



OPERATING PERMIT CONDITIONS  
PERMIT NO. OP-23-0012  
EPSILON PRODUCTS COMPANY

CONDITIONS (CONTINUED):

3. This Reasonably Available Control Technology (RACT) Operating Permit is issued to Epsilon Products Company (Epsilon) for the operation of their Polypropylene Plant No. 1 located at Post Road and Blueball Avenue, Marcus Hook Borough, Delaware County. This Operating Permit is the Department's determination of RACT for the volatile organic compound (VOC) emission sources at this facility. Epsilon is a minor source of nitrogen oxides (NOx).

4. This Operating Permit is issued for the operation of a polypropylene plant No. 1 with the following sources:

A. A flare system for the control of VOC emissions from:

1. 2 polypropylene reaction systems
2. 2 compressor vent Nos. 1 and 2
3. 1 mixer vent
4. 2 analyzer vents and pellet dryer vents

B. The company shall limit VOC emissions from silo sources and fugitive emission sources as follows:

Sources	Allowable Emissions (tons/year)
1. three (3) storage silos	12.10
2. fugitive emission sources	19.60

C. The total volatile organic compounds (VOC) emissions from the polypropylene Plant No. 1 shall never exceed the limitations of 10 pounds per hour, 240 pounds per day and ~~37.10 tons/year~~.

5. The flare shall be operated with a flame present at all times.

6. The presence of a flare pilot flame shall be monitored using a thermocouple or any equivalent device and recorder to detect the presence of a flame.

7. The flare shall be designed for and operated with no visible emissions except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours or in conformance with 25 PA Code Section 123.41, whichever is more stringent.

8. Any gases to be flared shall have a net heating value of 300 Btu per standard cubic foot or greater.

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9. The flare shall be operated with no emissions of malodorous air contaminants detectable beyond the plant's property in conformance with 25 PA Code §123.31.
10. Epsilon Products Company must comply, at start-up, with Section 129.71 of Chapter 129 of the Rules and Regulations of the Department of Environmental Protection.
11. The company shall record the types, amounts and physical properties of all volatile organic compounds used on a daily and annual basis in the polypropylene Plant No. 1 production process.
12. The company shall comply with the proposed New Source Performance Standard for Volatile Organic Compound Emissions from the Polymer Manufacturing industry, 40 CFR 60, Subpart DDD where applicable.
13. Epsilon shall notify the Department within two hours during normal working hours of any malfunction of the flare which is expected to last longer than two hours. ~~A written report regarding the malfunction shall be sent to the Department within seven working days.~~
14. This RACT determination applies to the emissions of VOC pollutants only. Emissions of other pollutants, including criteria pollutants, shall be governed by existing Plan Approvals, Operating Permits, and the applicable requirements of the Rules and Regulations of the Department. Such approval, permits, and requirements are incorporated herein by reference and made part of this permit. All conditions of plan approval and operating permit of 23-312-172 shall be incorporated to this operating permit.
15. The expiration date shown on the Operating Permit is for state purposes. ~~For Federal enforcement purposes the RACT provisions of the Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by the U.S. EPA upon its approval of the above as a revision to the SIP.~~
16. **Monitoring, Recordkeeping and Reporting Procedures:**

Epsilon shall keep records to demonstrate compliance with §129.91-129.94 of Pennsylvania's RACT regulations. All records shall be maintained at the facility for at least two (2) years and will be made available to the Department upon request. Recordkeeping shall be conducted for major VOC sources that are identified in the RACT proposal and shall include, inventory records, and material balances shall be used to calculate VOC emissions using the Department approval. All recordkeeping requirements from existing permits shall continue to be met.

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CONDITIONS (CONTINUED):

17. Schedule for compliance shall be as follows:
  - A. All proposed RACT monitoring and recordkeeping measures shall be fully implemented upon issuance of this permit.

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