



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY NATURAL MINOR OPERATING PERMIT

Issue Date: May 20, 2025

Effective Date: October 20, 2025

Revision Date: October 20, 2025

Expiration Date: May 19, 2030

Revision Type: Amendment

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: 09-00117

Natural Minor

Federal Tax Id - Plant Code: 22-2882341-1

Owner Information

Name: SUDARSHAN FAIRLESS HILLS MFG LTD

Mailing Address: 99 NEWBOLD RD

FAIRLESS HILLS, PA 19030-4307

Plant Information

Plant: SUDARSHAN/FAIRLESS HILLS

Location: 09 Bucks County

09002 Falls Township

SIC Code: 2865 Manufacturing - Cyclic Crudes And Intermediates

Responsible Official

Name: TRACY HANSON

Title: SITE DIRECTOR

Phone: (215) 736 - 0712 Ext.151

Email: tracy.hanson@sudarshan.com

Permit Contact Person

Name: YANI GAO

Title: PS & REGULATORY MGR

Phone: (215) 736 - 0712 Ext.163

Email: yani.gao@heubach.com

[Signature] _____

JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



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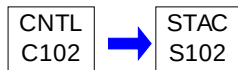
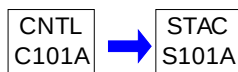
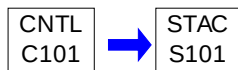
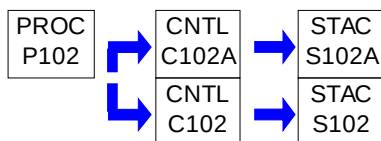
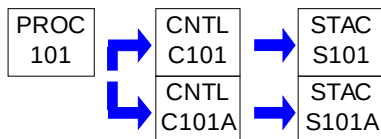
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	PIGMENT MIXING OPERATIONS	700.000 Lbs/HR	
P102	CORROSIVE-RESISTANT PIGMENT OPERATION	1,038.000 Lbs/HR	PIGMENTS, ALUMINUM H
C101	ONE DUST COLLECTOR	39.000 Lbs/HR	
C101A	SCRUBBER	39.000 Lbs/HR	
C102	FOUR DUST COLLECTORS	N/A	
C102A	TWO SCRUBBERS	N/A	
S101	STACK FOR DUST COLLECTOR (ONE)		
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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.
- (2) For a facility that is not a synthetic minor, a fee equal to:

**SECTION B. General State Only Requirements**

- (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:
 - (1) Enforcement action

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(2) Permit termination, revocation and reissuance or modification

(3) Denial of a permit renewal application

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

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

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

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

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

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

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

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

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

(1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.

(2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.

(4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

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

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

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

**SECTION B. General State Only Requirements**

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:

(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

**SECTION B. General State Only Requirements**

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

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

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

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

**SECTION B. General State Only Requirements****#015 [25 Pa. Code § 127.11a]****Reactivation of Sources**

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

#016 [25 Pa. Code § 127.36]**Health Risk-based Emission Standards and Operating Practice Requirements.**

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

#017 [25 Pa. Code § 121.9]**Circumvention.**

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

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

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:
- Regional Air Program Manager
PA Department of Environmental Protection
(At the address given in the permit transmittal letter, or otherwise notified)
- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

**SECTION B. General State Only Requirements****#019 [25 Pa. Code §§ 127.441(c) & 135.5]****Sampling, Testing and Monitoring Procedures.**

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

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

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

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

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

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

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

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

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

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

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

#023 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

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

**SECTION B. General State Only Requirements****#024 [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.

#025 [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**

(a) 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) N/A

(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.

(b) An application form for requesting a determination under either subsection (a)(9) or 25 Pa. Code § 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 25 Pa. Code § 123.2 (relating to fugitive particulate matter) or of the requirements of 25 Pa. Code § 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) A person responsible for any source specified in paragraph (a), shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(3) Paving and maintenance of roadways.

(4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

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.

**SECTION C. Site Level Requirements****# 005 [25 Pa. Code §123.41]****Limitations**

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

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

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).
- (d) When arising from the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

007 [25 Pa. Code §123.43]**Measuring techniques**

Visible emissions may be measured using either of the following:

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

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

(a). The permittee shall limit combined total air contaminant emission from the facility sources, listed in Section A, Site Inventory List, and listed in Section G, Miscellaneous Section of this Operating Permit, to less than following:

- (i). Particulate Matter with an aerodynamic diameter of 10 micrometer or less (PM₁₀): 0.39 pounds per hour and 1.71 tons per year, calculated as a 12-month rolling sum.
 - (ii). Ammonia (NH₃): 1.14 pounds per hour and 4.98 tons per year, calculated as a 12-month rolling sum.
 - (iii). Volatile Organic Compounds (VOC): 0.62 pounds per hour and 2.71 tons per year, calculated as a 12-month rolling sum.
- (b). The facility shall remain a natural minor facility and comply with the requirements of this Operating Permit.

009 [25 Pa. Code §129.14]**Open burning operations**

The permittee may not permit the open burning of material in the Southeast Air Basin, except when the open burning results 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.

**SECTION C. Site Level Requirements**

- (g) A fire set solely for cooking food.

II. TESTING REQUIREMENTS.**# 010 [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 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 permittee that testing is required.

III. MONITORING REQUIREMENTS.**# 011 [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, the Department will determine the feasibility of decreasing the monitoring frequency to weekly.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification, complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.**# 012 [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);
 - (b) The cause of the event; and
 - (c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

**SECTION C. Site Level Requirements****# 013 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall keep sufficient records to ensure compliance with its facility PM₁₀, NH₃ and VOC emission limitations, Condition No. 008, Section C of this Operating Permit.

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

All records, reports, and analysis results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with General State Only Requirement #020(b), of Section B of this permit, and shall be made available to the Department upon written or verbal request within a reasonable time.

015 [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.

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

The permittee shall use keep records of Certified Product Data Sheets (CPDS) and/or Safety Data Sheets (SDS) of all pigments used at the facility.

V. REPORTING REQUIREMENTS.**# 017 [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.

**SECTION C. Site Level 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.

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:
- Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or,
 - 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:

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

(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.

**SECTION C. Site Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 019 [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.

020 [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 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.

021 [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.

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

The following individual has been approved by the Department as an additional responsible official for the facility:

Richard Hyde
Maintenance Planner
99 Newbold Rd.
Fairless Hills, PA 19030-4307
215-736-0712
richard.hyde@sudarshan.com

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

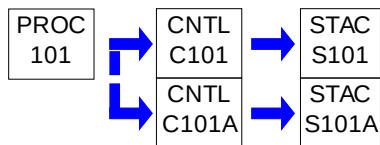
No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: PIGMENT MIXING OPERATIONS

Source Capacity/Throughput: 700.000 Lbs/HR

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

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

- The permittee shall visually monitor the equipment including tanks, mixers and the air pollution control devices to ensure good operating conditions, on a daily basis when operating.
- The permittee shall monitor the processed material throughput, on monthly basis. This is for the purpose of emission calculations.
- The permittee shall monitor the pigment loss, on monthly basis. This is for the purpose of emission calculations.
- The permittee shall calculate its emissions on a monthly and 12-month rolling basis in order to ensure compliance with the emission limitations of this Operating Permit.

IV. RECORDKEEPING REQUIREMENTS.**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.****Recordkeeping and Reporting Requirements.**

Sufficient data shall be recorded, in a format approved by the Department, so that compliance with the conditions of this Operating Permit can be determined. Records shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

- The permittee shall keep a record of the emissions of particulate matter, ammonia, and volatile organic compounds from the sources included under Source ID No. 101. The emissions shall be recorded on a monthly basis and as a 12-month rolling sum.
- The permittee shall maintain a daily log of equipment checks when operating, including the tanks, mixers, and air pollution control devices to ensure good operating conditions.
- The permittee shall maintain a log of the processed material throughput on a monthly basis, calculated on a monthly basis as well as a 12-month rolling sum.
- The permittee shall keep an inventory record of the amount of the VOCs and HAPs that are purchased and produced by the company on a monthly basis, calculated on a monthly basis as well as a 12-month rolling sum.

**SECTION D. Source Level Requirements**

e. The permittee shall maintain a log of the pigment loss on a monthly basis and calculated on a monthly basis as well as a 12-month rolling sum. This may be done based on the concentrations of purchased and sold material, or other analysis approved by the Department.

V. REPORTING REQUIREMENTS.

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

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

(a). The permittee shall operate the organic pigments production (Source ID 101) using only the following equipment:

(i). PM1, PM2, PM3, PM4, and PM5 pre-mix tanks; NP mixer, PNP pre-mix tank of the pilot plant; and drum/additive scale station; with a Donaldson Torit dust collector, Model No. TD3060;

(ii). NP1, NP2, NP3, NP4 pre-mix tanks, A1, A2, A3, A4, B1, B2, B3, B4, C1, C2, C3, D1, D2, D3, E1, E2, E3, F1, F2, F3 toning tanks, M1, M2, M3, M4, M6, and M7 mixers, 3-Roll mill, drum/additive scales stations, and 8 mixing vessels HT1 through HT8, with a Fisher-Klosterman venturi scrubber, Model No. MS-400.

(b). None of these control devices shall be modified, replaced or removed without prior approval from the Department. No source shall be added to the list of equipments above without prior approval from the Department.

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

For the sources covered by this Operating Permit, the permittee shall direct the exhaust from the:

(a). PM 1, 2, 3, 4 and 5 pre-mixing tanks; NP mixer and PNP pre-mix tank; and drum/additive scale station; to the Donaldson Torit dust collector, Model No. TD3060;

(b). NP1, NP2, NP3, NP4 pre-mix tanks, A1, A2, A3, A4, B1, B2, B3, B4, C1, C2, C3, D1, D2, D3, E1, E2, E3, F1, F2, F3 toning tanks, M1, M2, M3, M4, M6, and M7 mixers, 3-Roll mill, drum/additive scales stations, and 8 mixing vessels HT1 through HT8, to the Fisher-Klosterman venturi scrubber, Model No. MS-400.

VII. ADDITIONAL REQUIREMENTS.

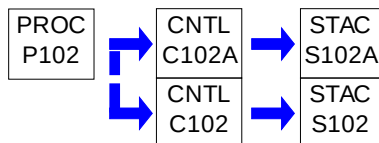
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: P102

Source Name: CORROSIVE-RESISTANT PIGMENT OPERATION

Source Capacity/Throughput: 1,038.000 Lbs/HR PIGMENTS, ALUMINUM HYDROX

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

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

- The permittee shall visually monitor the equipment including tanks, mixers and the air pollution control devices to ensure good operating conditions, on a daily basis.
- The permittee shall monitor the processed material throughput, on monthly basis. This is for the purpose of emission calculations.
- The permittee shall monitor the pigment loss, on monthly basis. This is for the purpose of emission calculations.
- The permittee shall calculate its emissions on a monthly and on a 12-month rolling basis in order to ensure compliance with the emission limitations of this Operating Permit.

IV. RECORDKEEPING REQUIREMENTS.**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.****Recordkeeping and Reporting Requirements.**

Sufficient data shall be recorded, in a format approved by the Department, so that compliance with the conditions of this Operating Permit can be determined. Records shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

- The permittee shall keep a record of the emissions of particulate matter from the sources included under Source ID P 102. The emissions shall be calculated monthly and as a 12-month rolling sum.
- The permittee shall maintain a daily log of equipment checks when operating, including the tanks, mixers, and air pollution control devices to ensure good operating conditions.
- The permittee shall maintain a log of the processed material throughput on a monthly basis, calculated on a monthly basis as well as a 12-month rolling sum.
- The permittee shall keep an inventory record of the amount of the VOCs and HAPs that are purchased and produced by the company on a monthly basis, calculated on a monthly basis as well as a 12-month rolling sum.

**SECTION D. Source Level Requirements**

e. The permittee shall maintain a log of the pigment loss on a monthly basis as well as a 12-month rolling sum. This may be done based on the concentrations of purchased and sold material, or other analysis approved by the Department.

V. REPORTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall submit a quarterly notification report to the Department within 30 days after the completion of each calendar quarter:

Q1: January 1 - March 31, is due by April 30th.

Q2: April 1 - June 30, is due by July 30th.

Q3: July 1 - September 30, is due by October 30th.

Q4: October 1 - December 31, is due by January 30th of the following year.

The notification report shall provide the operation status of the Corrosive Resistant Pigment Operation (Source P102) and its control devices (Sources C102 and C102A) and shall include all required recordkeeping that is specified under this Source ID, if operated. If no operation has occurred, the report should indicate this information.

The quarterly report shall be submitted electronically via the Public Upload Page (PUP).

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a). For the sources covered by this Operating Permit, the permittee shall direct the exhaust from the:

i. T-01 and T-02 pre-mixing tanks to the Mahle dust collectors, Models SFK 15/07/56/AF [#1 Dust Collector and #2 Dust Collector] and TD Landis scrubbers, models 700 CFM Impingement Collector [#1 Scrubber and #2 Scrubber], during charging operations and while the super sacs are removed from the charging ports;

ii. T-01 and T-02 pre-mixing tanks to the TD Landis scrubbers, models 700 CFM Impingement Collector [#1 Scrubber and #2 Scrubber], during mixing operations;

iii. Belt dryer (D-01) to a dust collector Schenck Process, Model 78LSTC100;

iv. Grinder (ACM-01) to a dust collector Schenck Process, Model 120AVR80.

(b). None of these control devices shall be modified, replaced or removed without prior approval from the Department. No source shall be added to the list of equipments above without prior approval from the Department.

VII. ADDITIONAL REQUIREMENTS.

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

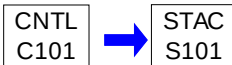
**SECTION D. Source Level Requirements**

Source ID: C101

Source Name: ONE DUST COLLECTOR

Source Capacity/Throughput:

39.000 Lbs/HR

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit particulate matter emissions from the dust collector, Source Id C101, to 0.02 grains per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- a. The permittee shall visually monitor the air pollution control devices to ensure good operating conditions, on a daily basis.
- b. The permittee shall monitor the pressure drop of each air cleaning device for the 101 process line, at least once per eight hour shift.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.**Recordkeeping and Reporting Requirements.**

Sufficient data shall be recorded, in a format approved by the Department, so that compliance with the conditions of this Operating Permit can be determined. Records shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

- a. The permittee shall record the pressure drop of each air cleaning device for the 101 process line, at least once per eight hour shift.
- b. The permittee shall keep a record of the particulate matter emissions from Source ID No. C101. The emissions recorded shall be as calculated on a monthly and on a 12-month rolling sum basis.
- c. The permittee shall maintain a copy of the manufacturer's specifications for the operation and maintenance of the air pollution control devices. The permittee shall maintain records of tune-ups, repairs, part replacements, and other maintenance performed in accordance with manufacturer's specifications.
- d. The permittee shall keep a record of any investigations in response to Condition #004 3(b) and (c) of this section.

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

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.**Operational Limitations**

1. For the sources covered by this Operating Permit, the permittee shall direct the exhaust from the:

PM 1, 2, 3, 4 and 5 pre-mixing tanks; NP mixer and PNP pre-mix tank; and drum/additive scale station; to the Donaldson Torit dust collector, Model No. TD3060;

2. The flow rate for the Donaldson Torit dust collector, Model No. TD3060, shall not exceed 6,000 SCFM;

3. The pressure drop in inches of water gauge shall be:

(a) 0.20 – 7.0 in.w.c. for the Donaldson Torit dust collector, Model No. TD3060.

(b) If there are five or more consecutive pressure drop readings over 6 in. w. c., the company shall investigate the source of the higher pressure drop readings to include consulting the manufacturers manual, manufacturer or examining general operation to bring the readings below 6 in. w. c. These efforts may include changing the filter cartridges.

(c) If there are five or more consecutive pressure drop readings under 1 in. w.c., and not associated with a change in filter cartridges over the past 3 months, the company shall investigate the source of the lower pressure drop readings to include consulting the manufacturers manual, manufacturer or examining general operation to bring the readings above 1 in. w. c. These efforts may include examining the filter cartridges for holes or to assure they are properly connected.

4. The permittee shall operate, and maintain the air cleaning devices to the manufacturer's specifications as well as good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

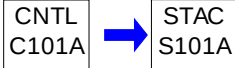
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: C101A

Source Name: SCRUBBER

Source Capacity/Throughput: 39.000 Lbs/HR

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit particulate matter emissions from the scrubber, Source ID C101A, to 0.02 grains per dry standard cubic foot.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- The permittee shall visually monitor the air pollution control device to ensure good operating conditions, on a daily basis.
- The permittee shall calculate its emissions on a monthly and on a 12-month rolling basis in order to ensure compliance with the emission limitations of this Operating Permit.
- The permittee shall monitor the pressure drop of each air cleaning device for the 101 process line, at least once per eight hour shift.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.**Recordkeeping and Reporting Requirements.**

Sufficient data shall be recorded, in a format approved by the Department, so that compliance with the conditions of this Operating Permit can be determined. Records shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

- The permittee shall record the pressure drop of each air cleaning device for the 101 process line, at least once per eight hour shift.
- The permittee shall keep a record of the particulate matter emissions from Source ID No. C101A. The emissions recorded shall be as calculated on a monthly and on a 12-month rolling sum basis.
- The permittee shall maintain a copy of the manufacturer's specifications for the operation and maintenance of the air pollution control devices. The permittee shall maintain records of tune-ups, repairs, part replacements, and other maintenance performed in accordance with manufacturer's specifications.

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

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Operational Limitations

1. For the sources covered by this Operating Permit, the permittee shall direct the exhaust from the:

NP1, NP2, NP3, NP4 pre-mix tanks, A1, A2, A3, A4, B1, B2, B3, B4, C1, C2, C3, D1, D2, D3, E1, E2, E3, F1, F2, F3 toning tanks, M1, M2, M3, M4, M6, M7 mixers, 3-Roll mill, and drum/additive scales stations, to the Fisher-Klosterman venturi scrubber, Model No. MS-400.

2. The flow rate shall not exceed 9600 SCFM for the Fisher-Klosterman scrubber.

3. The pressure drop in inches of water gauge shall be a minimum of 12.0 inches for the Fisher-Klosterman scrubber Model MS-400.

4. The permittee shall operate, and maintain the air cleaning device to the manufacturer's specifications as well as good air pollution control practices.

[Compliance with condition #004 (2) is demonstrated by design specifications].

VII. ADDITIONAL REQUIREMENTS.

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

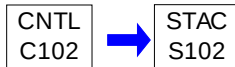
**SECTION D. Source Level Requirements**

Source ID: C102

Source Name: FOUR DUST COLLECTORS

Source Capacity/Throughput:

N/A

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

001 [25 Pa. Code §123.13]

Processes

The permittee shall limit particulate matter emissions from each of the four dust collector, Source ID C102, to 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

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.

- a. The permittee shall visually monitor the air pollution control devices to ensure good operating conditions, on a daily basis.
- b. The permittee shall monitor the pressure drop of each air cleaning device for the P102 process line, as follows:
 - (i) Two (2) Mahle dust collectors, at least once per batch.
 - (ii) Two (2) TD Landis scrubbers, at least once per batch.
 - (iii) Two (2) Schenck Process dust collectors, at least once per eight hour shift.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.**Recordkeeping and Reporting Requirements.**

Sufficient data shall be recorded, in a format approved by the Department, so that compliance with the conditions of this Operating Permit can be determined. Records shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

- a. The permittee shall record the pressure drop of each air cleaning device for the P102 process line, as follows:
 - (i) Two (2) Mahle dust collectors, at least once per batch.
 - (ii) Two (2) TD Landis scrubbers, at least once per batch.
 - (iii) Two (2) Schenck Process dust collectors, at least once per eight hour shift.
- b. The permittee shall keep a record of the particulate matter emissions from Source ID No. C102. The emissions recorded shall be as calculated on a monthly and on a 12-month rolling sum basis.
- c. The permittee shall maintain a copy of the manufacturer's specifications for the operation and maintenance of the air pollution control devices. The permittee shall maintain records of tune-ups, repairs, part replacements, and other

**SECTION D. Source Level Requirements**

maintenance performed in accordance with manufacturer's specifications.

d. The permittee shall keep a record of any investigations in response to Condition #004 3.i.(b), 3.ii.(b) and (c), 3.iii.(b) and (c) of this section.

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

The permittee shall submit a quarterly notification report to the Department within 30 days after the completion of each calendar quarter:

Q1: January 1 - March 31, is due by April 30th.

Q2: April 1 - June 30, is due by July 30th.

Q3: July 1 - September 30, is due by October 30th.

Q4: October 1 - December 31, is due by January 30th of the following year.

The notification report shall provide the operation status of the Corrosive Resistant Pigment Operation (Source P102) and its control devices (Sources C102 and C102A) and shall include all required recordkeeping that is specified under this Source ID, if operated. If no operation has occurred, the report should indicate this information.

The quarterly report shall be submitted electronically via the Public Upload Page (PUP).

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

1. For the sources covered by this Operating Permit, the permittee shall direct the exhaust from the:

i. T-01 and T-02 pre-mixing tanks to the Mahle dust collectors, Models SFK 15/07/56/AF [#1 Dust Collector and #2 Dust Collector] and TD Landis scrubbers, models 700 CFM Impingement Collector [#1 Scrubber and #2 Scrubber], during charging operations and while the super sacs are removed from the charging ports;

ii. T-01 and T-02 pre-mixing tanks to the TD Landis scrubbers, Models 700 CFM Impingement Collector [#1 Scrubber and #2 Scrubber], during mixing operations;

iii. Belt dryer (D-01) to a dust collector Schenck Process, Model 78LSTC100;

iv. Grinder (ACM-01) to a dust collector Schenck Process, Model 120AVR80;

2. For the C102 control devices, the flow rate shall not exceed:

i. 706 ACFM for the two Mahle dust collectors, Model SFK 15/07/56/AF;

ii. 13,184 ACFM for the dust collector Schenck Process, Model 78LSTC100;

iii. 3,335 ACFM for the dust collector Schenck Process, Model 120AVR80;

3. For the C102 air cleaning devices, the permittee shall maintain the pressure drop across the dust collectors as follows:

i. (a) initiate cleaning when the pressure drop reaches 8 inches of water column for the for the two Mahle dust collectors, Model SFK 15/07/56/AF;

(b) If there are five or more consecutive pressure drop readings over 8 in. w. c, the company shall investigate the source of the higher pressure drop readings to include consulting the manufacturers manual, manufacturer or examining general operation to bring the readings below 8 in. w. c. These efforts may include changing the filter cartridges;

**SECTION D. Source Level Requirements**

ii. (a) 0.5 to 5.0 inches of water column for the the dust collector Schenck Process, Model 78LSTC100;

(b) If there are five or more consecutive pressure drop readings over 5.0 inches of water column, the company shall investigate the source of the higher pressure drop readings to include consulting the manufacturers manual, manufacturer or examining general operation to bring the readings below 5.0 inches of water column. These efforts may include changing the filter cartridges;

(c) If there are five or more consecutive pressure drop readings under 0.5 inches of water column, and not associated with a change in filter cartridges over the past 3 months, the company shall investigate the source of the lower pressure drop readings to include consulting the manufacturers manual, manufacturer or examining general operation to bring the readings above 0.5 inches of water column. These efforts may include examining the filter cartridges for holes or to assure they are properly connected;

iii. (a) 0.5 to 5.0 inches of water column for the dust collector Schenck Process, Model 120AVR80;

(b) If there are five or more consecutive pressure drop readings over 5.0 inches of water column, the company shall investigate the source of the higher pressure drop readings to include consulting the manufacturers manual, manufacturer or examining general operation to bring the readings below 5.0 inches of water column. These efforts may include changing the filter cartridges;

(c) If there are five or more consecutive pressure drop readings under 0.5 inches of water column, and not associated with a change in filter cartridges over the past 3 months, the company shall investigate the source of the lower pressure drop readings to include consulting the manufacturers manual, manufacturer or examining general operation to bring the readings above 0.5 inches of water column. These efforts may include examining the filter cartridges for holes or to assure they are properly connected;

4. The permittee shall operate, and maintain the air cleaning devices to the manufacturer's specifications as well as good air pollution control practices.

[Compliance with condition #004 (2) is demonstrated by design specifications].

VII. ADDITIONAL REQUIREMENTS.

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

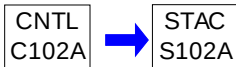
**SECTION D. Source Level Requirements**

Source ID: C102A

Source Name: TWO SCRUBBERS

Source Capacity/Throughput:

N/A

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

001 [25 Pa. Code §123.13]

Processes

The permittee shall limit particulate matter emissions from each of the two scrubbers, Source ID C102A, to 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

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.

- a. The permittee shall visually monitor the air pollution control devices to ensure good operating conditions, on a daily basis.
- b. The permittee shall calculate its particulate matter emissions on a monthly and on a 12-month rolling basis in order to ensure compliance with the emission limitations of this Operating Permit.
- c. The permittee shall monitor the pressure drop of each air cleaning device for the P102 process line, as follows:
 - (i) Two (2) Mahle dust collectors, at least once per batch.
 - (ii) Two (2) TD Landis scrubbers, at least once per batch.
 - (iii) Two (2) Schenck Process dust collectors, at least once per eight hour shift.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.**Recordkeeping and Reporting Requirements.**

Sufficient data shall be recorded, in a format approved by the Department, so that compliance with the conditions of this Operating Permit can be determined. Records shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

- a. The permittee shall record the pressure drop of each air cleaning device for the P102 process line, as follows:
 - (i) Two (2) Mahle dust collectors, at least once per batch.
 - (ii) Two (2) TD Landis scrubbers, at least once per batch.
 - (iii) Two (2) Schenck Process dust collectors, at least once per eight hour shift.
- b. The permittee shall keep a record of the particulate matter emissions from Source ID No. C102A. The emissions recorded shall be as calculated on a monthly and on a 12-month rolling sum basis.

**SECTION D. Source Level Requirements**

c. The permittee shall maintain a copy of the manufacturer's specifications for the operation and maintenance of the air pollution control devices. The permittee shall maintain records of tune-ups, repairs, part replacements, and other maintenance performed in accordance with manufacturer's specifications.

V. REPORTING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall submit a quarterly notification report to the Department within 30 days after the completion of each calendar quarter:

Q1: January 1 - March 31, is due by April 30th.

Q2: April 1 - June 30, is due by July 30th.

Q3: July 1 - September 30, is due by October 30th.

Q4: October 1 - December 31, is due by January 30th of the following year.

The notification report shall provide the operation status of the Corrosive Resistant Pigment Operation (Source P102) and its control devices (Sources C102 and C102A) and shall include all required recordkeeping that is specified under this Source ID, if operated. If no operation has occurred, the report should indicate this information.

The quarterly report shall be submitted electronically via the Public Upload Page (PUP).

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Operational Limitations

1. For the sources covered by this Operating Permit, the permittee shall direct the exhaust from the:

i. T-01 and T-02 pre-mixing tanks to the Mahle dust collectors, Models SFK 15/07/56/AF [#1 Dust Collector and #2 Dust Collector] and TD Landis scrubbers, models 700 CFM Impingement Collector [#1 Scrubber and #2 Scrubber], during charging operations and while the super sacs are removed from the charging ports;

ii. T-01 and T-02 pre-mixing tanks to the TD Landis scrubbers, Models 700 CFM Impingement Collector [#1 Scrubber and #2 Scrubber], during mixing operations;

2. The flow rate shall not exceed 700 CFM for each of the two TD Landis scrubbers, Model 700 CFM Impingement Collector.

3. The pressure drop in inches of water gauge shall be maintained between 4.0 to 7.0 inches for each of the two TD Landis scrubbers, Model 700 CFM Impingement Collector.*

4. The permittee shall operate, and maintain the air cleaning devices to the manufacturer's specifications as well as good air pollution control practices.

* The Department reserves the right to re-establish the pressure drop range of the two (2) TD Landis Scrubbers at any time based on, but not limited to, the review of additional monitoring data, and/or Department findings.

VII. ADDITIONAL REQUIREMENTS.

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



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

Site Emission Restriction Summary

Emission Limit		Pollutant
2.710 Tons/Yr	12-month rolling sum	VOC
4.980 Tons/Yr	12-month rolling sum	Ammonia
1.710 Tons/Yr	12-month rolling sum	PM10

**SECTION H. Miscellaneous.**

Other related permits : PA-09-0117

APS #495060, AUTH #517481 PA-09-0117A

APS #495060, AUTH #601900 PA-09-0117B amended and replaced PA-09-0117A

APS #629279, AUTH #700385 09-00117 amended and incorporated PA-09-0117B

March 2009

APS 629279

AUTH 700385

The following previously issued approval serves as a basis for certain conditions in this operating permit 09-00117; pigment mixing operations, Source Id 101 with the associated air pollution control devices Source Ids. C101 and C101A and listed below facility miscellaneous sources.

(001). Miscellaneous Sources:

(a). 0.663 MMBtu/hr natural gas fired boiler manufactured by Buderus, model G315;

(b). Two 1,000 gallons storage tanks for Joncryl 60 Resin Solution with vapor pressure of 0.04 psia/0.62 psia at storage temperature; and

(c). One 7,000 gallons storage tank for HPD 96 Resin Solution with vapor pressure 0.04 psia/0.62 psia at storage temperature.

July 2014

APS #629279, AUTH #995671. This Operating Permit is being renewed with the following modification: 8 mixing vessels HT1 through HT8 controlled by existing scrubber were added to the permit.

November 2014

APS No. 629279; Authorization No. 1050309: This permit action is an administrative amendment to correct an error in the updating of the Section C requirement changing the frequency of monitoring odors, visible emissions, and fugitive particulate matter. The update of the language in the permit did not include the procedure for requesting weekly or monthly monitoring. The change in the permit was made in accordance with 25 Pa. Code Section 127.450(a)(1).

November, 2017

APS No. 629279 AUTH No. 1193823

This permit action is a minor modification to revise the allowable pressure drop range for the TD3060 dust collector (part of Source ID C101).

With this issuance of the Operating Permit the names of source IDs C101 and S101 are changed from "Two Baghouses" and "Stacks for Baghouses (Two)" to "Two Dust Collectors" and "Stacks for Dust Collectors (Two)" to be more descriptive of the actual installation.

April 2020

APS #629279, AUTH #1255183. This Operating Permit is being renewed with the following modification (further information is available in the review memo for this renewal):

- Source ID Nos. 101 and C101- the pre-mix tank 7 (PM7) and the Donaldson Torit dust collector, Model No. 3DF12 were removed
- Source P102, which has been approved through two Requests for Determination (RFD# 6215 and 6485) submitted respectively in April 2017 and August 2017, was added to this SOOP along with its associated air pollution control devices Source ID Nos. C102 and C102A

**SECTION H. Miscellaneous.**

The list of miscellaneous sources was updated as follows:

- (a). 0.663 MMBtu/hr natural gas fired boiler manufactured by Buderus, model G315;
- (b). Two 1,000 gallons storage tanks for Joncryl 60 Resin Solution with vapor pressure of 0.04 psia/0.62 psia at storage temperature; and
- (c). One 7,000 gallons storage tank for HPD 96 Resin Solution with vapor pressure 0.04 psia/0.62 psia at storage temperature.

APS #629279, AUTH #1404346. A minor operating permit modification is being processed to clarify permit condition #003 for Source P102: Corrosive-Resistant Pigment Operation, and permit condition #004 for Sources C102: Four Dust Collectors and C102A: Two Scrubbers.

These conditions have been revised to specify that the exhaust flow from P102 is to be directed to C102 only during charging of the T-01 and T-02 pre-mixing tanks. During all modes of operation, the exhaust flow from P102 shall be directed to Source C102A: Two Scrubbers.

APS #629279, AUTH #1477549. A minor operating permit modification for the replacement of one dust collector (Source ID C101) that is associated with the Pigment Mixing Operations (Source ID 101). The new dust collector (Source ID C101B) is a Donaldson Torit, Model No. DFO 3-12 with a designed flow volume of 6,000 SCFM. This project will not result in any emission increases to the source or the facility.

APS #629279, AUTH #1506338. This operating permit is being renewed, with the following notes:

- (a) A new dust collector (C101B) identified in the minor modification processed under AUTH # 1477549 was never completed. The previous dust collector (C101) was never removed and continues to operate (controlling emissions from Source 101). This existing dust collector (C101) is being re-instated back into the permit and the new dust collector (C101B) will not be carried over into this renewal. Any future plans to replace any control devices on site shall require Department approval.
- (b) A revised compliance milestone (schedule) has been established for Source C102A: Two (2) TD Landis Scrubbers. Pressure drop readings shall be collected for a minimum of six months and submitted to the Department by January 31, 2026, so that an appropriate range can be established. Although manufacturer recommended range is 4-7" w.g., this is subject to change pending Department review of data collected.
- (c) This renewal identifies Tracy Hanson, Site Director, as the new Responsible Official.

APS #629279, AUTH #1535730. This operating permit is being amended to identify a facility name change from Heubach, Ltd. to Sudarshan Fairless Hills Mfg. Ltd., LP.

Due to suspended operation of the Corrosive Resistant Pigment Operation (Source P102), the Compliance Milestone that was previously established in Section C of the permit has been removed. However, since Source P102 has not been physically removed from the site, the permittee shall submit a quarterly notification report to the Department of the status of Source P102 and its associated control devices and shall include all required recordkeeping for the source and its controls from the previous calendar quarter.



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