

City of Philadelphia  
Department of Public Health  
Air Management Services

**Southeastern Pennsylvania Transportation Authority  
(SEPTA)  
Roberts Complex**

Roberts Train Yard  
341-342 Roberts Avenue  
Philadelphia, PA 19140

Midvale Bus Facility  
4301 Wissahickon Avenue  
Philadelphia, PA 19129

Liberty Yard  
4400 Clarissa Street  
Philadelphia, PA 19140

**Synthetic Minor Operating Permit No. OP17-000024**

Issuance Date: **XXXXX**  
Effective Date: **XXXXXX**  
Expiration Date: **XXXXXX**

**DRAFT 3/8/2023**

- \* Updated Section A to update the permit contact and responsible official.
- \* Updated Table A1 to update formatting, remove the welder engine, add the CHP units, update the rated capacity of Boiler Nos. 7 and 8, update the gasoline dispensing facility, and add Source ID for insignificant combustion units and emergency generators.
- \* Updated the Process Flow Diagram to be consistent with Table A1.
- \* Updated Sections B and C to current AMS version.
- \* Removed the references to welding engine in Section D.
- \* Added Condition D.1.(a)(2) to add the facility-wide VOC emission limit for compliance with the SMOP limit.
- \* Added Condition D.1.(a)(3) to add the facility-wide CO emission limit.
- \* Removed Condition D.1.(b)(3) for Best Available Technology requirement for the Boiler Nos. 7 and 8 since the boilers have been derated to less than 10 MMBTU/hr and the BAT limits do not apply.
- \* Added the requirements for the CHP units in Sections D.1.(d), D.2.(d), D.3.(e)-(g), D.4.(d), and D.5.(d).
- \* Updated the requirements of 25 Pa. Code §129.201-205 for the emergency generator and added them for the CHP units in Conditions D.1.(c)(3), D.1.(d)(9), D.2.(c)(2), and D.2.(d)(7).
- \* Added Condition D.1.(g)(3) for the toxic air contaminant requirement for the spray booth.
- \* Added Section D.2.(a) for the facility-wide fuel usage limits and work standards for compliance with the SMOP limit.
- \* Added Conditions D.2.(c)(1)(i), D.2.(c)(3)(i), D.2.(d)(1) & D.2.(e)(1), and updated Condition D.2.(b)(1) to specify installation, maintenance, and operating requirements.
- \* Updated Condition D.2.(b)(2) to specify the fuel type for each external combustion unit.
- \* Added Condition D.2.(b)(3) and updated Condition D.2.(b)(4) for the 40 CFR 63 Subpart JJJJJ requirements and added COMB-07 and COMB-08 in the Conditions. Removed the Condition in the previous SMOP No. S12-019 regarding exemption of COMB-07 and COMB-08 from 40 CFR 63 Subpart JJJJJ.
- \* Updated Condition D.2.(b)(5) to specify the boilers that require visual inspection while burning No. 2 oil.
- \* Updated the maximum allowable operating hours for the emergency generator in Condition D.2.(c)(1)(iii).
- \* Updated Conditions D.2.(c)(1)(iv) for the emergency generator to update the definition of emergencies and allowable hours for testing, tuning, and maintenance.
- \* Updated Condition D.2.(c)(1)(v) for the emergency generator to update the links to check AQI forecast.

- \* Removed the sound and vibration level requirement of the previous SMOP since the Conditions are not related to air emission; however, the facility still needs to comply with the requirements.
- \* Updated the operating hour limit for the air compressor AC-01 in Condition D.2.(c)(3)(iii).
- \* Added Condition D.2.(d)(6) and D.3.(e)(1) to add the requirement to establish an SCR urea flow to engine load map for each CHP unit to determine the urea injection rate for the SCR at various engine loads.
- \* Added work practice standards, monitoring requirements, and recordkeeping requirements for the insignificant sources in Sections D.2.(j), D.4.(h), and D.5.(h).
- \* In Condition D.3.(b)(2)(i), specified that compliance with PM emission limit of 25 Pa Code §123.13(c)(1)(i) shall be based on method 5 only.
- \* Updated the monitoring and recordkeeping requirements in Sections D.4 and D.5.
- \* Added Conditions D.4.(a)(1)(i)-(ii) and D.5.(a)(1)(i)-(ii) to specify the calculation method, monitoring, and recordkeeping requirements to verify compliance with the SMOP limit for NO<sub>x</sub> and VOC, and CO emission limits.
- \* Added Conditions D.4.(a)(2) and D.5.(a)(2) to specify monitoring, and recordkeeping requirements to verify compliance with the facility-wide fuel usage limits.
- \* Added Condition D.4.(b)(6) and D.5.(b)(6) for Boilers COMB-07 and COMB-08 to require monitoring and recording the fuel usage and reason for operating the boilers.
- \* Updated Condition D.5.(b)(9) for the recordkeeping requirements and Condition D.6.(c)(1)(iii)-(v) for reporting requirement of 40 CFR 63 Subpart JJJJJ.
- \* Removed stack test records and fuel certification requirements of 40 CFR 60 Subpart Dc for Boilers COMB-07 and COMB-08 since the boilers are derated and the requirements do not apply.

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City of Philadelphia  
Department of Public Health  
Air Management Services

Effective Date: **XXXXXX**

Expiration Date: **XXXXXX**

Replaces Permit No.: S12-019

**SECTION A. SOURCE IDENTIFICATION**

In accordance with the provisions of the Pennsylvania Code Title 25, Philadelphia Code Title III, and Air Management Regulation (AMR) XIII, the owner or operator (Permittee) identified below is authorized by Philadelphia Air Management Services (AMS) to operate the air emission source(s) listed in Table A-1. This facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the Permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

Facility: SEPTA – Roberts Complex

Owner: Southeastern Pennsylvania Transportation Authority

Location: 341-342 Roberts Avenue, Philadelphia, PA 19140  
4301 Wissahickon Avenue, Philadelphia, PA 19129  
4400 Clarissa Street, Philadelphia, PA 19140

Mailing Address: 1234 Market Street, 6<sup>th</sup> Floor, Philadelphia, PA 19107

SIC Code(s): 4111

Plant ID: 01573

Facility Contact: Bree Cantiello

Phone: (215) 580-7113

Email: bcantiello@septa.org

Permit Contact: Bree Cantiello

Responsible Official: Bree Cantiello

Title: Director Occupational Safety & Environmental Management

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Edward Wiener, Chief of Source Registration

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Date

**TABLE A1-FACILITY INVENTORY LIST****Group 01 – External Combustion Units**

| <b>Source ID</b> | <b>Source Description</b> | <b>Manufacturer</b> | <b>Model No. / Serial No.</b> | <b>Capacity</b>   | <b>Fuel/Material</b>         | <b>Construction Date / (Permit No.)</b> |
|------------------|---------------------------|---------------------|-------------------------------|---|------------------------------|---|
| COMB-01          | Boiler No. 1              | Cleaver-Brooks      | CB500-100                     | 4,184,000 BTU/hr  | No. 2 Fuel Oil               | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-02          | Boiler No. 2              | Cleaver-Brooks      | CB500-200                     | 8,369,000 BTU/hr  | No. 2 Fuel Oil               | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-03          | Boiler No. 3              | Cleaver Brooks      | CB500-200                     | 8,369,000 BTU/hr  | No. 2 Fuel Oil               | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-04          | Boiler No. 4              | H.B. Smith          | Not Available                 | 522,000 BTU/hr  | No. 2 Fuel Oil               | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-05          | Boiler No. 5              | A.O. Smith          | BTP150-720                    | 720,000 BTU/hr  | Natural Gas                  | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-06          | Boiler No. 6              | A.O. Smith          | BTP140-720                    | 720,000 BTU/hr  | Natural Gas                  | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-07          | Boiler No. 7 with FGR     | Kewanee             | K-350-G04-FGR                 | 9,900,000 BTU/hr<br>(derated on 6/2/2016 from original capacity of 11.7 MMBTU/hr) | Natural Gas / No. 2 Fuel Oil | (AMS IP No. 13302 dated 1/29/14)        |
| COMB-08          | Boiler No. 8 with FGR     | Kewanee             | K-350-G04-FGR                 | 9,900,000 BTU/hr<br>(derated on 6/2/2016 from original capacity of 11.7 MMBTU/hr) | Natural Gas / No. 2 Fuel Oil | (AMS IP No. 13303 dated 1/29/14)        |
| COMB-09          | Boiler No. 9              | Smith               | 19 Series - 4                 | 359,000 BTU/hr  | Natural Gas                  | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-10          | Boiler No. 10             | Smith               | 19 Series - 4                 | 359,000 BTU/hr  | Natural Gas                  | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-11          | Pressure Washer           | Hotsy               | 5732                          | 657,000 BTU/hr  | Natural Gas                  | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-12          | Space Heater No. 1        | Reznor              | B400-S-E                      | 400,000 BTU/hr  | Natural Gas                  | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-13          | Space Heater No. 2        | Reznor              | B400-S-E                      | 400,000 BTU/hr  | Natural Gas                  | (AMS PA No. 11035 dated 2/3/2012)       |
| COMB-14          | Space Heater No. 3        | Reznor              | B400-S-E                      | 400,000 BTU/hr  | Natural Gas                  | (AMS PA No. 11035 dated 2/3/2012)       |

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|         |                    |            |          |                  |             |                                   |
|---------|--------------------|------------|----------|------------------|-------------|-----------------------------------|
| COMB-15 | Space Heater No. 4 | Reznor     | B400-S-E | 400,000 BTU/hr   | Natural Gas | (AMS PA No. 11035 dated 2/3/2012) |
| COMB-16 | Space Heater No. 5 | Reznor     | B400-S-E | 400,000 BTU/hr   | Natural Gas | (AMS PA No. 11035 dated 2/3/2012) |
| COMB-17 | Space Heater No. 6 | Reznor     | B400-S-E | 400,000 BTU/hr   | Natural Gas | (AMS PA No. 11035 dated 2/3/2012) |
| CU-SB   | Spray Booth Burner | Infratherm |          | 1,771,000 Btu/hr | Natural Gas | (AMS PA No. 11035 dated 2/3/2012) |

**Emission Points or Stacks**

| Source ID | Source Description                         |
|-----------|--|
| CSTAC-01  | Combustion Stack 1 for COMB-01             |
| CSTAC-02  | Combustion Stack 2 for COMB-02 and COMB-03 |
| CSTAC-04  | Combustion Stack 4 for COMB-04             |
| CSTAC-05  | Combustion Stack 5 for COMB-05 and COMB-06 |
| CSTAC-07  | Combustion Stack 7 for COMB-07             |
| CSTAC-08  | Combustion Stack 8 for COMB-08             |
| CSTAC-09  | Combustion Stack 9 for COMB-09 and COMB-10 |
| CSTAC-11  | Combustion Stack 11 for COMB-11            |
| CSTAC-12  | Combustion Stack 12 for COMB-12            |
| CSTAC-13  | Combustion Stack 13 for COMB-13            |
| CSTAC-14  | Combustion Stack 14 for COMB-14            |
| CSTAC-15  | Combustion Stack 15 for COMB-15            |
| CSTAC-16  | Combustion Stack 16 for COMB-16            |
| CSTAC-17  | Combustion Stack 17 for COMB-17            |

**Group 02 – Emergency Generator, Air Compressor, and Sand Blasting Operations**

| Source ID | Source Description                          | Manufacturer             | Model No. / Serial No. | Capacity  | Fuel / Material | Construction Date / (Permit No.)  |
|-----------|---|--------------------------|------------------------|---|-----------------|-----------------------------------|
| EG-01     | Emergency generator                         | CAT<br>(1996 Model Year) | 3512                   | 10.150 MMBTU/hr<br>(2974.7 kW)<br>(74.1 gal/hr) | Diesel          | (AMS PA No. 11035 dated 2/3/2012) |
| AC-01     | Air compressor for sand blasting operations | Ingersoll Rand           | P260WIR                | 79 HP<br>(4.59 gal/hr)                          | Diesel          | (AMS PA No. 11035 dated 2/3/2012) |
| BLAST-01  | Sand Blasting                               |                          |                        |   | Sand Blasting   | (AMS PA No. 11035)                |

|                                  |                           |  |  |  |          |                 |
|----------------------------------|---------------------------|--|--|--|----------|-----------------|
|                                  | Operation                 |  |  |  | Material | dated 2/3/2012) |
| <b>Emission Points or Stacks</b> |                           |  |  |  |          |                 |
| <b>Source ID</b>                 | <b>Source Description</b> |  |  |  |          |                 |
| EGSTAC-01                        | Emergency Generator Stack |  |  |  |          |                 |

**Group 03 – Combined Heat and Power Units (CHP)**

| Source ID                        | Source Description  | Manufacturer | Model No. / Serial No. | Capacity | Fuel / Material                  | Construction Date / (Permit No.)   |
|----------------------------------|---|--------------|------------------------|----------|----------------------------------|--|
| G-01                             | CHP Generator Unit with Steuler SCR (urea injection) and Oxidation Catalyst (OC) System | GE Jenbacher | JMS624H01 / 1322303    | 6,113 HP | Natural Gas (4-Stroke Lean Burn) | (AMS PA No. IP17-000009 dated 11/29/2017 and extended under IP19-000384 dated 5/15/2019, IP19-000699 dated 10/24/2019, IP20-000497 dated 10/16/2020, and IP21-001007 dated 11/18/2021) |
| G-02                             | CHP Generator Unit with Steuler SCR (urea injection) and Oxidation Catalyst (OC) System | GE Jenbacher | JMS624H01 / 1322313    | 6,113 HP | Natural Gas (4-Stroke Lean Burn) | (AMS PA No. IP17-000009 dated 11/29/2017 and extended under IP19-000384 dated 5/15/2019, IP19-000699 dated 10/24/2019, IP20-000497 dated 10/16/2020, and IP21-001007 dated 11/18/2021) |
| <b>Emission Points or Stacks</b> |   |              |                        |          |                                  |  |
| <b>Source ID</b>                 | <b>Source Description</b>   |              |                        |          |                                  |  |
| GSTAC-01                         | CHP Generator G-01 Stack  |              |                        |          |                                  |  |
| GSTAC-02                         | CHP Generator G-02 Stack  |              |                        |          |                                  |  |

**Group 04 – Gasoline Tank (Gasoline Dispensing Facility)**

| Source ID                        | Source Description                        | Manufacturer | Model No     | Capacity                      | Fuel / Material | Construction Date / (Permit No.) |
|----------------------------------|---|--------------|--------------|-------------------------------|-----------------|----------------------------------|
| GDF-01                           | Gas Dispensing Facility with 2 dispensers | Gasboy       | Atlas #9153K | 10,000 gallons (Storage Tank) | Gasoline        | 2022                             |
| <b>Emission Points or Stacks</b> |   |              |              |                               |                 |                                  |
| <b>Source ID</b>                 | <b>Source Description</b>                 |              |              |                               |                 |                                  |
| GTSTAC-01                        | Gasoline Tank Stack                       |              |              |                               |                 |                                  |



**Group 05 – Part Washers – Degreasers**

| Source ID | Source Description   | Manufacturer | Model No | Capacity | Fuel / Material | Construction Date / (Permit No.)  |
|-----------|--|--------------|----------|----------|-----------------|-----------------------------------|
| PW-01     | Five (5) Parts Washers / Degreasers (cold cleaning machines) |              |          |          |                 | (AMS PA No. 11035 dated 2/3/2012) |

**Group 06 – Spray Paint Booth**

| Source ID | Source Description                                      | Manufacturer            | Model No | Capacity | Fuel / Material | Construction Date / (Permit No.)  |
|-----------|---|-------------------------|----------|----------|-----------------|-----------------------------------|
| SB-01     | Spray booth for mobile equipment repair and refinishing | Binks Sames Corporation |          |          |                 | (AMS PA No. 11035 dated 2/3/2012) |

| Emission Points or Stacks |                   |
|---------------------------|-------------------|
| Source ID                 | Source ID         |
| SBSTAC-01                 | Spray Booth Stack |

**Group 07 –Windshield Washer Fluid Storage Tank**

| Source ID | Source Description                 | Manufacturer | Model No | Capacity      | Fuel / Material | Construction Date / (Permit No.)  |
|-----------|------------------------------------|--------------|----------|---------------|-----------------|-----------------------------------|
| TANK-01   | Windshield Washer Fluid (WWF) Tank |              |          | 2,000 gallons |                 | (AMS PA No. 11035 dated 2/3/2012) |

| Emission Points or Stacks |                |
|---------------------------|----------------|
| Source ID                 | Source ID      |
| TSTAC-01                  | WWF Tank Stack |

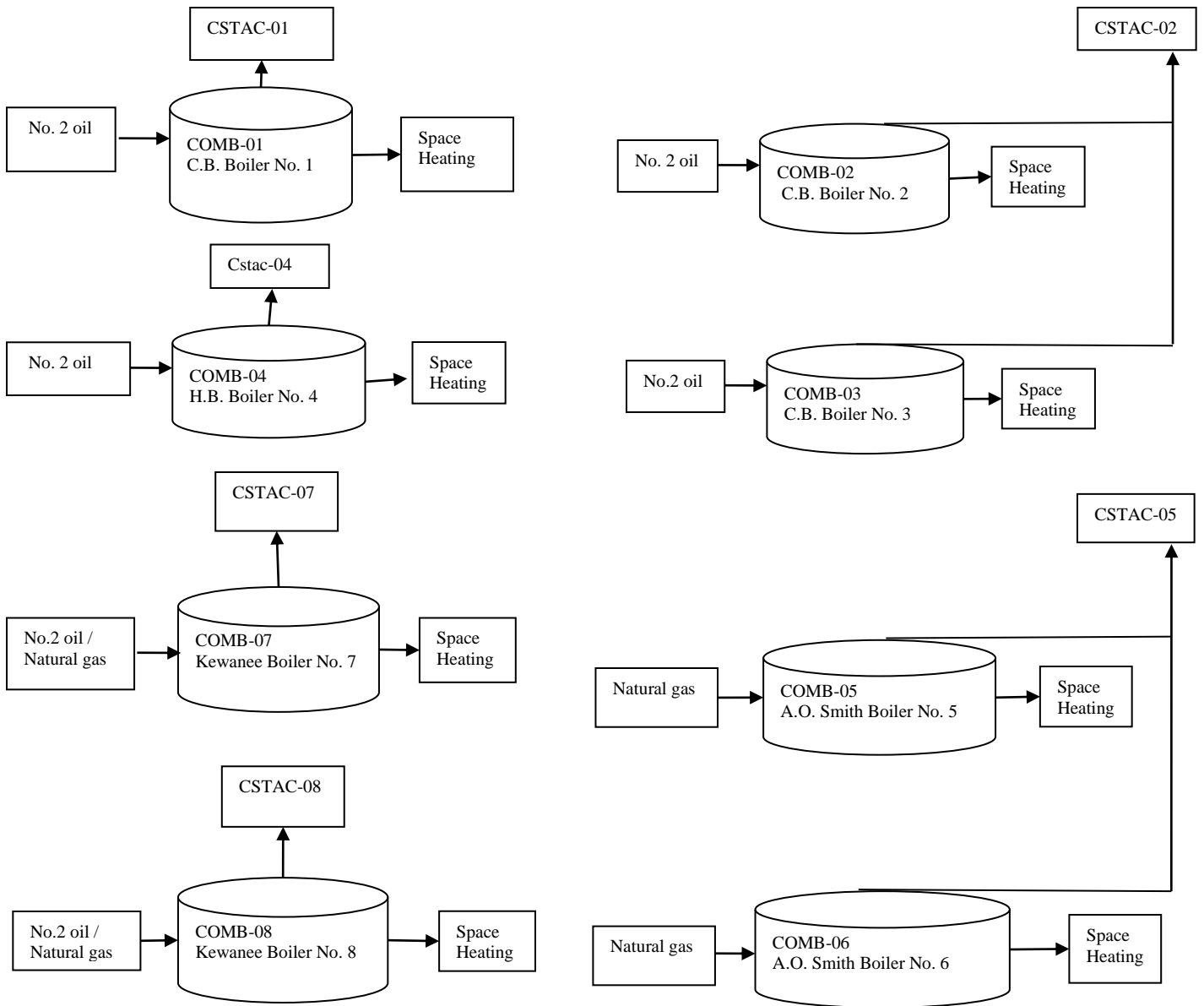
**Group IN – Insignificant Sources**

| Source ID | Source Description                    | Manufacturer | Model No | Capacity            | Fuel/ Material | Construction Date |
|-----------|---------------------------------------|--------------|----------|---------------------|----------------|-------------------|
|           | Motor Oil Storage Tanks               |              |          | 2 - 5,000 gal each  |                |                   |
|           | Auto Transmission Fluid Storage Tanks |              |          | 2 - 5,000 gal each  |                |                   |
|           | Ethylene Glycol Storage Tank          |              |          | 5,000 gal           |                |                   |
|           | Antifreeze Storage Tanks              |              |          | 2 - 5,000 gal each  |                |                   |
|           | Waste Antifreeze Storage Tank         |              |          | 1,000 gal           |                |                   |
|           | Heating Oil Storage Tank              |              |          | 25,000 gal          |                |                   |
|           | Diesel Fuel Storage Tanks             |              |          | 4 - 25,000 gal each |                |                   |

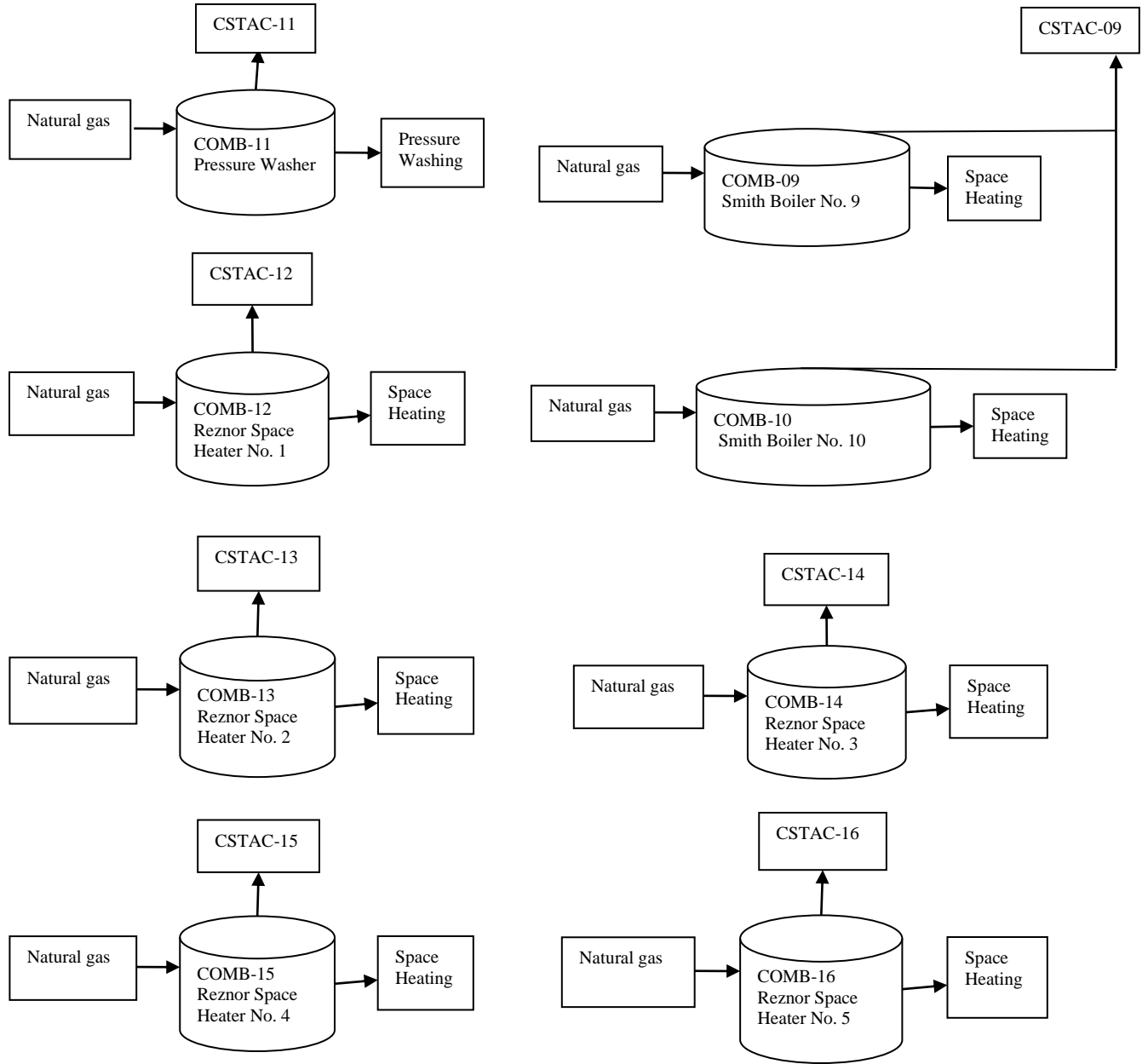
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|              |  |                   |                         |                              |   |  |
|--------------|--|-------------------|-------------------------|------------------------------|---|--|
|              | Waste Oil Storage Tanks  |                   |                         | 1 - 6,000 gal<br>1 - 600 gal |   |  |
|              | Oil/Water Separation Tank No. 1  |                   |                         | 10,000 gal                   |   |  |
|              | Oil/Water Separation Tank No. 2  |                   |                         | 2,500 gal                    |   |  |
|              | Diesel Fuel Storage Tank   |                   |                         | 6,000 gal                    |   |  |
|              | Heating Oil Storage Tank   |                   |                         | 8,000 gal                    |   |  |
|              | Heating Oil Storage Tank   |                   |                         | 15,000 gal                   |   |  |
|              | Heating Oil Storage Tank   |                   |                         | 2,000 gal                    |   |  |
|              | Heating Oil Storage Tanks  |                   |                         | 2 - 500 gal each             |   |  |
|              | Bus Maintenance Control Device<br>(Cyclone followed by baghouse –<br>vented indoors) |                   |                         |                              |   |  |
| IS-1         | Boiler   | Hydrotherm        |                         | 0.103 MMBTU/hr               | No. 2 Fuel<br>Oil                       |  |
| IS-2         | Boiler   | Bradford<br>White |                         | 0.105 MMBTU/hr               | No. 2 Fuel<br>Oil                       |  |
| IS-3         | Boiler   | A.O. Smith        |                         | 0.120 MMBTU/hr               | Natural Gas                             |  |
| IS-4 – IS-12 | Nine (9) Space Heaters   | Reznor            |                         | 0.118 MMBTU/hr<br>each       | No. 2 Fuel<br>Oil                       |  |
| IS-13        | Emergency Generator  | Caterpillar       |                         | 48 HP                        | Natural Gas                             |  |
| IS-14        | Emergency Generator  | Kohler            | CSG-<br>6491-<br>6005-F | 39 KW                        | Liquid<br>Petroleum<br>Gas /<br>Propane |  |

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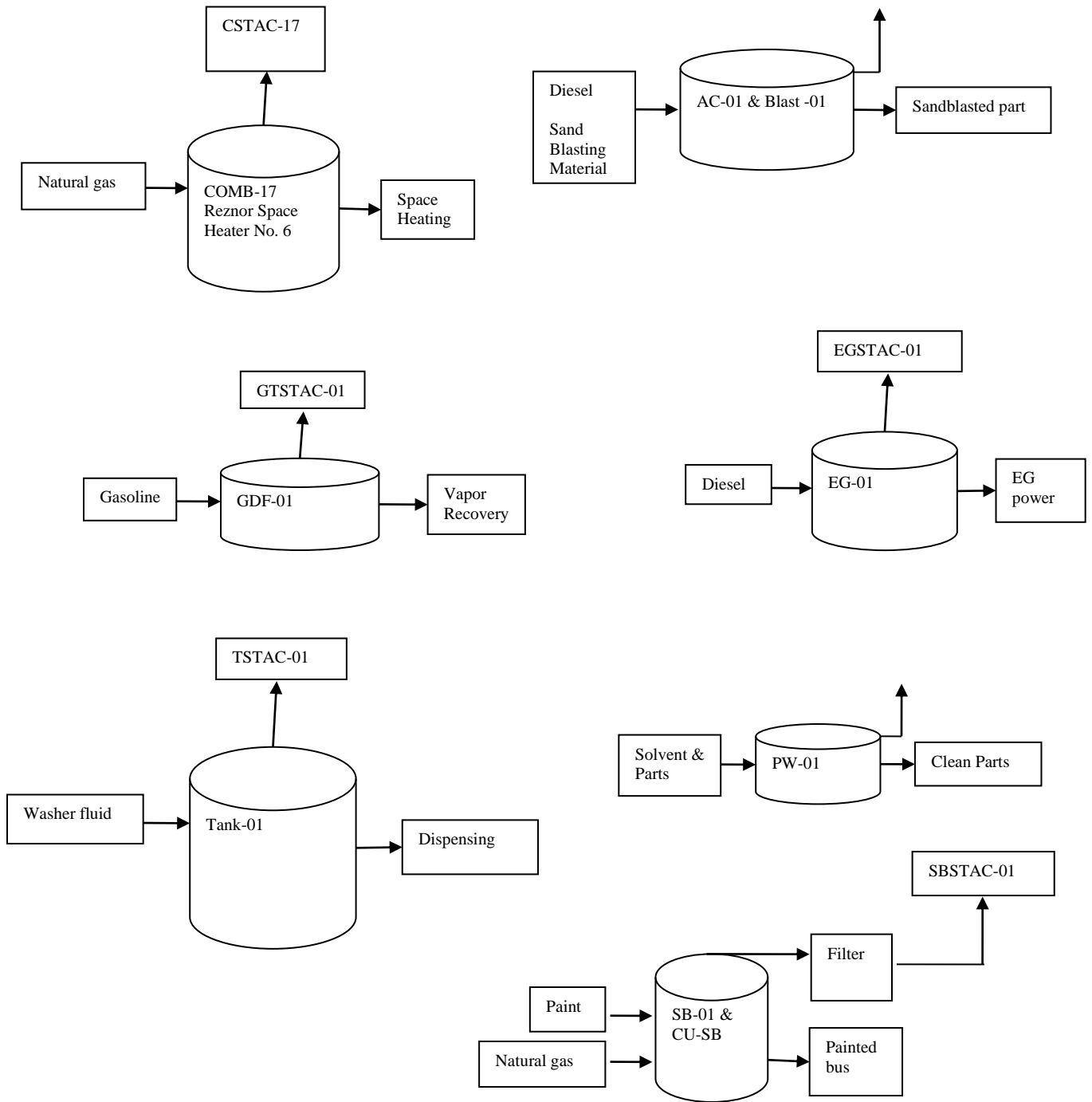


PROCESS FLOW DIAGRAM FOR SEPTA – ROBERTS COMPLEX

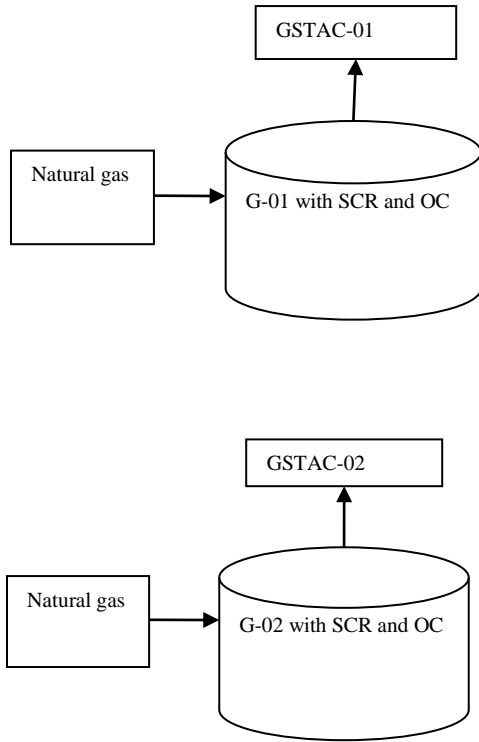


PROCESS FLOW DIAGRAM FOR SEPTA – ROBERTS COMPLEX

SEPTA – Roberts Complex –DRAFT Synthetic Minor Operating Permit



PROCESS FLOW DIAGRAM FOR SEPTA – ROBERTS COMPLEX



PROCESS FLOW DIAGRAM FOR SEPTA – ROBERTS COMPLEX

## **SECTION B. GENERAL CONDITIONS**

### **1. Definitions**

[25 Pa Code §121.1]

Words and terms used in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. §4003) and in 25 Pa Code §121.1, unless the context clearly indicates otherwise.

### **2. Prohibition of Pollution**

[25 Pa. Code § 121.7 & Phila. Code § 3-201(a)(1)-(3)]

(a) No person shall discharge, or allow the escape of air contaminants to the atmosphere:

- (1) Which are prohibited by or are in excess of those permitted by this Code or by the regulations of the Air Pollution Control Board; or
- (2) Which exceed the density or opacity limits established by the Board; or
- (3) Which result in or cause air pollution or an air pollution nuisance as defined in the Pennsylvania Air Pollution Control Act or Air Management Code.

### **3. Permit Expiration**

[25 Pa Code §127.446]

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on page 4 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the Permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa Code §127, Subchapter I and AMS is unable, through no fault of the Permittee, to issue or deny a new permit before the expiration of the previous permit.

### **4. Permit Renewal**

[25 Pa Code §§127.412, 127.413, 127.414, 127.446, 127.703(b) & (c)]

- (a) The Permittee shall submit a complete application for renewal of the operating permit at least 6 months and not more than 18 months before the expiration date of this permit.
- (b) The application for renewal shall include the current permit number, description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. The application should be sent to the Chief of Source Registration. A complete application includes the submission of supplemental compliance review forms in accordance with 25 Pa Code §127.412(b) or (c).
- (c) The Permittee shall submit with the renewal application a fee to AMS as specified in 25 Pa Code §127.703(b)(2). The applicable fees shall be made payable to the

“City of Philadelphia” or paid online through City’s web portal at [www.citizenserve.com/philadelphia](http://www.citizenserve.com/philadelphia).

- (1) Two thousand one hundred dollars (\$2,100) for applications filed during calendar years 2021—2025. [25 Pa Code §127.703(b)(2)(ii)]
- (2) Two thousand six hundred dollars (\$2,600) for applications filed during calendar years 2026—2030. [25 Pa Code §127.703(b)(2)(iii)]
- (3) Three thousand three hundred dollars (\$3,300) for applications filed with calendar years beginning with 2031. [25 Pa Code §127.703(b)(2)(iv)]
- (d) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (e) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a permit.

## 5. Fee Payment

[25 Pa Code §§127.702, 127.703, and Phila. Code §3-307]

- (a) The Permittee shall pay fees to AMS in accordance with the applicable fee schedules in 25 Pa Code §127 Subchapter I (relating to plan approval and operating permit fees) or in Philadelphia Code §3-307 (relating to installation permit).
- (b) The Permittee shall pay the annual operating permit maintenance fee to AMS according to the following fee schedule in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year.
  - (1) Four thousand dollars (\$4,000) for calendar years 2021—2025. [25 Pa. Code § 127.703(d)(2)(i)]
  - (2) Five thousand dollars (\$5,000) for calendar years 2026—2030. [25 Pa. Code § 127.703(d)(2)(ii)]
  - (3) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031. [25 Pa. Code § 127.703(d)(2)(iii)]
- (c) The applicable fees shall be made payable to the “City of Philadelphia” or paid online through City’s web portal at [www.citizenserve.com/philadelphia](http://www.citizenserve.com/philadelphia).

## 6. Transfer of Ownership or Operation

[25 Pa Code §§127.464, 127.450(a)(4) and AMR I Sec. II.A]

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of ownership which are documented and approved by AMS.
- (b) In accordance with 25 Pa Code §127.450(a)(4) a change in ownership of the source shall be treated as an administrative amendment if



- (1) AMS determines that no other change in the permit is required,
  - (2) a written agreement has been submitted to AMS identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new Permittee, and
  - (3) a compliance review form has been submitted to and the permit transfer has been approved by AMS.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

## 7. Inspection and Entry

[25 Pa Code §127.441, 35 P.S. §4008 and Phila. Code §3-304]

- (a) Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow AMS or authorized representatives of AMS to perform the following:
- (1) Enter at reasonable times upon the Permittee's premises where an operating permit facility or activity is located or conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy or remove, at reasonable times any records that must be kept under the conditions of this permit.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
  - (4) Sample or monitor at reasonable time, any substances or parameters at any location, during operating hours, for the purpose of assuring permit compliance or as otherwise authorized by the Clean Air Act, the Air Pollution Control Act, the Philadelphia Air Management Code, and the regulations promulgated thereunder.
- (b) Pursuant to 35 P.S. §4008, no person shall hinder, obstruct, prevent, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee in accordance with Section 114 or other applicable provision of the Clean Air Act.

## 8. Compliance Requirements

[25 Pa Code §§127.441, 127.444 and A

MR I Sec. II]

- (a) The Permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act, Pennsylvania Air Pollution Control Act, and Philadelphia Air Management Code. A violation of any condition of this permit is grounds for one or more of the following:

- (1) Enforcement action.
  - (2) Permit termination, revocation and reissuance or modification.
  - (3) Denial of permit renewal.
- (b) The Permittee may not cause or permit the operation of the source(s) described in this permit unless the source(s) and all associated air cleaning devices are operated and maintained in accordance with specifications in any related plan approval application and the conditions of the plan approvals and operating permits issued by AMS. A Permittee may not cause or permit the operation of an air contamination source subject to 25 Pa Code §127 and Air Management Code in a manner inconsistent with good operating practice
- (c). For purposes of Sub-condition 8(b) above of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which AMS determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the Permittee.

## 9. Need to Halt or Reduce Activity Not A Defense

[25 Pa Code §127.441]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

## 10. Duty to Provide Information

[25 Pa Code §§127.411(d), 127.442(a), AMR I Sec. II.B]

- (a) The Permittee shall furnish AMS, within a reasonable time, any information that AMS may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.
- (b) Upon request, the Permittee shall also furnish AMS copies of required records, or for information claimed to be confidential, the Permittee may furnish such records along with any claim of confidentiality.

## 11. Revising the Operating Permit for Cause

[25 Pa Code §127.461]

This permit may be terminated, modified, suspended, or revoked and reissued if one or more of the following applies:

- (a) The Permittee constructs or operates a source subject to the operating permit so that it is in violation of the Air Management Code, the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, plan approval, a permit or in a manner that causes air pollution.

- (b) The Permittee fails to properly maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (c) The Permittee fails to submit a report required by the operating permit or an applicable regulation.
- (d) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

## 12. Permit Revisions

[25 Pa Code §§127.450 & 127.462]

- (a) The Permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications under this permit, as outlined below:
- (b) The Permittee shall make administrative operating permit amendments, as defined in §127.450(a), according to the procedures specified in §127.450 unless precluded by the Clean Air Act or its regulations.
- (c) The Permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450.
- (d) For minor operating permit modifications, the Permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462
- (e) For significant operating permit modifications, the permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.
- (f) The applicable fees shall be made payable to the “City of Philadelphia” or paid online through City’s web portal at [www.citizenserve.com/philadelphia](http://www.citizenserve.com/philadelphia).

## 13. Severability

[25 Pa Code §127.441]

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

## 14. De Minimis Emissions Increases

[25 Pa Code §§127.14(b), 127.449 and Phila. Code §3-306]

- (a) The Permittee shall provide AMS with a written notice seven (7) days prior to commencing any de minimis emission increase. The notice shall:
  - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis increase.
  - (2) Provide emission rates in tons/year and in terms necessary to establish compliance consistent with any applicable requirement.
  - (3) Certify the de minimis increase does not exceed the Permittee’s emissions cap or the synthetic minor operating permit status.

AMS may disapprove or condition the de minimis emission increase at any time.

- (b) Except as provided below in (c), the Permittee is authorized to make the following de minimis emission increases up to the following amounts (expressed in tons per year):
  - (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
  - (2) One ton of NO<sub>x</sub> from a single source during the term of the permit and five tons of NO<sub>x</sub> at the facility during the term of the permit.
  - (3) One and six-tenths tons of oxides of sulfur from a single source during the term of the permit and eight tons of oxides of sulfur at the facility during the term of the permit.
  - (4) Six-tenths of a ton of PM-10 from a single source during the term of the permit and three tons of PM-10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, or 25 Pa Code Article III.
  - (5) One ton of VOCs from a single source during the term of the permit and five tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, or 25 Pa Code Article III.
- (c) The Permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:
  - (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 250,000 or less Btu per hour of net load rating.
  - (3) Laboratory equipment used exclusively for chemical or physical analysis.
  - (4) Other sources and classes of sources determined to be of minor significance by the Department...
- (d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
  - (1) Increase the emissions of the pollutant regulated under section 112 of the clean air act except as authorized in subparagraph (b)(4) & (5) of this permit condition.
  - (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa Code Chapter 127, Subchapter D and/or the new source review requirements in subchapter E.
  - (3) Violate any applicable requirement of the Air Management Code, the Air Pollution Control Act, the Clean Air Act, or the regulation thereunder.
- (e) Emissions authorized under this provision shall be included in the monitoring, recordkeeping, and reporting requirements of this permit.
- (f) The Permittee is authorized to conduct all insignificant activities described in 25 Pa Code §127.14 without applying for a plan approval or operating permit

amendment. A City of Philadelphia Installation Permit is required if the activities are subject to the Philadelphia Air Management Code.

- (g) Except as provided in this permit condition and in the Air Management Code, the Permittee is prohibited from making changes or engaging in activities covered by 25 Pa Code §127.11 that are not specifically allowed or addressed in this permit without first applying for a plan approval or Philadelphia Installation Permit.
- (h) The Permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the source.

## 15. Operational Flexibility

[25 Pa Code §127.3 and AMR I Sec. XII]

The Permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa Code §127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa Code Chapter 127 which implement the operational flexibility requirements include the following:

- (a) Section 127.14 (relating to exemptions)
- (b) Section 127.447 (relating to alternative operating scenarios)
- (c) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (d) Section 127.449 (relating to de minimis emission increases)
- (e) Section 127.450 (relating to administrative operating permit amendments)
- (f) Section 127.462 (relating to minor operating permit amendments)
- (g) Subchapter H (relating to general plan approvals and operating permits)

## 16. Reactivation of Sources

[25 Pa Code §§127.11, 127.11a, 127.215 & AMR I Sec. II.A.5.]

- (a) The Permittee shall notify AMS of any source that is out of operation for more than a year in its annual monitoring report.
- (b) The Permittee may reactivate a source at the facility that has been out of operation or production for at least one (1) year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa Code §§127.11a and 127.215. The reactivated source will not be considered a new source.
- (c) A source which has been out of operation or production for more than five (5) years but less than ten (10) years may be reactivated and will not be considered a new source if the Permittee satisfies the conditions specified in 25 Pa Code §127.11a(b).

## 17. Health Risk-based Emission Standards and Operating Practice Requirements

[25 Pa Code §127.36]

- (a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
- (b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

## 18. Circumvention

[25 Pa Code §121.9 and AMR I Sec. VII]

- (a) The Permittee may not circumvent the plan approval requirements of 25 Pa Code Chapter 127 by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa Code Article III, except that with prior approval of AMS, the device or technique may be used for control of malodors.

## 19. Trading Under Federally Enforceable Emission Caps

[25 Pa Code §127.448]

When a federally enforceable emissions cap exists for the facility, the Permittee may trade increases and decreases in emission between sources with fees at the permitted facility in accordance with 25 Pa Code §127.448.

## 20. Alternative Operating Scenarios

[25 Pa Code §127.447]

The Permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa Code §127.447.

## 21. Property Rights

[25 Pa Code §127.443]

This permit does not convey any property rights of any sort, or any exclusive privileges.

## **SECTION C. FACILITY WIDE**

### **1. Fugitive Emissions**

[25 Pa Code §§123.1, 123.2, and AMR II Sec. VIII]

- (a) The Permittee may not permit the emission into the outdoor atmosphere of a fugitive air contaminant from a source other than the following:
  - (1) Construction, or demolition of buildings or structures.
  - (2) Grading, paving and maintenance of roads and streets.
  - (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from use of roads and streets.
  - (4) Clearing of land.
  - (5) Stockpiling of materials.
  - (6) Sources and classes of sources other than those identified in paragraphs 1(a)(1)-1(a)(5) for which the Permittee has obtained a determination from AMS that fugitive emissions from the source, after appropriate control, meet the following requirements:
    - (i) The emissions are of minor significance with respect to causing air pollution.
    - (ii) The emissions are not preventing or interfering with the attainment or maintenance of an ambient air quality standard.
- (b) The Permittee may not permit fugitive particulate matter from a source specified in paragraphs 1(a)(1)-1(a)(6) if the emissions are visible at the point the emissions pass outside the facility's property. In addition, the Permittee shall take all reasonable actions to prevent particulate matter emitted from a source identified in paragraphs 1(a)(1)-1(a)(6) from becoming airborne. These actions include, but are not limited to, the following:
  - (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads or the clearing of land.
  - (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
  - (3) Paving and maintenance of roadways.
  - (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosions by water, or other means.

### **2. Odor Emissions Limitations**

[25 Pa Code §123.31(b) and AMR V Sec. XX]

The Permittee shall not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source, in such a manner that the malodors are detectable outside the property of the Permittee.

### 3. Visible Emissions Limitations

[25 Pa Code §§123.41, 123.42, 123.43, and AMR II Sec. IV]

- (a) The Permittee may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:
  - (1) Equal to or greater than 20% for a period or periods aggregating more than 3 minutes in any one hour.
  - (2) Equal to or greater than 60% at any time.
- (b) These emission limitations do not apply when: [25 Pa Code §123.42]
  - (1) The presence of uncombined water is the only reason for failure of the emission to meet the limitations.
  - (2) When the emission results from sources specified in 25 Pa Code §123.1(a)(1)-(9).
- (c) The visible emissions may be measured using either of the following: [25 Pa Code §123.43]
  - (1) A device approved by AMS and maintained to provide accurate opacity measurements.
  - (2) Observers trained and qualified to measure plume opacity with the naked eye or with the aid of devices approved by AMS.
- (d) The emission limitations of 20% and 60% as stated above do not apply to facilities which have received a stricter emission limitation in a plan approval or operating permit as part of AMS's Best Available Technology determination, if that limitation is stated elsewhere in this permit.

### 4. Fuel Usage

[AMR III Sec. I & III. Compliance with the requirement specified in this streamlined permit condition assures compliance with the provisions specified in 25 Pa Code §123.22(e)]

- (a) Unless specified in Section D, the Permittee shall use only natural gas, propane, or commercial fuel oil.
  - (1) Effective July 1, 2015, no person shall use commercial fuel oils which contain sulfur in excess of the percentages by weight set forth below: [Air Management Code §3-207 – assures compliance with 25 Pa Code §123.22(e)(2)]

*Grades Commercial Fuel Oil*

|                              |         |            |
|------------------------------|---------|------------|
| No. 2 and lighter oil        | 0.0015% | (15 ppm)   |
| No. 4 oil                    | 0.2500% | (2500 ppm) |
| No. 5, No. 6 and heavier oil | 0.5000% | (5000 ppm) |

- (2) No. 2 grade commercial fuel oil that was stored by the ultimate consumer at its Facility prior to July 1, 2015, and that met the applicable maximum allowable



sulfur content for commercial fuel oil through June 30, 2015 at the time it was stored, may be used by the ultimate consumer at its Facility on and after July 1, 2015, provided that all of the following shall apply:

- (i) Any such ultimate consumer demonstrates to the Department, by means of written records (including but not limited to documentation from fuel suppliers), that any fuel oil delivered to the Facility after April 1, 2015 met the sulfur content standard effective July 1, 2015 under this Section 3-207, which records shall be maintained until July 1, 2016, or until such time as the consumer no longer relies on the exemption in subsection 3-207(c) or (d), whichever is later;
  - (ii) Any such fuel oil may only be used at the Facility where such fuel oil was delivered and stored on or before June 30, 2015; and
  - (iii) Any fuel oil that is not compliant with the standards for sulfur content imposed by this Section effective July 1, 2015 shall be consumed, brought into compliance, or otherwise eliminated from use no later than July 1, 2020.
  - (iv) The Department shall have the authority to extend the above exemption as per Section 3-207(e) of the Air Management Code.
- (3) Effective April 1, 2020, no person may use or burn No. 4 or heavier grade of commercial fuel oil (SSU Viscosity at 100° F >45).
- (4) No. 4 grade commercial fuel oil (SSU Viscosity at 100° F >45, but <145) that was stored by the ultimate consumer at its Facility prior to April 1, 2020, and that has a sulfur content by weight not in excess of .2500% (2500 ppm); and No. 5 grade or heavier commercial fuel oil (SSU Viscosity at 100° F ≥ 145) that was stored by the ultimate consumer at its Facility prior to April 1, 2020, and that has a sulfur content by weight not in excess of .5000% (5000 ppm), may be used by the ultimate consumer at its Facility, provided that all of the following shall apply:
- (i) Any such ultimate consumer demonstrates to the Department, by means of written records (including but not limited to documentation from fuel suppliers), that no No. 4 grade or heavier commercial fuel oil has been delivered to the Facility after March 31, 2020, which records shall be maintained until such time as the consumer no longer relies on the exemption in subsection 3-207(c) or (d), whichever is later; for as long as the user relies on this exemption;
  - (ii) Any such fuel oil may only be used at the Facility where such fuel oil was delivered and stored on or before March 31, 2020; and
  - (iii) Any fuel oil that is not compliant with the standards for sulfur content imposed by this Section effective July 1, 2015 shall be consumed, brought into compliance, or otherwise eliminated from use no later than July 1, 2024.
  - (iv) The Department shall have the authority to extend the above exemption as per Section 3-207(e) of the Air Management Code.

- (5) Any public utility, as defined by Section 102 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §102, and certificated by the Pennsylvania Public Utility Commission pursuant to 66 Pa. C.S. § 1101, et seq., authorizing it to offer, render, furnish, or supply steam to or for the public for compensation, shall be permitted to take delivery to a Facility owned by such public utility (and a vendor shall be permitted to sell or deliver), for use only at a Facility owned by the same public utility, of No. 4 or heavier grade of commercial fuel oil (SSU viscosity at 100° F > 45) through December 31, 2022.
- (b) When it appears that the delivery of low sulfur fuel is, or is about to be, interrupted because of unavailability, accident, or other emergency conditions, AMS may authorize the use of an alternative fuel supply, involving the least adverse impact on air quality, for a period not to exceed 30 days. Longer periods of time of 120 days each may be authorized by AMS only after review and recommendation made by the Air Pollution Control Board for each extended period of time. Factors to be considered shall include the availability of alternate complying fuels, the availability of sulfur dioxide stack gas removal equipment, and the anticipated effect on air quality in the neighborhood, area and region. The Air Pollution Control Board, after a hearing, shall have the right to adjust, revoke, rescind, and make changes or modifications of any authorizations if there shall occur such change in the condition of availability of low sulfur fuel or the factors set forth in this subsection. [AMR III, Sec. III.C]

## 5. Open Burning

[AMR II Sec. II]

No person shall ignite, burn or permit the continuation of the burning of garbage, refuse, or other waste material, demolition materials, leaves, grass, weeds, trees, batteries, wire, tires, cars, vehicles or parts thereof, or any other combustible material in an open fire. Any open burning for salvage purposes is prohibited. This requirement shall not apply to outdoor home cooking. A special exception may be made by order of the Commissioner of Health where the Fire Commissioner certifies an emergency exists which endangers the public safety, and the Health Commissioner finds that no practical alternative method of disposal of hazardous or flammable materials exists. The conditions for allowing open fires shall be approved by both the Health and Fire Commissioners.

## 6. Risk Management

[25 Pa Code §127.441(b) and 40 CFR Part 68]

- (a) If required by Section 112(r) of the Clean Air Act, the Permittee shall develop and implement an accidental release program consistent with the requirements of the Clean Air Act and 40 CFR Part 68 (relating to chemical accident prevention provisions).
- (b) When a regulated substance listed in 40 CFR §68.130 is present in a process at the Operating Permit facility in a quantity greater than the threshold listed in 40 CFR Part 68.130, the Permittee shall prepare and implement a risk management

plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68.

- (1) The Permittee shall submit the first RMP to AMS and EPA no later than the latest of the following:
    - (i) June 21, 1999.
    - (ii) Three years after the date on which a regulated toxic substance is first listed under §68.130; or
    - (iii) The date on which a regulated substance is first present above a threshold quantity in a process.
  - (2) The Permittee shall submit any additional relevant information requested by AMS or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR §68.190.
  - (3) The Permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68 and guidance developed by EPA, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, and defined in 40 CFR §68.3, the term “process” means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the facility is subjected to 40 CFR Part 68, as part of the certification required under this permit, the Permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR §68.10(a); or
  - (2) Certify that the operating permit facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If the facility is subjected to 40 CFR Part 68, the Permittee shall maintain records supporting the implementation of an accidental release program for five years in accordance with 40 CFR §68.200.
- (f) When the operating permit facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by AMS if:
- (1) the Permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.
  - (2) the Permittee fails to certify that the operating permit facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa Code §127.441(b).

## 7. Stratospheric Ozone Protection

[25 Pa Code §127.441(b) and 40 CFR Part 82]

The Permittee shall satisfy applicable requirements of 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction, during the service, maintenance, repair and disposal of equipment containing Class I and Class II refrigerants regulated under such regulations.

## 8. Sampling, Testing and Monitoring Procedures

[25 Pa Code §§127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the Clean Air Act & AMR I Sec. III]

- (a) The Permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this operating permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) The Permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
- (c) Unless alternative methodology is required by the Clean Air Act (including §§114(a)(3) or 504(b)) and regulations adopted thereunder, the sampling, testing and monitoring required by or used by the Permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa Code Chapter 139.

## 9. Recordkeeping Requirements

[25 Pa Code §§127.441, 135.21, 135.5]

- (a) The Permittee shall maintain and make available, upon request by AMS, the following records of monitored information:
  - (1) The date, place (as defined in the permit) and time of sampling or measurements.
  - (2) The dates the analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of analyses.
  - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The Permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes calibration and maintenance records and original strip-chart or electronic recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

- (c) The Permittee shall maintain and make available to AMS upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping, and emission statements requirements in 25 Pa Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa Code §135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by AMS to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

## 10. Reporting Requirements

[25 Pa Code §§127.442 & 135.5 and AMR I Sec. II]

On or before the following January 31 and every twelve months thereafter, the Permittee shall submit reports covering the immediately preceding twelve-month period of January 1 - December 31 on the monitoring prescribed in all applicable conditions. Instances of deviations from permit requirements shall be clearly identified in the reports.

## 11. Philadelphia Toxic Notification

[AMR VI Sec. II & III]\*\*

The Permittee shall notify AMS of any change in its “Notice of Toxic Air Contaminant Emissions” report within 30 days of the occurrence of such change.

## 12. Reporting

[25 Pa Code § 135.3]

- (a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.
- (b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.
- (c): The annual emission statement for a Synthetic Minor Facility shall contain emission information for the following pollutants:
  - (1) Oxides of nitrogen and VOCs. The statement for these pollutants shall contain a certification by a company officer or plant manager that the information contained in the statement is accurate.
  - (2) Total suspended particulate, PM-10, sulfur oxides, carbon monoxide, hazardous air pollutants, and any other pollutants or information requested by AMS.

- (d) If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.

### 13. Reporting of Malfunctions

[25 Pa Code §127.441 and AMR I Sec. II.A.5]

- (a) The Permittee shall, within two (2) hours of knowledge of any occurrence, notify AMS, by calling 215-685-7580 during business hours and 215-686-4514 during other times, of any malfunction of the source(s) or associated air pollution control devices listed in Table A1 of this permit, which results in, or may result in, the emission of air contaminants in excess of the limitations specified in this permit, or regulation contained in 25 Pa Code Article III or the Philadelphia Air Management Code.
- (b) Malfunction(s) which occur at this facility and pose(s) an imminent danger to public health, safety, welfare and the environment, and would violate permit conditions if the source were to continue to operate after the malfunction, shall immediately be reported to AMS by telephone at the above number.
- (c) A written report shall be submitted to AMS within two (2) working days following the (notification of the) malfunction, and shall describe, at a minimum, the following:
  - (1) The nature and degree of malfunction(s).
  - (2) The emission(s) of each pollutant.
  - (3) The duration.
  - (4) Any corrective action taken.

### 14. Submissions

[25 Pa Code §§127.402(d) and 127.513(1)]

- (a) The Permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Permit applications and related fees, stack test protocols and reports, and applications and reports related to the installation of new Continuous Emission Monitoring Systems (CEMS) shall be submitted to:

Chief of Source Registration  
Air Management Services  
321 University Ave.  
Philadelphia, PA 19104-4543

- (d) Compliance-related reports and notifications, including Monitoring Report Forms and reports required under Federal, State, and Local regulations shall be submitted to:

Chief of Facility Compliance and Enforcement  
Air Management Services  
321 University Ave.  
Philadelphia, PA 19104-4543

- (e) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (f) Any records, reports or information submitted to the Department shall be available to the public except for such reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The Permittee may not request a claim of confidentiality for any emissions data generated for the facility.

## **SECTION D. SOURCE SPECIFIC REQUIREMENTS**

### **1. Emission Limits**

- (a) Facility
  - (1) Nitrogen Oxides (NO<sub>x</sub>) emissions from the facility shall be less than 25 tons per rolling 12-month period. [Restriction taken to qualify for Synthetic Minor Permit]
  - (2) Volatile Organic Compound (VOC) emissions from the facility shall be less than 25 tons per rolling 12-month period. [Restriction taken to qualify for Synthetic Minor Permit]
  - (3) Carbon Monoxide (CO) emissions from the facility shall be less than 28.5 tons per rolling 12-month period calculated monthly. [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022]
- (b) Group 01 – External Combustion Units
  - (1) Particulate Matter (PM) emissions from each boiler, pressure washer, space heater, or paint booth burner may not exceed 0.10 lbs/MMBTU. [AMR II Sec. V.2]
  - (2) CO emissions from each boiler, pressure washer, space heater, or paint booth burner may not exceed 1% by volume of exhaust gases. [AMR VIII Sec. II.6]
- (c) Group 02 – Emergency Generator, Air Compressor, and Sand Blasting Operations

- (1) PM emissions from the emergency generator, air compressor, and sand blasting operations each shall not exceed 0.04 grain per dry standard cubic foot when the effluent gas volume is less than 150,000 dry standard cubic feet per minute. [25 Pa. Code §123.13(c)(1)(i)]
- (2) CO emissions from the emergency generator, air compressor, and sand blasting operations each shall not exceed 1% by volume of exhaust gases. [AMR VIII Sec. II.6]
- (3) For the emergency generator, the Permittee shall comply with the following:
  - (i) The allowable NO<sub>x</sub> emissions from the emergency generator, a compression ignition stationary internal combustion engine firing diesel fuel, shall be 2.3 grams per brake horsepower-hour during the period of May 1 through September 30 (“ozone season”). If the actual NO<sub>x</sub> emission during the ozone season exceeds the allowable NO<sub>x</sub> emission, NO<sub>x</sub> allowance(s) may be purchased to demonstrate compliance. [25 Pa Code §129.203]
  - (ii) The Permittee shall surrender to the Pennsylvania Department of Environmental Protection (PADEP) one CAIR (CSAPR) NO<sub>x</sub> allowance and one CAIR (CSAPR) NO<sub>x</sub> Ozone Season allowance, as defined in 40 CFR §§96.102 and 96.302 (relating to definitions), for each ton of NO<sub>x</sub> by which the combined actual emissions from the emergency generator and any other units at the facility subject to 25 Pa Code §129.204 exceed their combined allowable emissions from May 1 through September 30. The surrendered NO<sub>x</sub> allowances shall be of current year vintage. For the purpose of determining the amount of allowances to surrender, any remaining fraction of a ton equal to or greater than 0.50 ton is deemed to equal 1 ton and any fraction of a ton less than 0.50 ton is deemed to equal zero tons. [25 Pa Code §129.204(c)]
  - (iii) If the combined allowable emissions from the emergency generator or other units subject to 25 Pa Code §129.201-205 at the facility from May 1 to September 30 exceed the combined actual emissions from the emergency generator or other units subject to 25 Pa Code §129.201-205 at the facility during the same period, the Permittee may deduct the difference or any portion of the difference from amount of the actual emissions from other units subject to 25 Pa Code §129.201-205 at the Permittee’s other facilities. [25 Pa Code §129.204(d)]
- (d) Group 03 – Combined Heat and Power Units (CHP)
  - (1) NO<sub>x</sub> emissions from each CHP unit shall not exceed 0.2 grams per brake horsepower hour (g/bhp-hr). [Best Available Technology (BAT) Required under 25 Pa. Code §127.1, ensures compliance with 40 CFR §60 Subpart JJJJ, Table 1]
  - (2) NO<sub>x</sub> emissions from each CHP unit shall not exceed 10.9 tons per rolling 12-month period. [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022]
  - (3) VOC emissions from each CHP unit shall be less than 8.2 tons per rolling 12-



month period. [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022]

- (4) Non-Methane, Non-Ethane Hydrocarbons (NMNEHC) emission as propane excluding Formaldehyde (HCHO) from each CHP unit shall not exceed 0.15 g/bhp-hr. [BAT Required under 25 Pa Code §127.1, ensures compliance with 40 CFR Part 60, Subpart JJJJ, Table 1]
- (5) HCHO emissions from each CHP unit shall not exceed 0.05 g/bhp-hr. [BAT Required under 25 Pa Code §127.1]
- (6) CO emissions from each CHP unit shall not exceed either of the following:
  - (i) 0.25 g/bhp-hr. [BAT Required under 25 Pa Code §127.1, ensures compliance with 40 CFR §60 Subpart JJJJ, Table 1]
  - (ii) 13.6 tons per rolling 12-month period. [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022]
- (7) PM emissions from each CHP unit shall not exceed 0.04 grain per dry standard cubic foot. [25 Pa. Code §123.13(c)(1)(i)]
- (8) Ammonia slip from operation of the Urea-Injection Selective Catalytic Reduction (SCR) shall not exceed 5 ppmvd @ 15% O<sub>2</sub>. Sufficient care must be exercised to ensure that urea associated with the SCR system will not be a safety problem. [BAT Required under 25 Pa. Code §127.1]
- (9) The Permittee shall comply with the following for each CHP unit:
  - (i) The allowable NO<sub>x</sub> emissions from the CHP unit, a spark-ignited engine firing natural gas, shall be 3.0 grams per brake horsepower-hour during the period of May 1 through September 30 (“ozone season”). If the actual NO<sub>x</sub> emissions during the ozone season exceeds the allowable NO<sub>x</sub> emissions, NO<sub>x</sub> allowance(s) may be purchased to demonstrate compliance. [25 Pa. Code §129.203]
  - (ii) The Permittee shall surrender to the Pennsylvania Department of Environmental Protection (PADEP) one CAIR (CSAPR) NO<sub>x</sub> allowance and one CAIR (CSAPR) NO<sub>x</sub> Ozone Season allowance, as defined in 40 CFR §96.102 and §96.302 (relating to definitions), for each ton of NO<sub>x</sub> by which the combined actual emissions from each CHP unit and any other units at the facility subject to 25 Pa. Code §129.204 exceed their combined allowable emissions from May 1 through September 30. The surrendered allowances shall be of current year vintage. For the purpose of determining the amount of allowances to surrender, any remaining fraction of a ton equal to or greater than 0.50 ton is deemed to equal 1 ton and any fraction of a ton less than 0.50 ton is deemed to equal zero tons. [25 Pa. Code §129.204(c)]
  - (iii) If the combined allowable emissions from the CHP units or other units subject to 25 Pa. Code §129.201-205 at the facility from May 1 to September 30 exceed the combined actual emissions from the CHP units or other units subject to 25 Pa. Code §129.201-205 at the facility during the same period, the Permittee may deduct the difference or any portion of the

difference from amount of the actual emissions from other units subject to 25 Pa. Code §129.201-205 at the Permittee’s other facilities. [25 Pa. Code §129.204(d)]

- (e) Group 04 - Gasoline Tank (Gasoline Dispensing Facility)
  - (1) The Permittee shall not use or dispense any gasoline having a Reid Vapor Pressure (RVP) greater than 9.0 psi during the period May 1 through September 15. Blends of gasoline and oxygenate compounds are exempt from the 9.0 psi Reid Vapor Pressure limitation, except for the gasoline portion of the blend, prior to blending shall not be exempted. [AMR V Sec. V.D]
- (f) Group 05 – Part Washers – Degreasers
  - (1) VOC emissions from photochemically reactive materials may not exceed 40 pounds per day or must be reduced by at least 85 percent overall from any machine, equipment, or device. [AMR V Sec. VII]
- (g) Group 06 – Spray Paint Booth
  - (1) The Permittee shall not permit, cause, suffer, or allow an emission of odor beyond the perimeter of the facility. [AMR V Sec. XIV.F]
  - (2) The Permittee shall not permit, cause, suffer, and/or allow from any finishing operation any visible emissions or fallout of paint material from any stack, vent or other opening. [AMR V Sec. XIV.J]
  - (3) The Permittee shall ensure that potential and/or actual emissions of toxic air contaminants comply with Air Management Regulation VI "Control of Emissions of Toxic Air Contaminants" and Guidelines adopted there-under, as well as any requirements under applicable Federal Laws, statutes and regulations including, but not limited to Title III of the Federal Clean Air Act, as amended. [AMR V. Sec. XIV.E.]
  - (4) The Permittee may not apply to mobile equipment or mobile equipment components any coating, including any VOC-containing materials added to the original coating supplied by the manufacturer, that contain VOCs in excess of the following limits, as applied: [25 Pa. Code §129.75(c) Table III]

Weight of VOC per Volume of Coating (minus water and non-VOC solvents)

| <b>Coating Type</b>             | <b>Pounds per Gallon</b> | <b>Grams per Liter</b> |
|---------------------------------|--------------------------|------------------------|
| Automotive pretreatment primer  | 6.5                      | 780                    |
| Automotive primer-surfacer      | 4.8                      | 575                    |
| Automotive primer-sealer        | 4.6                      | 550                    |
| Automotive topcoat:             |                          |                        |
| single stage-topcoat            | 5.0                      | 600                    |
| 2 stage basecoat/clearcoat      | 5.0                      | 600                    |
| 3 or 4-stage basecoat/clearcoat | 5.2                      | 625                    |
| Automotive multicolored topcoat | 5.7                      | 680                    |
| Automotive specialty            | 7.0                      | 840                    |

## 2. Work Practice Standards

### (a) Facility

- (1) The combined natural gas usage for CHP Unit G-01 and CHP Unit G-02 shall not exceed 572.67 million cubic feet (MMft<sup>3</sup>) per rolling 12-month period. [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022, Along with Conditions D.2.(a)(2)-(5), D.2.(c)(1)(iii), D.2.(c)(3)(iii), and D.2.(j)(2), ensures compliance with Conditions D.1.(a)(1)-(3)]
- (2) Natural gas usage for all other significant sources (combustion units COMB-05 through COMB-17 and CU-SB) and insignificant sources (Boiler IS-3 and Emergency Generator IS-13) at SEPTA Roberts Complex shall not exceed 17.81 MMft<sup>3</sup> per rolling 12-month period. [Modification requested during SMOP renewal via Potential to Emit (PTE) calculation submitted on January 4, 2022 to ensure compliance with the synthetic minor emission limits, Along with Conditions D.2.(a)(1), D.2.(a)(3)-(5), D.2.(c)(1)(iii), D.2.(c)(3)(iii), and D.2.(j)(2), ensures compliance with Conditions D.1.(a)(1)-(3)]
- (3) The facility-wide No. 2 fuel oil usage shall not exceed 117,090 gallons per rolling 12-month period for COMB-01 through COMB-04, COMB-07, COMB-08, and insignificant sources (combustion units IS-1, IS-2, and IS-4 through IS-12) combined. [Modification requested during SMOP renewal via Potential to Emit (PTE) calculation submitted on January 4, 2022 to ensure compliance with the synthetic minor emission limits, Along with Conditions D.2.(a)(1)-(2), D.2.(a)(4)-(5), D.2.(c)(1)(iii), D.2.(c)(3)(iii), and D.2.(j)(2), ensures compliance with Conditions D.1.(a)(1)-(3)]
- (4) Source COMB-07 and Source COMB-08 are limited to a combined total of 3.88 MMft<sup>3</sup> of natural gas and 7,080 gallons of No. 2 fuel oil per rolling 12-month period, which is equivalent to 200 hours of operation of each boiler at the maximum rated capacity using natural gas and 50 hours of operation of each boiler at the maximum rated capacity using No. 2 fuel oil. All fuel combusted by Sources COMB-07 and COMB-08 are subject to the facility-wide limits of Conditions D.2.(a)(2)-(3) above. [Modification requested during SMOP renewal via Potential to Emit (PTE) calculation submitted on January 4, 2022 to ensure compliance with the synthetic minor emission limits, Along with Conditions D.2.(a)(1)-(3), D.2.(a)(5), D.2.(c)(1)(iii), D.2.(c)(3)(iii), and D.2.(j)(2), ensures compliance with Conditions D.1.(a)(1)-(3)]
- (5) Source COMB-07 (Boiler 7) and Source COMB-08 (Boiler 8) are back-up units and shall not operate while either CHP Unit G-01 or CHP Unit G-02 is operating, except as follows: [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022, Along with Conditions D.2.(a)(1)-(4), D.2.(c)(1)(iii), D.2.(c)(3)(iii), and D.2.(j)(2), ensures compliance with Conditions D.1.(a)(1)-(3)]
  - (i) For maintenance and testing of COMB-07 and COMB-08 as required under good engineering practices and/or manufacturer's recommendations.
  - (ii) During periods when both CHP units G-01 and G-02 are not providing heat

to the Midvale Maintenance Facility due to shut down or maintenance of both CHP units G-01 and G-02 or the associated heat transfer system between the CHP units and the Midvale Maintenance Facility.

(b) Group 01 – External Combustion Units

- (1) Each external combustion unit shall be installed, maintained, and operated in accordance with manufacturer's specifications, the specifications in the associated permit applications (as approved herein), and with good operating practices. [AMS Plan Approval No. 11035 dated 2/3/2012 and AMS Installation Permit Nos. 13302 – 13303 dated 1/29/2014]
- (2) Each external combustion unit shall only burn fuel types as specified in Table A1 of this permit.
- (3) The Permittee at all times must operate and maintain the Boilers COMB-01, COMB-02, COMB-03, COMB-04, COMB-07, and COMB-08 in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR §63.11205(a)]
- (4) The Permittee shall conduct a tune-up of Boilers COMB-02, COMB-03, COMB-07, and COMB-08 biennially to demonstrate compliance with 40 CFR §63.11223. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. The Permittee must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. The tune-up shall include the following requirements: [40 CFR §63.11223(a)-(b)]
  - (i) Inspect the burner, and clean or replace any components of the burner as necessary. The Permittee may delay the burner inspection until the next scheduled unit shutdown, but must inspect the burner at least once every 36 months.
  - (ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
  - (iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The Permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection.
  - (iv) Optimize total emissions of CO. The optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject.
  - (v) Measure the concentration in the effluent stream of CO in parts per million by volume and oxygen in volume percent, before and after the adjustments are made. Measurements may be either on a wet or dry basis as long as it is the same basis before and after the adjustments are made. Measurements may be taken using a portable CO analyzer.
  - (vi) If the unit is not operating on the required date for a tune-up, a tune-up must be conducted within 30 days of startup.

- (vii) For affected boilers that switch fuels or make a physical change to the boiler that results in the applicability of a different subcategory within 40 CFR §63 subpart JJJJJJ or the boiler becoming subject to 40 CFR §63 subpart JJJJJJ, the Permittee must demonstrate compliance within 180 days of the effective date of the fuel switch or the physical change. Notification of such changes must be submitted according to §63.11225(g). [40 CFR §63.11210(i)]
- (5) The Permittee shall conduct a tune-up of Boilers COMB-01 and COMB-04 every 5 years to demonstrate compliance with 40 CFR §63.11223. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. The Permittee must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. The tune-up shall include the following requirements: [40 CFR §63.11223(a)-(b)]
  - (i) Inspect the burner, and clean or replace any components of the burner as necessary. The Permittee may delay the burner inspection until the next scheduled unit shutdown, but must inspect the burner at least once every 72 months.
  - (ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer’s specifications, if available.
  - (iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The Permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 72 months from the previous inspection.
  - (iv) Optimize total emissions of CO. The optimization should be consistent with the manufacturer’s specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject.
  - (v) Measure the concentration in the effluent stream of CO in parts per million by volume and oxygen in volume percent, before and after the adjustments are made. Measurements may be either on a wet or dry basis as long as it is the same basis before and after the adjustments are made. Measurements may be taken using a portable CO analyzer.
  - (vi) If the unit is not operating on the required date for a tune-up, a tune-up must be conducted within 30 days of startup.
  - (vii) For affected boilers that switch fuels or make a physical change to the boiler that results in the applicability of a different subcategory within 40 CFR §63 subpart JJJJJJ or the boiler becoming subject to 40 CFR §63 subpart JJJJJJ, the Permittee must demonstrate compliance within 180 days of the effective date of the fuel switch or the physical change. Notification of such changes must be submitted according to §63.11225(g). [40 CFR §63.11210(i)]
- (6) A visual inspection of Boilers COMB-02, COMB-03, COMB-07, and COMB-08

each shall be conducted during fuel oil burning as required in Condition D.4.(b)(8). [25 Pa. Code §127.441]

(c) Group 02 – Emergency Generator, Air Compressor, and Sand Blasting Operations

- (1) For the emergency generator, the Permittee shall meet the following:
  - (i) The emergency generator shall be installed, maintained, and operated in accordance with manufacturer’s specifications, the specifications in the associated permit applications (as approved herein), and with good operating practices. [AMS Plan Approval No. 11035 dated 2/3/2012]
  - (ii) The emergency generator shall only burn diesel fuel oil. [AMS Plan Approval No. 11035 dated 2/3/2012]
  - (iii) The emergency generator shall not combust more than 1,850 gallons of diesel fuel per rolling 12-month period, based on 25 hours of operation at maximum capacity. [Modification requested during SMOP renewal via PTE calculation submitted on January 4, 2022 to ensure compliance with the synthetic minor emission limit, Along with Conditions D.2.(a)(1)-(5), D.2.(c)(3)(iii), and D.2.(j)(2), ensures compliance with Conditions D.1.(a)(1)-(3)]
  - (iv) The emergency generator shall be operated only during emergencies, testing, and engine tuning. [AMS Plan Approval No. 11035 dated 2/3/2012]
    - (A) Emergencies for the emergency generator are defined as when the primary power source for the facility is disrupted or discontinued during a power outage, or natural disasters that are beyond the control of the owner or operator of a facility.
    - (B) The emergency generator shall operate for a maximum of 25 hours per calendar year for testing, engine tuning, maintenance checks, and readiness testing. The emergency generator may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. [Modification requested during SMOP renewal via addendum to the SMOP application dated 1/12/2022]
  - (v) During the ozone season (May 1 – September 30), the Permittee shall comply with the following requirements of Air Management Regulation (AMR) XV:
    - (A) Testing and/or tuning of emergency engines during the ozone season (May 1 to September 30) shall only be done between the hours of 5:00 PM and 11:00 PM. Facilities that are able to demonstrate compliance with Philadelphia Code Chapter 10-400 (Noise and Excessive Vibration) can perform testing and/or tuning between the hours of 5:00 PM and 7:30 AM.
    - (B) No testing and/or tuning of emergency engines shall be performed on a day for which an Air Quality Forecast has predicted an Air Quality Action

- Day, or on an Air Quality Action Day during the ozone season. An Air Quality Action Day is defined when the Air Quality Index (AQI) for the Southeast Region of Pennsylvania has exceeded the National Ambient Air Quality Standards for ozone or fine particulate matter. An Air Quality Action Day is represented by an AQI greater than 100.
- (C) Prior to testing during the ozone season, the Permittee shall check the AQI forecast. The AQI forecast can be checked after 5:00 PM on the day prior to testing or on the day of testing. This can be done by either:
    - (a) Receiving daily forecasts by email from the Pennsylvania Air Quality Partnership which can be subscribed to by registering at: <http://www.enviroflash.info/> OR
    - (b) Checking for the forecast at the following website: <https://www.ahs.dep.pa.gov/AQPartnersWeb/forecast.aspx?vargroup=se> OR <https://www.airnow.gov/?city=Philadelphia&state=PA&country=USA>
    - (c) Checking the forecast at EPA’s AirNow app by downloading the app from the Apple App Store link or the Google Play Store link provided at the following website: <https://www.airnow.gov/airnow-mobile-app/>
  - (vi) The emergency generator is exempt from the requirements of Conditions D.2.(c)(1)(v) during emergencies or emergency repairs regardless of the air quality.
  - (2) The Permittee shall comply with the following requirements of 25 Pa. Code §129.201-205 for the emergency generator:
    - (i) By October 31 of each year, the Permittee shall calculate the difference between the actual NO<sub>x</sub> emissions from emergency generator and the allowable NO<sub>x</sub> emissions from the emergency generator during the period from May 1 through September 30 (“ozone season”). The allowable emissions for the period shall be calculated by multiplying the cumulative hours of operation for each unit for the period by the horsepower rating of the unit and by the applicable emission rate of 2.3 grams NO<sub>x</sub> per brake horsepower-hour (Bhp-hr). [25 Pa Code §129.203]
    - (ii) The Permittee shall calculate actual emissions of NO<sub>x</sub> during the ozone season for the emergency generator based on one of the following: [25 Pa Code §129.204]
      - (A) The 1-year average emission rate calculated from the most recent compliance demonstration test data for NO<sub>x</sub>.
      - (B) The maximum hourly allowable NO<sub>x</sub> emission rate contained in the permit or the higher of the following:
        - (i) The highest rate determined by use of the emission factor for the unit class contained in the most up-to date version of the EPA publication, “AP-42 Compilation of Air Pollution Emission Factors.”
        - (ii) The highest rate determined by use of the emission factor for the unit class contained in the most up-to date version of EPA’s “Factor Information Retrieval (FIRE)” data system.

- (C) The Permittee can elect to monitor NO<sub>x</sub> emissions with CEMs. If a NO<sub>x</sub> CEMs is used, then the owner or operator shall monitor emissions and report the data from this CEM in accordance with Chapter 139 or Chapter 145 (relating to interstate pollution transport reduction). Any data invalidated under Chapter 139 shall be substituted with data calculated using the potential emission rate for the unit or, if approved by AMS in writing, an alternative amount of emissions that is more representative of actual emissions that occurred during the period of invalid data.
  - (D) The Permittee can use an alternate calculation and recordkeeping procedure based upon emissions testing and correlations with operating parameters if AMS, prior to implementation, approves the alternate calculation and recordkeeping procedures. The operator of the unit shall demonstrate that the alternate procedure does not underestimate actual emissions throughout the allowable range of operating conditions.
  - (iii) By November 1 each year, the Permittee of a unit subject to 25 Pa Code §129.201-205 shall surrender the required NO<sub>x</sub> allowance to the PA DEP's NO<sub>x</sub> allowance tracking system account and provide to AMS the following:
    - [25 Pa Code §129.204(e)]
    - (A) The serial number of each NO<sub>x</sub> allowance surrendered.
    - (B) The calculations used to determine the quantity of NO<sub>x</sub> allowances required to be surrendered.
  - (iv) If the Permittee fails to comply with 25 Pa Code §129.204(e), regarding the submission of NO<sub>x</sub> allowances by November 1, the Permittee shall surrender by December 31 three NO<sub>x</sub> allowances of the current or later year vintage for each NO<sub>x</sub> allowance that was required to be surrendered by November 1 of that year. The surrender of NO<sub>x</sub> allowances under this condition does not affect the liability of the owner or operator of the unit for any fine, penalty or assessment, or an obligation to comply with any other remedy for the same violation, under the Clean Air Act Amendments or the Clean Air Act. For purposes of determining the number of days of violation, if a facility has excess emissions for the period May 1 through September 30, each day in that period (153 days) constitutes a day in violation unless the Permittee demonstrates that a lesser number of days should be considered. Each ton of excess emissions is a separate violation. [25 Pa Code §129.204(f)-(g)]
- (3) The Permittee shall meet the following requirements for the air compressor and sand blasting operations:
- (i) The air compressor and sand blasting operations shall be installed, maintained, and operated in accordance with manufacturer's specifications, the specifications in the associated permit applications (as approved herein), and with good operating practices. [AMS Plan Approval No. 11035 dated 2/3/2012]
  - (ii) The air compressor shall only burn diesel fuel oil. [AMS Plan Approval No.



11035 dated 2/3/2012]

- (iii) The air compressor shall not combust more than 918 gallons of diesel fuel per rolling 12-month period, based on 200 hours of operation at maximum capacity. [Modification requested during SMOP renewal via PTE calculation submitted on January 4, 2022, Along with Conditions D.2.(a)(1)-(5), D.2.(c)(1)(iii), and D.2.(j)(2), ensures compliance with Conditions D.1.(a)(1)-(3)]
- (d) Group 03 – Combined Heat and Power Units (CHP)
  - (1) Each CHP unit and its associated SCR and oxidation catalyst shall be installed, operated, and maintained in accordance with both the manufacturer’s specification, the specifications in the application (as approved herein), and with good operating practices. [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022]
  - (2) For G-01 and G-02, the Permittee shall comply with the applicable requirements of 40 CFR §63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Internal Combustion Engines for stationary spark ignition internal combustion engines. Each affected source that is a new or reconstructed stationary RICE located at an area source shall meet the requirements of this part by meeting the requirement of 40 CFR Part 60 Subpart JJJJ, for spark ignition engines. [40 CFR §63.6590(c)(1)]
  - (3) For G-01 and G-02, the Permittee shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate each engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §60.4243(b)(2)(ii)].
  - (4) Each CHP unit (G-01 and G-02) shall only burn natural gas. [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022]
  - (5) Each SCR and Oxidation Catalyst system shall be used whenever each CHP is in operation. [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022]
  - (6) The Permittee shall establish an SCR urea flow to engine load map for each CHP unit that can be used to determine the urea injection rate for the SCR at various engine loads during normal operation as defined in Condition D.2.(d)(6)(ii) to achieve compliance with the NO<sub>x</sub> emissions limit in Condition D.1.(d)(1) and ammonia slip emission limit in Condition D.1.(d)(8). [Synthetic Minor Operating Permit No. OP17-000024 dated XXXX, XXXX]
    - (i) A programmable SCR trim system may be used to optimize the urea injection rate to differ from the SCR urea flow to engine load map for a maximum of ±15% deviation as recommended by the manufacturer. The SCR trim system shall be used to ensure the CHP units are in compliance with both the NO<sub>x</sub> emission limit in Condition D.1.(d)(1) and ammonia slip emission limit in Condition D.1.(d)(8).
    - (ii) Normal operation is defined as the period between when startup ends and when shutdown begins.

- (a) Startup is defined as the period that begins when fuel flow to the engine starts and ends after appropriate and safe loading of the engine, not to exceed 60 minutes.
  - (b) Shutdown is defined as the period that begins when the power breaker goes to an open state and ends when fuel flow to the engine stops, not to exceed 30 minutes.
- (7) For each CHP unit, the Permittee shall meet the following requirements of 25 Pa. Code §§129.201-205:
- (i) By October 31 of each year, the Permittee shall calculate the difference between the actual NO<sub>x</sub> emissions and the allowable NO<sub>x</sub> emissions for each CHP unit during the period from May 1 through September 30 (“ozone season”). The allowable emissions for the period shall be calculated by multiplying the cumulative hours of operation for the CHP unit for the period by the horsepower rating of the unit and by the applicable emission rate of 3.0 grams NO<sub>x</sub> per brake horsepower-hour (BHP-hr). [25 Pa. Code §129.203]
  - (ii) The Permittee shall calculate actual emissions of NO<sub>x</sub> during the ozone season for the CHP units based on one of the following: [25 Pa. Code §129.204]
    - (A) The 1-year average emission rate calculated from the most recent compliance demonstration test data for NO<sub>x</sub>.
    - (B) The maximum hourly allowable NO<sub>x</sub> emission rate contained in the permit or the higher of the following:
      - (i) The highest rate determined by use of the emission factor for the unit class contained in the most up-to date version of the EPA publication, “AP-42 Compilation of Air Pollution Emission Factors.”
      - (ii) The highest rate determined by use of the emission factor for the unit class contained in the most up-to date version of EPA’s “Factor Information Retrieval (FIRE)” data system.
    - (C) The Permittee can elect to monitor NO<sub>x</sub> emissions with CEMs. The owner or operator shall monitor emissions and report the data from this CEM in accordance with Chapter 139 or Chapter 145 (relating to interstate pollution transport reduction). Any data invalidated under Chapter 139 shall be substituted with data calculated using the potential emission rate for the unit or, if approved by AMS in writing, an alternative amount of emissions that is more representative of actual emissions that occurred during the period of invalid data.
    - (D) The Permittee can use an alternate calculation and recordkeeping procedure based upon emissions testing and correlations with operating parameters if AMS, prior to implementation, approves the alternate calculation and recordkeeping procedures. The operator of the unit shall demonstrate that the alternate procedure does not underestimate actual emissions throughout the allowable range of operating conditions.

- (iii) By November 1 each year, the Permittee of a unit subject to 25 Pa. Code §§129.201-205 shall surrender the required NO<sub>x</sub> allowance to the PADEP's NO<sub>x</sub> allowance tracking system account and provide to AMS the following: [25 Pa. Code §129.204(e)]
  - (A) The serial number of each NO<sub>x</sub> allowance surrendered.
  - (B) Calculations used to determine the quantity of NO<sub>x</sub> allowances required to be surrendered.
- (iv) If the Permittee fails to comply with 25 Pa. Code §129.204(e), regarding the submission of NO<sub>x</sub> allowances by November 1, the Permittee shall surrender by December 31 three NO<sub>x</sub> allowances of the current or later year vintage for each NO<sub>x</sub> allowance that was required to be surrendered by November 1 of that year. The surrender of NO<sub>x</sub> allowances under this condition does not affect the liability of the owner or operator of the unit for any fine, penalty or assessment, or an obligation to comply with any other remedy for the same violation, under the Clean Air Act Amendments or the Clean Air Act. For purposes of determining the number of days of violation, if a facility has excess emissions for the period May 1 through September 30, each day in that period (153 days) constitutes a day in violation unless the Permittee demonstrates that a lesser number of days should be considered. Each ton of excess emissions is a separate violation. [25 Pa. Code §§129.204(f)-(g)]
- (e) Group 04 - Gasoline Tank (Gasoline Dispensing Facility)
  - (1) The gasoline dispensing facility (GDF) shall be installed, maintained, and operated in accordance with the manufacturer's specification, the specifications in the application (as approved herein), and with good operating practices. [AMS Plan Approval No. 11035 dated 2/3/2012]
  - (2) The Permittee must, at all times, operate and maintain each source or control device in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administration which may include, but is not limited to monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR §63.11115(a)]
  - (3) The monthly throughput for the GDF shall be less than 10,000 gallons. [AMS Plan Approval No. 11035 dated 2/3/2012, Exemption from the requirements of 40 CFR §63.11117 and 40 CFR §63.11118]
  - (4) The Permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [40 CFR §63.11116(a)]
    - (i) Minimize gasoline spills;
    - (ii) Clean up spills as expeditiously as practicable;

- (iii) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
  - (iv) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- (f) Group 05 – Parts Washers – Degreasers
- (1) The parts washers shall be installed, maintained, and operated in accordance with the manufacturer's specification, the specifications in the application (as approved herein), and with good operating practices. [AMS Plan Approval No. 11035 dated 2/3/2012]
  - (2) If the Permittee intends to use any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent in the degreaser, it shall, prior to use, submit a plan approval application to AMS and comply with 40 CFR §63, Subpart T (the MACT Standard for Halogenated Solvent Cleaners). [AMS Plan Approval No. 11035 dated 2/3/2012]
  - (3) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater. [25 Pa. Code §129.63(a)(1)]
  - (4) Cold cleaning machines shall be operated in accordance with the following procedures [25 Pa. Code §129.63(a)(3)]:
    - (i) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
    - (ii) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
    - (iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
    - (iv) Air agitated solvent baths may not be used.
    - (v) Spills during solvent transfer and use of cleaning machine shall be cleaned up immediately.
  - (5) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall have a permanent, conspicuous label summarizing the operating requirements in Conditions D.2.(e)(4)(i)-(v). In addition, the label shall include the following discretionary good operating practices [25 Pa. Code §129.63(a)(2)(i)]:
    - (i) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.

- (ii) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
  - (iii) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.
  - (iv) Cold cleaning machines shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover [25 Pa. Code §129.63(a)(2)(ii)].
- (6) The Permittee may not use, sell, or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs. [25 Pa. Code §129.63(a)(4)] This condition does not apply to the following: [25 Pa. Code §129.63(a)(7)]
- (i) If the cold cleaning machine is used in extreme cleaning service.
  - (ii) If the owner or operator of the cold cleaning machine demonstrates, and AMS approves in writing, that compliance with 25 Pa. Code §129.63(a)(4) results in unsafe operating conditions.
  - (iii) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.
- (7) If the Permittee sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine, the Permittee shall provide to the purchaser, the following written information [25 Pa. Code §129.63(a)(5)]:
- (i) The name and address of the solvent supplier.
  - (ii) The type of solvent including the product or vendor identification number.
  - (iii) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).
- (g) Group 06 – Spray Paint Booth
- (1) The spray paint booth shall be installed, maintained, and operated in accordance with the manufacturer's specification, the specifications in the application (as approved herein), and with good operating practices. [AMS Plan Approval No. 11035 dated 2/3/2012]
  - (2) The Permittee shall not apply coatings except by the use of one of the following methods operated according to procedures recommended by the manufacturer: [AMR V Sec. XIV.G.1 and AMR V Sec. XIV.G.2 - ensures compliance with 25 Pa. Code §129.75(e)]
    - (i) electrostatic application, or
    - (ii) high-volume, low pressure (HVLP) spray.
  - (3) The Permittee shall meet the following requirements:
    - (i) The Permittee shall spray all coatings inside an enclosed paint spray booth, which operates according to design and specifications of the manufacturer [AMR V Sec. XIV.G.3]. All the airflow carrying paint fumes must pass through a filter system to a properly designed stack and not by-pass the

- filter system due to gaps in the filter frames structure. [AMR V Sec. XIV.G.3(a)]
- (A) The filters must include a final bank of fiberglass or similar filters but may include prefiltration with other types of filters. [AMR V Sec. XIV.G.3(a)(1)]
  - (B) The filters must be changed on a regular basis, consistent with the paint usage schedule, to provide proper filtration and to allow manufacturer's specifications for air flow to be met at all times. [AMR V Sec. XIV.G.3(a)(2)]
- (ii) Rain protection for the stack shall be designed consistent with good ventilation practice and not include stack caps which may prevent good dispersion. [AMR V Sec. XIV.G.5]
- (4) The Permittee shall not use MeCl in paint stripping operations at the facility. [Exemption from the requirements of 40 CFR §63.11173(a)-(d)]
- (5) The Permittee must ensure that the following operating practices are in effect at all times:
- (i) Spray guns must be cleaned with a device that: [AMR V Sec. XIV.C.1 and 25 Pa. Code §129.75(g)]
    - (A) Re-circulates solvent during the cleaning process so that the solvent is used to clean a number of guns before being disposed; [AMR V Sec. XIV.C.1(a)]
    - (B) Collects spent solvent for proper disposal; and [AMR V Sec. XIV.C.1(b)]
    - (C) Prevents the emission of vapors during and between cleaning operations within safe and practical limits. [AMR V Sec. XIV.C.1(c)]
  - (ii) Fresh and spent solvent must be stored in containers with gasket sealed, spring loaded covers, or equivalent. [AMR V Sec. XIV.C.2 and 25 Pa. Code §129.75(h)(1)]
  - (iii) Waste paint, spent solvent, and sludge from gun cleaners or in-house distillation units must be stored in gasket sealed containers until properly disposed. Proper disposal includes releasing wastes to a licensed reclaiming or hazardous waste management facility, or recycling with an in-house distillation unit. [AMR V Sec. XIV.C.3]
  - (iv) All sanding operations are to be done by using sanders with built-in ventilation provided by a central vacuum system or equivalent filtered system. [AMR V Sec. XIV.C.4]
  - (v) All doors and windows which lead to the outdoors from any area used to spray, coat and/ or brush on paints or from any area where surface preparation including sanding or grinding takes place must be kept closed to the maximum extent possible which will allow sufficient ventilation for the facility's exhaust system at any time when said work is being performed unless exempted by AMS. [AMR V Sec. XIV.C.5]
  - (vi) All applicable sections of Fire Code, Chapter 5-1700, must be met. [AMR V Sec. XIV.C.6]
  - (vii) All refinishing operations shall be conducted indoors. [AMR V Sec. XIV.C.7]

- (viii) Cloth and paper, or other absorbent applicators, moistened with coatings, solvents or cleaning solvents, shall be stored in closed, nonabsorbent, nonleaking containers. [25 Pa. Code §129.75(h)(2)]
- (ix) Handling and transfer procedures shall minimize spills during the transfer of coatings, solvents, and cleaning solvents through the use of devices including pumps or spouts on larger containers. [25 Pa. Code §129.75(h)(3)]
- (6) The Permittee shall ensure that a person who applies mobile equipment repair and refinishing coatings has completed training in the proper use and handling of the mobile equipment repair and refinishing coatings, solvents, and waste products to minimize the emission of air contaminants and to comply with 25 Pa. Code §129.75. [25 Pa. Code §129.75(h)(4)]
- (h) Group 07 - Windshield Washer Fluid Storage Tank
  - (1) The Windshield Washer Fluid Storage Tank shall be installed, maintained, and operated in accordance with the manufacturer's specification, the specifications in the application (as approved herein), and with good operating practices. [AMS Plan Approval No. 11035 dated 2/3/2012]
  - (2) The storage tank shall have a pressure relief valve which is maintained in good operating condition and which is set to release at [25 Pa. Code §129.57]:
    - (i) No less than 0.7 psig of pressure, or
    - (ii) 0.3 psig of vacuum, or
    - (iii) The highest possible pressure and vacuum in accordance with the state or local fire codes or the National Fire Prevention Association guidelines or other national consensus standards acceptable to AMS.
- (i) Group IN-Oil-Water Separator [AMS Plan Approval No. 11035 dated 2/3/2012]
  - (1) The oil-water separator shall only receive VOC materials from a spill. The facility shall not store VOC materials in containers of 200 gallons or greater.
- (j) Group IN – Insignificant Sources IS-1 through IS-14
  - (1) Each insignificant source IS-1 through IS-14 shall only burn fuel types as specified in Table A1 of this permit.
  - (2) Insignificant Emergency Generators IS-13 and IS-14 each shall operate for a maximum of 100 hours per rolling 12-month period for emergencies, testing, engine tuning, maintenance checks, and readiness testing. [Modification requested during SMOP renewal via PTE calculation submitted on January 4, 2022 to ensure compliance with the synthetic minor emission limit, Along with Conditions D.2.(a)(1)-(5), D.2.(c)(1)(iii), and D.2.(c)(3)(iii), ensures compliance with Conditions D.1.(a)(1)-(3)]
  - (3) During the ozone season (May 1 – September 30), the Permittee shall comply with the requirements of AMR XV specified in Condition D.2.(c)(1)(vii) for the Insignificant Emergency Generators IS-13 and IS-14.

### 3. Testing Requirements [25 Pa Code §139]

- (a) If at any time AMS has cause to believe that air contaminant emissions from any source(s) listed in Section A of this permit may be in excess of the limitations specified in this permit, or established pursuant to, any applicable rule or regulation contained in 25 PA Code Article III, the Permittee shall be required to conduct whatever tests are deemed necessary by AMS to determine the actual emission rate(s).
- (b) The following performance tests methods shall be used to demonstrate compliance with the emission limitations:
  - (1) U.S. EPA Reference Method 7E shall be used for NO<sub>x</sub>.
  - (2) U.S. EPA Reference Method 5 and 202 shall be used for PM.
    - (i) Compliance with the PM emission limit of 25 Pa. Code §123.13(c)(1)(i) shall be based only on Method 5.
  - (3) U.S. EPA Reference Method 9 shall be used for opacity. At a minimum, opacity shall be determined as an average of 24 consecutive observations recorded at 15-second intervals.
  - (4) U.S. EPA Reference Method 10 shall be used for CO.
  - (5) ASTM D1266, D129, D1552, D2622 or D270 shall be used for sulfur in fuel.
- (c) Compliance determination shall consist of the arithmetic means of results of three separate runs for each source test using U.S. EPA Reference Methods 5, 7E, and 10. The source test shall be consistent with U.S. EPA designated test methods and 25 Pa Code §139. The Permittee shall submit a test protocol to AMS for approval at least 30 days before the test date. The test report shall be submitted to AMS within 60 days of completing the stack test.
- (d) The Permittee may use alternative test methods to those listed in this section if they are given prior approval by AMS in accordance with 25 Pa Code §139.3 and the Permittee shall only use test methods authorized in accordance with 25 Pa Code §139.3.
- (e) For the CHP Units G-01 and G-02, the Permittee shall conduct a performance test for each CHP unit every 8,760 hours of operation of each CHP or every 3 years, whichever comes first, to demonstrate compliance with the NO<sub>x</sub>, CO, NMNEHC, HCHO, and ammonia slip emission limitation established in Conditions D.1.(d)(1), D.1.(d)(4)-(5), D.1.(d)(6)(i), and D.1.(d)(8). [40 CFR §60.8(a), 40 CFR §60.4243(b)(2)(ii), and AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022]
  - (1) The Permittee must conduct performance stack test for each CHP unit no later than February 4, 2025, and must conduct the test sooner if a CHP unit reaches the 8,760 hours of operation since the date of the previous stack test sooner.
  - (2) During the initial and subsequent performance test, an SCR urea flow to engine load map for each CHP unit shall be established that can be used to determine the urea injection rate for the SCR as required in Condition D.2.(d)(6) to achieve compliance with the NO<sub>x</sub> emission limit in Condition D.1.(d)(1) and ammonia slip emission limit in Condition D.1.(d)(8). For the OC,



the performance test shall establish the pressure drop range. [Synthetic Minor Operating Permit No. OP17-000024 dated XXXX, XXXX]

- (f) For the CHP Units G-01 and G-02, the Permittee shall conduct the performance tests on each CHP unit following 25 PA Code Chapter 139, the Pennsylvania Source Testing Manual, and procedures in 40 CFR §60 Subpart JJJJ. [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022]
  - (1) Each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load. [40 CFR §60.4244(a)]
  - (2) The Permittee shall not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in 40 CFR §60.8(c). If the stationary SI internal combustion engine is non-operational, the Permittee does not need to startup the engine solely to conduct a performance test; however, the Permittee must conduct the performance test immediately upon startup of each engine. [40 CFR §60.4244(b)]
  - (3) The Permittee shall conduct three separate test runs for each performance test and each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour. [40 CFR §60.4244(c)]
- (g) For the CHP Units G-01 and G-02, the Permittee shall perform quarterly NO<sub>x</sub> and CO portable analyzer tests on each CHP using an AMS-approved procedure to verify that the SCR and OC for each unit are working properly. (Replaces the annual catalytic activities test requirement). [AMS Plan Approval No. IP17-000009 dated 11/29/2017 and extended under IP22-000384 dated 10/3/2022]

**4. Monitoring Requirements**

[25 Pa Code §139, §127.441(c), §§114(a)(3) & 504(b) of Clean Air Act]

(a) Facility

- (1) The Permittee shall provide verification on a monthly basis that facility-wide NO<sub>x</sub> and VOC emissions are each less than 25 tons per rolling 12-month period, and facility-wide CO emission is less than 28.5 tons per rolling 12-month period.
  - (i) Emission calculations shall be based on the following:

Table D.4-1: Emission Factors for various sources

| Source  | Fuel Type   | NO <sub>x</sub> | VOC             | CO             | Emission Factor Source                             |
|---|-------------|-----------------|-----------------|----------------|--|
| CHP Units G-01 and G-02                                 | Natural Gas | 0.2 g/HP-hr     | 0.15 g/HP-hr    | 0.25 g/HP-hr   | Conditions D.1.(d)(1), D.1.(d)(4), & D.1.(d)(6)(i) |
| Significant and insignificant external combustion units | Natural Gas | 100 lbs / MMSCF | 5.5 lbs / MMSCF | 84 lbs / MMSCF | AP-42, Tables 1.4-1 and 1.4-2                      |

|   |                                    |                       |                         |                      |                               |
|---|------------------------------------|-----------------------|-------------------------|----------------------|-------------------------------|
| Significant and insignificant external combustion units | No. 2 Oil                          | 20 lbs / 1000 gallons | 0.34 lbs / 1000 gallons | 5 lbs / 1000 gallons | AP-42, Tables 1.3-1 and 1.3-3 |
| Emergency Generator EG-01                               | Diesel                             | 3.2 lbs / MMBTU       | 0.082 lbs / MMBTU       | 0.85 lbs / MMBTU     | AP-42, Table 3.4-1            |
| Air Compressor AC-01                                    | Diesel                             | 4.41 lbs / MMBTU      | 0.36 lbs / MMBTU        | 0.95 lbs / MMBTU     | AP-42, Table 3.3-1            |
| Insignificant Emergency Generators IS-13 and IS-14      | Natural Gas / Liquid Petroleum Gas | 4.08 lbs / MMBTU      | 0.118 lbs / MMBTU       | 0.317 lbs / MMBTU    | AP-42, Table 3.2-2            |

- (ii) Emission calculations shall assume average heating value for natural gas of 1,020 BTU/SCF, for No. 2 oil of 0.140 MMBTU/gal, and for diesel fuel of 0.137 MMBTU/gal.
- (iii) Compliance with the emission limits for the CHP units G-01 and G-02 in Conditions D.1.(d)(1), D.1.(d)(4), & D.1.(d)(6)(i), the facility-wide natural gas and No. 2 fuel oil usage limits listed in Conditions D.2.(a)(1)-(4), the work standard practice operating limits listed in Conditions D.2.(a)(5)(i)-(ii), the fuel usage limits for the Emergency Generator EG-01 and Air Compressor AC-01 listed in Conditions D.2.(c)(1)(iii) and D.2.(c)(3)(iii), and the operating hour limits for the insignificant Emergency Generators IS-13 and IS-14 listed in Condition D.2.(j)(2) ensures compliance with the facility-wide NO<sub>x</sub>, VOC, and CO emission limits listed in Conditions D.1.(a)(1)-(3).
- (2) Facility-wide natural gas and No. 2 fuel oil usage to demonstrate compliance with Conditions D.2.(a)(1)-(3).
- (b) Group 01 – External Combustion Units
  - The Permittee shall monitor the following:
    - (1) The proper operation of each unit in accordance with manufacturer’s recommended operations and maintenance.
    - (2) The total combined monthly No. 2 fuel oil usage for Boiler Nos. COMB-01, COMB-02, COMB-03, and COMB-04.
    - (3) The total combined monthly natural gas usage for Boiler Nos. COMB-05, COMB-06, COMB-09, and COMB-10.
    - (4) The monthly natural gas and monthly No. 2 fuel oil usage for Boiler Nos. COMB-07 and COMB-08.
    - (5) The total monthly natural gas usage for the Pressure Washer COMB-11, Space Heater Nos. 1-6 (COMB-12 through COMB-17), and Spray Booth Burner CU-SB.
    - (6) Combined fuel usage for Sources COMB-07 and COMB-08 on a monthly basis and the reason Sources COMB-07 and COMB-08 operated on a daily basis.
    - (7) Sulfur content of No. 2 fuel oil. The Permittee shall monitor fuel manifest records to demonstrate compliance.
    - (8) For the external combustion units COMB-02, COMB-03, COMB-07, and

COMB-08 burning fuel oil, visible emission for each boiler by using a daily visual check of the exhaust stack during fuel oil burning. The visual check does not need to meet the requirements of Federal Reference Method 9. If visible emissions are detected, adjustments shall be made to the unit to eliminate the visible emissions or a certified smoke reader shall be used to determine the opacity of the emissions. [25 Pa. Code §127.441]

- (c) Group 02 – Emergency Generator, Air Compressor, and Sand Blasting Operations
  - (1) For the emergency generator, the Permittee shall monitor the following:
    - (i) Monthly fuel usage and sulfur content of fuel oil.
    - (ii) Monthly operating hours and operating hours per rolling 12-month period calculated monthly, total hours operated per calendar year for testing, engine tuning, maintenance checks, and readiness testing, and reason for operation (during emergencies and non-emergencies).
    - (iii) During the ozone season, the Permittee shall monitor the AQI forecast, and daily operating hours and times to demonstrate compliance with AMR XV.
    - (iv) Allowable and actual NO<sub>x</sub> emissions, any other calculations or verification, and NO<sub>x</sub> allowance surrendered. Verification or calculations shall be based on AP-42 emission factors, fuel usage, or manufacturer’s specifications.
  - (2) For the air compressor, the Permittee shall monitor the following:
    - (i) Monthly fuel usage for the air compressor.
    - (ii) Monthly operating hours for the air compressor.
    - (iii) For sand blasting operations, monthly blast media usage and the type/name of blasting media used. The Permittee shall keep a copy of the Safety Data Sheets (SDS) for each blasting media used at the facility.
- (d) Group 03 – Combined Heat and Power Units (CHP)
  - (1) The Permittee shall monitor the following for G-01 and G-02:
    - (i) The pressure drop across the oxidation catalyst continuously to ensure that the pressure drop is maintained within the pressure drop range established during the most recent stack test.
    - (ii) The inlet temperature to the oxidation catalyst continuously.
    - (iii) Monthly verification of compliance with the emission limits on a rolling 12-month basis in Conditions D.1.(d)(2), D.1.(d)(3), and D.1.(d)(6)(ii) for each engine.
      - (A) Emission calculations shall be based on the emission limits in Conditions D.1.(d)(1), D.1.(d)(4), & D.1.(d)(6)(i).
      - (B) Compliance with the emission limits for the CHP units G-01 and G-02 in Conditions D.1.(d)(1), D.1.(d)(4), & D.1.(d)(6)(i) and the natural gas usage limit for the CHP units in Condition D.2.(a)(1) ensure compliance with the emission limits on a rolling 12-month basis in Conditions D.1.(d)(2), D.1.(d)(3), and D.1.(d)(6)(ii) for each engine.
    - (iv) Test results and manufacturer’s emissions data for each engine.
    - (v) Fuel type and amount of fuel used for each engine to demonstrate

- compliance with Condition D.2.(a)(1).
- (vi) Operating hours of each engine.
  - (vii) Generator electrical production for each engine.
  - (viii) Performance stack test results for each engine.
  - (ix) Quarterly portable analyzer test results.
  - (x) Allowable and actual NO<sub>x</sub> emissions, any other calculations or verification, and NO<sub>x</sub> allowance surrendered to demonstrate compliance with the requirements of 25 Pa. Code §§129.201-205 in Conditions D.1.(d)(9), and D.2.(d)(7). Verification or calculations shall be based on the stack test data and electrical generation of the engine.
  - (xi) Actual and expected urea injection rate using the SCR urea flow to engine load map and SCR Trim System as per Condition D.2.(d)(6).
- (e) Group 04 - Gasoline Tank (Gasoline Dispensing Facility)
- (1) The Permittee shall monitor each gasoline shipment received at the facility between April 15 and September 1. [AMR V Sec. V.D] The Permittee shall monitor the following:
    - (i) Reid Vapor Pressure.
    - (ii) Quantity of shipment or delivery.
    - (iii) Date of shipment or delivery.
    - (iv) Monthly gasoline throughput.
    - (v) Any failures – type and duration.
    - (vi) Maintenance and repair.
    - (vii) Tests / certifications.
- (f) Group 05 – Parts Washers – Degreasers
- (1) For the degreasers, the Permittee shall monitor the following:
    - (i) Name, vapor pressure, and VOC content of the solvents used in each degreaser.
    - (ii) Dates and amount of solvent added to each degreaser.
    - (iii) Total monthly VOC usage for each degreaser.
    - (iv) Safety Data Sheet (SDS) of solvents used in each degreaser.
    - (v) The Permittee shall maintain the information specified in Condition D.2.(f)(6). An invoice, bill of sale, certificate that corresponds to a number of sales, Safety Data Sheet (SDS), or other appropriate documentation acceptable to AMS may be used to comply with this condition. [25 Pa. Code §129.63(a)(6)]
- (g) Group 06 – Spray Paint Booth
- (1) For the spray booth, the Permittee shall monitor the following:
    - (i) Proper operation of the booths in accordance with manufacturer’s recommended operations and maintenance.
    - (ii) Number of partial and full refinishing jobs completed on a daily basis. [AMR V Sec. XIV.D.1]
    - (iii) The VOC content, less water, of surface preparation products used. [AMR V Sec. XIV.D.2]

- (iv) The volume and/or weight of surface preparation products used on a daily basis. [AMR V Sec. XIV.D.3]
- (2) The Permittee shall on a weekly schedule: [AMR V Sec. XIV.K]
  - (i) Inspect equipment, frames, filters, and stacks.
  - (ii) Inspect the roof while paint spraying is in process for paint deposits or visible emission coming from the stack.
- (h) Group IN – Insignificant Sources IS-1 through IS-14
  - (1) For the insignificant external combustion units IS-1 through IS-12, the Permittee shall monitor the fuel type and fuel usage by each unit.
  - (2) For the insignificant Emergency Generators IS-13 and IS-14, the Permittee shall monitor the fuel type, monthly fuel usage, monthly operating hours, operating hours per rolling 12-month period calculated monthly, and reason for operating the emergency generators.
  - (3) During the ozone season, the Permittee shall monitor the date and time when testing and/or tuning of the Emergency Generator IS-13 or IS-14 was conducted and the AQI forecast or color code during testing and/or tuning.

## 5. Recordkeeping Requirements

[25 Pa Code §§127.441(c), 135.21, 135.5 & 139]

### (a) Facility

The Permittee shall keep records of the following:

- (1) The Permittee shall record all verification that facility-wide NO<sub>x</sub> and VOC emissions are each less than 25 tons per rolling 12-month period, and facility-wide CO emission is less than 28.5 tons per rolling 12-month period, to ensure compliance with the facility-wide emission limits listed in Conditions D.1.(a)(1)-(3).
  - (i) Emission calculations shall be based on the emission factors for various sources in Table D.4-1.
  - (ii) Compliance with the emission limits in Conditions D.1.(d)(1), D.1.(d)(4), and D.1.(d)(6)(i) for the CHP units G-01 and G-02, the facility-wide natural gas and No. 2 fuel oil usage limits listed in Conditions D.2.(a)(1)-(4), the work standard practice operating limits listed in Conditions D.2.(a)(5)(i)-(ii), the fuel usage limits for the Emergency Generator EG-01 and Air Compressor AC-01 listed in Conditions D.2.(c)(1)(iii) and D.2.(c)(3)(iii), and the operating hour limits for the insignificant Emergency Generators IS-13 and IS-14 listed in Condition D.2.(j)(2) ensures compliance with the facility-wide NO<sub>x</sub>, VOC, and CO emission limits listed in Conditions D.1.(a)(1)-(3).
- (2) Facility-wide natural gas and No. 2 fuel oil usage per rolling 12-month period calculated monthly to demonstrate compliance with Conditions D.2.(a)(1)-(3).
- (3) The Permittee shall establish and maintain baseline operating records, sampling data concurrent with any emission tests, and any supporting calculations used to determine emissions.
- (4) Records of the occurrence or duration of malfunction of operation of a boiler or emergency generator.

- (5) Records of the occurrence, duration, and cause (if known) of each malfunction of air pollution equipment or monitoring equipment used to comply with the restrictions or monitoring provisions of this permit.
- (6) For monitoring equipment used to comply with the monitoring requirements of this permit, records documenting the completion of installation, calibration checks, and maintenance.

(b) Group 01 – External Combustion Units

The Permittee shall keep the following records:

- (1) The proper operation of the boilers and maintenance conducted on the boilers in accordance with manufacturer’s recommended operations and maintenance to ensure compliance with Condition D.2.(b)(1).
- (2) The total combined No. 2 fuel oil usage for Boilers COMB-01, COMB-02, COMB-03, and COMB-04 per rolling 12-month period calculated on a monthly basis.
- (3) The total combined natural gas usage for Boilers COMB-05, COMB-06, COMB-09, and COMB-10 per rolling 12-month period calculated on a monthly basis.
- (4) The monthly natural gas and monthly No. 2 fuel oil usage for Boilers COMB-07 and COMB-08 per rolling 12-month period calculated on a monthly basis to verify that the natural gas usage limit per rolling 12-month period and No. 2 oil usage limit per rolling 12-month period in Condition D.2.(a)(4) is not exceeded.
- (5) The total natural gas usage for the pressure washer COMB-11, Space Heater Nos. 1-6 (COMB-12 through COMB-17), and spray booth burner CU-SB per rolling 12-month period calculated on a monthly basis.
- (6) Records sufficient to demonstrate compliance with Conditions D.2.(a)(4)-(5), including but not limited to the combined fuel usage for Sources COMB-07 and COMB-08 per rolling 12-month period calculated on a monthly basis and the reason Sources COMB-07 and COMB-08 operated on a daily basis.
- (7) Sulfur content of No. 2 fuel oil. The Permittee shall keep fuel manifest records to demonstrate compliance with Conditions C.4.(a)(1) and D.4.(b)(7).
- (8) Records of visible emissions checks for the Boilers COMB-02, COMB-03, COMB-07, and COMB-08 during No. 2 fuel oil burning to ensure compliance with Condition D.4.(b)(8). [25 Pa. Code §127.441 and 25 Pa. Code §135.5]
- (9) For Boilers COMB-01, COMB-02, COMB-03, COMB-04, COMB-07, and COMB-08, the Permittee shall keep the following records: [40 CFR §63.11225(c)]
  - (i) Copies of all required notifications. [40 CFR §63.11225(c)(1)]
  - (ii) Tune-up records - records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer’s specifications to which the boiler was tuned. [40 CFR §63.11225(c)(2)(i)]
  - (iii) A copy of each notification and report submitted to comply with 40 CFR §63 Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status submitted. [40 CFR §63.11225(c)(1)]
  - (iv) Records of occurrence and duration of each malfunction of the boilers, or

the associated air pollution control and monitoring equipment. [40 CFR §63.11225(c)(4)]

- (v) Records of actions taken during periods of malfunctions to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [40 CFR §63.11225(c)(5)]
  - (vi) Maintain onsite and submit, if requested by the Administrator, a biennial report (for Boilers COMB-02, COMB-03, COMB-07, and COMB-08) or 5-year report (for Boilers COMB-01 and COMB-04) containing the following information:
    - (A) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
    - (B) A description of any corrective actions taken as a part of the tune-up of the boiler.
    - (C) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
  - (vii) Records of any initial boiler tune-up conducted by March 21, 2014 as required by 40 CFR §63.11196(a)(1).
  - (viii) The Permittee must keep each record for 5 years following the date of each recorded action. The Permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The Permittee may keep the records off site for the remaining 3 years. [40 CFR §63.11225(d)]
- (c) Group 02 – Emergency Generator, Air Compressor, and Sand Blasting Operations
- (1) The Permittee shall keep records of the following:
    - (i) Proper operation and maintenance conducted on the emergency generator, air compressor, or sand blasting operations to ensure compliance with Conditions D.2.(c)(1)(i) and D.2.(c)(3)(i).
    - (ii) Monthly fuel usage per rolling 12-month period and fuel type for the emergency generator to ensure compliance with Conditions D.2.(c)(1)(ii)-(iii).
    - (iii) Daily operating hours and operating hours per rolling 12-month period calculated monthly, total hours operated per calendar year for testing, engine tuning, maintenance checks, and readiness testing, and reason for operation (during emergencies and non-emergencies) for the emergency generator to ensure compliance with Conditions D.2.(c)(1)(iv).
    - (iv) During the ozone season, the date and time when testing and/or tuning of the emergency generator was conducted and the AQI forecast or color

- code during testing and/or tuning to demonstrate compliance with AMR XV requirements in Condition D.2.(c)(1)(v).
- (v) Allowable and actual NO<sub>x</sub> emissions, any other calculations or verification, and NO<sub>x</sub> allowance surrendered to demonstrate compliance with Condition D.2.(c)(2). Verification or calculations shall be based on AP-42 emission factors, fuel usage, or manufacturer’s specifications.
  - (vi) Monthly fuel usage per rolling 12-month period and fuel type for the air compressor to ensure compliance with Conditions D.2.(c)(3)(ii)-(iii).
  - (vii) Monthly operating hours for the air compressor, calculated monthly.
  - (viii) For sand blasting operations, monthly blast media usage and the type/name of blasting media used. The Permittee shall keep a copy of the Safety Data Sheets (SDS) for each blasting media used at the facility.
- (d) Group 03 – Combined Heat and Power Units (CHP)
- (1) The Permittee shall keep records of the following:
    - (i) Proper operation and maintenance conducted on each combined heat and power (CHP) unit to ensure compliance with Condition D.2.(d)(1).
    - (ii) The pressure drop across the oxidation catalyst continuously.
    - (iii) The inlet temperature to the oxidation catalyst continuously.
    - (iv) Monthly verification of compliance with the emission limits on a rolling 12-month basis in Conditions D.1.(d)(2), D.1.(d)(3), and D.1.(d)(6)(ii) for each engine.
      - (A) Emission calculations shall be based on the emission limits in Conditions D.1.(d)(1), D.1.(d)(4), & D.1.(d)(6)(i).
      - (B) Compliance with the emission limits for the CHP units G-01 and G-02 in Conditions D.1.(d)(1), D.1.(d)(4), & D.1.(d)(6)(i) and the natural gas usage limit for the CHP units in Condition D.2.(a)(1) ensures compliance with the emission limits on a rolling 12-month basis in Conditions D.1.(d)(2), D.1.(d)(3), and D.1.(d)(6)(ii) for each engine.
    - (v) Test results and manufacturer’s emissions data for each engine to demonstrate compliance with Conditions D.1.(d)(1), D.1.(d)(4), D.1.(d)(5), D.1.(d)(6)(i), and D.1.(d)(8).
    - (vi) Fuel type and amount of fuel used for each engine per rolling 12-month period calculated on a monthly basis to ensure compliance with Conditions D.2.(a)(1) and D.2.(d)(4).
    - (vii) Operating hours of each engine.
    - (viii) Generator electrical production for each engine.
    - (ix) Performance stack test results for each engine to demonstrate compliance with Condition D.3.(e).
    - (x) Quarterly portable analyzer test results.
    - (xi) Allowable and actual NO<sub>x</sub> emissions, any other calculations or verification, and NO<sub>x</sub> allowance surrendered to demonstrate compliance with Conditions D.1.(d)(9) and D.2.(d)(7). Verification or calculations shall be based on the stack test data and electrical generation of the engine.
    - (xii) Actual and expected urea injection rate using the SCR urea flow to engine



load map and SCR Trim System to demonstrate compliance with Condition D.2.(d)(6).

- (2) The Permittee shall keep records of the following information: [40 CFR §60.4245(a)]
  - (i) All notifications submitted to comply with 40 CFR Part 60 Subpart JJJJ and all documentation supporting any notification.
  - (ii) Maintenance conducted on each engine.
  - (iii) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR §60.4243(a)(2), documentation that the engine meets the emission standards.
- (e) Group 03 - Gasoline Tank (Gasoline Dispensing Facility)
  - (1) The Permittee shall keep records of the following: [25 Pa. Code §129.82(b)(5) and AMR V Sec. V.D]
    - (i) Monthly gasoline throughput.
    - (ii) Any failures – type and duration.
    - (iii) Maintenance and repair.
    - (iv) Tests / certifications.
    - (v) Records of occurrence and duration of any malfunction of operation or air pollution control device [40 CFR §63.11125(d)(1)]; and
    - (vi) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR §63.11125(d)(2)]
- (f) Group 05 – Parts Washers - Degreasers
  - (1) For the degreasers, the Permittee shall keep records of the following:
    - (i) Name, vapor pressure, and VOC content of the solvents used in each degreaser.
    - (ii) Dates and amount of solvent added to each degreaser.
    - (iii) Total monthly VOC usage for each degreaser.
    - (iv) Safety Data Sheet (SDS) of solvents used in each degreaser.
    - (v) Invoices, bill of sale, and other documentation to demonstrate compliance with Condition D.2.(f)(6).
- (g) Group 06 – Spray Paint Booth
  - (1) For the spray booth, the Permittee shall keep records of the following:
    - (i) Proper operation of the booths in accordance with manufacturer's recommended operations and maintenance.
    - (ii) Number of partial and full refinishing jobs completed on a daily basis. [AMR V Sec. XIV.D.1]
    - (iii) The VOC content, less water, of surface preparation products used. [AMR V Sec. XIV.D.2]
    - (iv) The volume and/or weight of surface preparation products used on a daily

basis. [AMR V Sec. XIV.D.3]

- (2) For each type of primer, topcoat, and specialty coating used, daily records must be kept of: [AMR V Sec. XIV.D.4]
- (i) Volume of coating, catalyst, and reducer used;
  - (ii) Mix ratio of components in the coating;
  - (iii) VOC content of coating, less water, as applied.
    - (A) Supplied by the coating manufacturer, or
    - (B) If the supplied coatings are subsequently thinned, the VOC content shall be calculated in accordance with Condition D.5.(g)(3).
- (3) The Permittee shall provide documentation concerning the VOC content of the coatings calculated in accordance with the following: [25 Pa. Code §129.75(d)]
- (i) The mass of VOC per combined volume of VOC and coating solids, less water and exempt compounds, shall be calculated by the following equation: [25 Pa. Code §129.75(d)(1)]

$$\text{VOC} = \frac{(\text{W}_v - \text{W}_w - \text{W}_{ec})}{(\text{V} - \text{V}_w - \text{V}_{ec})}$$

where:

VOC = VOC content in grams per liter (g/l) of coating less water and non-VOC solvents,

W<sub>v</sub> = Mass of total volatiles, in grams.

W<sub>w</sub> = Mass of water, in grams.

W<sub>ec</sub> = Mass of exempt compounds, in grams.

V = Volume of coating, in liters.

V<sub>w</sub> = Volume of water, in liters.

V<sub>ec</sub> = Volume of exempt compounds, in liters.

To convert from grams per liter to pounds per gallon (lb/gal), multiply the result (VOC content) by  $8.345 \times 10^{-3}$  (lb/gal/g/l).

- (4) The Permittee shall keep a log of the dates and times of weekly inspections of equipment; paint spray booth - frames, filters, and stacks; and roof during paint spraying.
- (5) For each spray gun, a gun cleaner log must be kept of the following: [AMR V Sec. XIV.D.5.]
- (i) The quantity of replacement solvent added to the gun cleaner on a monthly basis.
  - (ii) The number of gun cleanings performed on a daily basis.
  - (iii) The amount of waste solvent removed from the gun cleaner on a monthly basis. This must include documentation of the amount released to a licensed reclaiming or hazardous waste management facility; and
  - (iv) The dates and times of routine inspections and maintenance repair activities.
- (6) Safety Data Sheet (SDS) of all paints and solvents used.

- (h) Group IN – Insignificant Sources IS-1 through IS-14
  - (1) For the insignificant external combustion units IS-1 through IS-12, the Permittee shall keep record of the fuel type and fuel usage by each unit to demonstrate compliance with Condition D.2.(j)(1).
  - (2) For the insignificant Emergency Generators IS-13 and IS-14, the Permittee shall keep record of the fuel type, monthly fuel usage, monthly operating hours, operating hours per rolling 12-month period calculated monthly, and reason for operating the emergency generators to demonstrate compliance with Conditions D.2.(j)(1)-(2).
  - (3) During the ozone season, the Permittee shall keep record of the date and time when testing and/or tuning of the Emergency Generator IS-13 or IS-14 was conducted and the AQI forecast or color code during testing and/or tuning to demonstrate compliance with Condition D.2.(j)(3).

## 6. Reporting Requirements

[25 Pa Code §127.442, §127.511(c), & AMR I Sec. II]

- (a) Any violation of an emission limitation that does not result from a malfunction requiring reporting under Section C.13 shall be reported (by phone call or facsimile transmission) to AMS within twenty-four (24) hours of detection and followed by written notification within thirty-one (31) days.
- (b) The Permittee shall submit to AMS annual reports of the performance of the facility using the City of Philadelphia Monitoring Report Form as required in Section C.10 of this permit. These reports shall consist of the following:
  - (1) A description of any deviations from permit requirements that occurred during the 12-month reporting period, the probable cause of such deviations, and corrective actions or preventive measures taken;
  - (2) A description of any malfunction of processes, air pollution control equipment, or monitoring equipment that occurred during the 12-month reporting period, the date and duration of the incidents, the probable cause of the incidents, and actions taken to remediate such incidents;
  - (3) A description of any sources which have not been operated for more than one year.
  - (4) Along with each annual report submittal, the Permittee shall submit a statement listing any Synthetic Minor emission limitations that were violated during the previous 12-month time period.
- (c) Group 01 – External Combustion Units
  - (1) The Permittee shall submit the following for Boilers COMB-01, COMB-02, COMB-03, COMB-04, COMB-07, and COMB-08:
    - (i) If the Permittee has switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within this subpart, in the boiler becoming subject to this subpart, or in the boiler switching out of this subpart due to a fuel change that results in the boiler meeting the definition of gas-fired boiler, as defined

in 40 CFR §63.11237, or the Permittee has taken a permit limit that resulted in the Permittee becoming subject to this subpart or no longer being subject to this subpart, the Permittee must provide notice of the date upon which the Permittee switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify [40 CFR 63.11225(g)]:

- (A) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.
  - (B) The date upon which the fuel switch, physical change, or permit limit occurred.
- (ii) The Permittee shall submit a Notification of Compliance Status Report in accordance with 40 CFR §63.9(h) no later than 120 days after the applicable compliance date specified in 40 CFR §63.11196 for COMB-01 through COMB-04 and no later than 120 days after the fuel switch occurs for COMB-07 and COMB-08. [40 CFR §63.11225(a)(4)]
  - (iii) A sample form can be found at the following website:  
<https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source>
  - (iv) The Permittee shall prepare by March 1 every 2 years (for Boilers COMB-02, COMB-03, COMB-07, and COMB-08) or every 5 years (for Boilers COMB-01 and COMB-04) and submit upon request to AMS and EPA Region III, a biennial or 5-year compliance certification report for the calendar years since the last tune-up containing the following information: [40 CFR §63.11225(b)]
    - (A) Company name and address.
    - (B) Statement by a responsible official with official's name, title, phone number, e-mail address and signature certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR §63 Subpart JJJJJJ.
  - (C) The following certification(s) of compliance, as applicable, and signed by a responsible official:
    - (i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."
    - (ii) "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."
  - (v) The Permittee shall prepare by March 1 and submit notification to AMS and EPA Region III by March 15 of the year if the boiler experiences any deviations from the applicable requirements during the reporting period.

The notification shall include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken. [40 CFR §63.11225(b)(3)]

## **SECTION E. NON-APPLICABILITY REQUIREMENTS**

### **(a) Spray Paint Booth**

- (1) The spray paint booth is exempt from the motor vehicle and mobile equipment surface coating requirements of the National Emission Standard for Hazardous Air Pollutants, at Area Sources, 40 CFR Part 63 Subpart HHHHHH, since the spray paint booth does not use any coating with target Hazardous Air Pollutants (HAPs) such as chromium (Cr), lead (Pb), nickel (Ni), cadmium (Cd), and manganese (Mn).

\* This is a State requirement and is not Federally enforceable.

\*\* This is a Local requirement and is not Federally enforceable.