

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 Major VOC emitting facility described below:

Permit No.	<u>OP-46-0016</u>	Major VOC Emitting Facility	<u></u>
Owner	<u>Handy and Harman Tube Company</u>	Related Plan Approvals	<u>PA-46-0016</u>
Address	<u>701 West Township Line Road</u>	RACT Proposal	<u>Control VOC from Degreasers</u>
	<u>Norristown, PA 19403-4629</u>	Location	<u>701 West Township Line Road</u>
Attention	<u>Mr. Mark Scheidecker</u>		<u>East Norriton Township</u>
	<u>Environmental Compliance Manager</u>		<u>Montgomery County</u>

This permit is subject to the following conditions:

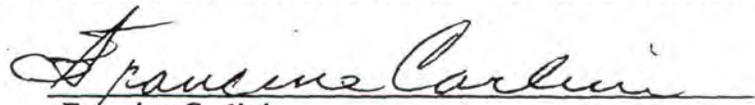
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of any applicable plan approvals and operating permits; and
 - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. Failure to comply with the conditions placed on this permit is a violation of Section 127.444.

(SEE ADDITIONAL CONDITIONS ATTACHED)

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 09/25/1995

Expires 09/25/2002


Francine Carlini
Regional Manager
Air Quality

cc: Central Office
Administration
SEFO
Re (SMC)251-3

OPERATING PERMIT CONDITIONS
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(Revised 02/6/98)

CONDITIONS (continued):

3. The Operating Permit No. OP-46-0016 is issued to Handy and Harman Tube Company (Handy Harman) for the operation of Volatile Organic Compound (VOC) emission sources regulated under 25 PA Code §§ 129.91-95. This permit specifies the company's Reasonably Available Control Technology (RACT) requirements for Sources of VOCs.

4. The purpose of the permit is to establish VOC RACT for Handy Harman's facility to reduce emissions of VOC. This permit covers the following facility sources located at the intersection of Township Line and Whitehall Road in East Norriton Township, Montgomery County:
 - Vat Vapor Degreaser which has a vat opening equal to 9.76 square feet.
 - Handy Harman Pump Degreaser with rated capacity of 3 gpm.
 - Nine (9) Cold Degreasers/Washers located throughout the plant.
 - Miscellaneous Solvents used at miscellaneous locations on the production lines.

5. Vat Vapor Degreaser

A. Source Description

The Vat Vapor Degreaser is a VOC emission source covered under this permit. The unit is filled with trichloroethylene (TCE) and equipped with a water cooling coil to condense the TCE vapors.

B. Control Technology

To control VOC emissions the VAT Vapor Degreaser shall be equipped with the following:

- (1) A cover that can be opened or closed easily without disturbing the vapor zone.
- (2) A safety switch which shuts off the sump heat if condenser coolant is either not circulating or too warm.
- (3) A permanent, conspicuous label summarizing the opening requirements.

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CONDITIONS (continued):

- (4) A condensing coil.
- (5) Freeboard ratio (FBR) greater than or equal to 0.75.

C. Operating Requirements

The unit shall be operated in accordance with the following requirements:

- (1) Keep cover closed at all times except when processing work load through the degreaser.
- (2) Rack all parts to allow full drainage.
- (3) Move parts in and out of the degreaser at <11 fpm.
- (4) Degrease workload in vapor zone for at least 30 seconds or until condensation ceases.
- (5) Tip out any pools of solvent on the cleaned parts before removal.
- (6) Allow parts to dry within degreaser for at least 15 seconds or until visually dry.
- (7) Do not degrease porous or absorbent materials.
- (8) Workload should not occupy more than half of the open top area of the degreaser.
- (9) Never spray above the vapor level.
- (10) Repair solvent leak immediately or (if not repaired) shutdown the degreaser.
- (11) Do not dispose of waste solvent or transfer it to another party in such a way that greater than 20% of waste will evaporate into the atmosphere.
- (12) Store waste solvent only in closed containers.

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CONDITIONS (continued):

D. Emission Limitations

The total TCE emissions from the source shall be limited to the maximum of 8.2 tons per year as a 12 month rolling average calculated monthly.

E. Monitoring Requirements

(1) Temperature Monitoring

The company shall monitor the temperature of the:

- vapor space at the cooling coil
- water in the cooling coil

(2) Flow Monitoring

The company shall monitor a liquid flow through the degreaser. The total flow shall be recorded on a monthly basis. The data shall be used for mass-balance emission calculations to demonstrate compliance with Condition 5D.

F. Recordkeeping and Reporting Requirements

(1) The Company shall maintain the following records:

- Temperature measurement record to demonstrate compliance with Condition 5E(1).
- Flow measurement record to demonstrate compliance with Conditions 5E(2).

(2) The Company shall perform its routine and preventive maintenance inspections to ensure that leaks are repaired immediately.

(3) The Company shall generate records of maintenance performed on the degreaser.

(4) Data required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.

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CONDITIONS (continued):

- The record of maintenance performed on the degreaser.
 - The record of throughputs to demonstrate compliance with Condition 6C.
- (2) The Company shall establish a TCE emission tracking system to document compliance with Condition 6D above. The tracking system shall be approved by the Department and shall include, but not be limited to the following information:
- Number of production runs/day
 - Hours per production run
 - Quantity of TCE used per production run and quantity of liquid recovered to the adjacent vapor degreaser. The Department shall approve a method to determine quantity of the TCE used and recovered.
- (3) The Company shall generate a summary of the estimated actual TCE emissions on an hourly and monthly basis.
- (4) Data required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
- (5) Records required under this permit shall be kept for a period of five (5) years and shall be made available to the Department upon request.

7. Cold Degreasers/Washers

- A. Nine (9) Safety Kleen Degreasers/Washers, covered under this permit are located throughout the plant.
- B. The sources shall be operated and maintained in accordance with good air pollution control practices.
- C. These stations shall use Safety 105 washing solvents and shall be serviced monthly by the Safety Kleen Corporation or equivalent.
- D. The aggregated VOC emissions from the sources shall not exceed 3.2 tons per year as a 12 month rolling average calculated monthly.
- E. The Company shall maintain record of monthly inventories of the solvent, in order to demonstrate compliance with Condition 7D.

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CONDITIONS (continued):

- B. Revision to any emission limitations incorporated in this Operating Permit will require resubmission as revision to the PA State Implementation Plan. The applicant shall bear the cost of public hearing and notification required for EPA approval as stipulated in 25 Pa. Code § 129.91(h).
- C. 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.
- D. 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.

Re 30 (SMC)255