



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date: August 15, 2025

Effective Date: August 19, 2025

Expiration Date: August 18, 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: 46-00081

Synthetic Minor

Federal Tax Id - Plant Code: 85-4328888-1

Owner Information

Name: OPTINOVA VALLEY FORGE INC

Mailing Address: 435 SCHOOL LN
PLYMOUTH MEETING, PA 19462-2744

Plant Information

Plant: OPTINOVA VALLEY FORGE/PLYMOUTH MEETING

Location: 46 Montgomery County 46944 Plymouth Township

SIC Code: 3082 Manufacturing - Unsupported Plastics, Profile Shapes

Responsible Official

Name: VINCENT TORELLI

Title: PLANT MANAGER

Phone: (484) 845 - 3166

Email: Vincent.Torelli@optinova.com

Permit Contact Person

Name: CHARLES WOLANSKI

Title: ENGR & MNT MGR

Phone: (215) 704 - 9233

Email: charles.wolanski@optinova.com

[Signature] _____

JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



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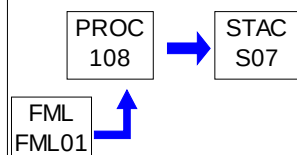
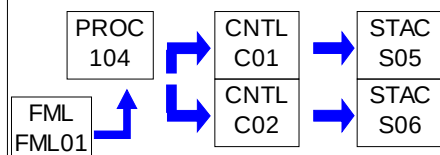
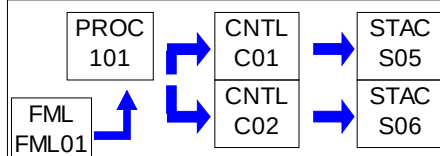
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	FIVE HORIZONTAL EXTRUDERS (EXTRUDERS A,B,D,E,F)	N/A	SOLTROL 100
104	ONE HORIZONTAL EXTRUDER (EXTRUDER H)	N/A	SOLTROL 100
108	15-KW EMERGENCY GENERATOR	139.510 CF/HR	Natural Gas
C01	CATALYTIC OXIDIZER (CATOX)	N/A	Natural Gas
C02	REGENERATIVE THERMAL OXIDIZER (RTO)	N/A	Natural Gas
FML01	NATURAL GAS LINE		
S05	CATOX STACK		
S06	RTO STACK		
S07	EMERGENCY GENERATOR STACK		

PERMIT MAPS

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

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

#002 [25 Pa. Code § 127.446]**Operating Permit Duration.**

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

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

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

#004 [25 Pa. Code § 127.703]**Operating Permit Fees under Subchapter I.**

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

**SECTION B. General State Only Requirements**

(2) For a facility that is not a synthetic minor, a fee equal to:

- (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
- (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
- (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.

(b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]**Transfer of Operating Permits.**

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

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

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

(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

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

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

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

**SECTION B. General State Only Requirements**

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

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

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]**Need to Halt or Reduce Activity Not a Defense.**

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

#009 [25 Pa. Code §§ 127.442(a) & 127.461]**Duty to Provide Information.**

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]**Revising an Operating Permit for Cause.**

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

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

#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]**Operating Permit Modifications**

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

**SECTION B. General State Only Requirements**

(b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.

(e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#012 [25 Pa. Code § 127.441]**Severability Clause.**

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

#013 [25 Pa. Code § 127.449]**De Minimis Emission Increases.**

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

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

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

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

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:

**SECTION B. General State Only Requirements**

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

#014 [25 Pa. Code § 127.3]**Operational Flexibility.**

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

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

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(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

**SECTION B. General State Only Requirements**

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

#019 [25 Pa. Code §§ 127.441(c) & 135.5]**Sampling, Testing and Monitoring Procedures.**

(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.

(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

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

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

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.

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

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]**Property Rights.**

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

#022 [25 Pa. Code § 127.447]**Alternative Operating Scenarios.**

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

**SECTION B. General State Only Requirements****#023 [25 Pa. Code §135.3]****Reporting**

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]**Report Format**

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

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

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

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

No person may permit the emission into the outdoor atmosphere of a 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, as specified in 25 Pa. Code § 129.14.
- (7) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting;
- (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) of this condition, for which the permittee 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.

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

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

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

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

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

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

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

006 [25 Pa. Code §123.42]**Exceptions**

The opacity limitations as per 25 Pa. Code § 123.41 shall not apply to a visible emission in any of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions).

**SECTION C. Site Level Requirements****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the total VOC post-control emissions and fugitive emissions from all extruder operations does not exceed 21.00 tpy on a twelve-month rolling basis.

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

(a) The emissions cap on Sources 101, 104 and C02 are a compliance cap imposed for the limited purpose of limiting emissions increases related to the installation of Control C02. This cap does not provide any relief from obtaining a plan approval for any future physical change or change in the method of operation of an extruder(s), or the addition or modification of any controls at the facility. The latter is true even if the permittee does not request a change in the compliance cap.

(b) By accepting this cap and agreeing to consider the above-listed extruders and RTO as one emissions unit for NSR purposes, any future applicability determinations must involve all those extruders along with the RTO, e.g., should NSR be triggered for any extruder or the RTO or process change, the permittee will comply with the requirements of 25 Pa. Code, Subchapter E, NSR for all extruders and the RTO. If the permittee finds it necessary to relax the cap at some future date, the source obligation requirements of 127.203(e)(2) apply.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

Aggregate VOC emissions from the facility may not exceed 24.99 tons per year on a 12-month rolling basis.

010 [25 Pa. Code §129.14]**Open burning operations**

No person may permit the open burning of material in the Southeast Air Basin except where the open burning operations result from.

(a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.

(b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(c) A fire set for the prevention and control of disease or pests, when approved by the Department.

(d) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

(e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.

(f) A fire set solely for recreational or ceremonial purposes.

(g) A fire set solely for cooking food.

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

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

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, the most current version of the DEP Source Testing Manual, and the EPA Clean Air Act National Stack Testing Guidance, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the

**SECTION C. Site Level Requirements**

permittee that testing is required.

III. MONITORING REQUIREMENTS.**# 012 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

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

The permittee shall monitor and calculate the Facilitywide VOC emissions on a monthly basis and a 12-month rolling basis.

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

- (a) The permittee shall monitor the facility, once per operating day, for the following:
 - (1) odors which may be objectionable (as per 25 Pa. Code §123.31);
 - (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
 - (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).
- (b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:
 - (1) be investigated;
 - (2) be reported to the facility management, or individual(s) designated by the permittee;
 - (3) have appropriate corrective action taken (for emissions that originate on-site); and
 - (4) be recorded in a permanent written log.
- (c) After six (6) months of daily monitoring, and upon the permittee's request accompanied with six (6) months of monitoring records, the Department will review and determine the feasibility of decreasing the monitoring frequency to weekly.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request accompanied with six (6) months of monitoring records, the Department will review and determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification (if applicable), complaints, monitoring results, and/or Department findings.

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

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

- (a) Date, time, and location of the incident(s).

**SECTION C. Site Level Requirements**

- (b) The cause of the event.
- (c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

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

The permittee shall record the facility wide VOC emissions on a monthly basis and a 12-month rolling basis.

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

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

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

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

[Additional authority for this permit condition is also derived from 40 CFR Part 68.]

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

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

(1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following.

- (i) Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130.
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

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

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

(1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a).

(2) Certify that this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

**SECTION C. Site Level Requirements**

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

(f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

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

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to DEP's 24-hour Emergency Hotline at 800.541.2050. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

(e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.

(f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.

(g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

VI. WORK PRACTICE REQUIREMENTS.**# 020 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following.

**SECTION C. Site Level Requirements**

- (a) Use, where possible, of water or suitable chemicals, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (b) Application of asphalt, water, or other suitable chemicals, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (c) Paving and maintenance of roadways.
- (d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.

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

The permittee shall adhere to the following work practice standards.

- (1) All materials containing VOCs, to include but not limited to; liquids, pastes, solids and powders, shall be stored in closed, nonabsorbent, non-leaking containers when not being mixed or transferred to another container.
- (2) Cloth and paper, or other absorbent applicators, moistened with any VOC containing materials to include: adhesives, inks, fountain solution, press wash or solvents, shall be stored in closed, nonabsorbent, non-leaking containers.
- (3) All spills of VOC containing materials shall be cleaned up as soon as possible.

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

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

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

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

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

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

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

The permittee may make substitutions for specific raw materials mentioned in this permit as long as the substitute is functionally equivalent and will not increase the VOC and/or HAP emissions. The permittee shall notify the Department, and receive written approval from the Department, prior to any changes of raw materials, used at the facility, that would increase emissions beyond the facility's HAP or VOC emission limits as listed in this operating permit.

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).

**SECTION C. Site Level Requirements****IX. COMPLIANCE SCHEDULE.**

No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: FIVE HORIZONTAL EXTRUDERS (EXTRUDERS A,B,D,E,F)

Source Capacity/Throughput:

N/A

SOLTROL 100

**I. RESTRICTIONS.****Operation Hours Restriction(s).**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source cannot be operated unless the RTO or CatOX are in operation.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of Soltrol 100, or equivalent, used on a daily basis and produce the monthly VOC emission summary to ensure the VOC emission limitations are not exceeded.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall produce a monthly report of the VOC emission summary generated from the tracking system report, that was previously approved by the Department. The report shall detail total monthly and annual emissions on a twelve (12) month rolling basis for these extruders.

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.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain the extruders in accordance with manufacturers' specifications to demonstrate compliance with pollutant emission limits in this section.

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 104

Source Name: ONE HORIZONTAL EXTRUDER (EXTRUDER H)

Source Capacity/Throughput:

N/A

SOLTROL 100

**I. RESTRICTIONS.****Operation Hours Restriction(s).**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source cannot be operated unless the RTO or CatOX are in operation.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of Soltrol 100, or equivalent, used on a daily basis and produce the monthly VOC emission summary to ensure the VOC emission limitations are not exceeded.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall produce a monthly report of the VOC emission summary generated from the tracking system report, that was previously approved by the Department. The report shall detail total monthly, and annual emissions on a twelve (12) month rolling basis for this extruder.

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.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain this extruder in accordance with manufacturers' specifications to demonstrate compliance with pollutant emission limits in this section.

VII. ADDITIONAL REQUIREMENTS.

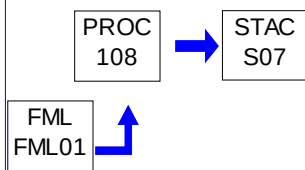
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: 15-KW EMERGENCY GENERATOR

Source Capacity/Throughput: 139.510 CF/HR Natural Gas

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

001 [25 Pa. Code §123.13]

Processes

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from a process in a manner that the concentration of particulate matter in the effluent gas does not exceed 0.04 grain per dry standard cubic foot.

002 [25 Pa. Code §123.21]

General

The permittee may not permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

Operation Hours Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) As referenced in Table 6 to Subpart ZZZZ of Part 63, the permittee must demonstrate continuous compliance by:

(1) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or

(2) Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate this source for more than 500 hours per calendar year.

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.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall monitor, record and maintain records of the following:

**SECTION D. Source Level Requirements**

(1) A copy of each report submitted.

(2) Records of the occurrence and duration of each malfunction of operation; (i.e., control or monitoring equipment) to include the corrective actions related to malfunction.

(3) Records of the maintenance conducted on the engine in order to demonstrate that you operated and maintained the engine and after-treatment control device (if any) according to your own maintenance plan, or the manufacturer's emission-related written instructions.

(4) Records of the hours of operation of the engine that is recorded through the non-resettable hour meter on a monthly basis and on a 12-month rolling sum. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

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

(a) According to 40 C.F.R. § 63.6660:

(1) Your records must be in a form suitable and readily available for expeditious review.

(2) The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(3) The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.

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

The permittee shall report any failure to perform a scheduled management practice. If an engine is operating during an emergency and it is not possible to shut down the engine in order to perform a scheduled management practice, or if performing the management practice poses an unacceptable risk, the management practice can be delayed until the emergency is over or the unacceptable risk has abated.

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

(a) The permittee shall follow the following work practice standards to operate this source:

(1) Maintain a non-resettable hour meter.

(2) Operate and maintain the engine in accordance with manufacturer's emission-related written instructions, or develop a maintenance plan providing for operation and maintenance of the engine consistent with good air pollution control practice.

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

(4) Perform the following maintenance.

(i) Change oil and filter every 500 hours of operation or annually, whichever comes first. There is also an option to utilize an oil analysis program in order to extend the specified oil change requirement; (reference 40 C.F.R. § 63.6625[j]).

**SECTION D. Source Level Requirements**

(A) Parameters of the oil analysis program: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5; If limits are not exceeded, engine owner/operator is not required to change the oil and filter.; If the limits are exceeded, the oil and filter must be changed within 2 business days of receiving the results of the analysis; Analysis must be a part of the maintenance plan for the engine.

(ii) Inspect air cleaner every 1,000 hours or annually, whichever comes first, and replace as necessary.

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

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: C01

Source Name: CATALYTIC OXIDIZER (CATOX)

Source Capacity/Throughput:

N/A

Natural Gas

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

The permittee shall ensure that the VOC emissions from the Catalytic Oxidizer stack (Source ID: S05) shall not exceed 2.97 pounds per hour.

[This condition applies when CatOX is in operation]

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

When the CatOX is in operation, the permittee shall ensure that the combustion chamber gas inlet temperature for the Catalytic Oxidizer shall be maintained at a minimum of 640°F.

Operation Hours Restriction(s).**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The CatOx will serve as a back-up control device for the RTO.
- (b) The CatOx will only be used if the RTO has a mechanical failure.
- (c) The CatOx shall not be used when the RTO is going through routine maintenance.
- (d) The CatOX can be used for periodic testing for catalyst activity as given in Condition #012.

Control Device Efficiency Restriction(s).**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the VOC emissions from the Horizontal Extruders (Sources ID(s): 101 and 104) shall be controlled by the Catalytic Oxidizer (Source ID: C01) that either achieves a minimum of 95% (by weight) destruction efficiency of the VOCs in the gas stream or maintains an outlet concentration of 20 ppmv as propane. The overall control efficiency shall be maintained at a minimum of 90%.

[Compliance with this condition assures compliance with the requirements of RACT as defined under Permit # OP-46-0081]

[This condition applies when CatOX is in operation]

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

If the RTO has a mechanical failure and the CatOx is used, the permittee shall follow conditions:

- (a) If the CatOx is used for more than 30 cumulative days in a 12-month rolling period, and if the CatOx has not had an acceptable source test performed in the last five (5) years, the permittee shall perform a source test on the CatOx. This source test shall be conducted within 90 days of the 30th day of use. The permittee shall not be required to stack test the CatOx more frequently than once every five (5) years, unless the source test is determined to be unacceptable by the Department. Performance tests shall be conducted while the sources are operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.

**SECTION D. Source Level Requirements**

The source test shall be completed using the same source testing requirements for the RTO in this operating permit.

(b) Source testing shall be conducted on source ID Nos. 101 and 104.

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

(a) The permittee shall do the following to monitor the condition of the Catalytic Oxidizer (Source ID: C01) to assure compliance with VOC destruction and control efficiency.

(1) Monitor inlet and outlet VOC concentration while CatOX is in operation via a method that is approved by the department.

(2) Monitor temperature rise across the catalyst bed while CatOX is in operation.

(b) If the monitored activity of the catalyst falls below the minimum efficiencies established in Condition #004, the permittee shall ensure that the catalyst shall be replaced or other corrective action consistent with the manufacturer's recommendation shall be taken.

(1) If the preventive maintenance inspections indicate a problem with the catalyst, such as channeling, abrasion, or settling, the catalyst will be replaced or other corrective action consistent with the manufacturer's recommendation shall be taken.

(2) If the preventive maintenance inspections indicate other potential problems, the equipment shall be adjusted to correct the issue.

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

The permittee shall continuously monitor the combustion chamber inlet gas and outlet gas temperature of the Catalytic Oxidizer (Source ID: C01). The temperature monitoring shall be performed using a Department approved method.

[The above conditions apply when CatOX is in operation]

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

(a) The permittee shall record the Catalytic Oxidizer combustion chamber inlet and outlet gas temperature continuously (i.e., at least once every fifteen (15) minutes) when CatOX is in operation.

(b) The permittee shall record all inspections, repair, and maintenance performed on the monitoring equipment.

(c) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, probable causes and corrective actions taken for the incidents.

(d) All records shall be kept for a period of five (5) years and shall be made available to the Department upon request.

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

The permittee shall report all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable), their dates, times and durations, probable causes and corrective actions taken, every six (6) months.

**SECTION D. Source Level Requirements**

[The above conditions apply when CatOX is in operation]

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

- (a) The permittee shall maintain the CatOX by following the maintenance plan that was submitted to the Department.
- (b) The permittee shall have on site and available for review a copy of the CatOX maintenance plan that was submitted to the Department.

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

- (a) The permittee shall implement a preventive corrective and routine maintenance program to ensure the integrity of the Catalytic Oxidizer (Source ID: C01). The program shall include biennial preventive maintenance inspection, including: inspection of flame sensing devices; check operation of limit interlocks; check alarms, blowers, burners, motors, leak test safety shut-off.
- (b) The permittee shall conduct daily checks of the oxidizer when any of the Horizontal Extruders (Source ID(s): 101 and 104) are running to ensure operation.
- (c) The permittee shall record the date and the description of maintenance performed on the oxidizer.

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

The permittee shall conduct a biennial planned start-up of the CatOX to include the following:

- (a) Start-up of the CatOX and ensure the operating temperature is attained.
- (b) Once the CATOX is at operating temperature, switch the horizontal extruders from the RTO over to the CATOX.
- (c) Monitor the inlet/outlet temperature rise across the catalyst bed over a several hour period.
- (d) If the permittee establishes that the catalyst bed temperature rise is not correct, switch the horizontal extruders back over to the RTO, and make the necessary repairs to the unit.
- (e) Maintain records of this periodic testing and make it available to the department upon request.

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

The permittee shall continue to ensure continuing validity of data and proper performance of the control device.

- (a) The permittee shall install detectors or sensors at a Department approved location for obtaining data that is representative of the monitored indicator.
- (b) The permittee shall, once per shift, review the combustion chamber inlet temperature data to ensure that the temperature has been 640 degrees Fahrenheit or greater during manufacturing operations.
- (c) The permittee shall continue to follow the Department approved maintenance plan with biennial preventive maintenance inspections to include the following.
- (1) Inspection of flame sensing devices.
 - (2) Check operation limits of interlocks.
 - (3) Check alarms, blowers, burners and motors.

**SECTION D. Source Level Requirements**

(4) Leak test safety shut-off.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall maintain all monitoring equipment and stock spare parts as necessary for routine onsite repairs.
- (b) The permittee shall ensure that at least 90% of the approved monitoring data has been properly and accurately collected.
- (c) The permittee shall submit an implementation plan and schedule if the approved monitoring requires installation, testing or other necessary activities. The schedule for completing installation and beginning operation of the monitoring may not exceed one hundred eighty (180) days after the issuance of the permit.
- (d) The permittee shall ensure that the Catalytic Oxidizer (Source ID: C01) has reached its minimum operating temperature prior to placing any affected source on line by keeping a daily log of the production start time and record of the temperature when production starts.
- (e) The permittee shall ensure that the Catalytic Oxidizer (Source ID: C01) will not exceed the total combined airflow rate of 2,000 scfm (2,490 acfm @ 200°F) prior to routing the exhaust of any additional source(s) to it.

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: C02

Source Name: REGENERATIVE THERMAL OXIDIZER (RTO)

Source Capacity/Throughput:

N/A

Natural Gas

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

The emissions cap on Sources 101, 104 and C02 is a compliance cap, imposed for the limited purpose of limiting emissions increases related to the installation of Source C02. This cap does not provide any relief from obtaining a plan approval for any future physical change or change in the method of operation of an extruder(s), or the addition or modification of any controls at the facility. The latter is true even if the permittee does not request a change in the compliance cap. Furthermore, by accepting this cap and agreeing to consider the above-listed extruders and RTO as one emissions unit for NSR purposes, any future applicability determinations must involve all those extruders along with the RTO, e.g., should NSR be triggered for any extruder or the RTO or process change, the permittee will comply with the requirements of 25 Pa. Code, Subchapter E, NSR for all extruders and the RTO. If the permittee finds it necessary to relax the cap at some future date, the source obligation requirements of 127.203(e)(2) apply.

Fuel Restriction(s).**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The RTO shall use only natural gas as fuel.

Control Device Efficiency Restriction(s).**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the VOC emissions from the extruders (Sources ID(s): 101 and 104) are controlled by the Regenerative Thermal Oxidizer (RTO) (Source ID: C02) that either achieves a minimum of 98% (by weight) destruction efficiency of the VOCs in the gas stream or a post control non-methane hydrocarbon (NMHC) emission of 20 ppmvd as methane or 7 ppmvd as propane, whichever is less stringent.

[Compliance with this condition assures compliance with the requirements of RACT as defined under Condition #004, Source ID: C01]

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

The combustion chamber outlet temperature shall be maintained at a minimum of 1,500 °F.

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

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

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

(1) Test Date(s)

(i) For protocols, provide the proposed date on which testing will commence or "TBD"

(ii) For reports, provide the first and last day of testing

**SECTION D. Source Level Requirements**

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

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

(4) Testing Requirements (all that apply)

(i) Operating permit number

(ii) Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)

(iii) Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

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

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

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

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

(e) Email all electronic submissions to both the PSIMS Administrator in Central Office and the Air Quality Program Manager for the Southeast Regional Office. Email addresses are provided below:

Central Office
RA-EPstacktesting@pa.gov

Southeast Region
RA-EPSEstacktesting@pa.gov

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

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

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall perform a stack test using the Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while the sources are operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the

**SECTION D. Source Level Requirements**

Department. When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval; thereafter, a letter referencing the previously approved procedural protocol is sufficient. However, if modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack testing manual has been revised since approval, a new protocol must be submitted for approval.

(b) This stack test is required to demonstrate compliance with the VOC emission limits set for the RTO. The stack test shall be conducted at least one year prior to the expiration date of the operating permit.

(c) The stack test shall be conducted in accordance with Department approved methodology and 25 Pa. Code Chapter 139. Testing shall be conducted at the combustion chamber inlet and outlet of the RTO to demonstrate compliance with the 98% VOC destruction efficiency and to demonstrate compliance with 20 ppmvd outlet concentration of non-methane hydrocarbon (NMHC) as methane if the 98% VOC destruction efficiency cannot be met due to low inlet concentrations.

(d) The VOC test results are to be expressed as methane.

(e) The RTO combustion chamber outlet temperature (°F) shall be recorded in fifteen (15) minute intervals during each test run to document the operation of the RTO.

(f) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(g) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(h) Within sixty (60) days after the source test(s) one paper copy plus one electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(i) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

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

The temperature of the combustion chamber outlet shall be visually displayed in the area of the RTO or other commonly accessed area of the RTO.

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

(a) The permittee shall continuously monitor the combustion chamber temperature of the RTO when operating.

(b) The permittee shall monitor the airflow or fan amperage on a daily basis and prior to routing a source's exhaust to the RTO.

(c) The permittee shall monitor the startup and shutdown times of the RTO and extruders.

(d) The permittee shall monitor the natural gas usage, from the single meter within the facility, for the entire facility on a monthly basis.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall monitor and calculate the NO_x, CO and VOC emissions from the RTO on a monthly basis and a 12-month rolling basis.

(b) The permittee shall use the most current AP-42 emission factors to calculate the NO_x and CO emissions from the

**SECTION D. Source Level Requirements**

burner of the RTO.

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

(a) The permittee shall monitor:

(1) The pressure drop across the RTO once per operating day.

(2) The pressure drop across the capture hood above each turn around box on each vertical extruder once per operating day.

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

(a) The permittee shall maintain records the following operational parameters for the RTO:

(1) Combustion chamber outlet temperature of the RTO once per minute, when operating;

(2) The airflow or fan amperage on a daily basis.

(3) The startup and shutdown times of the RTO.

(4) The natural gas usage in the RTO.

(b) All records shall be maintained for a period of five years.

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

(a) The permittee shall record all inspections, repair, and maintenance performed on the RTO.

(b) The permittee shall maintain records of all monitoring downtime incidents. The permittee shall also record the dates, times and durations, probable causes and corrective actions taken for the incidents.

(c) All records shall be kept for a period of five years.

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

The permittee shall record the NO_x, CO, and VOC emissions from the RTO on a monthly basis and a 12-month rolling basis.

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

(a) The permittee shall record:

(1) The pressure drop across the RTO once per operating day.

(2) The pressure drop across the capture hood above each turn around box on each vertical extruder once per operating day.

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

(a) The permittee shall maintain records of all employee training, as specified in Condition #020 work practice standards, regarding the RTO.

**SECTION D. Source Level Requirements**

(b) The training records at minimum shall include:

- (1) Type of training.
- (2) Date and time of training.
- (3) Employee name and signature.
- (4) Trainer name and signature.

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.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a pressure drop of 0-16 inches of water across the RTO.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain the monitoring equipment in good working order.

(b) If any of the monitoring equipment should fail or malfunction, the permittee shall monitor the outside of the facility for odors once per hour until the equipment is repaired.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall operate and maintain the RTO in accordance with the manufacturer's operation and maintenance schedule.

(b) The permittee shall have on site and available for review a copy of the RTO operation and maintenance manual supplied by the manufacturer of the RTO.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

An alarm shall be installed, on the RTO, to sound when there is a failure of the main thermocouple in the RTO.

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The RTO manufacturer shall provide initial training to operators and maintainers of the RTO in the areas of: general system operations, start up and shut down sequences, alarm system, preventive maintenance, and inspections. Any future training can be conducted by previously trained employees.

(b) The permittee shall provide the RTO training to any new operator or maintainer and annual training to current operators and maintainers.

VII. ADDITIONAL REQUIREMENTS.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The RTO shall meet the following specifications.

(a) Manufacturer: Air Clear LLC

**SECTION D. Source Level Requirements**

(b) Serial No.: 8251

(c) Design Volume of Gases: 11,000 scfm

(d) Number of Burners: One (1)

(e) Fuel: Natural Gas

(f) Rated Capacity: 1.5 MMBtu/hr



SECTION E. Source Group Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description	
C01	CATALYTIC OXIDIZER (CATOX)	
Emission Limit		Pollutant
2.970	Lbs/Hr	VOC

Site Emission Restriction Summary

Emission Limit		Pollutant
24.990 Tons/Yr	On a 12-month rolling basis	VOC

**SECTION H. Miscellaneous.**

(a) The following previously issued operating permits and plan approvals serve as a basis for certain terms and conditions set forth in this Title V Operating Permit.

- (i) RACT Operating Permit: OP-46-0081
- (ii) Plan Approval: PA-46-0081B and 46-0081C

(b) The report required in Section C, VIII. Compliance Certification shall be for the period from January 1st through December 31st of the previous year.

(c) The data listed in Section A, Site Inventory List, for the capacity and fuel/material and the source capacity descriptions and the permit maps in Section D are for descriptive purposes and are not considered as maximum source capacities or design limitations or enforceable conditions. Source limits are indicated in the text conditions in Sections D and E and are listed in Section G of this Title V Operating Permit.

(d) The Department has determined that the emissions from the following sources, excluding those indicated as Site Level Requirements, in Section D of this permit do not require additional limitations, monitoring or recordkeeping:

- (1) 8,000 gallon above-ground Isopar G Storage Tank - Potential VOC emissions are well below 1.0 tpy
- (2) 3,000 gallon above-ground No. 2 Fuel Oil Storage Tank - Potential VOC emissions are well below 1.0 tpy
- (3) Fluoropolymer Mix Room Operations - Potential VOC emissions (fugitive) are well below 1.0 tpy
- (4) Extruder No. 9
- (5) Dispatch Oven
- (6) Etching Process
- (7) Miscellaneous heaters ranging in size from 0.075 to 0.75 MMBTU/hr

(e) VOC RACT for the following sources is maintenance and operation in accordance with manufacturer's specifications and good air pollution control practices:

- (1) Fluoropolymer Mixing Room
- (2) Four (4) Air Preheaters

(f) This Title V Operating Permit (APS No. 458147, AUTH ID: 503485) has been amended to incorporate to following modifications:

- (i) Section C, Condition #007 - the condition has been revised to omit the requirement to test for the capture efficiency of Sulfur Oxides emissions by the control devices (i.e., Thermal Catalytic Oxidizer), and to require testing for the capture efficiency of volatile organic compounds (VOC) emissions by the control device. In addition, a requirement has been added to test for particulate matter emissions at the outlet of the oxidizer;
- (ii) Section C, Condition #014 - the condition has been revised to correctly reference paragraph (b) of Condition No. 023, Section B, which describes the frequency of the submission of the required monitoring reports and to change the frequency of the report from one (1) year to six (6) months;
- (iii) Section D, Source 106, Condition #001 - the following sources were omitted from this condition: 2-Tubing Product Washers; Combustion Units C01 through C05;
- (iv) Section D, Source 106, Condition #004 - the following sources were omitted from this condition: 2-Tubing Product Washers; Combustion Units C01 through C05;
- (v) Section D, Source 106, Condition #004 - the following change was made: The number associated with the maintenance/engineering parts washers was changed from two (2) to one (1);

**SECTION H. Miscellaneous.**

(vi) Section A and D - incorporation of Source ID: 105 (Two Horizontal Extruders (I & J)), including applicable requirements for emission limitations, monitoring, testing, recordkeeping and work practice standards. The total VOC emissions from through the oxidizer stack, when controlling all 10 Horizontal Extruders, has been revised to 2.97 lbs/hr. The total annual VOC emission from all ten (10) Horizontal Extruders has been revised to 26.8 tons/year on a 12-month rolling basis. The total annual VOC emissions, both stack and fugitive, from the two (2) Horizontal Extruders I & J shall not exceed 5.3 tons/year on a twelve (12) month rolling basis.

(g) This Title V Operating Permit (APS No:458147, AUTH ID: 625092) has been administratively amended to correct an error in the VOC emission limit (e.g., 2.97 lb/hr) in the testing condition for Source ID(s): 101, 104 and 105.

(h) The following changes have been made in the renewed Title V Operating Permit No. 46-00081:

(1) Title Page: Plant Name changed to Markel Corporation/Plymouth Meeting.

(2) Title page: Responsible Official Title changed to Director, Administration & IT.

(3) Sections A and D, Source ID: 102: Source designation revised to Three Vertical Tuber Extruders (2, 3, 5).

(4) Section A, D and E: Addition of Source ID: 107 (Parts Cleaner) to Sections A, D, and E.

(5) Section C: Deletion of Condition #007 (Testing Requirement).

(6) Section C, Condition #008: This site level testing condition as been revised as a source level condition in Section D for the 10 Horizontal Extruders (Source ID(s): 101, 104 and 105). This condition has been revised to require testing at the combustion chamber inlet and outlet of the Catalytic Oxidizer and to demonstrate compliance with the 95% destruction efficiency and the 2.97 lb/hr VOC emission limit.

(7) Section C, Condition #013(b): Revised this condition as follows:

"Within sixty (60) calendar days of permit re-issuance, the permittee shall submit the format(s) to the Department for approval. The format of these records shall be in conformance with the formats submitted by the company on December 20, 2001, or subsequent submissions as approved by the Department. The records shall be kept as required in paragraph (a) above."

(8) Section C, Condition #014: Revised this condition to require that the compliance certification and semiannual deviation report be submitted thirty (30) days prior to the submittal deadline(s).

(9) Section C, Condition #017: Revised the reporting requirement condition.

(10) Section C, Condition #022(a): Revised this condition as follows:

"(a) The permittee shall not modify any source identified in Sections A or G of this permit, prior to obtaining Department approval, except those modifications authorized by Condition #017(g), of Section B, of this permit."

(11) Section D, Source ID(s): 031 and 032, Condition #001 [25 Pa. Code § 123.11] - This condition has been revised to cite Method 5 of 40 CFR 60, Appendix A (or equivalent method approved by the Department).

(12) Section D, Source ID(s): 031 and 032, Condition #005 and #007(a) - Changed of the frequency for monitoring and recording the type and amount of fuel used to monthly.

(13) Section D, Source ID(s): 101, 104 and 105, Condition #001 [25 Pa. Code § 123.13]: This condition has been revised to cite Method 5 of 40 CFR 60, Appendix A (or equivalent method approved by the Department).

(14) Section D, Source ID: 101, Condition #004: Revised this testing requirement condition.

(15) Section D, Source ID(s): 101, 104, Condition #007 and Source ID: 105, Condition #008: This condition has been revised as a recordkeeping requirement that includes the provision of recording the combustion chamber inlet and outlet gas temperatures at least once every fifteen (15) minutes.

(16) Section D, Source ID(s): 101, 104 and Condition #009 and Source ID: 105, Condition #010: This condition has been revised to

**SECTION H. Miscellaneous.**

require a semi-annual preventive maintenance inspection that includes inspection of flame sensing devices; check operation of limit interlocks; check alarms, blowers, burners, motors, leak test safety shut-off.

(17) Section D, Source ID(s): 101, 104 and Condition #012 and Source ID: 105, Condition #013: This condition has been revised to require that the combustion chamber inlet and outlet temperatures are both maintained at a minimum of 600°F.

(18) Section D, Source ID(s): 101, 104, Condition #014 and Source ID: 105, Condition #015: This new Additional Requirement condition is incorporated and revised as follows:

"(a) The permittee shall use one of the following methods to monitor the condition of the Catalytic Oxidizer (Source ID: CO1) to assure compliance with VOC destruction and control efficiency.

(i) Perform an annual analysis of the catalyst in the catalytic bed for signs for degradation, or by measuring the inlet and outlet concentrations using a portable flame ionization detector (FID), or equivalent methods, or

(ii) Perform VOC emission stack test as requested by the Department.

(b) If the tested activity of the catalyst falls below the minimum efficiencies established in Condition #004, the permittee shall ensure that the catalyst shall be replaced or other corrective action consistent with the manufacturer's recommendation shall be taken.

(i) If the preventive maintenance inspections indicate a problem with the catalyst, such as channeling, abrasion, or settling, the catalyst will be replaced or other corrective action consistent with the manufacturer's recommendation shall be taken.

(ii) If the preventive maintenance inspections indicate other potential problems, the equipment will be adjusted."

(19) Section D, Source ID: 106, Condition #001: This condition has been revised as follows:

"The permittee shall ensure that the VOC emissions from the following individual sources and source categories shall not exceed 2.7 tons per year or 15 pounds per day or 3 pounds per hour for each source."

(20) Section D, Source ID: 106, Condition #001 and #004: The list of sources associated with this source group (Miscellaneous Sources) has been revised as follows:

(a) One (1) No. 2 fuel oil storage tank

(b) One (1) Isopar G storage tank

(c) Extruder No. 9

(21) Section D, Source ID: 107 (Parts Cleaner): The Parts Cleaner is listed in Source ID: 106 and in Section G ("Miscellaneous") in the administratively amended TVOP, issued March 29, 2006, has been incorporated as a separate source in the renewed TVOP and is subject to 25 Pa. Code § 129.63 (relating to degreasing operations).

(22) Section D, Source ID: 107, Condition #001: Revised this condition as follows:

" The permittee shall maintain records of the amount and type of cleaning solvents used in this source on an annual basis."

(23) Section D, Source ID: CO1 - Incorporated applicable conditions to ensure compliance with the federal Compliance Assurance Monitoring (CAM) provisions of 40 CFR 64.

(The following changes were made based upon the company's comments of a revised, proposed, draft TVOP containing CAM conditions for the Catalytic Oxidizer control device (Source ID: CO1).

(24) Section D, Source ID: CO1, Condition #010(c): Revised this condition as follows:

"The permittee shall calibrate and check the accuracy of the monitoring equipment, at least twice per calendar year, according to the manufacturer's recommended procedures."

**SECTION H. Miscellaneous.**

(25) Section D, Source ID: CO1, Condition #014: Corrected the typing error to include the term "temperature".

(26) Section C, Source ID: CO1, Condition #015: Revised this condition as follows:

"The permittee shall ensure that the Catalytic Oxidizer System (Source ID: CO1) will not exceed the total combined airflow rate of 2,000 scfm (2,490 acfm @ 200°F) prior to routing the exhaust of any additional source(s) to it."

(26) Section C, Source ID: CO1, Condition #016(a): Revised this condition as follows:

"For properly and accurately collected data, accumulated excursions exceed two percent (2%) of the monitored data (e.g., combustion chamber inlet gas and outlet gas temperatures of the Catalytic Oxidizer System (Source ID: CO1))."

(i) This Title V Operating Permit (APS No: 458147, AUTH ID: 628681) has been renewed.

(j) This Title V Operating Permit (APS No: 458147, AUTH ID: 890806) has been modified to change the source testing report due date on the Catalytic Oxidizer System (Source CO1) from six (6) months to two (2) months prior to the expiration of the permit.

(k) AUTH No. 1082251, APS No. 875940- The following changes have been made:

(1) Plan Approval No. 46-0081C and Title V operating permit have been incorporated into Synthetic Minor operating permit. With this authorization, the facility has officially become a Synthetic Minor facility.

(2) The Boilers with Source IDs 031 and 032 have been removed.

(3) A 4.2 MMBTU/hr boiler (ID 033) has been added.

(4) A 15-kw emergency generator has been added.

(5) Section C of the operating permit has been revised.

(6) Pressure drop range across RTO has been established.

(7) Maximum VOC concentration limit at the RTO outlet has been established.

(8) CAM requirements under Source ID C01/C02 were removed.

(9) Source ID 106 has been removed from Section D.

(l) The department has considered the following sources to be insignificant:

(1) One No. 2 fuel oil storage tank.

(2) One Isopar G and H storage tank.

The permittee shall keep records of actual emissions or calculate potential to emit (PTE) for the above sources to demonstrate compliance with emission limits of 3 lb/hr, 15 lb/day and 2.7 tons per year. The above sources were located under Section D as Source ID 106 in previous permits.

(m) APS No. 875940; Authorization No. 1250332: The State Only Operating Permit was revised to change the name of the Responsible Official Contact for this facility to Barbra Levan, Director of Operations.

(n) October 2019, APS No. 875940 AUTH No. 1289517, this State Only Operating Permit was amended to change the name of the Responsible Official for this facility to Barbie L. Spear, Director and Officer.

(o) August 2020, AUTH ID #1299376 APS ID #875940 this State Only Operating Permit has been renewed.

(p) July 2021, AUTH ID# 1357677 APS ID# 1040741 Administrative Amendment for transfer of operating permit from Markel to Optinova.

(q) October 2021, AUTH ID# 1368765 APS ID# 1040741 Minor Modification for the removal of extruders C, G, I, J, 1, 2, 4, 5, 6 and the removal of Isopar which was replaced by Soltrol 100.

(r) October 2021, RFD No. 9258 for the installation of 5 melt extruders, identified as Red, Orange, Blue, No. 6, and No. 15

(s) September 2024, RFD No. 10777 for the installation of 3 melt extruders, identified as Extrusion Lines 1, 2, and 3

(t) August 2025, AUTH ID # 1510320 APS ID # 1040741 this State Only Operating Permit has been renewed.



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