

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-46-0020</u>	Source(s)	<u>Facility VOC & NOx Sources</u>
Owner	<u>Superior Tube Company</u>	Air	<u></u>
Address	<u>P.O. Box 159</u> <u>3900 Germantown Pike</u> <u>Evansburg, PA 19426-0159</u>	Cleaning	<u></u>
		Device	<u></u>
Attention	<u>Mr. Dennis Hurchalla</u>	Location	<u></u>
	<u>Manager of Manufacturing Services</u>		<u>Lower Providence Township</u>
			<u>Montgomery County</u>

This permit is subject to the following conditions:

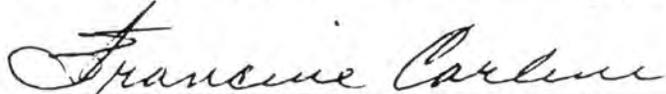
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of the plan approval issued;
 - c. operated and maintained in a manner consistent with good operating and 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 04/17/1998

Expires 04/17/2003-


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (RN)9840-5a

**OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0020
SUPERIOR TUBE COMPANY**

CONDITIONS (continued):

3. This RACT Operating Permit includes Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the CAAA, and, 25 Pa. Code Sections 129.91 through 129.95 for:
- (a) **Vacuum Pickling Process and Pickle Tank** Nos. 6143, 6139, and 6146.
 - (b) **Combustion Sources:** Boiler Nos. 1 & 2, Multiple Retort Annealing Furnace #2, Air Draw Tempering Furnace #237, DX Gas Generator for #3012 Furnace, Annealing Furnace #3042, Selas-Annealing Furnace #3050, Acid Still Heater #6127, and four (4) Space Heaters.
 - (c) **Air Stripping Column** Nos. 3528, 3542, and 3543.
 - (d) **Spray Lubrication Booth** Nos. 1540, 1691, 6720, 1976, and 6779.
 - (e) **Flash and Blowout Booth** Nos. 1603, 1960, and 6868.
 - (f) **Solvent Cleaner Tank** Nos. 1291, 1498, 1369, 6516, 6836, 1731, 1916, and 6169.
 - (g) **Lubrication Dip Tank** Nos. 6876, 6922, and 1205.
 - (h) **Rust Preventile Dip Tank** Nos. 1011 and 1061.
 - (i) **Storage Tank** No. 6825.
 - (j) **Miscellaneous Cleaning** including Bench Cleaning Pots, General Cleaning, and General Mill Wiping.
4. The total volatile organic compound (VOC) and nitrogen oxides (NOx) emissions from the facility shall not exceed 166 and 79.2 tons per year respectively on a 12 month rolling average.
5. Each of the following sources shall be operated with VOC emission rates of no greater than 3 pounds per hour, 15 pounds per day, or 2.7 tons per year on a 12 month rolling average. Storage Tank No. 6825, Boiler Nos. 1 and 2, Multiple Retort Annealing Furnace #2, Air Draw Tempering Furnace #237, DX Generator for # 3012 Furnace, Annealing Furnace #3042, Selas-Annealing Furnace #3050, Acid Still Heater #6127, Four (4) Space Heaters, Air Stripping Column Nos. 3528, 3542, and 3543.
6. The following table specifies the source specific emission limits:

NOx emission limit on 12-month rolling basis

Source Description	NOx limit on 12 month rolling basis
Pickle Tank No. 6143	
Pickle Tank No. 6139	
Pickle Tank No. 6146	Total of three tanks 4.5 TPY

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CONDITIONS (continued):

VOC emission limit on 12-month rolling basis

Source Description	VOC limit on 12 month rolling basis
Spray Lubrication Booth No. 1540	6.4 TPY
Spray Lubrication Booth No. 1691	6.0 TPY
Spray Lubrication Booth No. 6720	6.9 TPY
Spray Lubrication Booth No. 6779	5.7 TPY
Flash and Blowout No. 1603	7.2 TPY
Flash and Blowout No. 1960	4.1 TPY
Solvent Cleaner No. 6836	2.9 TPY
Lubrication Dip Tank No. 6876	11.5 TPY
Lubrication Dip Tank No. 6922	2.9 TPY
Lubrication Dip Tank No. 1205	16.3 TPY
Bench Cleaning Pots	5.0 TPY
General Cleaning	13.8 TPY
Rust Preventile Dip Tank No. 1011	4.1 TPY

7. Solvent cleaner Nos. 1291 and 1369 shall operate in compliance with 25 Pa. Code Section 129.63.
8. VOC RACT for the following sources is maintenance and operation in accordance with manufacturer's specifications and good air pollution control practices:
 - a) All the spray lubrication booths.
 - b) Solvent cleaner Nos. 1498, 6516, 6836, 1731, 1916, and 6169.
 - c) All the flash and blowout units.
 - d) All the lubrication dip tanks.
 - e) Two (2) rust preventile dip tanks.
9. VOC RACT for general cleaning, general mill wiping, and bench cleaning pots is operation in accordance with good air pollution control practices.
10. NOx RACT for Boiler No. 1 shall be annual tune up in accordance with 25 Pa. Code Section 129.93(b)(2).
11. In accordance with 25 Pa. Code Section 129.93(c), NOx RACT for Boiler #2, Multiple Retort Annealing Furnace #2, Air Draw Tempering Furnace #237, DX Gas Generator for #3012 Furnace, Annealing Furnace #3042, Selas-Annealing Furnace #3050, Acid Still Heater #6127 and four (4) Space Heaters shall be maintenance and operation in accordance with manufacturers specifications and good air pollution control practices.

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CONDITIONS (continued):

12. NO_x RACT for the vacuum pickling process and three (3) pickling tanks shall be operation and maintenance in accordance with manufacturer's specifications and good air pollution control practices.
13. All lids from drums and containers containing volatile organic compounds shall be kept closed except when the contents are being transferred.
14. Any spills of solvents shall be cleaned up as soon as possible.
15. Superior Tube Company shall implement an employee training program for all new and existing personnel involved in cleaning operations. This training shall address steps to reducing VOC usage, the requirements of this operating permit, as well as the requirements of all applicable State and Federal regulations. The training program will include the following:
 1. A list of all personnel by name and job description that are required to be trained;
 2. An outline of the subjects to be covered in the initial and refresher training for each person, or group of personnel;
 3. Lesson plans for courses to be given at the initial and the annual refresher training that include appropriate application techniques for appropriate management of cleanup wastes;
 4. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
16. Company shall maintain records in accordance with the minimum recordkeeping requirements of 25 Pa. Code Section 129.95. At a minimum, this shall include:
 - a. Records shall provide sufficient data and calculations to clearly demonstrate that the requirements of Conditions 4, 5, 6, 8, 10, 11, 12, and 15 are met.
 - b. Data or information required to determine compliance with Conditions 4, 5 and 6 shall be recorded and maintained in a time frame consistent with the averaging period of the requirements.
 - c. Records shall be retained for at least five years and be made available to the Department upon request.
17. ~~The operation of the facility shall not at any time result in the emission of any air contaminants 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.~~

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CONDITIONS (continued):

- ~~18. The company shall within an hour of occurrence notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants 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.~~
- ~~19. The expiration date shown on this RACT Operating Permit is for State purposes. For Federal Enforcement purposes the RACT provisions of this 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 US Environmental Protection Agency (EPA).~~
- ~~20. If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Protection) of the aforementioned air contamination source(s), the operation and use of which is authorized by this permit, or causes, permits and allows any modifications, malfunction or removal of any air pollution control device required as a condition of this permit, then and in that event, this permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).~~
- ~~21. The aforementioned source(s) may be operated and used only so long as any associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s) and the RACT application (as approved by the Department), and in accordance with any conditions set forth herein.~~
- ~~22. If at any time it is determined that the operation of the aforementioned source(s) is causing the emission of visible air contaminants in excess of the limitations specified in Section 123.41, or malodorous air contaminants in excess of the limitations specified in Section 123.31 of Article III of the Rules and Regulations of the Department of Environmental Protection, and is causing the emission of these contaminants or any other type of air contaminant in excess of the limitations specified in this permit and specified in, or established pursuant to, any other applicable rule or regulation contained in Article III, the owner shall take immediate steps, including the installation of additional air cleaning device(s), if necessary, to reduce the air contaminant emissions to within the applicable limitations.~~
- ~~23. 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~~

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CONDITIONS (continued):

with any restrictions or limitations established by the Department at such time as it notifies the company that testing required.

- ~~24.~~ This operating permit is valid for a limited period of time and may be renewed before its expiration. Requests for an operating permit renewal must be in writing and must be accompanied by the appropriate permit application processing and annual permit administration fees as specified in Section 127.703 of the Rules and Regulations of the Department of Environmental Protection. These fees shall be paid in the form of a check payable to the "Commonwealth of Pennsylvania-Clean Air Fund." The request should be made using the appropriate application form and must be received by the Department along with a completed Air Pollution Control Act Compliance Review form no later than 60 days prior to the expiration date of this permit.

All necessary forms can be obtained from the Department upon request.

- ~~25.~~ Any notification required as a result of any condition herein should be directed to:

Regional Air Quality Manager
Pennsylvania Department of Environmental Protection
Suite 6010
Lee Park, 555 North Lane
Conshohocken, PA 19428

Re 30 (RN)9840-5b