

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

15-469
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OPERATING PERMIT

PERMIT
 QUALITY
 PERMITS

In accordance with provisions of the Air Pollution Control Act, the Act of 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 contaminant source(s) described below.

January 8, 1960,
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PA092-04

Permit No. <u>OP-15-0015</u>	Source(s) <u>Synthetic Minor N_x Facility</u>
Owner <u>Sartomer Company, Inc.</u>	Air <u>Major VOC Facility</u>
Address <u>610 South Bolmar Street</u>	Cleaning <u></u>
<u>West Chester, PA 19382</u>	Device <u></u>
Attention <u>Mr. David Campbell</u>	Location <u>610 South Bolmar Street</u>
<u>Environmental Engineer</u>	<u>West Chester, PA 19382</u>
	<u>West Chester Borough</u>

RECEIVED
 Chester County Ozone/Co & Mobile Sources
 Section (3AT21)

MAR 26 1996

EPA, REGION III

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. 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 THE ATTACHED ADDITIONAL CONDITIONS)

Failure to comply with the conditions placed on this permit is a violation of Section 127.25. 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 01/17/96
 Expires 01/17/2001

Francine Carlini
 FRANCINE CARLINI
 Regional Manager
 Air Quality

Central Office
 Southeast Regional Office

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-15-0015
SARTOMER COMPANY, INC.
(REVISED 3/25/98)

CONDITIONS (continued):

3. General Requirements

- A. This operating permit is issued to Sartomer Company for the operation of the sources as shown in condition No. 4 and to specify Reasonably Available Control Technology (RACT) for volatile organic compounds (VOCs) and nitrogen oxides (NOx) emissions under 25 PA Code § 129.91 through 129.95. Sartomer Company is a major VOC source and a synthetic minor NOx source.
- B. The expiration date shown on operating permit No. OP-15-0015 is for ~~state purposes only~~. For federal enforcement purposes the ~~operating permit shall remain in effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed pursuant to 40 CFR 51 and approved by the United States Environmental Protection Agency (EPA). The operating permit shall become enforceable by the EPA upon its approval of the above as a revision to the SIP.~~
- C. This RACT approval applies to the emissions of NOx and VOC pollutants only. ~~Emissions of other pollutants, including criteria pollutants, shall be governed by existing plan approval, operating permit, 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 from plan approval and operating permit No. 15-313-040, 15-302-074B, 15-313-005C, 15-313-04†, 15-302-083, 15-313-042A, and 15-302-083A are incorporated by reference into this permit.~~
- 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 limitations established by the Department at such time as it notifies the company that testing is required.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-15-0015
SARTOMER COMPANY, INC.
 (REVISED 3/25/98)

CONDITIONS (continued):

Facility Inventory

VOC Sources

<u>Unit No.</u>	<u>Description</u>	<u>1990 Actual VOCs (tons)</u>	<u>Current Potential VOCS (tons)</u>
1	Boiler - 901	0.05	0.18
2	Boiler - 902	0.05	0.18
3	Boiler - 903	0.00	0.18
4	Fire Pump	0.00	0.11
5	Emerg. Gen.	0.00	0.41
6	Reactor - 150	1.98	2.04
7	Reactor - 151	1.98	2.04
8	Reactor - 154	1.98	2.04
9	Reactor - 155	1.98	2.04
10	Reactor - 201	1.65	2.52
11	Reactor - 202	1.65	2.52
12	Reactor - 204	1.65	2.52
13	Reactor - 205	1.65	2.52
14	Reactor - 1101	0.00	8.19
15	Reactor - 1151	0.00	8.19
16	Washer - 152	0.22	0.40
17	Washer - 160	0.22	0.40
18	Washer - 203	0.31	1.04
19	Washer - 206	0.31	1.04
20	Washer - 211	0.31	1.04
21	Washer - 1101	0.00	3.98
22	Stripper - 149	16.47	30.18
23	Stripper - 151	16.47	30.18
24	Stripper - 207	13.69	23.87
25	Stripper - 212	13.69	19.80
26	Stripper - 1101	0.00	22.42
27	Raw Material Storage Tanks	0.32	0.52
28	In-Process Tanks	0.74	2.31
29	Hazardous Waste System	0.47	1.31
30	Fugitives	2.90	5.80

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SARTOMER COMPANY, INC.
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CONDITIONS (continued):

<u>VOC Sources</u>			
<u>Unit No.</u>	<u>Description</u>	<u>1990 Actual VOCs (tons)</u>	<u>Current Potential VOCS (tons)</u>
31	Pilot Plant	0.09	0.30
32	Utility Vacuum	14.10	22.80
33	Non-Hazardous Wastewater Pre- Treatment System	15.00	0.40
34	Hoods	0.35	1.26
36	Parts Washer	0.12	0.40
37	S-150 Hi Vac	0.001	0.001

OPERATING PERMIT CONDITIONS
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SARTOMER COMPANY, INC.

(REVISED 3/25/98)

CONDITIONS (continued):

NOx Sources

<u>Emission Sources</u>	<u>Rated Capacity</u>	<u>Fuel Used</u>	<u>Manufacturer/Model No.</u>
Boiler B-901	14.645 MMBtu/hr	Natural Gas/ No. 2 FO	Cleaver Brooks
Boiler B-901	14.645 MMBtu/hr	Natural Gas/ No. 2 FO	Cleaver Brooks
Boiler B-903	14.645 MMBtu/hr	Natural Gas/ No. 2 FO	Clayton
Emergency Generator	1.26 MMBtu/hr	No. 2 FO	Detroit Diesel/8V-92 TTA
Fire Pump	4.55 MMBtu/hr	No. 2 FO	Cummins/6BTA5.9F1
FO = Fuel Oil			

5. The following conditions apply to boiler B-903 only:

- a. The natural gas consumption by this boiler shall not exceed 15,021 SCF per hour and 131.58 million SCF per year.
- b. The No. 2 fuel oil consumption by this boiler shall not exceed 105 gallons per hour and 919,800 gallons per year.
- c. The No. 2 fuel oil supplied to this boiler shall not ~~exceed 0.3% by weight sulfur content.~~
- d. The actual stack emissions from this boiler shall not exceed the following limits:

<u>Pollutants</u>	<u>(lb/hr)</u>
Particulate Matter	0.303
Sulfur Dioxide	4.482
Carbon Monoxide	1.05
Nitrogen Oxide	4.1
Volatile Organic Compound (VOC)	0.108

- e. This boiler is subject to the emission limitations of the New Source Performance Standard, 40 CFR 60, Subpart Dc. The following limits shall be maintained for this boiler.
 - A. Opacity limitations of § 60.43c(c) (~~discharge gases shall not exceed 20% opacity at any six minute average per one hour~~), or the limitations 25 PA Code §123.41 whichever is ~~more~~ stringent.

OPERATING PERMIT CONDITIONS
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SARTOMER COMPANY, INC.

(REVISED 3/25/98)

CONDITIONS (continued):

- B. Sulfur dioxide emissions shall not exceed ~~0.5 pounds/MM BTU heat input~~ or as an alternative, the sulfur content of the No. 2 fuel oil shall not exceed 0.3% sulfur by weight in accordance with ~~40 CFR~~ paragraph 60.42c(d).
6. The utility vacuum shall be used only when materials are transferred from one process unit to another.
7. The utility vacuum shall be operated according to manufacturers specifications. The sources shall also be operated and maintained in accordance with good air pollution control practices.
8. The company shall establish NO_x and VOC ~~emission tracking systems to document compliance with condition No. 4 above.~~ The tracking system must be approved by the Department.
9. Sartomer Company shall maintain comprehensive records for all de minimus sources in a Department approved format to demonstrate compliance with the de minimus limits. All fugitive sources shall be checked manually at least every four hours as proposed, also be operated and maintained according to manufacturers specification with good air pollution control practices.
10. The owner and operator of a major NO_x or VOC emitting facility shall keep records to demonstrate compliance with all the permit conditions contained in this operating permit.
11. Sartomer Company shall keep record for units equipped with condensers and maintain condenser maintenance and repair records to demonstrate that the units are operating according to manufacturer's specifications. The sources shall also be operated and maintained in accordance with good air pollution control practices.
12. The records shall be retained for at least two years and shall be made available to the Department upon request.
13. Fire pump and emergency generator shall be maintained and operated in accordance with manufacturers specifications. The sources shall also be operated and maintained in accordance with good air pollution control practices.
14. RACT Implementation for NO_x
- Sartomer Company shall limit the facility oxides of nitrogen emissions to less than 25 tons per year. The following requirements apply:
- A. Boilers B-901 and B-902 shall be limited in their natural gas usage to 118.13×10^6 cubic feet in any 12 month consecutive period. No. 2 fuel oil shall only be used as back-up to the natural gas.

OPERATING PERMIT CONDITIONS
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SARTOMER COMPANY, INC.

(REVISED 3/25/98)

CONDITIONS (continued):

- B. Boiler B-903 shall be limited in its natural gas usage to 131.58×10^6 cubic feet in any 12 month consecutive period. No. 2 fuel oil shall only be used as back-up to the natural gas.
 - C. Fire pump and emergency generator shall not exceed 500 hours each in any consecutive 12 month period. An elapsed time meter shall be installed and maintained in each unit to indicate cumulative hours operated.
15. The following conditions apply to air stripper (S-1101) and two esterification reactors (R-1101) and (R-1102), controlled by a total of eight (8) condensers. These conditions were originally included in Plan Approval No. 15-313-042A:
- A. The sources covered under the above plan approval shall be limited to the following total emissions:
 - 1. volatile organic compound emissions shall be less than 11.9 lbs/hr and ~~37.4 tons/yr on a 12 month rolling average.~~
 - 2. ~~acrylic acid emissions shall be less than 0.5 lbs/hr and 1.4 tons/yr.~~
 - B. The vent condensers associated with the sources covered under the above plan approval shall be operated with a maximum vent discharge temperature of 85°F. Each shall be equipped with a temperature alarm.
 - C. Sartomer Company, Inc. shall monitor the temperature of the stack exhaust, on both the reactors and stripper on an hourly basis.
16. Recordkeeping Requirements
- A. A bound logbook shall be maintained on each boiler listed in condition 4 so that compliance with condition 14 (A) and (B) can be determined. At a minimum, the logbook shall contain the following:
 - i a monthly summary of the amount of natural gas used
 - ii a monthly summary of the amount of No. 2 fuel oil used
 - B. A bound logbook shall be maintained for the fire pump and emergency generator listed in condition 4 so that compliance with condition 14.C. can be determined. At a minimum, the logbook shall contain the following:
 - i the number of hours per month that the fire pump has operated
 - ii the amount of fuel used during the month

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(REVISED 3/25/98)

CONDITIONS (continued):

- C. The necessary information shall be kept for two (2) years in order to determine compliance with the permit conditions and shall be made available to the Department upon request.

Re 30 (RN)162-19