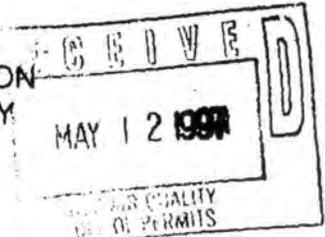


COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - BUREAU OF AIR QUALITY



OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below:

Permit No.	<u>OP-46-0025</u>	Source(s)	<u>NO_x/VOC Sources</u>
Owner	<u>Lonza, Inc.</u>	Air	<u></u>
Address	<u>900 River Road</u>	Cleaning	<u></u>
	<u>Conshohocken, PA 19428</u>	Device	<u></u>
Attention	<u>Mr. Paul Sieracki</u>	Location	<u>900 River Road</u>
	<u>Environmental Manager</u>		<u>Upper Merion Township</u>
			<u>Montgomery County</u>

This permit is subject to the following conditions:

1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of the applicable plan approval(s) and operating permits;
 - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

(SEE ADDITIONAL CONDITIONS ATTACHED)

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued 04/22/1997

Francine Cartini
Regional Manager
Air Quality

Expires 04/22/2002

cc: Division of Permits, RCSOB
Administration
SEFO
Re (KAL)214.21

PERMIT NO. OP-46-0025
LONZA, INC.
 (REVISED 06/16/1998)

CONDITIONS (CONTINUED):

3. This Operating Permit, OP-46-0025, is issued to Lonza, Inc., for the operation of oxides of nitrogen (NO_x) and volatile organic compounds (VOCs) emission sources regulated under 25 Pa. Code §§ 129.91-129.95. This Operating Permit, OP-46-0025, also specifies Lonza Inc.'s Reasonably Available Control Technology (RACT) requirements for sources of VOC and NO_x. Other pollutants are regulated under the applicable provision of Title 25 of the Pennsylvania Code and by existing permit conditions which are incorporated by reference.
4. The company shall operate the vent system connected from the seven (7) storage tanks (V-305, V-316, V-318, V-510, V-511, V-519 and V-593) to the thermal oxidizer.
5. The thermal oxidizer system shall not treat more than 11,580 SCFM of vent gas stream, and shall maintain an outlet gas temperature of 1500°F. The system shall utilize a low NO_x burner.
6. The expiration date shown on the operating permit No. OP-46-0025 is for the state purposes. For Federal enforcement purposes the RACT provision of the operating permit shall remain in effect as part of the State Implementation Plan until repealed pursuant to 40 CFR Part 51 and approved by the US Environmental Protection Agency (EPA).
7. The RACT portions of this permit apply to the emissions of NO_x and VOC pollutants only. All conditions from Plan Approval Nos. 46-301-208, 46-399-109 and Operating Permit No. 46-313-116B are incorporated to this permit. The referenced Plan Approvals and Operating Permit will no longer be issued separately in the future. If any conflict arises between the conditions of this permit and the referenced plan approvals and operating permit, the more stringent requirements shall apply.
8. Source Inventory

This permit covers the following sources located in Upper Merion Township, Montgomery County:

Source Category Description	RACT Method for VOC	RACT Method for NO _x	Allowable Emissions (tpy)	
			VOC	NO _x
Hazardous Waste Incinerator	De minimis	Presumptive	0.62	23.65
Boilers	De minimis	Presumptive	0.62	32.10
Space Heaters	De minimis	Presumptive	0.03	0.35
Emergency Electric Generator & Fire Pump	Case-by-Case	Presumptive	0.46	8.09
Fuel Oil & Diesel Fuel Tanks	De minimis	NA	0.02	NA
Manufacturing and	Case-by-Case	Presumptive	3.90	24.10

OPERATING PERMIT CONDIT IS
PERMIT NO. OP-46-0025
LONZA, INC.
 (REVISED 06/16/1998)

CONDITIONS (CONTINUED):

Pilot Processes (Thermal Oxidizer)				
Tank Storage	§129.57 and Case-by-Case	NA	2.68	NA
Dust Collectors	De minimis	NA	2.50	NA
Underground Sumps	De minimis	NA	2.60	NA
Fugitive Emissions	Case-by-Case	NA	2.74	NA
Wastewater Treatment	Case-by-Case	NA	30.49	NA
Laboratory Hoods	De minimis	NA	0.81	NA
Total	De minimis		47.47	88.29

NA = not applicable

9. This permit does not authorize the construction or modification of any source. Construction or modification of a source is subject to the Plan Approval requirements of 25 PA Chapter 127 Subchapter B. Except as provided below, the permit does not modify in any way the terms and conditions of any existing or subsequent plan approval or operating permit issued for the sources that are the subject of this permit.

10. Hours of Operation
 - A. The hours of operation of the Emergency Electric Generator and the Fire Pump shall be limited to 499 hrs/yr based on a 12 month rolling average.
 - B. The hours of operation of the six (6) maintenance area space heaters, five (5) boiler house space heaters and two (2) Cleaver Brooks boilers shall not be limited to hours of operation.

11. NOx RACT Implementation
 - A. RACT for the two (2) Cleaver Brooks boilers shall be an annual tune-up on the combustion process. The annual tune-up of the combustion process shall consist of but not be limited to the following:
 1. Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
 2. Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NOx, and, to the extent practicable, minimize the emissions of CO.
 3. Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

CONDITIONS (CONTINUED):

4. Each adjustment conducted under the procedures in Condition 11A shall be recorded in a permanently bound log book.
 - a. the date of tuning procedure
 - b. the name of the service company and technicians
 - c. the final operating rate or load
 - d. the final CO and NO_x emission rates
 - e. the final excess oxygen rate
 5. The annual adjustment shall be made in accordance with the EPA document "Combustion Efficiency Optimization Manual for Operators of Oil and Gas fired Boilers", September 1983 (EPA-340/1-83-023) or equivalent procedures approved in writing by the Department.
 6. Lonza shall maintain records which include a certification from the fuel supplier of the type of the fuel and for each shipment of No. 2 fuel oil a certification that the fuel complies with ASTM D396-78 "Standard Specifications for Fuel Oils".
- B. The Hazardous Waste Incinerator, six (6) Maintenance Area Space Heaters, five (5) Boiler House Space Heaters, Emergency Electric Generator, Thermal Oxidizer, and Fire Pump shall conform with the presumptive Reasonably Available Control Technology (RACT) requirements of 25 Pa. Code §129.93(c). The presumptive RACT requirements of 25 Pa. Code §129.93(c) are that the sources will be installed, maintained and operated in accordance with manufacturer's specifications.
12. RACT Recordkeeping Requirements
- A. A bound logbook for the Hazardous Waste Incinerator, both Cleaver Brooks boilers, six (6) maintenance area space heaters, five (5) boiler house space heaters, emergency electric generator, thermal oxidizer, and fire pump will be kept and sufficient data recorded so that compliance with Conditions 6 and 8 can be determined. Records shall be kept for a minimum of two (2) years and shall be made available to the Department upon request.
 - B. Lonza, Inc. shall maintain comprehensive records for all de-minimis sources, to demonstrate compliance with the de-minimis limits.
 - C. The company shall establish NO_x and VOC emission tracking systems to document compliance with condition No. 8 above. The records shall be kept to provide sufficient data and calculation to clearly demonstrate that the requirements of 25 Pa. Code §129.91-129.94 are met.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0025
LONZA, INC.

(REVISED 06/16/1998)

CONDITIONS (CONTINUED):

13. Conditions from wastewater treatment plant, Plan Approval No. 46-399-109.

A. The existing wastewater treatment plant which shall be controlled by biological treatment. The specific air contamination sources are listed above:

- influent storage tank
- aerated equalization basin
- effluent equalization basin
- sand filtration

B. The operation of the following source shall not emit air contaminants into the atmosphere in excess of the limits listed below: (VOC = volatile organic compound)

Source	VOCs	
	lbs/hr	tons/yr
Wastewater Treatment Plant	6.96	30.49

C. Lonza shall maintain the records of wastewater throughput on a monthly basis. The total volatile organic compound (VOC) concentration shall be sampled and recorded on a weekly basis for the sources below:

- Storage tank - V-518
- Aerated equalization basin - No. 551
- Biological treatment tanks - Nos. 525 and 526
- Effluent aerated equalization basin - V-552

D. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.

E. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, where applicable, and in accordance with any restrictions or

OPERATING PERMIT CONDITIONS

PERMIT NO. OP-46-0025

LONZA, INC.

(REVISED 06/16/1998)

CONDITIONS (CONTINUED):

limitations established by the Department at such time as it notifies the company that testing is required.

(SMC98)54B