

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

COMPLIANCE PERMIT

In accordance with Section 7.2 of the Air Pollution Control Act, the Act of January 8, 1960, P.S. 2119, as amended, 35 P.S. §4007.2, and Section 127.445 of 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 and Minor NOx Emitting Facility described below:

Permit No. <u>CP-15-0009</u>	Major VOC and Minor NOx Emitting Facility
Air Cleaning Device _____	Related Plan Approvals <u>PA-15-0009</u>
Owner <u>ICI Fluoropolymers</u>	RACT Proposal <u>Control VOC from Poly Tetra Fluoro Ethylene (PTFE) Process</u>
Address <u>255 South Bailey Road</u> <u>Downington, PA 19335</u>	Location <u>255 South Bailey Road</u> <u>Caln Township</u>
Attention <u>Mr. Jeff Marshall</u> <u>Manager, SHEA</u>	<u>Chester County</u>

This permit is subject to the following conditions:

1. That the source(s) and any associated air cleaning device(s) are to be:
 - a. operated in such manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of the applicable plan approval(s) and operating permit(s); and
 - 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 described above. This permit is valid for a period of 5 years for all sources listed in this operating permit except PTFE Free Flow Process. Upon completion and demonstration of the controls described in plan approval PA-15-0009, the company shall apply for a revised operating permit to include PTFE Free Flow Process.

(SEE THE ATTACHED ADDITIONAL CONDITIONS)

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 10/03/95

Expires 09/28/2000

Richard L. Ruhl
RICHARD L. RUHL
Acting Air Pollution Control Manager

Central Office
Southeast Regional Office
(KAL)

Compliance Permit Conditions
Application No. CP-15-0009
ICI Fluoropolymers

Conditions (continued):

2. This RACT Compliance Permit is for the application of surfactant technology (alternative wetting agent (propoxy propoxy butanol) on or before December 31, 1995 on Poly Tetra Fluoro Ethylene (PTFE) free flow processes at the ICI fluoropolymers, Caln Township, Chester County.
3. The emission limits for volatile organic compounds (VOC) for the below listed sources at this facility are as follows:

<u>Source</u>	<u>VOC Emissions</u>	
	<u>Throughput Potential (TPY)</u>	<u>Emissions Potential (TPY)</u>
PTFE Free Flow Process	2476	53
PTFE Semi-Works Process	3.6	<0.1
Melt Extrusion Process	776	<1.06
Laboratory Operation	1.025	<1.1
Baking Ovens	11.9	<0.1
Safety Clean Parts Cleaners(3)	--	0.5
TOTAL	3269	54.5

4. The company shall not use vacuum ovens after December 31, 1995.
5. ICI Fluoropolymers shall restrict the total VOC content of each batch of PTFE free flow process production to no more than 4.28% by weight and to an annual average VOC content to 2.14% or less by weight.
6. This permit is issued for the purpose of authorizing operation of the source(s) between May 31, 1995 and the date by which implementation and operation of RACT shall be completed by December 31, 1995.
7. 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, this 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.
8. In the event that the permittee is prevented from complying in a timely manner with any interim time limit imposed in this permit solely because of a strike, fire, flood, act of God, or other circumstances entirely beyond the permittee's control and which permittee, by the exercise of all reasonable diligence, is unable to prevent, or mitigate, then the permittee may request an extension of time from the Department.

Compliance Permit Conditions
Application No. CP-15-0009
ICI Fluoropolymers

Conditions (continued):

The permittee shall only be entitled to the benefits of this paragraph if it notifies the Department within five (5) days by telephone and within ten (10) days in writing of the date it becomes aware or reasonably should have become aware of the event impending performance. The written submission shall include all related documentation, as well as a notarized affidavit from a responsible corporate official specifying the reasons for the delay, the expected duration of the delay, and the efforts which have been made.

9. PTFE free flow process sources shall have calculated and recorded daily for the following parameters.
 - . flow rate/velocity
 - . temperature
 - . VOC content
 - . percent moisture
 - . emission rate
10. All sources and monitoring, sampling and testing equipment shall be maintained and operated according to manufacturer's specifications. The sources shall also be operated and maintained in accordance with good air pollution control practices.
11. Calculation shall be done in a manner consistent with the methodology used, and approved by the Department, in developing the facility emission inventory.
12. The Company must perform calculations on VOCs sources to show compliance with the limits of Condition No. 3 above for the VOCs.
13. The company shall keep a record of PTFE process production and the usage of wetting agents. Records required under this permit shall be kept for a period of two (2) years and shall be made available to the Department upon request.
14. Company shall install surfactant technology (wetting agent - propoxy propoxy butanol) by December 31, 1995.
- ~~15. 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.~~
16. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated

Compliance Permit Conditions
Application No. CP-15-0009
ICI Fluoropolymers

Conditions (continued):

~~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.~~

- ~~17. The expiration date shown on the Plan Approval is for state purposes. For Federal enforcement purposes the Plan Approval shall remain in effect, as part of the State Implementation Plan until repealed pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency.~~

(15-1.KAL)

Plan Approval Conditions
Application No. PA-15-0009
ICI Fluoropolymers

Conditions (continued):

2. This RACT plan approval is for the implementation of surfactant technology (alternative wetting agent - propoxy propoxy butanol) on or before December 31, 1995 on the Poly Tetra Fluoro Ethylene (PTFE) free flow processes at ICI fluoropolymers, Caln Township, Chester County.
3. Emission limit for the listed sources at this facility are established as follows:

<u>Source</u>	<u>VOC Emissions</u>	
	<u>Throughput Potential (TPY)</u>	<u>Emissions Potential (TPY)</u>
PTFE Free Flow Process	2476	53
PTFE Semi-Works Process	3.6	<0.1
Melt Extrusion Process	776	<1.06
Laboratory Operation	1.025	<1.1
Baking Ovens	11.9	<0.1
Safety Clean Parts Cleaners(3)	--	0.5
TOTAL	3269	54.5

- ~~4. The company shall not use vacuum ovens after December 31, 1995.~~
5. ICI Fluoropolymers shall restrict the total VOC content of each batch of PTFE free flow process product to no more than 4.28% by weight and to an annual average VOC content of 2.14% or less by weight.
6. PTFE free flow process sources shall be monitored daily for the following parameters.
 - . flow rate/velocity
 - . temperature
 - . VOC content
 - . percent moisture
 - . emission rate
7. All sources and monitoring, sampling and testing equipment shall be maintained and operated according to manufacturer's specifications. The sources shall also be operated and maintained in accordance with good air pollution control practices.
8. Calculation shall be done in a manner consistent with the methodology used and approved by the Department, in developing the facility emission inventory.

Plan Approval Conditions
Application No. PA-15-0009
ICI Fluoropolymers

Conditions (continued):

9. Company shall keep a record of PTFE free flow process production and the usage of wetting agent. Records required under this Plan Approval shall be kept for a period of two (2) years and shall be made available to the Department upon request.
10. Company shall install surfactant technology (wetting agent - propoxy propoxy butanol) by December 31, 1995.
- ~~11. 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.~~
- ~~12. 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.~~
13. This Plan Approval shall become enforceable by the Environmental Protection Agency upon its approval of the above as a revision to the EPA PA State Implementation Plan.
- ~~14. The expiration date shown on the Plan Approval is for state purposes. For Federal enforcement purposes the Plan Approval shall remain in effect as part of the State Implementation Plan until repealed pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency.~~
15. This Plan Approval authorizes temporary operation of the source(s) covered by this Plan Approval provided the following conditions are met.
 - ~~A. The Department must receive written notice from the Owner/Operator of the completion of construction and the Operator's intent to commence operation at least five (5) working days prior to the completion of construction. The notice should state when construction will be completed and when Operator expects to commence operation.~~
 - ~~B. Operation is authorized only to facilitate the start-up and shake-down of sources and air cleaning devices, to permit operations pending the~~

Plan Approval Conditions
Application No. PA-15-0009
ICI Fluoropolymers

Conditions (continued):

- issuance of an Operating Permit or to permit the evaluation of the source(s) for compliance with all applicable regulations and requirements.
- C. This condition authorizes temporary operation of the source(s) for a period of 180 days from the date of commencement of operation, provided the Department receives notice from the Owner/Operator pursuant to subpart (a), above.
- D. The Owner/Operator may request an extension if compliance with all applicable regulations and Plan Approval requirements has not been established. The extension request shall be submitted in writing at least 15 days prior to the end of this period of temporary operation and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established.
- E. The notice submitted by the Owner/Operator pursuant to subpart (a), above, prior to the expiration of this Plan Approval, shall modify the plan approval expiration date. The new plan approval expiration date shall be 180 days from the date of the written notice.

(15-SMC)