

43-00364



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY NATURAL MINOR OPERATING PERMIT

Issue Date: June 26, 2025 Effective Date: June 26, 2025

Expiration Date: May 31, 2030

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

> The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

State Only Permit No: 43-00364

Natural Minor

Federal Tax Id - Plant Code: 13-3064673-1

Owner information				
Name: COMBINED SYSTEMS, INC.				
Mailing Address: PO BOX 506				
JAMESTOWN, PA 16134-0506				
Р	Plant Information			
Plant: COMBINED SYSTEMS INC/GREENE TWP				
Location: 43 Mercer County	43916 Greene Township			
SIC Code: 3489 Manufacturing - Ordnance And Access	ories, Nec			
Responsible Official				
Name: DON SMITH				
Title: C.E.O				
Phone: (724) 932 - 2177	Email: donsmith@combinedsystems.com			
Perr	mit Contact Person			
Name: TIMOTHY J BUCK				
Title: SAFETY & SECURITY MGR				
Phone: (724) 932 - 2177 Ext.130	Email: tbuck@combinedsystems.com			
[Signature]				
LORI L. MCNABB, NORTHWEST REGION AIR PROGRAM MANAGER				



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

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SECTION A. Site Inventory List

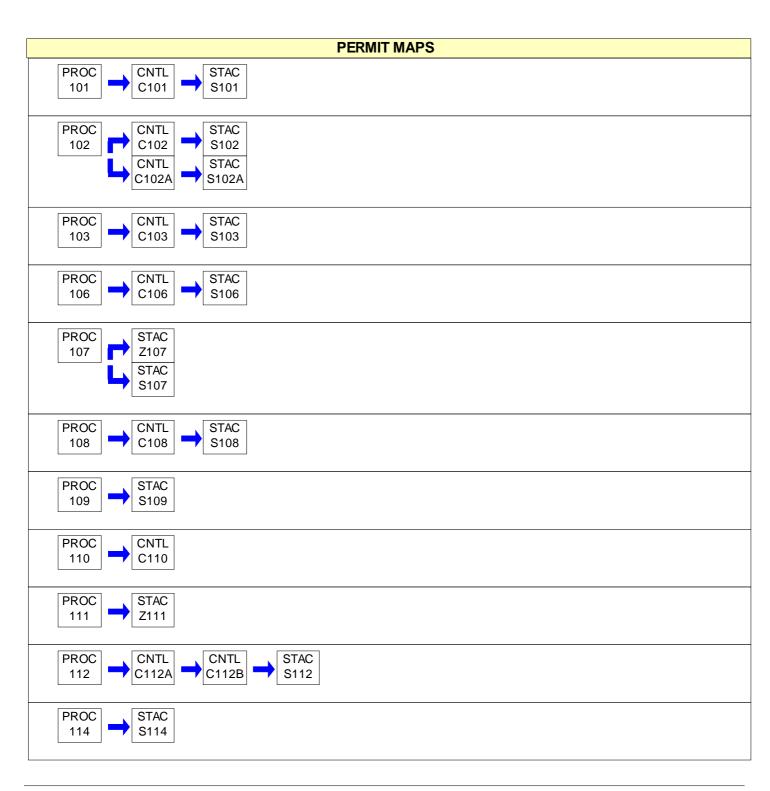
	ON A. Site inventory List			
Source I	D Source Name	Capacity/	Throughput	Fuel/Material
101	CS MIXING OPERATION (BLDG E1, CS MIX ROOM)	1.000	Gal/HR	RAW MAT'LS FOR CS
102	SIEVING & GRANULATION OPERATION (BLDG E2, FUEL MIX ROOM)	1.000	Gal/HR	K-CL-O3; FUEL MIX; CS
103	PELLETIZING OPERATION (BLDG O)	1.000	Gal/HR	CS FUEL MIX POWDER
106	SMALL 1600 CFM PAINT BOOTH (BLDG MS2)	1.000	Gal/HR	PAINT
107	SILK SCREENING, VARNISH, UV SEALANT (BLDGS D1, G, L, M, N)	1.000	Lbs/HR	INK, VARNISH, UV SEALAI
108	DELAY TESTING, 3 UNITS, (BUILDING L)	1.000	Gal/HR	DELAYS
109	T2 DELAY TESTING (BLDG L)	1.000	Gal/HR	DELAYS
110	SMOKE CANISTER TEST CHAMBER (LOCATED ON THE RANGE)	1.000	Gal/HR	CS, CN, & HC CANISTER(
111	SMOKE & OC CANISTER FIELD TESTING	1.000	Gal/HR	SMOKE & OC CANISTERS
112	MIXING OF MECL WITH CS OR CN FOR LIQUID PROJECTILE (BLDG G)	1.000	Gal/HR	CS & METHYLENE CHLOI
114	DELAY COMPOSITION LAB (BLDG C)	1.000	Gal/HR	SULFURIC ACID, HCL AC
115	HC SMOKE CANISTER MIXING & PRESSING (BUILDING G-RANGE)	1.000	Lbs/HR	HEXACHLOROETHANE, Z
C101	ACTIVATED CARBON FILTRATION UNIT (710 CFM)(BLDG E1, ID #465)			
C102	DONALDSON TORIT DUST COLLECTOR (4,000 CFM) (BLDG E2, ID #4)			
C102A	ACTIVATED CARBON FILTRATION UNIT (710 CFM)(BLDG E2, ID #466)			
C103	DONALDSON TORIT DUST COLLECTOR (4,000 CFM) (BLDG O)			
C106	PAINT BOOTH FILTERS (BLDG MS2)			
C108	TORIT MODEL MDY-2 DUST COLLECTOR FOR BLDG L DELAY TESTING			
C110	FARR DUST COLLECTOR FOR SMOKE CANISTER TEST CHAMBER			
C112A	PANEL PRE-FILTER FOR MECL MIXING			
C112B	CHARCOAL PANEL FILTER FOR MECL MIXING			
C115	DUST COLLECTOR FOR HC SMOKE CANISTER MIXING & PRESSING			
S101	EXHAUST FROM BLDG E1 CARBON FILTRATION			
S102	DUST COLLECTOR STACK			
S102A	EXHAUST FROM BLDG E2 CARBON FILTRATION			
S103	DUST COLLECTOR STACK			
S106	PAINT BOOTH STACK (BLDG MS2)			
S107	EXHAUST UV SEALANT PROCESS			
S108	STACK FOR BUILDING L DELAY TESTING DUST COLLECTOR			
S109	EXHAUST FOR BUILDING L TESTING ROOM			
S112	MECL GLOVE BOX EXHAUST			
S114	STACK FOR DELAY COMPOSITION LAB			
S115	STACK FOR SMOKE CANISTER MIXING & PRESSING DUST COLLECTOR			
Z107	INDOOR FUGITIVES SILKSCREENING & VARNISH APPLICATIONS			





SECTION A. Site Inventory List

Source	D Source Name	Capacity/Throughput	Fuel/Material
Z111	FUGITIVE EMISSIONS FROM FIELD SMOKE		
	CANISTER TESTING		





PERMIT MAPS



DEP Auth ID: 1314247 DEP PF ID: 757256





#001 [25 Pa. Code § 121.1]

Definitions.

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

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)]

Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
 - (1) For a synthetic minor facility, a fee equal to:
 - (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
 - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
 - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.







- (2) For a facility that is not a synthetic minor, a fee equal to:
 - (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
 - (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
 - (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.
- (b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

Transfer of Operating Permits.

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility. coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this

#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]

Inspection and Entry.

- (a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
 - (2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#007 [25 Pa. Code §§ 127.441 & 127.444]

Compliance Requirements.

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







- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

#009 [25 Pa. Code §§ 127.442(a) & 127.461]

Duty to Provide Information.

- (a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.
- (b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]

Operating Permit Modifications

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:







- (b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.
- (e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#012 [25 Pa. Code § 127.441]

Severability Clause.

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

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
 - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:



- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)





- (6) Section 127.462 (relating to minor operating permit modifications)
- (7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11a]

Reactivation of Sources

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

- (a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
- (b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]

Circumvention.

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#018 [25 Pa. Code §§ 127.402(d) & 127.442]

Reporting Requirements.

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

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

- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such







records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#019 [25 Pa. Code §§ 127.441(c) & 135.5]

Sampling, Testing and Monitoring Procedures.

- (a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
- (b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#020 [25 Pa. Code §§ 127.441(c) and 135.5]

Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
 - (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of the analyses.
 - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.





#023 [25 Pa. Code §135.3]

Reporting

- (a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.
- (b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]

Report Format

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.





SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P. S. § \$ 4001—4015).

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

- (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:
 - (1) Construction or demolition of buildings or structures.
 - (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
 - (4) Clearing of land.
 - (5) Stockpiling of materials.
 - (6) Open burning operations.
 - (7) & (8) [Not applicable]
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.
- (b) [Not applicable]
- (c) [Paragraph (c) of the regulation is printed under Workpractice Requirements in this section of permit.]
- (d) [Not applicable]

003 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in condition #002, above, if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]

Limitations

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

005 [25 Pa. Code §123.41]

Limitations

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

(1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.





SECTION C. Site Level Requirements

(2) Equal to or greater than 60% at any time.

006 [25 Pa. Code §123.42]

Exceptions

The limitations of 123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:

- (1) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions). [Refer to Condition 002 of this section of permit]
 - (4) [Not applicable]

007 [25 Pa. Code §129.14]

Open burning operations

- (a) [Not applicable]
- (b) Outside of air basins. No person may permit the open burning of material in an area outside of air basins in a manner that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life or property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health.
- (c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:
- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
 - (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
 - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
 - (4) [Not applicable]
 - (5) [Not applicable]
 - (6) A fire set solely for recreational or ceremonial purposes.
 - (7) A fire set solely for cooking food.
- (d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:





SECTION C. Site Level Requirements

(1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

- (2) [Not applicable]
- (3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:
- (i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.
- (ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.
- (4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

[This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act.]

II. TESTING REQUIREMENTS.

008 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The Department reserves the right to require exhaust stack testing of any source(s) as necessary to verify emissions for purposes including determining the correct emission fee, malfunctions, or determining compliance with applicable requirements.

[From Plan Approval 43-364A, Section C, Condition 006.]

III. MONITORING REQUIREMENTS.

009 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

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SECTION C. Site Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

010 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

From 25 Pa. Code §123.1(c):

- (c) A person responsible for any source specified in Condition #002, above, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:
- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
 - (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

DEP Auth ID: 1314247

DEP PF ID: 757256







Source ID: 101 Source Name: CS MIXING OPERATION (BLDG E1, CS MIX ROOM)

Source Capacity/Throughput: 1.000 Gal/HR RAW MAT'LS FOR CS

Conditions for this source occur in the following groups: 2 - CARBON ABSORPTION



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) The permittee shall maintain monthly records of VOC emissions for this source.
- (b) Each month, the total VOC emissions shall be added with the total from the 11 previous months to form a 12 consecutive months total.
- (c) These records shall be maintained for a period of no less than 5 years and shall be made available to the Department upon request.

[This condition assures compliance with Plan Approval 43-364A, Section D, Source 101, Condition 003.]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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







VII. ADDITIONAL REQUIREMENTS.

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



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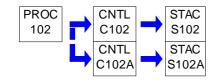
SECTION D. Source Level Requirements

Source ID: 102 Source Name: SIEVING & GRANULATION OPERATION (BLDG E2, FUEL MIX ROOM)

Source Capacity/Throughput: 1.000 Gal/HR K-CL-O3; FUEL MIX; CS

Conditions for this source occur in the following groups: 1 - TORIT 4,000 CFM DUST COLLECTORS

2 - CARBON ABSORPTION



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13] Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) The permittee shall maintain monthly records of VOC emissions from this source.
- (b) The monthly total shall be added to the total from the 11 previous months to form a 12 consecutive months total.
- (c) These records shall be maintained for a period of 5 years and shall be made available to the Department upon request.

[This condition assures compliance with Plan Approval 43-364A, Section D, Source 102, Condition 003.]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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





VII. ADDITIONAL REQUIREMENTS.

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

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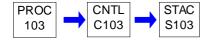


SECTION D. Source Level Requirements

Source ID: 103 Source Name: PELLETIZING OPERATION (BLDG O)

Source Capacity/Throughput: 1.000 Gal/HR CS FUEL MIX POWDER

Conditions for this source occur in the following groups: 1 - TORIT 4,000 CFM DUST COLLECTORS



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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







Source ID: 106 Source Name: SMALL 1600 CFM PAINT BOOTH (BLDG MS2)

Source Capacity/Throughput: 1.000 Gal/HR PAINT

PROC CNTL STAC S106

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) In accordance with 25 Pa. Code §129.51(d)(3), the permittee shall maintain records of VOC emissions from this source to demonstrate that this source does not emit VOC in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year.
- (b) (1) In accordance with the November 4, 2013, RFD approval, the permittee shall maintain monthly records of VOC emissions from this source to demonstrate that VOC emissions from this source are less than 2.7 tons per year based on any 12 consecutive month total.
- (2) Each month, the total quantity of VOC from this source shall be added to the 11 previous months to obtain the 12 consecutive month total.
- (c) (1) The permittee shall maintain monthly records of HAP emissions from this source.
- (2) Each month, the total quantity of each HAP from this source shall be added to the 11 previous months to obtain the 12 consecutive month total for each single HAP.
- (3) Each month, the total quantity of all HAPs combined from this source shall be added to the 11 previous months to obtain the 12 consecutive month total for all HAPs combined.
- (4) Should the any 12-month total exceed 1 ton per year for any single HAP or 2.5 tons per year for all HAPs combined, the facility shall submit an application for plan approval for this source within 30 days of the determination.

[From the November 4, 2013, Approval of Request for Determination for the paint booth.]



V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

- (a) The control device shall be operated at all times that the source is in operation.
- (b) The control device shall be maintained and operated in accordance with the manufacturer's specifications.

[From the November 4, 2013, Approval of Request for Determination for the paint booth.]

VII. ADDITIONAL REQUIREMENTS.

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

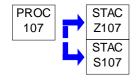






Source ID: 107 Source Name: SILK SCREENING, VARNISH, UV SEALANT (BLDGS D1, G, L, M, N)

> Source Capacity/Throughput: 1.000 Lbs/HR INK, VARNISH, UV SEALANT CON



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RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

MONITORING REQUIREMENTS. III.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) In accordance with 25 Pa. Code §129.51(d)(3), the permittee shall maintain records of VOC emissions from this source to demonstrate that this source does not emit VOC in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year.
- (b) (1) The permittee shall maintain monthly records of VOC emissions from this source to demonstrate that VOC emissions from this source are less than 2.7 tons per year based on any 12 consecutive month total.
- (2) Each month, the total quantity of VOC from this source shall be added to the 11 previous months to obtain the 12 consecutive month total.
- (c) (1) The permittee shall maintain monthly records of HAP emissions from this source.
- (2) Each month, the total quantity of each HAP from this source shall be added to the 11 previous months to obtain the 12 consecutive month total for each single HAP.
- (3) Each month, the total quantity of all HAPs combined from this source shall be added to the 11 previous months to obtain the 12 consecutive month total for all HAPs combined.
- (4) Should the any 12-month total exceed 1 ton per year for any single HAP or 2.5 tons per year for all HAPs combined, the facility shall submit an application for plan approval for this source within 30 days of the determination.

REPORTING REQUIREMENTS.

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



VI. WORK PRACTICE REQUIREMENTS.

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

ADDITIONAL REQUIREMENTS. VII.

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



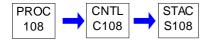




Source ID: 108 Source Name: DELAY TESTING, 3 UNITS, (BUILDING L)

> Source Capacity/Throughput: 1.000 Gal/HR **DELAYS**

Conditions for this source occur in the following groups: 3 - SMALL DUST COLLECTORS



RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

TESTING REQUIREMENTS.

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

MONITORING REQUIREMENTS. III.

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

IV. RECORDKEEPING REQUIREMENTS.

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

REPORTING REQUIREMENTS.

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

WORK PRACTICE REQUIREMENTS. VI.

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

ADDITIONAL REQUIREMENTS. VII.

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







Source ID: 109 Source Name: T2 DELAY TESTING (BLDG L)

Source Capacity/Throughput: 1.000 Gal/HR DELAYS



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



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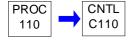


SECTION D. Source Level Requirements

Source ID: 110 Source Name: SMOKE CANISTER TEST CHAMBER (LOCATED ON THE RANGE)

Source Capacity/Throughput: 1.000 Gal/HR CS, CN, & HC CANISTERS

Conditions for this source occur in the following groups: 3 - SMALL DUST COLLECTORS



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

A daily log for the smoke canister test chamber shall be maintain documenting the following information.

- (a) Date and time of all tests:
- (b) Types and quantity of units tested;
- (c) Record of inspection of the emissions collection system before and during the test to ensure no release of irritant gases.

[From 3/1/2012 DEP Air Quality Inspection Report for Combined Systems, Inc.]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

A daily inspection of the emissions collection system shall be conducted before and during each test to ensure no release of irritant gases.

[From the 3/1/2012 DEP Air Quality inspection report for Combined Systems, Inc.]

VII. ADDITIONAL REQUIREMENTS.

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







Source ID: 111 Source Name: SMOKE & OC CANISTER FIELD TESTING

Source Capacity/Throughput: 1.000 Gal/HR SMOKE & OC CANISTERS

PROC STAC Z111

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

A daily log for the field testing shall be maintain documenting the following information.

- (a) Date and time of all tests;
- (b) Record of weather conditions including wind direction and speed;
- (c) Types and quantity of units tested;
- (d) Record of whether or not any emissions crossed property lines;
- (e) Record of any weather condition which causes the smoke to fail to dissipate (such as an inversion).

[From 3/1/2012 DEP Air Quality Inspection Report for Combined Systems, Inc.]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) Field testing shall be stopped if emissions cross property lines. Testing may be resumed when conditions that cause emissions to cross property lines no longer exist.
- (b) Field testing shall be stopped if weather conditions create a situation where the smoke is not dissipating (such as an inversion).

[From 3/1/2012 DEP Air Quality Inspection Report for Combined Systems, Inc.]



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SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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







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Source ID: 112 Source Name: MIXING OF MECL WITH CS OR CN FOR LIQUID PROJECTILE (BLDG G)

> Source Capacity/Throughput: 1.000 Gal/HR CS & METHYLENE CHLORIDE

Conditions for this source occur in the following groups: 4 - CMAS REQUIREMENTS



RESTRICTIONS.

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

TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

RECORDKEEPING REQUIREMENTS.

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

REPORTING REQUIREMENTS.

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

VI. **WORK PRACTICE REQUIREMENTS.**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The air contaminiation source and air pollution control device must be operated in a manner consistent with the manufacturer's specifications and good engineering practices.

[From July 21, 2017, RFD approval.]

VII. ADDITIONAL REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The mixing of CS and MeCI for liquid projectiles in Building D was originally permitted with the new issuance of the State Only operating permit on December 15, 2015, according to information provided with the permit application.

The additional process of mixing of CN and MeCl for liquid projectiles in Building D was determined to be exempt from plan approval requirements in a July 21, 2017, RFD approval.

The approval stipulated that the exemption is only valid for the equipment, throughput, and emission levels proposed in the



RFD. A revised RFD or plan approval application will be required prior to any future expansions or changes which increase atmospheric emissions of sources which are not listed as a published exemption.





Source ID: 114 Source Name: DELAY COMPOSITION LAB (BLDG C)

> Source Capacity/Throughput: 1.000 Gal/HR SULFURIC ACID, HCL ACID, NITI



RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All air contaminiation sources and air pollution control devices must be operated in a manner consistent with the manufacturer's specifications and good engineering practices.

[From January 15, 2016, RFD approval.]

ADDITIONAL REQUIREMENTS. VII.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source, the Delay Composition Lab, was determined to be exempt from plan approval requirements in a January 15, 2016, RFD approval. The approval stipulated that the exemption is only valid for the equipment, throughput, and emission levels proposed in the RFD. A revised RFD or plan approval application will be required prior to any future expansions or changes which increase atmospheric emissions of sources which are not listed as a published exemption.







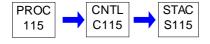
SECTION D.

Source Level Requirements

Source ID: 115 Source Name: HC SMOKE CANISTER MIXING & PRESSING (BUILDING G-RANGE)

> Source Capacity/Throughput: 1.000 Lbs/HR HEXACHLOROETHANE, ZINC OX

Conditions for this source occur in the following groups: 3 - SMALL DUST COLLECTORS



RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

TESTING REQUIREMENTS.

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

MONITORING REQUIREMENTS. III.

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

IV. RECORDKEEPING REQUIREMENTS.

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

REPORTING REQUIREMENTS.

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

WORK PRACTICE REQUIREMENTS. VI.

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

VII. ADDITIONAL REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source, the HC Smoke Canister Mixing and Pressing, was determined to be exempt from plan approval requirements in a November 30, 2018, RFD approval. The approval stipulated that the exemption is only valid for the equipment, throughput, and emission levels proposed in the RFD. A revised RFD or plan approval application will be required prior to any future expansions or changes which increase atmospheric emissions of sources which are not listed as a published exemption.







Group Name: 1 - TORIT 4,000 CFM DUST COLLECTORS

Group Description: Plan Approval requirements for the two 4,000 cfm Torit models DownFlo DFO 3-6 dust collectors

Sources included in this group

IE	0	Name
10	102 SIEVING & GRANULATION OPERATION (BLDG E2, FUEL MIX ROOM)	
10)3	PELLETIZING OPERATION (BLDG O)

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) The permittee shall maintain a record of all preventative maintenance inspections of the dust collector. These records shall, at a minimum, contain the dates of the inspections, any problems or defects, the actions taken to correct the problem or defects, and any routine maintenance performed.
- (b) The permittee shall maintain records of the pressure drop across the dust collector taken during the operational inspections.

[From Plan Approval 43-364A, Section D, Condition 002 of Sources 102 & 103.]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) The permittee shall perform a daily operational inspection of the dust collector.
- (b) The permittee shall install, operate, and maintain a magnehelic gauge or similar device to measure the pressure drop across the dust collector.
- (c) The permittee shall operate the dust collector at all times that the source is in operation.
- (d) The source and dust collector shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

[From Plan Approval 43-364A, Section D, Condition 004 of Source 102, Condition 003 of Source 103.]

VII. ADDITIONAL REQUIREMENTS.

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







Group Name: 2 - CARBON ABSORPTION

Group Description: Plan Approval requirements related to using carbon absorption for emissions control.

Sources included in this group

43-00364

ID	Name
101 CS MIXING OPERATION (BLDG E1, CS MIX ROOM)	
102	SIEVING & GRANULATION OPERATION (BLDG E2, FUEL MIX ROOM)

RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

Ш MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) The permittee shall maintain a record of all preventative maintenance inspections of the activated carbon filtration system. These records shall, at a minimum, contain the dates of the inspections, any problems or defects, the actions taken to correct the problem or defects and any routine maintenance performed.
- (b) The permittee shall maintain records of the number of batches processed and the date of filter media changeouts.
- (c) The permittee shall keep all records for a period of 5 years and make the records available to the Department upon request.

[From Plan Approval 43-364A, Section D, Source 101, Condition 005 and from page 2 of the August 21, 2014, Plan Approval Inspection Report for Source 102.]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) The activated carbon filtration system will be inspected on a monthly basis.
- (b) Filter media for the activated carbon filtration system will be changed out after every 60 batches.

[From Plan Approval 43-364A, Section D, Source 101, Condition 005 and from page 2 of the August 21, 2014, Plan Approval Inspection Report for Source 102.]

VII. ADDITIONAL REQUIREMENTS.

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

DEP Auth ID: 1314247 DEP PF ID: Page 38 757256







Group Name: 3 - SMALL DUST COLLECTORS

Group Description: Requirements for dust collectors not subject to Plan Approval requirements.

Sources included in this group

ID	Name	
108	DELAY TESTING, 3 UNITS, (BUILDING L)	
110	10 SMOKE CANISTER TEST CHAMBER (LOCATED ON THE RANGE)	
115	HC SMOKE CANISTER MIXING & PRESSING (BUILDING G-RANGE)	

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a record of all preventative maintenance inspections of the dust collector. These records shall, at a minimum, contain the dates of the inspections, any problems or defects, the actions taken to correct the problem or defects, and any routine maintenance performed.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall perform routine operational inspections of the dust collector.
- (b) The source and dust collector shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

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







Group Name: 4 - CMAS REQUIREMENTS

Group Description: 40 CFR Part 63 Subpart WWWW, NESHAP for Chemical Manufacturing Area Sources (CMAS)

Sources included in this group

ID	Name
112	MIXING OF MECL WITH CS OR CN FOR LIQUID PROJECTILE (BLDG G)

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11501]

Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources What are the notification, recordkeeping, and reporting requirements, and how may I assert an affirmative defense for violation of emission standards during malfunction?

- (a) General provisions. You must meet the requirements of the General Provisions in 40 CFR part 63, subpart A, as shown in Table 9 to this subpart. The General Provisions in other parts do not apply except when a requirement in an overlapping standard, which you determined is at least as stringent as subpart VVVVVV and with which you have opted to comply, requires compliance with general provisions in another part.
- (b) [The Notification of Compliance Status is a one-time requirement which has already been met with the December 1, 2015, submittal to the EPA for which the Department received a copy.]
- (c) Recordkeeping. You must maintain files of all information required by this subpart for at least 5 years following the date of each occurrence according to the requirements in §63.10(b)(1). If you are subject, you must comply with the recordkeeping and reporting requirements of §63.10(b)(2)(iii) and (vi) through (xiv), and the applicable requirements specified in paragraphs (c)(1) through (8) of this section.
- (1) For each CMPU subject to this subpart, you must keep the records specified in paragraphs (c)(1)(i) through (viii) of this section.
- (i) Records of management practice inspections, repairs, and reasons for any delay of repair, as specified in §63.11495(a)(5).
 - (ii) [This paragraph of the regulation is not applicable to this source.]
- (iii) If batch process vent emissions are less than 10,000 lb/yr for a CMPU, keep records of organic HAP usage, as specified in §63.11496(a)(4). [Non-applicable text from the regulation has been omitted from the permit.]
 - (iv) (vi) [Not applicable to this source.]
- (vii) Records of the date, time, and duration of each malfunction of operation of process equipment, control devices, recovery devices, or continuous monitoring systems used to comply with this subpart that causes a failure to meet a standard. The record must include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over the standard, and a description of the method used to estimate the emissions.



- (viii) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11495(d), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
 - (2) (6) [Not applicable to this facility.]
- (7) You must keep a record of all transferred liquids that are reactive or resinous materials, as defined in §63.11502(b), and not included in the NOCS.
 - (8) [Not applicable to this source.]
- (d) Semiannual Compliance Reports. You must submit semiannual compliance reports that contain the information specified in paragraphs (d)(1) through (7) of this section, as applicable. Reports are required only for semiannual periods during which you experienced any of the events described in paragraphs (d)(1) through (8) of this section.
 - (1) Deviations. You must clearly identify any deviation from the requirements of this subpart.
 - (2) [Not applicable.]
- (3) Delay of leak repair. You must provide the following information for each delay of leak repair beyond 15 days for any process equipment, storage tank, surge control vessel, bottoms receiver, and each delay of leak repair beyond 45 days for any heat exchange system with a cooling water flow rate less than 8,000 gal/min: information on the date the leak was identified, the reason for the delay in repair, and the date the leak was repaired.
- (4) Process change. You must report each process change that affects a compliance determination and submit a new certification of compliance with the applicable requirements in accordance with the procedures specified in paragraph (b) of this section.
 - (5) (6) [Not applicable.]
- (7) Reactive and resinous materials. Report any transfer of liquids that are reactive or resinous materials, as defined in §63.11502(b), and not included in the NOCS.
- (8) Malfunctions. If a malfunction occurred during the reporting period, the report must include the number of instances of malfunctions that caused emissions in excess of a standard. For each malfunction that caused emissions in excess of a standard, the report must include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over the standard, and a description of the method used to estimate the emissions. The report must also include a description of actions you took during a malfunction of an affected source to minimize emissions in accordance with §63.11495(d), including actions taken to correct a malfunction.
- (e) Affirmative defense for violation of emission standards during malfunction. In response to an action to enforce the standards set forth in §§63.11495 through 63.11499, you may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction, as defined at 40 CFR 63.2. Appropriate penalties may be assessed if you fail to meet your burden of proving all of the requirements in the affirmative defense. The affirmative defense shall not available for claims for injunctive relief.
- (1) To establish the affirmative defense in any action to enforce such a standard, you must timely meet the notification requirements in paragraph (e)(2) of this section, and must prove by a preponderance of evidence that:
 - (i) The violation:
- (A) Was caused by a sudden, infrequent, and unavoidable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner; and
- (B) Could not have been prevented through careful planning, proper design, or better operation and maintenance practices; and





- (C) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and
- (D) Was not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and
- (ii) Repairs were made as expeditiously as possible when a violation occurred. Off-shift and overtime labor were used, to the extent practicable to make these repairs; and
- (iii) The frequency, amount, and duration of the violation (including any bypass) were minimized to the maximum extent practicable; and
- (iv) If the violation resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and
- (v) All possible steps were taken to minimize the impact of the violation on ambient air quality, the environment and human health: and
- (vi) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and
- (vii) All of the actions in response to the violation were documented by properly signed, contemporaneous operating logs; and
- (viii) At all times, the affected CMPU was operated in a manner consistent with good practices for minimizing emissions; and
- (ix) A written root cause analysis has been prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the violation resulting from the malfunction event at issue. The analysis must also specify, using best monitoring methods and engineering judgment, the amount of any emissions that were the result of the malfunction.
- (2) Report. If you seek to assert an affirmative defense, you must submit a written report to the Administrator, with all necessary supporting documentation, that you have met the requirements set forth in paragraph (e)(1) of this section. This affirmative defense report must be included in the first periodic compliance report, deviation report, or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance report, deviation report, or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance report, deviation report, or excess emission report due after the initial occurrence of the violation of the relevant standard.

[74 FR 56041, Oct. 29, 2009, as amended at 77 FR 75758, Dec. 21, 2012]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11495]
Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources What are the management practices and other requirements?

- (a) Management practices. If you have a CMPU subject to this subpart, you must comply with paragraphs (a)(1) through (5) of this section.
- (1) Each process vessel must be equipped with a cover or lid that must be closed at all times when it is in organic HAP service or metal HAP service, except for manual operations that require access, such as material addition and removal, inspection, sampling and cleaning. This requirement does not apply to process vessels containing only metal HAP that are in a liquid solution or other form that will not result in particulate emissions of metal HAP (e.g., metal HAP that is in ingot, paste, slurry, or moist pellet form or other form).





- (2) [Not applicable.]
- (3) You must conduct inspections of process vessels and equipment for each CMPU in organic HAP service or metal HAP service, as specified in paragraphs (a)(3)(i) through (v) of this section, to demonstrate compliance with paragraph (a)(1) of this section and to determine that the process vessels and equipment are sound and free of leaks. Alternatively, except when the subject CMPU contains metal HAP as particulate, inspections may be conducted while the subject process vessels and equipment are in VOC service, provided that leaks can be detected when in VOC service.
 - (i) Inspections must be conducted at least quarterly.
- (ii) For these inspections, detection methods incorporating sight, sound, or smell are acceptable. Indications of a leak identified using such methods constitute a leak unless you demonstrate that the indications of a leak are due to a condition other than loss of HAP. If indications of a leak are determined not to be HAP in one quarterly monitoring period, you must still perform the inspection and demonstration in the next quarterly monitoring period.
- (iii) As an alternative to conducting inspections, as specified in paragraph (a)(3)(ii) of this section, you may use Method 21 of 40 CFR part 60, appendix A-7, with a leak definition of 500 ppmv to detect leaks. You may also use Method 21 with a leak definition of 500 ppmv to determine if indications of a leak identified during an inspection conducted in accordance with paragraph (a)(3)(ii) of this section are due to a condition other than loss of HAP. The procedures in this paragraph (a)(3)(iii) may not be used as an alternative to the inspection required by paragraph (a)(3)(ii) of this section for process vessels that contain metal HAP as particulate.
 - (iv) Inspections must be conducted while the subject CMPU is operating.
- (v) No inspection is required in a calendar quarter during which the subject CMPU does not operate for the entire calendar quarter and is not in organic HAP service or metal HAP service. If the CMPU operates at all during a calendar quarter, an inspection is required.
- (4) You must repair any leak within 15 calendar days after detection of the leak, or document the reason for any delay of repair. For the purposes of this paragraph (a)(4), a leak will be considered "repaired" if a condition specified in paragraph (a)(4)(i), (ii), or (iii) of this section is met.
 - (i) The visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated, or
 - (ii) No bubbles are observed at potential leak sites during a leak check using soap solution, or
 - (iii) The system will hold a test pressure.
- (5) You must keep records of the dates and results of each inspection event, the dates of equipment repairs, and, if applicable, the reasons for any delay in repair.
- (b) (c) [Not applicable.]
- (d) General duty. At all times, you must operate and maintain any affected CMPU, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the CMPU.

[74 FR 56041, Oct. 29, 2009, as amended at 77 FR 75756, Dec. 21, 2012]

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11496]

Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources What are the standards and compliance requirements for process vents?

(a) Organic HAP emissions from batch process vents. You must comply with the requirements in paragraphs (a)(1) through (4) of this section for organic HAP emissions from your batch process vents for each CMPU using Table 1 organic HAP. [Non-applicable text from the regulation is omitted from this paragraph.]





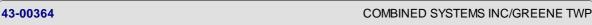
- (1) (3) [Paragraphs (1) through (3) of this section are not printed in the permit because the permittee has elected to maintain usage records allowed by the following paragraph (4).]
- (4) As an alternative to determining the HAP emissions, you may elect to demonstrate that the amount of organic HAP used in the process is less than 10,000 lb/yr. You must keep monthly records of the organic HAP usage.
- (b) (i) [Paragraphs (b) through (i) of this subsection are not applicable to this source.]

[74 FR 56041, Oct. 29, 2009, as amended at 77 FR 75757, Dec. 21, 2012]

VII. ADDITIONAL REQUIREMENTS.

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11494] Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources What are the applicability requirements and compliance dates?

- (a) Except as specified in paragraph (c) of this section, you are subject to this subpart if you own or operate a chemical manufacturing process unit (CMPU) that meets the conditions specified in paragraphs (a)(1) and (2) of this section.
 - (1) The CMPU is located at an area source of hazardous air pollutant (HAP) emissions.
- (2) HAP listed in Table 1 to this subpart (Table 1 HAP) are present in the CMPU, as specified in paragraph (a)(2)(i), (ii), (iii), or (iv) of this section.
- (i) The CMPU uses as feedstock, any material that contains quinoline, manganese, and/or trivalent chromium at an individual concentration greater than 1.0 percent by weight, or any other Table 1 HAP at an individual concentration greater than 0.1 percent by weight. To determine the Table 1 HAP content of feedstocks, you may rely on formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet (MSDS) for the material. If the concentration in an MSDS is presented as a range, use the upper bound of the range.
- (ii) Quinoline is generated as byproduct and is present in the CMPU in any liquid stream (process or waste) at a concentration greater than 1.0 percent by weight.
- (iii) Hydrazine and/or Table 1 organic HAP other than quinoline are generated as byproduct and are present in the CMPU in any liquid stream (process or waste), continuous process vent, or batch process vent at an individual concentration greater than 0.1 percent by weight.
 - (iv) Hydrazine or any Table 1 HAP is produced as a product of the CMPU.
- (b) A CMPU includes all process vessels, equipment, and activities necessary to operate a chemical manufacturing process that produces a material or a family of materials described by North American Industry Classification System (NAICS) code 325. A CMPU consists of one or more unit operations and any associated recovery devices. A CMPU also includes each storage tank, transfer operation, surge control vessel, and bottoms receiver associated with the production of such NAICS code 325 materials.
- (c) This subpart does not apply to the operations specified in paragraphs (c)(1) through (6) of this section.
 - (1) [Not applicable to this source.]
 - (2) Production of the following chemical manufacturing materials described in NAICS code 325:
 - (i) (iv) [Not applicable to this source.]
 - (3) Research and development facilities, as defined in CAA section 112(c)(7).
 - (4) Quality assurance/quality control laboratories.
 - (5) Ancillary activities, as defined in §63.11502(b).



- (6) Metal HAP in structures or existing as articles as defined in 40 CFR 372.3.
- (d) This subpart applies to each new or existing affected source. The affected source is the facility-wide collection of CMPUs and each heat exchange system and wastewater system associated with a CMPU that meets the criteria specified in paragraphs (a) and (b) of this section. A CMPU using only Table 1 organic HAP is required to control only total CAA section 112(b) organic HAP. A CMPU using only Table 1 metal HAP is required to control only total CAA section 112(b) metal HAP in accordance with §63.11495 and, if applicable, §63.11496(f).
- (1) An affected source is an existing source if you commenced construction or reconstruction of the affected source before October 6, 2008.
 - (2) [Not applicable to this source.]
- (e) Any area source that installed a federally-enforceable control device on an affected CMPU is required to obtain a permit under 40 CFR part 70 or 40 CFR part 71 if the control device on the affected CMPU is necessary to maintain the source's emissions at area source levels. For new and existing sources subject to this rule on December 21, 2012 and subject to title V as a result of this rule, a complete title V permit application must be submitted no later than December 21, 2013. New and existing sources that become subject to this rule after December 21, 2012 must submit a complete title V permit application no later than 12 months after becoming subject to this rule if the source is subject to title V as a result of this rule. Otherwise, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.
- (f) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions in this subpart no later than March 21, 2013.
- (g) (h) [Not applicable to this source.]

[74 FR 56041, Oct. 29, 2009, as amended at 77 FR 75756, Dec. 21, 2012]

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11502]

Subpart VVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources What definitions apply to this subpart?

(a) The following terms used in this subpart have the meaning given them in the CAA, §63.2, subpart SS (§63.981), subpart WW (§63.1061), 40 CFR 60.111b, subpart F (§63.101), subpart G (§63.111), subpart FFFF (§63.2550), as specified after each term:

[Refer to regulation for terms and definitions.]

(b) All other terms used in this subpart shall have the meaning given them in this section. If a term is defined in the CAA, §63.2, subpart SS (§63.981), subpart WW (§63.1061), 40 CFR 60.111b, subpart F (§63.101), subpart G (§63.111), or subpart FFFF (§63.2550), and in this section, it shall have the meaning given in this section for purposes of this subpart.

[Selected definitions are printed here. Refer to regulation for remaining definitions applicable to subpart WWW.]

Batch process vent means a vent from a CMPU or vents from multiple CMPUs within a process that are manifolded together into a common header, through which a HAP-containing gas stream is, or has the potential to be, released to the atmosphere. Batch process vents include vents from batch operations and vents with intermittent flow from continuous operations that are not combined with any stream that originated as a continuous gas stream from the same continuous process. Examples of batch process vents include, but are not limited to, vents on condensers used for product recovery, reactors, filters, centrifuges, and process tanks. The following are not batch process vents for the purposes of this subpart:

- (1) Continuous process vents;
- (2) Bottoms receivers;





- (3) Surge control vessels;
- (4) Gaseous streams routed to a fuel gas system(s);
- (5) A gas stream routed to other processes for reaction or other use in another process (i.e., for chemical value as a product, isolated intermediate, byproduct, or coproduct, or for heat value).
 - (6) Vents on storage tanks or wastewater systems;
 - (7) Drums, pails, and totes; and
- (8) Emission streams from emission episodes that are undiluted and uncontrolled containing less than 50 ppmv HAP are not part of any batch process vent. The HAP concentration may be determined using any of the following: process knowledge, an engineering assessment, or test data.

Chemical manufacturing process means all equipment which collectively functions to produce a product or isolated intermediate. A process includes, but is not limited to any, all, or a combination of reaction, recovery, separation, purification, or other activity, operation, manufacture, or treatment which are used to produce a product or isolated intermediate. A process is also defined by the following:

- (1) All cleaning operations;
- (2) Each nondedicated solvent recovery operation is considered a single process;
- (3) Each nondedicated formulation operation is considered a single process;
- (4) Quality assurance/quality control laboratories are not considered part of any process;
- (5) Ancillary activities are not considered a process or part of any process; and
- (6) The end of a process that produces a solid material is either up to and including the dryer or extruder, or for a polymer production process without a dryer or extruder, it is up to and including the die plate or solid-state reactor, except in two cases. If the dryer, extruder, die plate, or solid-state reactor is followed by an operation that is designed and operated to remove HAP solvent or residual monomer from the solid, then the solvent removal operation is the last step in the process. If the dried solid is diluted or mixed with a HAP-based solvent, then the solvent removal operation is the last step in the process.

Deviation means any instance in which an affected source subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart, including, but not limited to any emissions limitation or management practice; or fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit.

Organic HAP means any organic HAP listed in section 112(b) of the CAA. For the purposes of requirements in this subpart WWW, hydrazine is to be considered an organic HAP.

Reactive material means energetics, organic peroxides, and unstable chemicals such as chemicals that react violently with water and chemicals that vigorously polymerize, decompose, or become self-reactive under conditions of pressure or temperature.

Resinous material means a viscous, high-boiling point material resembling pitch or tar, such as plastic resin, that sticks to or hardens in the fill pipe under normal transfer conditions

[74 FR 56041, Oct. 29, 2009, as amended at 77 FR 75759, Dec. 21, 2012]

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR Part 63 Subpart VVVVVV Table 1] Subpart VVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources Hazardous Air Pollutants Used To Determine Applicability of Chemical Manufacturing Operations



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SECTION E. Source Group Restrictions.

As required in §63.11494(a), chemical manufacturing operations that process, use, or produce the HAP shown in the following table are subject to subpart VVVVV.

Type of HAP, Chemical name & CAS No.

- 1. Organic compounds
 - a. 1,3-butadiene, 106990
 - b. 1,3-dichloropropene, 542756
 - c. Acetaldehyde, 75070
 - d. Chloroform, 67663
 - e. Ethylene dichloride, 107062
 - f. Hexachlorobenzene, 118741
 - g. Methylene chloride, 75092
 - h. Quinoline, 91225
- 2. Metal compounds
 - a. Arsenic compounds
 - b. Cadmium compounds
 - c. Chromium compounds
 - d. Lead compounds
 - e. Manganese compounds
 - f. Nickel compounds
- 3. Others
 - a. Hydrazine, 302012

[Source: 74 FR 56041, Oct. 29, 2009]

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR Part 63 Subpart VVVVVV Table 9]
Subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources
Applicability of General Provisions to Subpart VVVVVV

As required in §63.11501(a), you must comply with the requirements of the NESHAP General Provisions (40 CFR part 63, subpart A) as shown in the following table.

[Refer to the regulation for Table 9 to 40 CFR Part 63 Subpart VVVVV, Applicability of General Provisions to Subpart VVVVV.]

[74 FR 56041, Oct. 29, 2009, as amended at 77 FR 75762, Dec. 21, 2012]



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

Source Id





SECTION G. Emission Restriction Summary.

Source Description

101	CS MIXING OPERATION (BLDG E1, CS MIX ROC	M)	
Emission Limit		Pollutant	
0.040	gr/DRY FT3	TSP	
102 SIEVING & GRANULATION OPERATION (BLDG E2, FUEL MIX ROOM)		E2, FUEL MIX ROOM)	
Emission Limit		Pollutant	
0.040	gr/DRY FT3	TSP	
103	PELLETIZING OPERATION (BLDG O)		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	TSP	

106 SMALL 1600 CFM PAINT BOOTH (BLDG MS2)

Emission Limit	Pollutant
0.040 gr/DRY FT3	PM10

108 DELAY TESTING, 3 UNITS, (BUILDING L)

Emission Limit	Pollutant
0.040 gr/DRY FT3	TSP

109 T2 DELAY TESTING (BLDG L)

Emission Limit	Pollutant
0.040 gr/DRY FT3	TSP

115 HC SMOKE CANISTER MIXING & PRESSING (BUILDING G-RANGE)

Emission Limit	Pollutant
0.040 gr/DRY FT3	TSP

Site Emission Restriction Summary

Emission Limit	Pollutant
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SECTION H. Miscellaneous.

(a) This facility is located in Greene Township, Mercer County at 388 Kinsman Road, Jamestown, PA 16134.

The facility operates a secondary testing range in Greenwood Township, Crawford County on Adamsville Road, Cochranton, PA.

This facility is a Natural Minor.

The following eFACTS ID's are assigned to this facility for this permit issuance:

Permit number: 43-00364

Records Management System (RMS) Facility Name: Combined Sys

RMS ID: 114767 APS ID: 851555

Master Auth ID: 1040473

Client ID: 275535 Site ID: 725379

Primary Facility (PF) ID: 757256

- (b) The Capacity/Throughput numbers listed in Section A, the Site Inventory List, and provided in Section D of this permit for individual sources are for informational purposes only and are not to be considered enforceable limits. The actual enforceable emission and operating limits for each source, with the correct number of significant digits, are listed in Sections C, D, and E of this permit. The Emission Restriction Summary in Section G of this permit is for information purposes only and is not to be used to establish enforceable limits.
- (c) Abbreviations used in this permit:

Schematics:

FML: Fuel material location CU: Combustion Unit

PROC: Process
CNTL: Control device

STAC: Stack. The stack can represent either the emission point or fugitive emissions in a permit map.

Pollutants:

CO: Carbon Monoxide
NOx: Nitrogen Oxides
SOx: Sulfur Oxides

TSP: Total Suspended Particulate
VOC: Volatile Organic Compounds
HAP: Hazardous Air Pollutant

Source ID: Department assigned ID number for the source Source Name: Department assigned name for the source

Capacity/Throughput: The maximum rated capacity or throughput for the source. The maximum rated capacity or throughput is not considered an enforceable limit. Enforceable limits are contained within the conditions of the permit.

Fuel/Material: The fuel/material assigned to SCC for the source

AIMS: Air Information Management System -- the DEP electronic database for permitting and emission reports

CFR: Code of Federal Regulations

Department: Pennsylvania Department of Environmental Protection (the DEP)

eFacts: Environmental Facility Application Compliance Tracking System -- the DEP electronic database for inspection reports

NWRO: Northwest Regional Office of PADEP

RFD: Request for Determination of Changes of Minor Significance & Exemption from plan approval.

SCC: Source Classification Code as defined by EPA Source: An air contamination source (25 Pa. Code § 121.1).

(d) All reports, submittals, and other communications required by this permit shall be submitted to the following office.

Bureau of Air Quality
Department of Environmental Protection
230 Chestnut Street





SECTION H. Miscellaneous.

Meadville, PA 16335 814-332-6940 (phone) 814-332-6121 (fax) Office Hours 8 a.m. - 4 p.m. 800-541-2050 (after hours)

Spills and other emergencies should be reported immediately to DEP by telephone at 800-541-2050.

- (e) The following 3 sources were approved with the May 23, 2013, issuance of plan approval 43-364A
- Source 101 in Building E1 consists of an electric oven and a mixing tank and is controlled by a carbon filtration system (identical to the system controlling building E2).
- Source 102 in Building E2 consists of a Gyra-Vib vibratory separator, a Hobart Mixer, trays and a granulator. The Hobart mixer is controlled by the carbon filtration system (identical to the one controlling building E1). The Gyra-Vib and the granulator are controlled by the 4,000 cfm Donaldson Torit DownFlo Oval DFO 3-6 dust collector (identical to the one controlling building O).
- Source 103 in Building O consists of 3 R-4 pellet press machines equipped with hoppers. Fuel mix dust emissions from the filling of the hoppers is controlled by a 4,000 cfm cfm Donaldson Torit DownFlo Oval DFO 3-6 dust collector (identical to the one controlling building E2).
- (f) Source 107 consists of the following activities, none which have emissions controls.
 - Silkscreening in Building G, emissions exhausted through ductwork to the outside;
 - Silkscreening in Building L, emissions exhausted through ductwork to the outside;
 - Silks creening in Building C Lean2, emissions exhausted through ductwork to the outside;
 - Varnish application in Building G, emissions exhausted through ductwork to the outside;
 - Varnish application in Building L, emissions are indoor fugitives;
 - Varnish application in Building Memissions are indoor fugitives;
 - UV Sealant application in Building N, emissions exhausted through ductwork to the outside.

Source 110 consists of CS, CN, and HC (hexachloroethane) smoke canister testing in the test chamber controlled by the 1,000 cfm Farr Gold Series model GS4 dust collector which is located outdoors and exhausts directly back inside the indoor test chamber. Because it does not exhaust outdoors, the permit map in Section A of the permit does not reflect a stack for Source 110. This activity was RFD approved on April 22, 2010. A June 11, 2012, letter of determination re-affirmed that the Department considers this source to be of minor significance.

Source 111 consists of the activity of testing smoke canisters and OC canisters outdoors in a field at the back of the property. The smoke canisters tested outdoors are not CS, CN, or HC canisters and do not contain any HAPs. A June 11, 2012, letter of determination affirms that the Department considers this source to be of minor significance.

- (g) Plan approval was 43-364A issued on May 23, 2013.
- (h) This new operating permit issued on December 15, 2015, is effective December 15, 2015.
- (i) This permit renewal effective June 26, 2025, is issued on June 26, 2025.





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