h; §2108.02; RACT OP #0060-OP17d, V.A.2.c; §129.112(c)(2)]
- 1) Testing shall be performed simultaneously at the inlet and the outlet of the thermal oxidizer to demonstrate compliance with the VOC and HAP destruction efficiency required by Condition V.A.1.b.1) above.
  - 2) Testing (inlet and outlet) shall consist of three one-hour test runs conducted at maximum VOC and HAP emission production and maximum gas flow through the thermal oxidizer.
  - 3) The thermal oxidizer operating temperature, inlet and outlet gas flow rate, and VOC & HAP inlet and outlet emissions shall be continuously monitored and recorded during the emissions testing.
  - 4) EPA Test Method 18 or Method 25A shall be used to determine the thermal oxidizer inlet and outlet concentrations of VOC.
  - 5) EPA Test Method 18 shall be used to determine the thermal oxidizer inlet and outlet concentrations of ethylbenzene, styrene, naphthalene, xylenes, and total HAPs.
  - 6) Testing shall be conducted to demonstrate that a minimum residence time of 0.5 seconds or greater will be maintained at the thermal oxidizer under all operating conditions of the units.
- d. The comprehensive and accurate compliance test results shall be reported in units of measurement specified by the applicable emission limitations of this permit to the Department within 30 days of completion of the aforementioned compliance test. [IP #0060-I001, V.A.1.e.3; §2108.02.c; RACT OP #0060-OP17d, V.A.2.d; §129.112(c)(2)]
- e. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Article XXI §2108.02. [§2103.12.h.1]

**3. Monitoring Requirements:**

- a. The permittee shall inspect the thermal oxidizer and associated ductwork weekly for proper operation as well as for integrity of the thermal oxidizer, process equipment, and gaseous collection systems. [IP #0060-I001, V.A.2.a; IP #0060-I006, V.A.3.a; §2103.12.i; RACT OP #0060-OP17d, V.A.3.a; §129.112(c)(2)]
- b. The thermal oxidizer shall be equipped with instrumentation that continuously always monitors the thermal oxidizer combustion chamber temperature to within  $\pm 10^{\circ}\text{F}$  of the actual temperature and records to within  $\frac{1}{2}^{\circ}\text{F}$  of the measured temperature when the thermal oxidizer is controlling emissions from the stills. The permittee shall always calibrate and properly maintain the continuous temperature monitor and recorder in accordance with manufacturer's specifications or documented preventive maintenance and quality assurance practices. [IP #0060-I006, V.A.1.e, V.A.3.b; §2103.12.i; RACT OP #0060-OP17d, V.A.3.b; §129.112(c)(2)]

**4. Record Keeping Requirements:**

- a. The permittee shall keep and maintain the following data for Still Nos. 15, 16, 18, and 19, Unit #43, thermal oxidizer, associated process equipment, and gaseous collection systems: [IP #0060-I001, V.A.3.a; IP #0060-I006, V.A.4.a; §2103.12.j; RACT OP #0060-OP17d, V.A.4.a; §129.115]
  - 1) All data obtained under Condition V.A.3.b above;
  - 2) Results of inspections required by Condition V.A.3.a above;
  - 3) Date and times of any period when the continuous temperature monitor required by Condition V.A.3.b is not in operation;
  - 4) Batch cycle times;
  - 5) Batch yield;
  - 6) Raw material per batch;
  - 7) Stack test protocols and reports; and
  - 8) Records of operation, maintenance, inspection, calibration, and/or replacement of equipment.
- b. The permittee shall record all instances of noncompliance with the conditions of this permit in accordance with General Condition III.15.b. [IP #0060-I006, V.A.4.b; §2103.12.j; RACT OP #0060-OP17d, V.A.4.b; §129.115]
- c. All records required under this section shall be maintained by the permittee for a period of five years following the date of such record. [§2103.12.j.2]

**5. Reporting Requirements:**

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15. The reports shall contain all required information for the time period of the report: [IP #0060-I001, V.A.4.a; IP #0060-I006, V.A.5.a; §2103.12.k; RACT OP #0060-OP17d, V.A.5.a; §129.115]
  - 1) Calendar dates covered in the reporting period;
  - 2) Total number of batches and total batch operating time per month; and
  - 3) Monthly high, monthly low, and monthly average thermal oxidizer temperatures.

- b. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k]

**6. Work Practice Standard:**

- a. The permittee shall do the following for the Still Nos. 15, 16, 18, and 19, Unit #43, and the associated thermal oxidizer: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d., V.A.6.a; §129.112(c)(2)]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. Still Nos. 15, 16, 18, and 19, Unit #43, and the associated thermal oxidizer shall be: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d. V.A.6.b; §129.112(c)(2)]
  - 1) Properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions; and
  - 2) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

*~PERMIT SHIELD IN EFFECT~*



**B. Process P006: Unit #20/21**

**Process Description:** Catalytic Resin & Polyoil Neutralization  
**Facility ID:** Unit #20/21  
**Raw Materials:** ethylene-cracking products, resin-forming feedstock, additives  
**Control Device:** packed bed scrubber (for BF<sub>3</sub> removal)

As identified above, Processes P006 consist of the equipment listed under the heading “Catalytic Resin and Polyoil Neutralization” in Table II-1 in the Facility Description, Section II.

**1. Restrictions:**

- a. The permittee shall not operate or allow to be operated Unit #20/21 in any configuration other than one of the four scenarios outlined in Section II: Facility Description, Table II-I: Emission Unit Identification. [IP #0060-I010a, V.A.1.a; §2103.12.a.2.D; 25 Pa. Code, §129.114(c)]
- b. The permittee shall not operate or allow to be operated Unit #20/21 unless the reactor is vented to a holding tank. Each holding tank shall be equipped with a conservation vent set at a minimum of 1.3 inches of water column. [IP #0060-I010a, V.A.1.b; §2103.12.a.2.D; §129.114(c)]
- c. The permittee shall not operate or allow to be operated Unit #20/21 unless the Aqueous Treaters are equipped with conservation vents. Each conservation vent shall have a set point above the maximum vapor pressure of the material being processed. [IP #0060-I010a, V.A.1.c; §2103.12.a.2.D]
- d. Total throughput through Unit #20/21 shall not exceed 66,600,000 pounds of poly oil in any 12-month period, and the number of product changes shall not exceed 78 in any 12-month period. [IP #0060-I010a, V.A.1.d; §2103.12.a.2.D]
- e. Emissions from the Unit #20/21 process shall not exceed the emissions limitations in Tables V-B-1 through V-B-4 below: [IP #0060-I010a, V.A.1.e; §2103.12.a.2.D; §129.114(c)]

**TABLE V-B-1: Unit #20/21 Emissions Limitations – Scenario #1**

Pollutant	Scenario #1 Total (for all process phases)	
	lb/product change <sup>1</sup>	tpy <sup>2</sup>
Volatile Organic Compounds (VOC)	70.053	3.054
Hazardous Air Pollutants (HAP)	14.201	0.554

**TABLE V-B-2: Unit #20/21 Emissions Limitations – Scenario #2**

Pollutant	Scenario #2 Total (for all process phases)	
	lb/product change <sup>1</sup>	tpy <sup>2</sup>
Volatile Organic Compounds (VOC)	52.797	9.457
Hazardous Air Pollutants (HAP)	26.772	4.852



TABLE V-B-3: Unit #20/21 Emissions Limitations – Scenario #3

Pollutant	Scenario #3 Total (for all process phases)	
	lb/product change <sup>1</sup>	tpy <sup>2</sup>
Volatile Organic Compounds (VOC)	76.463	3.304
Hazardous Air Pollutants (HAP)	17.324	0.676

TABLE V-B-4: Unit #20/21 Emissions Limitations – Scenario #4

Pollutant	Scenario Total (for all process phases)	
	lb/product change <sup>1</sup>	tpy <sup>2</sup>
Volatile Organic Compounds (VOC)	75.261	9.707
Hazardous Air Pollutants (HAP)	29.895	4.973

<sup>1</sup>Short-term emissions are based on the initial vessel fill time during each product change, not the entire batch cycle time after the vessels are filled.

<sup>2</sup>A year is defined as any consecutive 12-month period.

- f. The permittee shall not use boron trifluoride (BF<sub>3</sub>) as a catalyst in Unit #20/21 unless all BF<sub>3</sub> emissions from the Unit #20 Reactor and Holding Tank are being controlled by a packed-bed scrubber. [IP #0060-I010a, V.A.1.f; §2103.12.a.2.D; §129.114(c)]

## 2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Article XXI §2108.02. [§2103.12.h.1]

## 3. Monitoring Requirements:

The permittee shall visually inspect the BF<sub>3</sub> scrubber required under Condition V.B.1.f at least once per shift for visible emissions. If visible emissions are detected inside of the scrubber, the permittee shall adjust the flow of water to the scrubber accordingly. [§2103.12.i; IP #0060-I010a, V.A.3]

## 4. Record Keeping Requirements:

- a. The permittee shall keep and maintain the following data for the Unit #20/21 process and associated equipment: [§2103.12.j; IP #0060-I010a, V.A.4.a; §129.115(f)]
- 1) Number of product changes per month and the rolling 12-month total;
  - 2) Poly oil addition rate (lb/hr) and the rolling 12-month total;
  - 3) Operation scenario and type of poly oil used per batch;
  - 4) Number of solvent flushes per batch; and
  - 5) If the rolling 12-month total throughput of poly oil exceeds 60,000,000 lbs or if the rolling 12-month total number of product changes exceeds 70, the calculated estimated emissions per month.
- b. The permittee shall keep and maintain the following data for the Unit #21 Aqueous Treaters: [§2103.12.j; IP #0060-I010a, V.A.4.b; §129.115(f)]

- 1) Number of batch fillings per treater per month and the rolling 12-month total;
  - 2) Amount of water used per treater per batch; and
  - 3) Number of washings per treater per batch.
- c. The permittee shall keep and maintain records of any compositional analyses of poly oil processed in Unit #20/21. [§2103.12.j; IP #0060-I010a, V.A.4.c; §129.115(f)]
- d. The permittee shall keep and maintain the following data for the packed-bed scrubber: [§2103.12.j; IP #0060-I010a, V.A.4.d]
- 1) The amount of  $\text{BF}_3$  catalyst used in the reactor per batch; and
  - 2) A log of the monitoring required under Condition V.B.3 above indicating the time and date of the inspection.
- e. The permittee shall record all instances of noncompliance with the conditions of this permit in accordance with General Condition III.15.b above. [§2103.12.j; IP #0060-I010a, V.A.4.e]
- f. All records shall be retained by the facility in accordance with General Condition III.17. These records shall be made available to the Department upon request for inspection and/or copying. [§2103.12.j.2; IP #0060-I010a, V.A.4.f; §129.115(k)]

#### **5. Reporting Requirements:**

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15. The reports shall contain, at a minimum, the following: [§2103.12.k; IP #0060-I010a, V.A.5.a; §129.115(f)]
- 1) Calendar dates covered in the reporting period;
  - 2) All batch information required to be recorded under Conditions V.B.4.a and V.B.4.b above; and
  - 3) Packed-bed scrubber information required to be recorded under Condition V.B.4.d.1) above.
- b. The permittee shall notify the Department within 15 days any time a poly oil with a HAP composition other than the ones listed below is used. The notification shall include a copy of the analysis performed under Condition V.B.4.c above: [§2103.12.k; IP #0060-I010a, V.A.5.b]
- 1) Nevchem
  - 2) Nevpene
  - 3) Nevex (FT-11-134)
  - 4) NI-100
- c. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k]

**6. Work Practice Standard:**

- a. The permittee shall do the following for Unit #20/21 and all associated equipment: [§2105.03; IP #0060-I010a, V.A.6.a; §2103.12.a.2.D]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. Unit #20/21 and all associated equipment shall be: [IP #0060-I010a, V.A.6.b; §2103.12.a.2.D; §2105.03; §129.114(c)]
  - 1) Properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions; and
  - 2) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

*~PERMIT SHIELD IN EFFECT~*

**C. Process P008: No. 3 Continuous Still**

**Process Description:** Continuous Still  
**Facility ID:** No. 3 Continuous Still  
**Raw Materials:** polyoil, resin-forming feedstock, additives  
**Control Device:** none

As identified above, Processes P008 consist of the equipment listed under the heading “Continuous Still” in Table II-1 in the Facility Description, Section II.

**1. Restrictions:**

- a. The number of product changes shall be limited to 365 in any 12-month period in continuous still. [§2103.12.a.2.B]
- b. The #3 Continuous Still shall not exceed the emissions limitations in Table V-C-1 below: [§2103.12.a.2.B; RACT OP #0060-OP17d, V.D.1.b; §129.112(c)(2)]

**TABLE V-C-1: #3 Continuous Still Emission Limitations**

Pollutant	Short-term (lb/prod. change) <sup>1</sup>	Long-term (tpy) <sup>2</sup>
Volatile Organic Compounds (VOC)	14.00	2.56
Hazardous Air Pollutants (HAP)	1.66	0.31

<sup>1</sup>Short-term emissions are based on the initial vessel fill time during each product change, not the entire batch cycle time after the vessels is filled.

<sup>2</sup>A year is defined as any consecutive 12-month period.

**2. Testing Requirements:**

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled “Emissions Testing.” [§2103.12.h.1]

**3. Monitoring Requirements:**

None, except as provided elsewhere.

**4. Record Keeping Requirements:**

- a. The permittee shall keep and maintain the following data for the #3 Continuous Still and associated equipment: [§2103.12.j; RACT OP #0060-OP17d, V.D.4.a; §129.115]
  - 1) Number of product changes per month and the rolling 12-month total;
  - 2) Total operating times;
  - 3) Type and amount of daily raw materials used;
  - 4) Type and amount of daily resins produced; and
  - 5) For the still, if the rolling 12-month total number of product changes exceeds 330, the calculated estimated emissions per month.

- b. All records shall be retained by the facility in accordance with General Condition III.14. These records shall be made available to the Department upon request for inspection and/or copying. [§2103.12.j.2; RACT OP #0060-OP17d, V.D.4.b; §129.115]

**5. Reporting Requirements:**

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15. The reports shall contain, at a minimum, the following: [§2103.12.k; RACT OP #0060-OP17d, V.D.5.a; §129.115]
- 1) Calendar dates covered in the reporting period; and
  - 2) Total number of product changes and operating time per month.
- b. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k.1]

**6. Work Practice Standards:**

- a. The permittee shall do the following for the #3 Continuous Stills and associated equipment: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.D.6.c; §129.112(c)(2)]
- 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The #3 Continuous Stills and associated equipment shall be: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.D.6.d; §129.112(c)(2)]
- 1) Properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions; and
  - 2) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

***~PERMIT SHIELD IN EFFECT~***

**D. Process P011: No. 2 Packaging Center**

**Process Description:** Flaking and Packaging  
**Facility ID:** No. 2 Packaging Center  
**Raw Materials:** liquid hydrocarbon resins, flaked solid hydrocarbon resins  
**Control Device:** baghouse (Mikropul-Nedermen 144S-8-20 SRC)

As identified above, Process P011 consists of the equipment listed under the heading “Flaking and Packaging” in Table II-1 in the Facility Description, Section II.

**1. Restrictions:**

- a. The permittee shall not operate the #2 Packaging Center unless the equipment is properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions. Proper operation and maintenance shall include the use of covers on all kettles after the initial kettle charging and during process operations and the use of enclosures on all solids handling transfer equipment. [IP #0060-I007a, V.A.1.a; §2105.03; RACT OP #0060-OP17d, V.E.1.a; §129.114]
- b. Emissions from the resin flaking belt shall not exceed 0.338 lbs of VOC per ton of resin produced. [IP #0060-I007a, V.A.1.b; §2103.12.a.2; RACT OP #0060-OP17d, V.E.1.bD; §129.114]
- c. Emissions from the resin flaking belt shall not exceed 0.008 lbs of HAP per ton of resin produced. [IP #0060-I007a, V.A.1.c; §2103.12.a.2.D; RACT OP #0060-OP17d, V.E.1.c; §129.114]
- d. Fugitive emission from pumps, valves, compressors, and safety pressure relief valves in the #2 Packaging Center shall not exceed 1.49 tons/yr of VOCs. [IP #0060-I007a, V.A.1.e; §2103.12.a.2.D; RACT OP #0060-OP17d, V.E.1.d; §129.114]
- e. The permittee shall not operate the crusher or bagging stations unless all emissions are directed to the #2 Packaging Center baghouse. [IP #0060-I011, V.A.1.a; §2103.12.a.2.D; RACT OP #0060-OP17d, V.E.1.e; §129.114]
- f. The permittee shall not discharge or allow to be discharged gases from the #2 Packaging Center baghouse stack (S051) with particulate matter more than 0.0052 gr/dscf. [IP #0060-I011, V.A.1.b; §2103.12.a.2.D]
- g. Emissions from the #2 Packaging Center shall not exceed the following at any time: [IP #0060-I007a, V.A.1.g; IP #0060-I011, V.A.1.c; §2103.12.a.2.D; §129.114]

Table V-D-1: #2 Packaging Center Emission Limitations

Pollutant	Process	Short-term (lb/hr)	Long-term (tpy) <sup>1</sup>
Particulate Matter <sup>2</sup>	Baghouse	0.24	1.04
VOC <sup>3</sup>	Resin Drain Kettles	3.55	15.57
	#2 Flaking Belt	1.86	8.14
HAP	Resin Drain Kettles	0.08	0.36
	#2 Flaking Belt	0.04	0.19

<sup>1</sup>A year is defined as any 12 consecutive months.<sup>2</sup>All PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>.<sup>3</sup>Only the VOC emissions are subject to 25 Pa. Code §129.99.

## 2. Testing Requirements:

- a. Emissions testing shall be performed at least once every five years, in accordance with Site Level Condition IV.14 ("Emissions Testing") and §2108.02. [IP #0060-I007a, V.A.2.a-b; §2103.12.h; RACT OP #0060-OP17d, V.E.2.a; §129.115]
  - 1) Testing shall be performed at the outlet of the fume hood to demonstrate compliance with the flaking belt VOC and HAP emission limits in Condition V.D.1.g above;
  - 2) Testing shall be conducted at maximum flaker production and shall consist of three one-hour test runs;
  - 3) The outlet gas flow rate and VOC and HAP emissions shall be continuously monitored and recorded during the emissions testing;
  - 4) EPA Test Method 25A shall be used to determine outlet concentrations and mass emission rates (lb/hr) of VOC;
  - 5) EPA Test Method 18 shall be used to determine outlet concentrations and mass emission rates (lb/hr) of total HAPs; or
  - 6) Any alternative test methods approved by the Department.
- b. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12.h.1]

## 3. Monitoring Requirements:

- a. The permittee shall provide instrumentation to measure baghouse pressure drop to within ½" w.c. of the actual pressure drop at all times. The instrumentation shall be always maintained in good working condition and shall be located in an easily accessible location. [IP #0060-I011, V.A.3.a; §2103.12.i; RACT OP #0060-OP17d, V.E.3.a; §129.114]
- b. The permittee shall monitor and record the differential pressure drop across the baghouse compartment weekly for the #2 Packaging Center baghouse. [IP #0060-I011, V.A.3.b; §2103.12.i; RACT OP #0060-OP17d, V.E.3.b; §129.114]
- c. The permittee shall inspect the fabric filter for evidence of particulate matter leaks at least annually and shall repair any leaks as necessary. Bags shall be inspected annually, while the fabric filter is



not in operation, for tears, scuffs, abrasions, or holes. Bags shall be replaced as necessary. [IP #0060-I011, V.A.3.c; §2103.12.i; RACT OP #0060-OP17d, V.E.3.c; §129.114]

- d. The permittee shall perform an EPA Test Method 22 visual inspection of the #2 Packaging Center process equipment and control device once per week to ensure the equipment exhaust system, including material handling enclosures, is not compromised by damage, malfunction, or deterioration. Immediate repairs shall be made to correct obvious failures or deficiencies. [IP #0060-I011, V.A.3.d; §2103.12.i; RACT OP #0060-OP17d, V.E.3.d; §129.114]

#### 4. Record Keeping Requirements:

- a. The permittee shall record the following information for the #2 Packaging Center to demonstrate compliance with the requirements of this permit. Such records shall provide sufficient data and calculations to clearly demonstrate that the applicable requirements are being met, and shall include but not be limited to the following: [IP #0060-I007a, V.A.4.a; §2103.12.j; RACT OP #0060-OP17d, V.E.4.a; §129.115]
- 1) Process operation time, raw material usage, and production records (daily, monthly, and 12-month);
  - 2) Date of kettle fillings and amount filled during the reporting period;
  - 3) Total amount of final product packaged at the bagging areas (monthly and 12-month);
  - 4) Total calculated VOC and HAP emissions from the resin drain kettles and the flaker belt, as well as the calculation methods and emission factors used to determine those emissions (monthly and 12-month rolling totals);
  - 5) Records of all emission unit and control equipment inspections, emission test reports, and any maintenance, inspection, calibration, and/or replacement of such equipment required by Condition V.D.3.d above.
- b. The permittee shall maintain maintenance records for the baghouse. The records shall contain at a minimum: [IP #0060-I011, V.A.4.a; §2103.12.h.1; §2103.12.j]
- 1) The date and result of inspections required by Condition V.D.3.c above.
  - 2) The date of the last bag (or cartridge) replacement.
  - 3) Any mechanical repairs or adjustments made.
- c. The permittee shall record all instances of noncompliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. [IP #0060-I011, V.A.4.b; §2103.12.j]
- d. All records shall be retained by the facility in accordance with General Condition III.14. These records shall be made available to the Department upon request for inspection and/or copying. [IP #0060-I007a, V.A.4.c; IP #0060-I011, V.A.4.c; §2103.12.j.2; RACT OP #0060-OP17d, V.E.4.b; §129.115]

#### 5. Reporting Requirements:

- a. The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15. [IP #0060-I007a, V.A.5.a; §2103.12.k; RACT OP #0060-OP17d, V.E.5.a; §129.115]

- b. The semiannual report shall include the following information at a minimum: [IP #0060-I007a, V.A.5.b; IP #0060-I011, V.A.5.a; §2103.12.k; RACT OP #0060-OP17d, V.E.5.b; §129.115]
  - 1) Calendar dates covered in the reporting period;
  - 2) Monthly data required by Conditions V.D.4.a.1), 3), 4), and V.D.4.b above; and
  - 3) Reasons for any noncompliance with the emission standards.
- c. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [IP #0060-I007a, V.A.5.c; §2103.12.k; RACT OP #0060-OP17d, V.E.5.c]

**6. Work Practice Standard:**

- a. The permittee shall do the following for the #2 Packaging Center and associated equipment: [§2105.03; §129.114; §2103.12.a.2.B; RACT OP #0060-OP17d, V.E.6.a; §129.114]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The permittee shall calibrate, maintain, and operate all instrumentation, process equipment, and control equipment according to manufacturer's recommendations, good engineering control practices, and the applicable terms and conditions of this permit. [IP #0060-I007a, V.A.6; §2105.03; §129.114; §2103.12.a.2.D; RACT OP #0060-OP17d, V.E.6.b; §129.114]
- c. The permittee shall maintain on-site, for emergency replacement, some number of bags or filter elements use by the baghouse. [IP #0060-I011, V.A.6.a; §2105.03; §2103.12.a.2.D]
- d. Material removed from the fabric filter shall be handled in a manner minimizing entrainment into the atmosphere. [IP #0060-I011, V.A.6.b; §2101.11.c.; §2103.12.a.2.D]

***~PERMIT SHIELD IN EFFECT~***

**E. Process P012: #3 Packaging Center**

**Process Description:** Pastillating and Packaging  
**Facility ID:** #3 Packaging Center  
**Raw Materials:** Liquid hydrocarbon resins, flaked solid hydrocarbon resins  
**Control Device:** Pulse-jet fabric filter (Mikropul 48S-8-20)

As identified above, Process P012 consists of the equipment listed under the heading “Flaking and Packaging” in Table II-1 in the Facility Description, Section II.

**1. Restrictions:**

- a. The permittee shall not operate the #3 Packaging Center unless the equipment is properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions. Proper operation and maintenance shall include the use of covers on all kettles after the initial kettle charging and during process operations, and the use of enclosures on all solids handling transfer equipment. [§2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.F.1.a; §129.114; §129.112(c)(2)]
- b. Emissions from the Resin Pastillating Belt shall not exceed 0.51 lbs of VOC per ton of resin produced. [§2103.12.a.2.B; RACT OP #0060-OP17d, V.F.1.b; §129.114]
- c. Emissions from the Resin Pastillating Belt shall not exceed 0.02 lbs of HAP per ton of resin produced. [§2103.12.a.2.B; RACT OP #0060-OP17d, V.F.1.c; §129.114]
- d. The permittee shall not operate the bagging stations unless all emissions are directed to the #3 Packaging Center baghouse. [§2103.12.a.2.B; RACT OP #0060-OP17d, V.F.1.d; §129.114]
- e. Emissions from the #3 Packaging Center shall not exceed the following at any time: [§2103.12.a.2.B; §129.114]

**Table V-E-1: #3 Packaging Center Emission Limitations**

Pollutant	Process	Short-term (lb/hr)	Long-term (tpy) <sup>1</sup>
Particulate Matter <sup>2</sup>	Baghouse	0.26	1.13
VOC <sup>3</sup>	Resin Drain Kettles	4.97	21.79
	#2 Flaking Belt	1.53	6.69
	Pouring	0.94	1.88
HAP	Resin Drain Kettles	0.16	0.71
	#2 Flaking Belt	0.05	0.22
	Pouring	0.03	0.06

<sup>1</sup>A year is defined as any 12 consecutive months.

<sup>2</sup>All PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>.

<sup>3</sup>Only the VOC emissions are subject to 25 PA Code §129.114.

**2. Testing Requirements:**

- a. Emissions testing shall be performed at least once every five years, in accordance with Site Level Condition IV.14 (“Emissions Testing”) and §2108.02. [§2103.12.h; §129.115]
  - 1) Testing shall be performed at the outlet of the fume hood to demonstrate compliance with the pastillating belt VOC emission limits in Condition V.E.1.e above;
  - 2) Testing shall be conducted at maximum pastillating belt production and shall consist of three one-hour test runs;
  - 3) The outlet gas flow rate and VOC emissions shall be continuously monitored and recorded during the emissions testing;
  - 4) EPA Test Method 25A shall be used to determine outlet concentrations and mass emission rates (lb/hr) of VOC;
  - 5) EPA Test Method 18 shall be used to determine outlet concentrations and mass emission rates (lb/hr) of total HAPs; or
  - 6) Any alternative test methods approved by the Department.
- b. Emissions testing for VOC and HAP shall be performed within six months after actual throughput of resin on the pastillating belt first exceeds 24,000,000 pounds in any rolling 12-month period and every five years thereafter. [§2103.12.h]
  - 1) Emissions testing of VOC shall be in accordance with Condition V.E.2.a above;
  - 2) EPA Test Method 18 shall be used to determine outlet concentrations and mass emission rates (lb/hr) of total HAPs.
- c. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 above entitled “Emissions Testing.” [§2103.12.h.1]

**3. Monitoring Requirements:**

- a. The permittee shall provide instrumentation to measure baghouse pressure drop to within ½” w.c. of the actual pressure drop at all times. The instrumentation shall be always maintained in good working condition and shall be located in an easily accessible location. [§2103.12.i; RACT OP #0060-OP17d, V.F.3.a; §129.114]
- b. The permittee shall monitor and record the differential pressure drop across each baghouse compartment weekly for the #3 Packaging Center baghouse. [§2103.12.i; RACT OP #0060-OP17d, V.F.3.b; §129.114]
- c. The permittee shall inspect the fabric filter for evidence of particulate matter leaks at least annually and shall repair any leaks as necessary. Bags shall be inspected annually, while the fabric filter is not in operation, for tears, scuffs, abrasions, or holes. Bags shall be replaced as necessary. [§2103.12.i; RACT OP #0060-OP17d, V.F.3.c; §129.114]
- d. The permittee shall perform an EPA Test Method 22 visual inspection of the #3 Packaging Center process equipment and control device once per week to ensure the equipment exhaust system, including material handling enclosures, is not compromised by damage, malfunction, or deterioration. Immediate repairs shall be made to correct obvious failures or deficiencies. [§2103.12.i; RACT OP #0060-OP17d, V.F.3.d; §129.114]

**4. Record Keeping Requirements:**

- a. The permittee shall record the following information for the #3 Packaging Center to demonstrate compliance with the requirements of this permit. Such records shall provide sufficient data and calculations to clearly demonstrate that the applicable requirements are being met, and shall include but not be limited to the following: [§2103.12.j; RACT OP #0060-OP17d, V.F.4.a; §129.115]
  - 1) Process operation time, raw material usage, and production records (daily, monthly, and 12-month);
  - 2) Date of kettle fillings, amount filled, and type of fill (resin or resin solution) for the reporting period;
  - 3) Total amount of throughput on the pastillating belt (daily, monthly, and 12-month);
  - 4) Total amount of final product packaged at the bagging areas (monthly and 12-month);
  - 5) Total amount of final product from the pouring station (monthly and 12-month);
  - 6) Total calculated VOC and HAP emissions from the resin drain kettles, pastillating belt, and pouring station, as well as the calculation methods and emission factors used to determine those emissions (monthly and 12-month rolling totals);
  - 7) Records of all emission unit and control equipment inspections, emission test reports, and any maintenance, inspection, calibration, and/or replacement of such equipment required by Condition V.E.3.d above.
- b. The permittee shall record all instances of noncompliance with the conditions of this permit in accordance with General Condition III.15.b. [§2103.12.j]
- c. All records shall be retained by the facility in accordance with General Condition III.14. These records shall be made available to the Department upon request for inspection and/or copying. [§2103.12.j.2; §129.115]

**5. Reporting Requirements:**

- a. The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15. [§2103.12.k; RACT OP #0060-OP17d, V.F.5.a; §129.115]
- b. The semiannual report shall include, at a minimum, the following information: [§2103.12.k; RACT OP #0060-OP17d, V.F.5.b; §129.115]
  - 1) Calendar dates covered in the reporting period; and
  - 2) Monthly and 12-month data required by Conditions V.E.4.a.1), 4), 5), and 6) above.
- c. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8 above, if appropriate. [§2103.12.k]

**6. Work Practice Standards:**

- a. The permittee shall do the following for the #3 Packaging Center (pouring station): [§2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.F.6.a; §129.112(c)(2)]

- 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The permittee shall do the following for the #3 Packaging Center (drain kettles, pastillating belt, and associated equipment): [§2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.F.6.b; §129.114]
- 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- c. The permittee shall calibrate, maintain, and operate all instrumentation, process equipment, and control equipment according to manufacturer's recommendations, good engineering control practices, and the applicable terms and conditions of this permit. [§2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.F.6.c; §129.114]

*~PERMIT SHIELD IN EFFECT~*

**F. Process P013: #5 Packaging Center**

**Process Description:** Flaking and Packaging  
**Facility ID:** #5 Packaging Center  
**Raw Materials:** liquid hydrocarbon resins, flaked solid hydrocarbon resins  
**Control Device:** pulse-jet fabric filter (Mikropul 48S-8-20)

As identified above, Process P013 consists of the equipment listed under the heading “Flaking and Packaging” in Table II-1 in the Facility Description, Section II.

**1. Restrictions:**

- a. The permittee shall not operate the #5 Packaging Center unless the equipment is properly operated and always maintained according to good engineering practices, with the exception of activities to mitigate emergency conditions. Proper operation and maintenance shall include the use of covers on all kettles after the initial kettle charging and during process operations, and the use of enclosures on all solids handling transfer equipment. [IP #0060-I008, V.A.1.a; §2103.12.a.2.D; §2105.03; RACT OP #0060-OP17d, V.G.1.a; §129.114]
- b. Emissions from the Resin Flaking Belt shall not exceed 0.338 lbs of VOC per ton of resin produced. [IP #0060-I008, V.A.1.b; §2103.12.a.2.D; RACT OP #0060-OP17d, V.G.1.b; §129.114]
- c. Emissions from the Resin Flaking Belt shall not exceed 0.008 lbs of HAP per ton of resin produced. [IP #0060-I008, V.A.1.c; §2103.12.a.2.D; RACT OP #0060-OP17d, V.G.1.c; §129.114]
- d. The permittee shall not operate the crusher or bagging stations unless all emissions are directed to the #5 Packaging Center baghouse. [§2103.12.a.2.B; RACT OP #0060-OP17d, V.G.1.d; §129.114]
- e. Emissions from the #5 Packaging Center shall not exceed the following at any time: [IP #0060-I008, V.A.1.e; §2103.12.a.2.D; OP #4051008-000-66500; §129.114]

**Table V-F-1: #2 Packaging Center Emission Limitations**

Pollutant	Process	Short-term (lb/hr)	Long-term (tpy) <sup>1</sup>
Particulate Matter <sup>2</sup>	Baghouse	0.26	1.13
VOC <sup>3</sup>	Resin Drain Kettles	3.20	14.00
	#2 Flaking Belt	1.67	7.32
HAP	Resin Drain Kettles	0.10	0.45
	#2 Flaking Belt	0.04	0.17

<sup>1</sup>A year is defined as any 12 consecutive months.

<sup>2</sup>All PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>.

<sup>3</sup>Only the VOC emissions are subject to 25 PA Code §129.114.



**2. Testing Requirements:**

- a. Emissions testing shall be performed at least once every five years, in accordance with Site Level Condition IV.14 (“Emissions Testing”) and §2108.02. [IP #0060-I008, V.A.2.a & b; §2103.12.h; RACT OP #0060-OP17d, V.G.2.a; §129.115]
  - 1) Testing shall be performed at the outlet of the fume hood to demonstrate compliance with the flaking belt VOC and HAP emission limits in Condition V.F.1.e above;
  - 2) Testing shall be conducted at maximum flaker production and shall consist of three one-hour test runs;
  - 3) The outlet gas flow rate and VOC and HAP emissions shall be continuously monitored and recorded during the emissions testing;
  - 4) Molten resin feed rate and finished resin produced shall be recorded for each test run;
  - 5) Type of resin produced shall be recorded for each test run;
  - 6) EPA Test Method 25A shall be used to determine outlet concentrations and mass emission rates (lb/hr) of VOC;
  - 7) EPA Test Method 18 shall be used to determine outlet concentrations and mass emission rates (lb/hr) of total HAPs; or
  - 8) Any alternative test methods approved by the Department.
- b. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled “Emissions Testing.” [§2103.12.h.1]

**3. Monitoring Requirements:**

- a. The permittee shall provide instrumentation to measure baghouse pressure drop to within ½” w.c. of the actual pressure drop at all times. The instrumentation shall be always maintained in good working condition and shall be located in an easily accessible location. [§2103.12.i; RACT OP #0060-OP17d, V.G.3.a; §129.114]
- b. The permittee shall monitor and record the differential pressure drop across each baghouse compartment weekly for the #5 Packaging Center baghouse. [§2103.12.i; RACT OP #0060-OP17d, V.G.3.b; §129.114]
- c. The permittee shall inspect the fabric filter for evidence of particulate matter leaks at least annually and shall repair any leaks as necessary. Bags shall be inspected annually, while the fabric filter is not in operation, for tears, scuffs, abrasions, or holes. Bags shall be replaced as necessary. [§2103.12.i; RACT OP #0060-OP17d, V.G.3.c; §129.114]
- d. The permittee shall perform an EPA Test Method 22 visual inspection of the #5 Flaking Belt, exhaust hood, and associated duct work once per week to ensure the equipment is operating properly, and that the integrity of the system is not compromised by damage, malfunction, or deterioration. Immediate repairs shall be made to correct obvious failures or deficiencies. [IP #0060-I008, V.A.3; §2103.12.i; RACT OP #0060-OP17d, V.G.3.d; §129.114]

**4. Record Keeping Requirements:**

- a. The permittee shall record the following information for the #5 Packaging Center to demonstrate compliance with the requirements of this permit. Such records shall provide sufficient data and

calculations to clearly demonstrate that the applicable requirements are being met, and shall include but not be limited to the following: [IP #0060-I008, V.A.4.a; §2103.12.j; RACT OP #0060-OP17d, V.G.4.a; §129.115]

- 1) Process operation time, raw material usage, and production records (daily, monthly, and 12-month);
  - 2) Date of kettle fillings and amount filled during the reporting period;
  - 3) Total amount of final product packaged at the bagging areas (monthly and 12-month);
  - 4) Total calculated VOC and HAP emissions from the resin drain kettles and the flaker belt, as well as the calculation methods and emission factors used to determine those emissions (monthly and 12-month rolling totals);
  - 5) Records of all emission unit and control equipment inspections, emission test reports, and any maintenance, inspection, calibration, and/or replacement of such equipment required by Condition V.F.3.d above.
- b. The permittee shall record all instances of noncompliance with the conditions of this permit in accordance with General Condition III.15.b. [§2103.12.j]
- c. All records shall be retained by the facility in accordance with General Condition III.14 above. These records shall be made available to the Department upon request for inspection and/or copying. [§2103.12.j.2; §129.115(k)]

#### 5. Reporting Requirements:

- a. The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15. [IP #0060-I008, V.A.5.a; §2103.12.k; RACT OP #0060-OP17d, V.G.5.a; §129.115]
- b. The semiannual report shall include the following information: [IP #0060-I008, V.A.5.b; §2103.12.k; RACT OP #0060-OP17d, V.G.5.b; §129.115]
- 1) Calendar dates covered in the reporting period; and
  - 2) Monthly and 12-month data required by Conditions V.F.4.a.1), 3), and 4) above;
  - 3) Noncompliance information required by Condition V.F.4.b above, and
  - 4) Reasons for any noncompliance with the emission standards.
- c. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k]

#### 6. Work Practice Standards:

- a. The permittee shall do the following for the #5 Packaging Center and associated equipment: [§2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.G.6.a; §129.114]
- 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.

- b. The permittee shall calibrate, maintain, and operate all instrumentation, process equipment, and control equipment according to manufacturer's recommendations, good engineering control practices, and the applicable terms and conditions of this permit. [IP #0060-I008, V.A.6; §2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.G.6.b; §129.114]

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*~PERMIT SHIELD IN EFFECT~*

**G. Process P014: Wastewater Collection, Conveyance, and Treatment**

**Facility ID:** Wastewater Collection System  
**Raw Materials:** industrial process wastewaters, water treatment chemicals, biological treatment nutrients, storm waters  
**Control Device(s):** none

As identified above, Process P014 consists of equipment listed under the heading “Other Processes – Wastewater Collection, Conveyance, and Treatment” in Table II-1 in the Facility Description, Section II, as well as all catch basins and other water collection locations within the facility.

**1. Restrictions:**

- a. The permittee shall not operate or allow to be operated the Surge Tank (#5001), Batch Tanks (#2011-2013), and Sludge Holding Tank (#2010) unless each is covered with a fixed roof. §2103.12.a.2.B; [RACT OP #0060-OP17d, V.H.1.a; §129.114]
- b. Emissions from the wastewater collection and conveyance system shall not exceed the following at any time: [§2103.12.a.2.B; RACT OP #0060-OP17d, V.H.1.b; §129.114]

**TABLE V-G-1:  
Wastewater Conveyance System Emission Limitations**

Pollutant	Yearly Emissions (tons/yr) <sup>1</sup>
Volatile Organic Compounds (VOCs)	3.36
Hazardous Air Pollutants (HAPs)	1.08

<sup>1</sup>A year is defined as any consecutive 12-month period.

- c. Emissions from the surge tank, batch tanks, equalization tank, biological treatment system, and other vessels in the wastewater treatment system shall not exceed the following at any time: [IP #90-I-0058-P; §2103.12.a.2.D; §129.112(c)(2)]

**TABLE V-G-2: Wastewater Treatment System Emission Limitations**

Pollutant	Surge Tank	Batch Tanks	Equalization Tank	Biological Treatment
	tpy <sup>1</sup>	tpy <sup>1</sup>	tpy <sup>1</sup>	tpy <sup>1</sup>
Volatile Organic Compounds (VOCs)	1.89	10.28	1.79	1.37
Hazardous Air Pollutants (HAPs)	1.89	1.51	0.73	0.86

<sup>1</sup>A year is defined as any consecutive 12-month period.

- d. The permittee shall not operate or allow to be operated the Rotary Vacuum Filter unless Boiler #6 is in operation. The Rotary Vacuum Filter shall not be operated unless all emissions from the vacuum pump are vented to Boiler #6. [§2103.12.a.2.B; RACT OP #0060-OP17d, V.H.1.d; §129.114]

**2. Testing Requirements:**

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12.h.1]

**3. Monitoring Requirements:**

- a. The permittee shall take monthly Photo Ionization Detector (PID) readings (or equivalent monitoring device as approved by the Department) of each manhole/catch basin for the contaminated water system just below the manhole/catch basin opening for VOCs and HAPs. [§2103.12.i; RACT OP #0060-OP17d, V.H.3.a; §129.114]
- b. The permittee may reduce the frequency of manhole/catch basin PID readings from monthly to quarterly if total emissions from the contaminated water conveyance system do not exceed the limits in Condition V.G.1.b above for 12 consecutive monthly readings. [§2103.12.i; RACT OP #0060-OP17d, V.H.3.b; §129.114]
  - 1) The permittee may reduce the frequency from quarterly to semiannually if total emissions do not exceed the limits in Condition V.G.1.b above for three consecutive years.
  - 2) If emissions exceed the limits in Condition V.G.1.b above, the permittee shall resume more frequent readings.
- c. The PID monitoring device shall be calibrated using isobutylene gas to generate readings that have the same "PID or Isobutylene Units" as the PID readings from the "Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs) Emission Estimate for Wastewater Conveyance and Treatment" report (published by Malcolm Pirnie, Inc., January 2008). [§2103.12.i; RACT OP #0060-OP17d, V.H.3.c; §129.114]
- d. The permittee shall measure the VOC and total HAP concentrations of the wastewater influent to the Equalization Tank on a quarterly basis. [§2103.12.i; RACT OP #0060-OP17d, V.H.3.d; §129.114]

**4. Record Keeping Requirements:**

- a. The permittee shall keep rolling 12-month records of VOC and HAP emission calculations for the wastewater conveyance system based on the PID readings required by Conditions V.G.3.a and V.G.3.b above and the emission factors determined in the January 2008 wastewater emissions estimate report referenced in Condition V.G.3.c above, or other factors approved by the Department. [§2103.12.j; RACT OP #0060-OP17d, V.H.4.a; §129.115]
- b. The permittee shall keep records of the following for the wastewater treatment system: [§2103.12.j; RACT OP #0060-OP17d, V.H.4.b; §129.115]
  - 1) A table of all PID readings conducted.
  - 2) Daily, monthly, and rolling 12-month wastewater flow volume treated.

- 3) Quarterly wastewater influent concentrations samples required under Condition V.G.3.d above.
- c. If the recorded values of the quarterly wastewater concentrations in Condition V.G.4.b.3) above exceed the values in the January 2008 wastewater emissions estimate report referenced in Condition V.G.3.c, the permittee shall re-evaluate the emissions estimate using TOXCHEM or another model program as approved by the Department. [§2103.12.j; RACT OP #0060-OP17d, V.H.4.c; §129.115]
- d. The permittee shall record all instances of operation of the Rotary Vacuum Filter, including date, time, and duration of operation and total throughput of wastewater to the unit. [§2103.12.j; RACT OP #0060-OP17d, V.H.4.d; §129.115]
- e. The permittee shall record all instances of noncompliance with the conditions of this permit in accordance with General Condition III.15.b. [§2103.12.j]
- f. All records and supporting documentation shall be retained in accordance with General Condition III.14 and be made available to the Department for inspection and/or copying upon request. [§2103.12.j.2]

## 5. Reporting Requirements:

- a. The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15. [§2103.12.k]
- b. The semiannual report shall include the following information: [§2103.12.k; RACT OP #0060-OP17d, V.H.5.b; §129.115]
  - 1) Calendar dates covered in the reporting period.
  - 2) Estimated VOC and HAP emissions from the wastewater conveyance system required under Condition V.G.4.a above.
  - 3) A summary of the PID readings required to be maintained under Condition V.G.4.b.1) above.
  - 4) The monthly wastewater volume recorded under Condition V.G.4.b.2) above.
  - 5) Estimated VOC and HAP emissions from the wastewater treatment system.
  - 6) All information for the Rotary Vacuum Filter required to be recorded by Condition V.G.4.d above for the time of the report.
- c. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8 above, if appropriate. [§2103.12.k.1]

## 6. Work Practice Standards:

- a. The permittee shall do the following for the Wastewater Collection, Conveyance, and Treatment system: [§2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.H.6.a; §129.114]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and

- 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The Wastewater Collection, Conveyance, and Treatment system shall be properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions. [§2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.H.6.b; §129.114]

*~PERMIT SHIELD IN EFFECT~*

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**H. Process P016: Final Product Loading**

**Facility ID:** LX-830 Fuel Oil Barge Loading and Final Product Tankcar & Tank Wagon Loading  
**Raw Materials:** Petroleum hydrocarbon resins, distillate fuel oils, and distillate oils  
**Control Device(s):** none

**1. Restrictions:**

- a. Emissions from the Final Product Loading process from barge loading shall not exceed the emissions limits in Table V-H-1 below: [§2103.12.a.2.B; RACT OP #0060-OP17d, V.J.1.a; §129.114]

**TABLE V-H-1: Final Product Loading Emission Limitations**

Pollutant	Barge Loading	
	lb/hr	tpy <sup>1</sup>
Volatile Organic Compounds (VOCs)	13.30	0.78
Hazardous Air Pollutants	0.64	0.04

<sup>1</sup>A year is defined as any consecutive 12-month period.

- b. Emissions from the Final Product Loading process from Tankcar & Tank Wagon Loading shall not exceed the emissions limits in Table V-H-2 below: [§2103.12.a.2.B; RACT OP #0060-OP17d, V.J.1.b; §129.114]

**TABLE V-H-2: Final Product Loading Emission Limitations**

Pollutant	Tankcar & Tank Wagon Loading	
	lb/hr	tpy <sup>1</sup>
Volatile Organic Compounds (VOCs)	22.52	18.24
Hazardous Air Pollutants	0.26	0.21

<sup>1</sup>A year is defined as any consecutive 12-month period.

- c. The rate of barge loading shall not exceed 850 gallons per minute, and total transfer of material transferred to barges shall not exceed 6.0 million gallons in any 12-month period. [§2103.12.a.2.B; RACT OP #0060-OP17d, V.J.1.c; §129.114]
- d. The rate of Tankcar/Tank Wagon loading shall not exceed 250 gallons per minute, and total transfer of material transferred to tankcars or tank wagons shall not exceed 24.3 million gallons in any 12-month period. [§2103.12.a.2.B; RACT OP #0060-OP17d, V.J.1.d; §129.114]

**2. Testing Requirements:**

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12.h.1]

**3. Monitoring Requirements:**

None, except as provided elsewhere.

**4. Record Keeping Requirements:**

- a. The permittee shall keep and maintain the following records for each batch of product loaded: [§2103.12.j; RACT OP #0060-OP17d, V.J.4.a; §129.115]
  - 1) Date and time of loading operations;
  - 2) Type of loading (barge or tankcar);
  - 3) Amount of material transferred;
  - 4) Type of material transferred; and
  - 5) Temperature of material during loading of tankcars or tank wagons.
- b. The permittee shall record the calculated estimated emissions per month if the total amount of material loaded to barges exceeds 5.4 million gallons in any rolling 12-month period, or if the total amount of material loaded to tankcars or tank wagons exceeds 21.9 million gallons in any rolling 12-month period. [§2103.12.j; RACT OP #0060-OP17d, V.J.4.b; §129.115]
- c. The permittee shall record all instances of noncompliance with the conditions of this permit in accordance with General Condition III.15.b. [§2103.12.j]
- d. All records and supporting documentation shall be retained in accordance with General Condition III.14 and be made available to the Department for inspection and/or copying upon request. [§2103.12.j.2]

**5. Reporting Requirements:**

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15. The reports shall contain, at a minimum, the following: [§2103.12.k; RACT OP #0060-OP17d, V.J.5.a; §129.115]
  - 1) Calendar dates covered in the reporting period; and
  - 2) All loading information required to be recorded under Condition V.H.4.a above;
  - 3) In lieu of the actual temperatures recorded under Condition V.H.4.a.5) above, the permittee may report the temperature of the material at the storage tank.
- b. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k.1]

**6. Work Practice Standards:**

- a. The permittee shall do the following for the Tankcar and Tank Wagon product loading systems and associated equipment: [§2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.J.6.a; §129.114]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.

- b. The permittee shall do the following for the Barge Loading Operation and associated equipment: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.J.6.b; §129.114]
- 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- c. The Tankcar & Tank Wagon Loading processes shall be: [§2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.J.6.c; §129.114]
- 1) Properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions; and
  - 2) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.
- d. The Barge Loading processes shall be: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.J.6.d; §129.114]
- 1) Properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions; and
  - 2) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

***~PERMIT SHIELD IN EFFECT~***

**I. Still Process Heaters: B001, B002, B003, B004, B015 & B006**

Process Description:	Heat Poly Still Process Heaters					#3 Continuous Still Process Heater
Facility ID:	#15 Still Heater (B001)	#16 Still Heater (B002)	#18 Still Heater (B003)	#19 Still Heater (B004)	Unit #43 Heater (B015)	#3 Still Heater (B006)
Max. Design Rate:	7.5 MMBtu/hr	6.1 MMBtu/hr	7.2 MMBtu/hr	7.5 MMBtu/hr	7.5 MMBtu/hr	5.25 MMBtu/hr
Fuel(s):	natural gas					
Control Device:	none					

**1. Restrictions:**

- a. Only natural gas shall be combusted in the Still Process Heaters. [§2103.12.a.2.B]
- b. The amount of fuel combusted in the Still Process Heaters shall not exceed the following: [§2103.12.a.2.B]
  - 1) No. 15 Still Process Heater: 7,360 scf/hr or 64.4 mmcf/yr of natural gas;
  - 2) No. 16 Still Process Heater: 5,980 scf/hr or 52.4 mmcf/yr of natural gas;
  - 3) No. 18 Still Process Heater: 7,059 scf/hr or 61.8 mmcf/yr of natural gas;
  - 4) No. 19 Still Process Heater: 7,360 scf/hr or 64.4 mmcf/yr of natural gas;
  - 5) Unit #43 Still Process Heater: 7,360 scf/hr or 64.4 mmcf/yr of natural gas, and
  - 6) #3 Continuous Still Process Heater: 5,150 scf/hr or 45.1 mmcf/yr of natural gas.
- c. Emissions of particulate matter shall not exceed 0.008 lb/MMBtu. [§2104.02.a.1.A; §2103.12.a.2.B; RACT OP #0060-OP17d, V.K.1.c; §129.112(c)(2)]
- d. Emissions from the Nos. 15, 16, 18, 19, #Unit 43, and #3 Still Process Heaters shall not exceed the emissions limitations in Table V-I-1 below: [OP #4051008-000-23903; OP #4051008-000-00904; OP #4051008-000-24100; OP #4051008-000-23902; IP #0060-I001; §2104.02.a.1.A; §2103.12.a.2.D]

**Table V-I-1: Still Process Heaters Emissions Limitations**

Pollutant	#15 Still B001		#16 Still B002		#18 Still B003		#19 Still B004		#43 Still B015		#3 Cont. Still, B006	
	lb/hr	tpy <sup>2</sup>	lb/hr	tpy <sup>2</sup>	lb/hr	tpy <sup>2</sup>	lb/hr	tpy <sup>2</sup>	lb/hr	tpy <sup>2</sup>	lb/hr	tpy <sup>2</sup>
PM <sup>1</sup>	0.06	0.26	0.05	0.21	0.06	0.25	0.06	0.26	0.06	0.26	0.04	0.18
NO <sub>x</sub>	0.85	3.71	0.69	3.01	0.81	3.56	0.85	3.71	0.85	3.71	0.59	2.59
SO <sub>x</sub>	0.01	0.02	0.01	0.02	0.01	0.02	0.01	0.02	0.01	0.02	0.01	0.02
CO	0.71	3.11	0.58	2.53	0.68	2.99	0.71	3.11	0.71	3.11	0.50	2.18
VOC	0.05	0.21	0.04	0.17	0.04	0.20	0.05	0.21	0.05	0.21	0.03	0.14
HAP	0.02	0.07	0.01	0.06	0.01	0.06	0.02	0.07	0.02	0.07	0.01	0.05

<sup>1</sup>All PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub><sup>2</sup>A year is defined as any consecutive 12-month period.

**2. Testing Requirements:**

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12.h.1]

**3. Monitoring Requirements:**

The permittee shall install and maintain the necessary fuel flow meter(s) to determine and to record the monthly amount of natural gas combusted. [§2103.12.i; RACT OP #0060-OP17d, V.K.3; §129.114]

**4. Record Keeping Requirements:**

- a. The permittee shall keep and maintain the following records: [§2103.12.j; RACT OP #0060-OP17d, V.K.4.a; §129.115]
  - 1) Monthly fuel usage;
  - 2) Records of operation, maintenance, inspection, calibration, and/or replacement of equipment.
- b. All records required under this section shall be maintained by the permittee in accordance with General Condition III.14. [§2103.12.j.2; RACT OP #0060-OP17d, V.K.4.b; §129.115]

**5. Reporting Requirements:**

- a. The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15. [§2103.12.k]
- b. The semiannual report shall include the following information: [§2103.12.k; RACT OP #0060-OP17d, V.K.5.b; §129.115]
  - 1) Calendar dates covered in the reporting period;
  - 2) The records of fuel combustion required under Condition V.I.4.a above;
  - 3) Reasons for any noncompliance with the emission standards;
- c. Reporting instances of noncompliance in accordance with Condition V.I.5.b.3) above, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k.1]

**6. Work Practice Standards:**

- a. The permittee shall do the following for the Heat Polymerization Still Process Heaters and Continuous Still Process Heater and associated equipment: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.K.6.a; §129.114]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.

- b. The Heat Polymerization Still Process Heaters and Continuous Still Process Heater shall be properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions. [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.K.6.b; §129.114]

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*~PERMIT SHIELD IN EFFECT~*

**J. Packaging Center Heaters: B009, B010 & B011**

<b>Process Description:</b>	Packaging Center Heaters		
<b>Facility ID:</b>	#2 Packaging Center Heater (B009)	#3 Packaging Center Heater (B010)	#5 Packaging Center Heater (B011)
<b>Max. Design Rate:</b>	5.0 MMBtu/hr	3.91 MMBtu/hr	3.0 MMBtu/hr
<b>Fuel(s):</b>	natural gas		
<b>Control Device:</b>	none		

**1. Restrictions:**

- a. Only natural gas shall be combusted in the Packaging Center Heaters. [§2103.12.a.2.B]
- b. The amount of fuel combusted in the Packaging Center Heaters shall not exceed the following: [§2103.12.a.2.B; RACT OP #0060-OP17d, V.M.1.b; §129.114]
  - 1) #2 Packaging Center Heater: 4,910 scf/hr or 42.9 mmscf/yr of natural gas;
  - 2) #3 Packaging Center Heater: 3,840 scf/hr or 33.6 mmscf/yr of natural gas; and
  - 3) #5 Packaging Center Heater: 2,950 scf/hr or 25.8 mmscf/yr of natural gas.
- c. Emissions of particulate matter shall not exceed 0.008 lb/MMBtu. [§2104.02.a.1.A]
- d. Emissions from the Packaging Center Heaters shall not exceed the emissions limitations in Table V-J-1 below: [OP #4051008-000-00905; OP #4051008-000-00901; §2104.02.a.1.A; §2103.12.a.2.B; RACT OP #0060-OP17d, V.M.1.d; §129.114]

**TABLE V-J-1: Packaging Center Heaters Emissions Limitations**

Pollutant	AP-42 Factors <sup>1</sup> Natural Gas	#2 Packaging Center Heater (B009)		#3 Packaging Center Heater (B010)		#5 Packaging Center Heater (B011)	
	lb/10 <sup>6</sup> scf	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
PM <sup>2</sup>	0.008 <sup>1</sup>	0.040	0.18	0.031	0.14	0.024	0.11
NO <sub>x</sub>	100	0.564	2.47	0.441	1.93	0.338	1.48
SO <sub>x</sub>	0.6	0.003	0.01	0.003	0.01	0.002	0.01
CO	84	0.474	2.08	0.370	1.62	0.284	1.24
VOC	5.5	0.040	0.18	0.024	0.11	0.024	0.11
HAP	1.9	0.011	0.05	0.001	0.01	0.001	0.01

<sup>1</sup>Emission factors for PM, PM<sub>10</sub>, and PM<sub>2.5</sub> are from Article XXI, §2104.02.a.1.A (lb/MMBtu).<sup>2</sup>All PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>.**2. Testing Requirements:**

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12.h.1]



**3. Monitoring Requirements:**

The permittee shall install and maintain the necessary fuel flow meter(s) to determine and to record the monthly amount of natural gas and propane combusted. [§2103.12.i; RACT OP #0060-OP17d, V.M.3;]

**4. Record Keeping Requirements:**

- a. The permittee shall keep and maintain the following records: [§2103.12.j; RACT OP #0060-OP17d, V.M.4.a; §129.115]
  - 1) Monthly fuel usage;
  - 2) Records of operation, maintenance, inspection, calibration, and/or replacement of equipment.
- b. All records required under this section shall be maintained by the permittee in accordance with General Condition III.14. [§2103.12.j.2; RACT OP #0060-OP17d, V.M.4.b; §129.115]

**5. Reporting Requirements:**

- a. The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15. [§2103.12.k]
- b. The semiannual report shall include the following information: [§2103.12.k; RACT OP #0060-OP17d, V.M.5.b; §129.115]
  - 1) Calendar dates covered in the reporting period;
  - 2) The records of fuel combustion required under Condition V.J.4.a above;
  - 3) Reasons for any noncompliance with the emission standards;
- c. Reporting instances of noncompliance in accordance with Condition V.J.5.b.3) above, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k.1]

**6. Work Practice Standards:**

- a. The permittee shall do the following for the Packaging Center Heaters and associated equipment: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.M.6.a; §129.114]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The Packaging Center Heaters shall be properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions. [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.M.6.b; §129.114]

***~PERMIT SHIELD IN EFFECT~***

**K. B013: #6 Boiler**

**Facility ID:** #6 Boiler  
**Max. Design Rate:** 49.4 MMBtu/hr  
**Primary Fuel:** Natural Gas  
**Secondary Fuel:** none  
**Control Device(s):** none

**1. Restrictions:**

- a. At no time shall the permittee operate Boiler #6 using any fuel other than only utility-grade natural gas. [IP #0060-I009, V.A.1.a; §2103.12.a.2.D; RACT OP #0060-OP17d, V.N.1.a; §129.112(c)(2)]
- b. The amount of natural gas combusted shall not exceed 48,400 scf per hour or 424.3 mmscf in any consecutive 12-month period. [§2103.12.a.2.B; §129.112(c)(2)]
- c. Emissions of particulate matter from Boiler #6 shall not exceed 0.008 lb/MMBtu. [IP #0060-I009, V.A.1.b; §2103.12.a.2.D; §2104.02.a.1.A; RACT OP #0060-OP17d, V.N.1.c; §129.112(c)(2)]
- d. Emissions from Boiler #6 shall not exceed the limitation in Table V-K-1 below: [IP #0060-I009, V.A.1.c; §2103.12.a.2.D; §2104.02.a.1.A; §129.112(c)(2)]

**TABLE V-K-1: Boiler #6 Emission Limitations**

Pollutant	Short-Term	Long-Term
	lb/hr	tpy <sup>1</sup>
Particulate Matter <sup>2</sup>	0.40	1.75
Nitrogen Oxides (NO <sub>x</sub> )	5.57	24.39
Sulfur Oxides (SO <sub>x</sub> )	0.03	0.15
Carbon Monoxide (CO)	4.68	20.49
Volatile Organic Compounds (VOCs)	0.31	1.34

<sup>1</sup>A year is defined as any consecutive 12-month period.

<sup>2</sup>All PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>

**2. Testing Requirements:**

- a. The permittee shall perform an emissions test on Boiler #6 within six months after the amount of natural gas combusted in any rolling 12-month period first exceeds 212 mmscf to determine compliance with the NO<sub>x</sub> limits in Condition V.K.1.d above and every five years thereafter. [§2103.12.h; RACT OP #0060-OP17d, V.N.2.a; §129.114]
  - 1) Compliance shall be determined by an average of three one-hour test runs. Testing shall be conducted in accordance with Site Level Condition IV.14 above (“Emissions Testing”) and U.S. EPA Test Method Seven or other test methods approved by the Department: [§2103.12.h]

- b. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12.h.1]

### 3. Monitoring Requirements:

- a. The permittee shall perform an annual adjustment or "tune-up" on Boiler #6 once every 12 months. Such annual tune-ups shall include: [IP #0060-I009, V.A.3.a; §2105.06.d.2; RACT OP #0060-OP17d, V.N.3.a; §129.114]
- 1) Inspection, adjustment, cleaning, or necessary replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation;
  - 2) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions or NO<sub>x</sub>, and to the extent practicable, minimize emissions of carbon monoxide; and
  - 3) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation.

### 4. Record Keeping Requirements:

- a. The permittee shall maintain all appropriate records to demonstrate compliance with the requirements of both Article XXI §2105.06 and RACT OP #0060-OP17d. Such records shall provide sufficient data to clearly demonstrate that all requirements of Article XXI §2105.06 and RACT OP #0060-OP17d are being met. [IP #0060-I009, V.A.4.a; §2103.12.j]
- b. For the annual tune-up required under Condition V.K.3.a above, the permittee shall maintain the following records: [IP #0060-I009, V.A.4.b; §2103.12.j; RACT OP #0060-OP17d, V.N.4.b; §129.115]
- 1) The date of the annual tune-up;
  - 2) The name of the service company and/or individuals performing the annual tune-up;
  - 3) The CO and NO<sub>x</sub> emission rate before and after the annual tune-up; and
  - 4) The excess oxygen rate after the annual tune-up.
- c. The permittee shall maintain records of fuel usage for Boiler #6. [IP #0060-I009, V.A.4.c; §2103.12.j; RACT OP #0060-OP17d, V.N.4.c; §129.115]
- d. All records shall be retained by the facility for at least five years. These records shall be made available to the Department upon request for inspection and/or copying. [IP #0060-I009, V.A.1.a; §2103.12.j.2; RACT OP #0060-OP17d, V.N.4.d; §129.115]

### 5. Reporting Requirements:

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15. The reports shall contain all required information for the time period of the report: [IP #0060-I009, V.A.5.a; §2103.12.k.1; RACT OP #0060-OP17d, V.N.5.a; §129.115]
- 1) Records of the annual tune-up required under Condition V.K.4.b above; and
  - 2) Records of the fuel use required under Condition V.K.4.c above.

- b. Until terminated by written notice from the Department, the requirement for the permittee to report cold starts 24-hours in advance in accordance with Site Level Condition IV.9 is waived and the permittee may report all cold starts in the semiannual report required under Condition V.K.5.a above. [§2103.12.k; §2108.01.d; RACT OP #0060-OP17d, V.N.5.b; §129.115]
- c. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [IP #0060-I009, V.A.5.b; §2103.12.k.1; RACT OP #0060-OP17d, V.N.5.c; §129.115]

**6. Work Practice Standards:**

- a. The permittee shall do the following for the #6 Boiler: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.N.6.a; §129.114]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. Boiler #6 shall be properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions. [IP #0060-I009, V.A.6; §2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.N.6.b; §129.114]

*~PERMIT SHIELD IN EFFECT~*

**L. B012: #8 Boiler**

**Facility ID:** #8 Boiler  
**Max. Design Rate:** 29.5 MMBtu/hr  
**Primary Fuel:** Natural Gas  
**Secondary Fuel:** none  
**Control Device(s):** Induced Flue Gas Recirculation

**1. Restrictions:**

- a. Emissions of particulate matter from Boiler #8 shall not exceed 0.008 lb/MMBtu. [IP #0060-I003a, V.1.a; §2104.02.a.1.A; §2103.12.a.2.D; RACT OP #0060-OP17d, V.O.1.a; §129.114]
- b. The amount of natural gas combusted shall not exceed 28,922 scf per hour or 253.4 mmscf in any consecutive 12-month period. §2103.12.a.2.B; [RACT OP #0060-OP17d, V.O.1.b; §129.114]
- c. At no time shall the permittee operate Boiler #8 using any fuel other than utility-grade natural gas. [IP #0060-I003a, V.1.b; §2103.12.a.2.D; RACT OP #0060-OP17d, V.O.1.c; §129.114]
- d. Emissions from Boiler #8 shall not exceed the limitations in Table V-L-1. below: [IP #0060-I003a, V.1.c; §2104.02.a.1.A; §2103.12.a.2.D; RACT OP #0060-OP17d, V.O.1.d; §129.114]

**TABLE V-L-1: Boiler #8 Emission Limitations**

<b>Pollutant</b>	<b>Hourly Emissions (lb/hr)</b>	<b>Yearly Emissions (tons/yr)<sup>1</sup></b>
Particulate Matter <sup>2</sup>	0.24	1.05
Nitrogen Oxides (NO <sub>x</sub> )	1.66	7.28
Sulfur Oxides (SO <sub>x</sub> )	0.02	0.09
Carbon Monoxide (CO)	2.79	12.24
Volatile Organic Compounds (VOCs)	0.18	0.80

<sup>1</sup>A year is defined as any consecutive 12-month period.

<sup>2</sup>All PM is assumed to be PM<sub>10</sub>, and all PM<sub>10</sub> is assumed to be PM<sub>2.5</sub>

**2. Testing Requirements:**

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12.h.1]

**3. Monitoring Requirements:**

None, except as provided elsewhere.

**4. Record Keeping Requirements:**

- a. Records shall be kept of the amount of natural gas used monthly. [IP #0060-I003a, V.4.a; §2103.12.a.2.D; §60.48c(g); RACT OP #0060-OP17d, V.O.4.a; §129.115]
- b. All records and supporting documentation shall be retained in accordance with General Condition III.14, and be made available to the Department for inspection and/or copying upon request. [IP #0060-I003a, V.4.b; §2103.12.j.2; RACT OP #0060-OP17d, V.O.4.b; §129.115]

**5. Reporting Requirements:**

- a. The permittee shall submit reports of monthly fuel use required by Condition V.L.4.a above to the Department semiannually in accordance with General Condition III.15. [IP #0060-I003a, V.5.a; §2103.12.k; RACT OP #0060-OP17d, V.O.5.a; §129.115]
- b. Until terminated by written notice from the Department, the requirement for the permittee to report cold starts 24-hours in advance in accordance with Site Level Condition IV.9 is waived and the permittee may report all cold starts in the semiannual report required under Condition V.L.5.a above. [§2103.12.k; §2108.01.d; RACT OP #0060-OP17d, V.O.5.b; §129.115]
- c. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [IP #0060-I003a, V.5.c; §2103.12.k.1; RACT OP #0060-OP17d, V.O.5.c; §129.115]

**6. Work Practice Standards:**

- a. The permittee shall do the following for the #8 Boiler: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.O.6.a; §129.114]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. Boiler #8 shall be: [IP #0060-I003a, V.6.a; §2105.03; §2103.12.a.2.D; RACT OP #0060-OP17d, V.O.6.b; §129.114]
  - 1) Operated in such a manner as not to cause air pollution;
  - 2) Operated and maintained in a manner consistent with good operating and maintenance practices.
  - 3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

***~PERMIT SHIELD IN EFFECT~***

**M. D001-D011: Storage Tanks**

Process Description	Storage Tanks					
Facility ID	D001	D002	D003	D004	D005	D006
Stored Materials	Catalytic & Misc. Poly Oil	Distillates, Low VP	Distillates, Mid VP	Heat Poly Charge Stock	Misc.	Naphthenic/Ink /Vegetable Oil
Process Description	Storage Tanks					
Facility ID	D007	D008	D009	D010	D011	
Stored Materials	Nevchem LR	Recovered Oil	Resin Former	Resin Solutions	Unit 20/21 Feed Blend	

As identified above, the storage tanks consist of the tanks listed under the heading “Storage Tanks” in Table-II in the Facility Description, Section II.

**1. Restrictions:**

- a. The permittee shall store all materials in accordance with Site Level Condition IV.18. [§2103.12.a.2.B; §2105.12.a; RACT OP #0060-OP17d, V.P.1.a; §129.114]
- b. Emissions from the storage tanks shall not exceed the values in Table V-M-1 at any time: [§2103.12.a.2.B; §2105.12.b]

**TABLE V-M-1: Storage Tanks Emission Limitations**

Storage Tank Category		VOC Emissions (tons/yr) <sup>1</sup>	HAP Emissions (tons/yr) <sup>1</sup>
ID	Material Category		
D001	Catalytic & Misc. Poly Oil	3.08	0.13
D002	Distillates, Low VP	2.26	0.33
D003	Distillates, Mid VP	2.71	0.12
D004	Heat Poly Charge Stock	1.65	0.89
D005	Miscellaneous	0.04	0.00
D006	Naphthenic/Ink/Vegetable Oil	0.84	0.00
D007	Nevchem LR	0.15	0.00
D008	Recovered Oil	0.02	0.02
D009	Resin Former <sup>2</sup>	1.92	0.88
D010	Resin Solutions	18.31	0.01
D011	Unit 20/21 Feed Blend	3.32	0.17
Total		34.31	2.56

<sup>1</sup>A year is defined as any consecutive 12-month period.

- c. The permittee shall not store or allow to be stored in Tanks Nos. 2108, 6301, 6302, and 8501-8506 any liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa at a temperature equal to the local maximum monthly average temperature as reported by the National Weather



Service. The maximum true vapor pressure shall be determined as follows: [IP #0060-I004, V.A.1.d; §2103.12.a.2.B; §2105.12.b; §60.110b(b); RACT OP #0060-OP17d, V.P.1.f; §129.114]

- 1) In accordance with methods described in American Petroleum Institute Bulletin 2517, "Evaporation Loss from External Floating Roof Tanks"; or
  - 2) As obtained from standard reference texts; or
  - 3) As determined by ASTM Method D2879-97; or
  - 4) Any other method approved by the Department.
- d. The permittee shall not operate or allow to be operated Tanks Nos. 6301, 6302, and 8501-8506 unless the operating parameters for the conservation and vacuum vents for each tank are a minimum of 0.58 psig and 0.05 psig respectively. [IP #0060-I004, V.A.1.e; §2103.012.a.2.B; §2105.12.b; RACT OP #0060-OP17d, V.P.1.g; §129.114]
- e. The permittee shall not store or allow to be stored any material in Tank #601 unless the maximum vapor pressure of the material stored is less than 6.9 kPa (1.0 psi). [§2103.12.a.2.B; §2105.12.b; §60.113; RACT OP #0060-OP17d, V.P.1.h; §129.114]

## **2. Testing Requirements:**

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12.h.1]

## **3. Monitoring Requirements:**

None, except as provided elsewhere.

## **4. Record Keeping Requirements:**

- a. The permittee shall keep readily accessible records showing the dimension of the storage vessel and analysis showing the capacity of the storage vessel for the life of the source. [IP #0060-I004, V.A.3.b; §2103.12.j; RACT OP #0060-OP17d, V.P.4.a; §129.115]
- b. The permittee shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. The permittee shall determine the vapor pressure using one of the methods in Condition V.M.1.c above and shall indicate which method was used. [IP #0060-I004, V.A.3.c; §2103.12.j; RACT OP #0060-OP17d, V.P.4.b; §129.115]
- c. The permittee shall record and maintain records of the total yearly throughput of material and the number of turnovers in each tank. [IP #0060-I004, V.A.4.a.1; §2103.12.j; RACT OP #0060-OP17d, V.P.4.c]
- d. The permittee shall maintain records of the calculated VOC and HAP emissions from the storage tanks on a calendar year basis. If the actual throughput of resin formers (measured as receipts) exceeds 18.7 mmgal in any rolling 12-month period, the permittee shall calculate and report the VOC and HAP emissions from the storage tanks for the 12-month period. [§2103.12.j; RACT OP #0060-OP17d, V.P.4.e; §129.115]

- e. All records and supporting documentation shall be retained in accordance with General Condition III.14, and be made available to the Department for inspection and/or copying upon request. [§2103.12.j.2]

**5. Reporting Requirements:**

- a. The permittee shall notify the Department within 30 days of when the maximum true vapor pressure of the liquid stored in Tank Nos. 6301-6302 or 8501-8506 exceeds 3.5 kPa. [IP #0060-I004, V.A.4.d; §2103.12.k; RACT OP #0060-OP17d, V.P.5.a; §129.115]
- b. The permittee shall submit notification of intent to store any new material in Tank Nos. 6301-6302 or 8501-8506 other than resin forming feedstocks or fuel oil to the Department a minimum of ten working days prior to the intended store date. This notification shall at a minimum include the Material Safety Data Sheet (MSDS) and emission calculation for the new material. [IP #0060-I004, V.A.5.a.2; §2103.12.k; RACT OP #0060-OP17d, V.P.5.b; §129.115]
- c. The permittee shall report to the Department the calculated VOC and HAP emissions from the storage tanks in the previous 12-month period within 30 days upon request by the Department. [§2103.12.k; RACT OP #0060-OP17d, V.P.5.c; §129.115]
- d. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k.1]

**6. Work Practice Standards:**

- a. The permittee shall do the following for all storage tanks and associated equipment: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, V.P.6.a; §129.114]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The storage tanks shall be properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions. [§2103.12.a.2.B; §2105.03; RACT OP #0060-OP17d, V.P.6.b; §129.112(c)(2)]

***~PERMIT SHIELD IN EFFECT~***

## VI. MISCELLANEOUS

### A. Process P017: Groundwater Remediation

**Process Description:** Groundwater Remediation System  
**Facility ID:** Groundwater & Oil Recovery Well Nos. 2, 4, 7-11; 2 Dry Well #8  
**Max. Design Rate:** 165,000 gallons of recovered oil  
**Raw Materials:** contaminated groundwater; recovered oil  
**Control Device:** carbon adsorption for recovered water

#### 1. Restrictions:

- a. The permittee shall collect recovered oil in containers using Container Level Two controls meeting one of the following definitions: [§2103.12.a.2.B; §2104.08.a; §63.7900(b)(2); §63.7901(d)(1); §63.923(b); RACT OP #0060-OP17d, VI.A.1.a; §129.112(c)(2)]
  - 1) A container that meets the applicable U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation as specified in §63.923(f).
  - 2) A container that has been demonstrated to operate with no detectable organic emissions as defined in §63.921.
  - 3) A container that has been demonstrated within the preceding 12 months to be vapor tight by using Method 27 in appendix A of 40 CFR part 60 in accordance with the procedure specified in §63.925(b) of this subpart.
- b. Transfer of regulated material in to or out of a container using Container Level Two controls shall be conducted in such a manner as to minimize exposure of the remediated material to the atmosphere, to the extent practical, considering the physical properties of the remediated material and good engineering and safety practices for handling flammable, ignitable, explosive, or other hazardous materials. Examples of container loading procedures that meet the requirements of this paragraph include using any one of the following: [§2103.12.a.2.B; §2104.08.a; §63.7901(d)(2); §63.923(c); RACT OP #0060-OP17d, VI.A.1.b; §129.112(c)(2)]
  - 1) A submerged-fill pipe or other submerged-fill method to load liquids into the container;
  - 2) A vapor-balancing system or a vapor-recovery system to collect and control the vapors displaced from the container during filling operations; or
  - 3) A fitted opening in the top of a container through which the remediated material is filled, with subsequent purging of the transfer line before removing it from the container opening.
- c. The permittee shall install all covers and closure devices for the container, and secure and maintain each closure device in the closed position except as follows: [§2103.12.a.2.B; §2104.08(a); §63.7901(d)(3); §63.923(d); RACT OP #0060-OP17d, VI.A.1.c; §129.112(c)(2)]
  - 1) Opening of a closure device or cover is allowed for the purpose of adding material to the container as follows:
    - a) In the case when the container is filled to the intended final level in one continuous operation, the permittee shall promptly secure the closure devices in the closed position and install the covers, as applicable to the container, upon conclusion of the filling operation.
    - b) In the case when discrete quantities or batches of material intermittently are added to the

container over a period of time, the permittee shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon either the container being filled to the intended final level, the completion of a batch loading after which no additional material will be added to the container within 15 minutes, the person performing the loading operation leaves the immediate vicinity of the container, or the shutdown of the process generating the material being added to the container, whichever condition occurs first.

- 2) Opening of a closure device or cover is allowed for the purpose of removing material from the container as follows:
    - a) An empty container may be open to the atmosphere at any time (e.g., covers and closure devices are not required to be secured in the closed position on an empty container).
    - b) In the case when discrete quantities or batches of material are removed from the container but the container does not meet the conditions to be an empty container, the permittee shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the unloading operation leaves the immediate vicinity of the container, whichever condition occurs first.
  - 3) Opening of a closure device or cover is allowed when access inside the container is needed to perform routine activities other than transfer of regulated material. Examples of such activities include those times when a worker needs to open a port to measure the depth of or sample the material in the container, or when a worker needs to open a manhole hatch to access equipment inside the container. Following completion of the activity, the owner or operator shall promptly secure the closure device in the closed position or reinstall the cover, as applicable to the container.
  - 4) Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the container internal pressure in accordance with the container design specifications. The device shall be designed to operate with no detectable organic emissions when the device is secured in the closed position. The settings at which the device opens shall be established such that the device remains in the closed position whenever the container internal pressure is within the internal pressure operating range determined by the permittee based on container manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, combustible, explosive, reactive, or hazardous materials. Examples of normal operating conditions that may require these devices to open are during those times when the container internal pressure exceeds the internal pressure operating range for the container because of loading operations or diurnal ambient temperature fluctuations.
  - 5) Opening of a safety device is allowed at any time conditions require it to do so to avoid an unsafe condition.
- d. The permittee shall transfer the remediated material to one of the following facilities: [§2103.12.a.2.B; §2104.08.a; §63.7936(b); RACT OP #0060-OP17d, VI.A.1.d; §129.112(c)(2)]
- 1) A facility where the remediated material will be directly disposed in a landfill or other land disposal unit according to all applicable Federal and State requirements.
  - 2) A facility subject to 40 CFR part 63, subpart DD where the exemption under §63.680(b)(2)(iii) is waived and air emissions from the management of remediated material at the facility are controlled according to all applicable requirements in the subpart for an off-site material. Prior

to sending the remediated material, the permittee shall obtain a written statement from the owner or operator of the facility to which the remediated material is sent acknowledging that the exemption under §63.680(b)(2)(iii) will be waived for all remediated material received at the facility from the permittee and the remediated material will be managed as an off-site material at the facility according to all applicable requirements. This statement must be signed by the responsible official of the receiving facility, provide the name and address of the receiving facility, and a copy sent to the EPA Regional Office listed under Contact Information, Section I.

- 3) A facility where the remediated material will be managed according to all applicable requirements under 40 CFR Part 63, Subpart GGGGG.
  - a) The permittee shall prepare and include a notice with each shipment or transport of remediated material from the site. This notice must state that the remediated material contains organic HAP that are to be treated according to the provisions of Subpart GGGGG. When the transport is continuous or ongoing (for example, discharge to a publicly owned treatment works), the notice must be submitted to the receiving facility owner or operator initially and whenever there is a change in the required treatment.
  - b) The permittee shall not transfer the remediated material unless the owner or operator of the facility receiving the remediated material has submitted to the EPA a written certification that he or she will manage remediated material received from the facility according to the requirements of Subpart GGGGG. The receiving facility owner or operator may revoke the written certification by sending a written statement to the EPA and to the permittee providing at least 90 days' notice that they rescind acceptance of responsibility for compliance with the regulatory provisions listed in Subpart GGGGG. Upon expiration of the notice period, the permittee may not transfer the remediated material to the facility.
- e. The permittee shall develop a written startup, shutdown, and malfunction plan (SSMP) according to the provisions in §63.6(e)(3). [§2103.12.a.2.B; §2104.08.a; §63.7935(c); RACT OP #0060-OP17d, VI.A.1.e; §129.112(c)(2)]
- f. The permittee shall control equipment leaks according to all applicable requirements under 40 CFR Part 63, Subpart UU: *National Emission Standards for Equipment Leaks – Control Level 2*. [§2103.12.a.2.B; §2104.08.a; §63.7920(b); RACT OP #0060-OP17d, VI.A.1.f; §129.112(c)(2)]
- g. The permittee shall identify the equipment subject to control according to the requirements in §63.1022, including equipment designated as unsafe to monitor, and have records supporting the determinations with a written plan for monitoring the equipment according to the requirements in §63.1022(c)(4). [§2103.12.a.2.B; §2104.08.a; §63.7921(c); RACT OP #0060-OP17d, VI.A.1.g; §129.112(c)(2)]

## 2. Testing Requirements:

- a. The permittee shall conduct a test to demonstrate that each container operates with no detectable organic emissions or that the container is vapor tight. The permittee shall conduct the test using Method 21 (40 CFR part 60, appendix A) and the procedures in §63.925(a) to demonstrate that each container operates with no detectable organic emissions or Method 27 (40 CFR part 60, appendix A) and the procedures in §63.925(b) to demonstrate that each container is vapor tight. [§2104.08.a; §63.7941(i); RACT OP #0060-OP17d, VI.A.2.a; §129.112(c)(2)]



- b. Testing of containers in accordance with Condition VI.A.2.a above shall be conducted at least once every 12 months, or any time a new or repaired container is brought into service. [§2103.12.h; RACT OP #0060-OP17d, VI.A.2.b; §129.112(c)(2)]
- c. The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12.h.1]

### 3. Monitoring Requirements:

- a. The permittee shall inspect all remediated material containers as follows: [§2104.08(a); §63.7901(d)(1); §63.923(e); §63.926(a); RACT OP #0060-OP17d, VI.A.3.a; §129.112(c)(2)]
  - 1) In the case when a container filled or partially filled with remediated material remains unopened at the facility site for a period of one year or more, the container and its cover and closure devices shall be visually inspected by the permittee initially and thereafter, at least once every calendar year, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the owner or operator shall repair the defect in accordance with the requirements of Condition VI.A.3.a.2) below.
  - 2) When a defect is detected for the container, cover, or closure devices, the permittee must either empty the remediated material from the defective container or repair the defective container.
    - a) If the permittee elects to empty the waste from the defective container, the permittee must remove the remediated material from the defective container to meet the conditions for an empty container and transfer the removed remediated material to a container that meets the applicable standards under this permit. Transfer of the remediated material must be completed no later than five calendar days after detection of the defect. The emptied defective container must be either repaired, destroyed, or used for purposes other than management of regulated material.
    - b) If the permittee elects not to empty the remediated material from the defective container, the permittee must repair the defective container. First efforts at repair of the defect must be made no later than 24 hours after detection and repair must be completed as soon as possible but no later than five calendar days after detection. If repair of a defect cannot be completed within five calendar days, then the remediated material must be emptied from the container and the container must not be used to manage regulated material until the defect is repaired.
- b. The permittee shall demonstrate continuous compliance with the equipment leak standards required by Condition VI.A.1.f above by inspecting, monitoring, repairing, and maintaining records according to the requirements in §§63.1021 through 63.1039, as applicable. [§2104.08; §63.7922(c); RACT OP #0060-OP17d, VI.A.3.b; §129.112(c)(2)]

### 4. Record Keeping Requirements:

- a. The permittee shall demonstrate continuous compliance by keeping the following records: [§2103.12.j; §2104.08.a; §63.7903(b), (d)(6); §63.7922(d); RACT OP #0060-OP17d, VI.A.4.a; §129.115]
  - 1) The quantity and design capacity for each type of container used for remediated material remediation;

- 2) Date of each inspection;
  - 3) If a defect is detected during an inspection, the location of the defect, a description of the defect, the date of detection, the corrective action taken to repair the defect, and if repair is delayed, the reason for any delay and the date completion of the repair is expected.
  - 4) Keeping records to document compliance with the requirements according to the requirements in Condition VI.A.4.c below.
- b. The permittee shall maintain records of the following: [§2103.12.j; §2104.08.a; §63.7901(d)(4); RACT OP #0060-OP17d, VI.A.4.b; §129.115]
- 1) That each container meets the applicable U.S. Department of Transportation regulations; or
  - 2) The permittee shall conduct an initial test of each container for no detectable organic emissions using the procedures in §63.925(a), and have records documenting the test results; or
  - 3) The permittee shall have demonstrated within the last 12 months that each container is vapor tight according to the procedures in §63.925(a) and have records documenting the test results.
- c. The permittee shall keep the following records: [§2103.12.j; §2104.08.a; §63.7952(a); RACT OP #0060-OP17d, VI.A.4.c; §129.115]
- 1) A copy of each notification and report submitted to comply with this permit, including all documentation supporting any Initial Notification or Notification of Compliance Status that is submitted, according to the requirements in §63.10(b)(1) and (b)(2)(xiv).
  - 2) The records in §63.6(e)(3)(iii) through (v) related to startups, shutdowns, and malfunctions.
- d. The permittee shall keep records of the total quantity of remediated material collected in each 12-month period. [§2103.12.j; RACT OP #0060-OP17d, VI.A.4.d; §129.115]
- e. All records and supporting documentation shall be retained in accordance with General Condition III.14, and be made available to the Department for inspection and/or copying upon request. Records shall be kept on-site for at least two years after the date of each occurrence. Records may be kept off-site for the remaining three years. [§2103.12.j.2; §63.7953(b)-(c); RACT OP #0060-OP17d, VI.A.4.e; §129.115]

## 5. Reporting Requirements:

- a. The permittee shall submit compliance reports semiannually to the Department in accordance with General Condition III.15. [§2103.12.k; §63.7951(a)(5); RACT OP #0060-OP17d, VI.A.5.a; §129.115]
- b. Each compliance report shall include the following information: [§2103.12.k; §2104.08.a; §63.7951(b); RACT OP #0060-OP17d, VI.A.5.b; §129.115]
  - 1) Company name and address.
  - 2) Statement by a responsible official, with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - 3) Date of report and beginning and ending dates of the reporting period.
  - 4) If there was a startup, shutdown, or malfunction during the reporting period the permittee acted consistent with the startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).



- 5) If there were no deviations from any emissions limitations (including operating limit), work practice standards, or operation and maintenance requirements, a statement that there were no
  - 6) deviations from the emissions limitations, work practice standards, or operation and maintenance requirements during the reporting period.
  - 7) Information on equipment leaks required in periodic reports by §63.1018(a) or §63.1039(b).
- c. The permittee shall report each instance in which each emissions limitation and each operating limit was not met. This includes periods of startup, shutdown, and malfunction. The permittee shall also report each instance in which the requirements for work practice standards were not met. [§2104.08.a; §63.7935(e); RACT OP #0060-OP17d, VI.A.5.c; §129.115]
  - d. If there is a startup, shutdown, or malfunction during the semiannual reporting period that was not consistent with the startup, shutdown, and malfunction plan required under Condition VI.A.1.e, the permittee shall submit an immediate startup, shutdown, and malfunction report according to the requirements of §63.10(d)(5)(ii). [§2103.12.k; §2104.08.a; §63.7951(c); RACT OP #0060-OP17d, VI.A.5.d; §129.115]
  - e. The permittee shall report to the Department the 12-month rolling total of remediated material collected as required under Condition VI.A.4.d. [§2103.12.k; RACT OP #0060-OP17d, VI.A.5.e; §129.115]
  - f. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k.1]

#### 6. Work Practice Standards:

- a. The permittee shall do the following for the Groundwater Remediation System: [§2105.03; §2103.12.a.2.B; RACT OP #0060-OP17d, VI.A.6.a; §129.112(c)(2)]
  - 1) Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 2) Keep records of any maintenance; and
  - 3) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- b. The Groundwater Remediation System and all associated equipment shall be properly operated and always maintained according to good engineering practices, except for activities to mitigate emergency conditions. [§2103.12.a.2.B; §2105.03; §129.112(c)(2); RACT OP #0060-OP17d, VI.A.6.b; §129.112(c)(2)]

*~PERMIT SHIELD IN EFFECT~*

**B. Emergency Generators**

Process Description:	Emergency Generators							
Facility ID:	WWTP	Heat Poly	Unit 43	BH	Building 50	Building 19A	QTL	Building 50 ICT
Max. Design Rate:	600 hp	600 hp	691 hp	242 hp	31 hp	10 hp	12 hp	29.5 hp
Type:	4SLB	4SRB	4SLB	4SLB	4SLB	4SLB	4SLB	4SLB
Fuel(s):	natural gas							
Control Device(s):	none							

**1. Restrictions:**

- a. The permittee shall not operate or allow to be operated any emergency generator using a fuel other than utility-grade natural gas. [§2103.12.a.2.B; RACT OP #0060-OP17d, VI.B.1.a; §129.112]
- b. The permittee shall not operate or allow to be operated any emergency generator in such manner that emissions of particulate matter exceed 0.012 lb/MMBtu. [§2103.12.a.2.B; RACT OP #0060-OP17d, VI.B.1.b; §129.112]
- c. Each emergency generator shall not be operated for more than 500 hours, including operation for maintenance checks and readiness testing, in any 12-month period. [§2103.12.a.2.B; RACT OP #0060-OP17d, VI.B.1.c; §129.112(c)(8)]
- d. The generators shall be fired only during emergency conditions and for a maximum of 100 hours per year each for maintenance checks and readiness testing. [§2103.12.a.2.B; §63.6640(f)(2); RACT OP #0060-OP17d, VI.B.1.d; §129.112]
- e. The permittee may operate each generator up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted towards the 100 hours per year provided for maintenance and testing under Condition VI.B.1.d above. The 50 hours per year cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. [§2103.12.a.2.B; §63.6640(f)(4); RACT OP #0060-OP17d, VI.B.1.e; §129.112]

**2. Testing Requirements:**

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.14 entitled "Emissions Testing." [§2103.12.h.1]

**3. Monitoring Requirements:**

The permittee shall install a non-resettable hour meter on all emergency generators. [§2103.12.i; §63.6625(f); RACT OP #0060-OP17d, VI.B.3.a; §129.112]

**4. Record Keeping Requirements:**

- a. The permittee shall record hours of operation recorded through the non-resettable hour meters required under Condition VI.B.3. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§2103.12.j; §63.6655(f); RACT OP #0060-OP17d, VI.B.4.a; §129.115]
- b. The permittee shall keep records of the maintenance conducted on the emergency generators. [§2103.12.j; §63.6655(e); RACT OP #0060-OP17d, VI.B.4.b; §129.115]
- c. The permittee shall record all instances of noncompliance with the conditions of this permit in accordance with General Condition III.15.b. [§2103.12.j; RACT OP #0060-OP17d, VI.B.4.c; §129.115]
- d. All records and supporting documentation shall be retained in accordance with General Condition III.14, and be made available to the Department for inspection and/or copying upon request. [§2103.12.j.2]

**5. Reporting Requirements:**

- a. The permittee shall report the hours of operation required to be recorded by Condition VI.B.4.a above to the Department semiannually in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report. [§2103.12.k; RACT OP #0060-OP17d, VI.B.5.a; §129.115]
- b. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8, if appropriate. [§2103.12.k.1]

**6. Work Practice Standards:**

- a. The permittee shall not use an emergency generator for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§2103.12.a.2.B; §63.6640(f)(3); RACT OP #0060-OP17d, VI.B.6.a; §129.112]
- b. The permittee shall perform the following maintenance on each generator: [§2103.12.a.2.B; §63.6603(a), Table 2.d.5; RACT OP #0060-OP17d, VI.B.6.b; §129.112]
  - 1) Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - 2) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
  - 3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- c. The emergency generators shall be properly operated and always maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§2103.12.a.2.B; §2105.03; §63.6605(b); RACT OP #0060-OP17d, VI.B.6.c; §129.112]

- d. The permittee shall operate and maintain the emergency generators according to the manufacturer's emission-related written instructions or shall develop a maintenance plan. This plan shall provide to the extent practicable for the maintenance and operation of each generator in a manner consistent with good air pollution control practice for minimizing emissions. [§2103.12.a.2.B; §63.6625(e); RACT OP #0060-OP17d, VI.B.6.d; §129.112]

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**C. Sources of Minor Significance**

Facility ID	Source Description	Reason for Determination of Minor Significance
G001	Hydrolaser Water Blasting/Cleaning	Maximum PTE is <1.0 tpy of particulate; no VOC or HAP is emitted
G002	Parts Washing	Maximum PTE is <2.0 tpy of VOC; HAPs are negligible
G003	R&D Laboratory Hoods	Laboratory equipment used exclusively for chemical or physical analyses
G004	Tank Cleaning & Painting	Maximum PTE is <3.75 tpy of VOC
F001	Parking Lots & Roadways	Maximum PTE is <3.4 tpy of particulate

**1. Restrictions:**

- a. The permittee shall not exceed 2,500 gallons per year of cleaner in the parts washing process. [§2103.12.a.2.B; RACT OP #0060-OP17d, VI.C.1.a; §129.112(c)(2)]
- b. The permittee shall not use or allow to be used any halogen-containing cleaners in the parts washing process. [§2103.12.a.2.B; RACT OP #0060-OP17d, VI.C.1.b; §129.112(c)(2)]
- c. The permittee shall not exceed 2,000 gallons per year of coatings in the tank cleaning and painting process. [§2103.12.a.2.B; RACT OP #0060-OP17d, VI.C.1.c; §129.112]
- d. The permittee shall use only coatings compliant with Article XXI, §2105.10 in the tank cleaning and painting process. [§2103.12.a.2.B; §2105.10; RACT OP #0060-OP17d, VI.C.1.d; §129.112]
- e. For the parts washing process, the permittee shall keep and maintain records of the total amount and type of cleaner used. [§2103.12.a.2.B; §2103.12.j; RACT OP #0060-OP17d, VI.C.1.e; §129.112(c)(2)]
- f. For the tank cleaning and painting process, the permittee shall keep and maintain records of the total amount and type of all thinners and coatings used. [§2103.12.a.2.B; §2103.12.j; §2105.10.c; RACT OP #0060-OP17d, VI.C.1.f; §129.115]

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## **VII. ALTERNATIVE OPERATING SCENARIOS**

No alternative operating scenarios exist for the Operating Permit.

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**VIII. EMISSIONS LIMITATIONS SUMMARY**

*[This section is provided for informational purposes only and is not intended to be an applicable requirement.]*

The tons per year emission limitations in this permit for the Neville Chemical Company facility are summarized in the following table:

**TABLE VIII-1: Emission Limitations Summary**

<b>Pollutant</b>	<b>Total (tpy*)</b>
Particulate Matter	9.63
Particulate Matter <10 µm	9.13
Particulate Matter <2.5 µm (PM <sub>2.5</sub> )	9.13
Nitrogen Oxides (NO <sub>x</sub> )	69.17
Sulfur Oxides (SO <sub>x</sub> )	0.45
Carbon Monoxide (CO)	64.95
Volatile Organic Compounds (VOC)	181.80
Hazardous Air Pollutants (HAP)	16.40
Benzene	0.49
Ethylbenzene	2.22
Naphthalene	1.99
Styrene	1.67
Xylenes	7.15
Greenhouse Gases (CO <sub>2</sub> e)	77,327

\*A year is defined as any consecutive 12-month period.