

City of Philadelphia  
Department of Public Health  
Air Management Services

Natural Minor Operation Permit OP17-000056

**Philadelphia Refinery Operations - Evergreen  
Resources Group, LLC**

2700 W Passyunk Avenue, Philadelphia, PA 19145 (Sunoco Partners Marketing and  
Terminals L.P. (SPMT) Belmont Terminal Site)

3144 W Passyunk Avenue, Philadelphia, PA 19145 (Philadelphia Energy Solutions  
Refining & Marketing LLC (PES) Philadelphia Refining Complex Site)

Issuance Date: XXXX  
Effective Date: XXXXX  
Expiration Date: XXXXX

**Draft 10.11.2019**

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City of Philadelphia  
Department of Public Health  
Air Management Services

Effective Date: XXXXX

Expiration Date: XXXXX

Replaces Permits No. None

**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.

Commented [MU1]: Have to keep the language the same for NMOPs

PLID: 10479

Facility: Philadelphia Refinery Operations - Evergreen Resources Group, LLC  
Locations: 2700 W Passyunk Avenue, Philadelphia, PA 19145 (Belmont Terminal Site)  
3144 W Passyunk Avenue, Philadelphia, PA 19145 (PES Refinery Site)

Owner: Philadelphia Refinery Operations - Evergreen Resources Group.  
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Permit Contact: Tiffani L. Doerr  
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\_\_\_\_\_  
Edward Wiener, Chief of Source Registration

\_\_\_\_\_  
Date

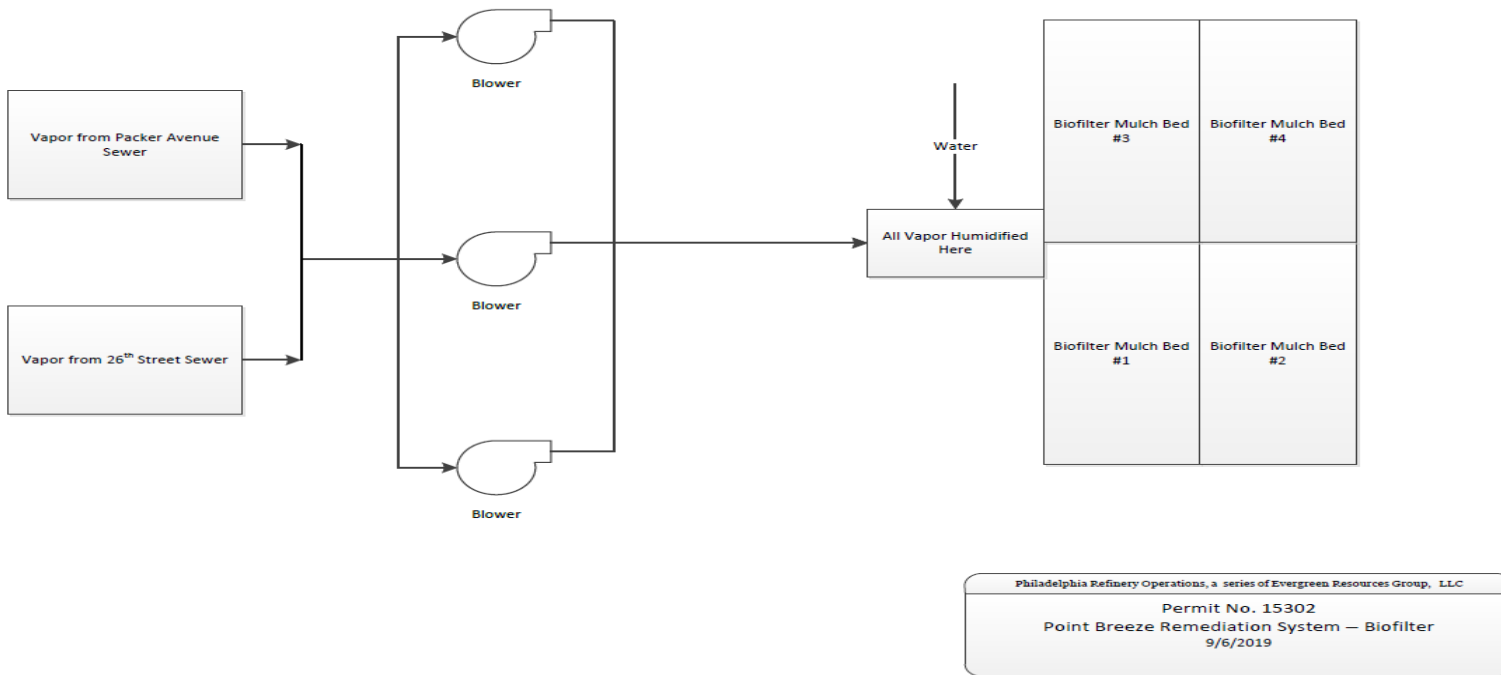
TABLE A1-FACILITY INVENTORY LIST

Group 01 - Soil Remediation Systems

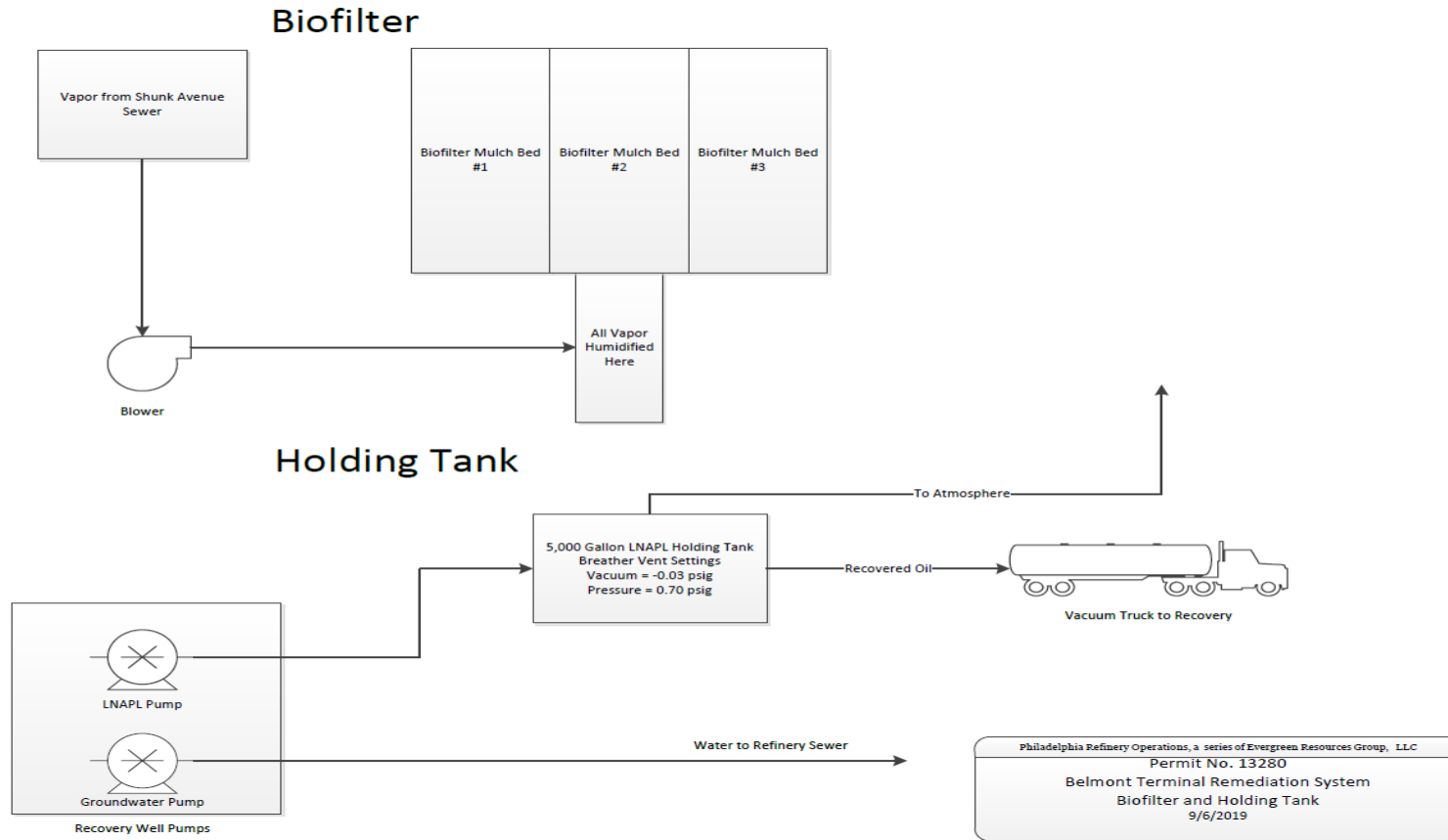
Source ID	Location	Source Name	Source Description and Capacity	Permit No. / Construction Date
PB-RS	PES Terminal Site	Point Breeze Remediation System	Consists of: <ul style="list-style-type: none"> <li>Biofilter 14,000 CFM, 2 banks of 2 beds for a total of 4 biomass treatment beds. Each bed is approx. 73 x 39 x 4 ft.</li> <li>Three (3) blower fans</li> </ul>	Originally Permitted under 98005 dated 3/23/1998. Modified under 06170 dated 4/30/2007. Modified under 15302 dated 11/29/2016.
BT-RS	Belmont Terminal Site	Belmont Terminal Remediation System And Holding Tank	Consists of: <ul style="list-style-type: none"> <li>Biofilter - Three (3) cells, biomass treatment beds</li> <li>Each bed is Approx 45 ft x 45ft x 4ft</li> <li>One (1) 5000 Gallon LNAPL Holding Tank</li> </ul>	Originally Permitted Under 01092. Modified under 13280 dated 12/23/2013.
PA-RS	PES Terminal Site	Penrose Avenue Remediation System	Consists of: <ul style="list-style-type: none"> <li>One (1) Oil-water separator (HydroQuip)</li> <li>One (1) Influent Settling Tank, 300 gallons</li> <li>One (1) Secondary Settling Tank (105 gallons, Chem Trailer /TC2454AA/AB)</li> <li>One (1) 550 Gallon LNAPL Holding Tank ( Highland Tank and Manufacturing, Inc.)</li> <li>One regenerative blower, AMETEK/Rotron/ EN404.</li> <li>One (1) Catalytic Oxidizer - Falmouth Products</li> </ul>	IP18-000431 dated 2/21/2019  Replaced 11277 dated 1/27/2012 (Biofilter)

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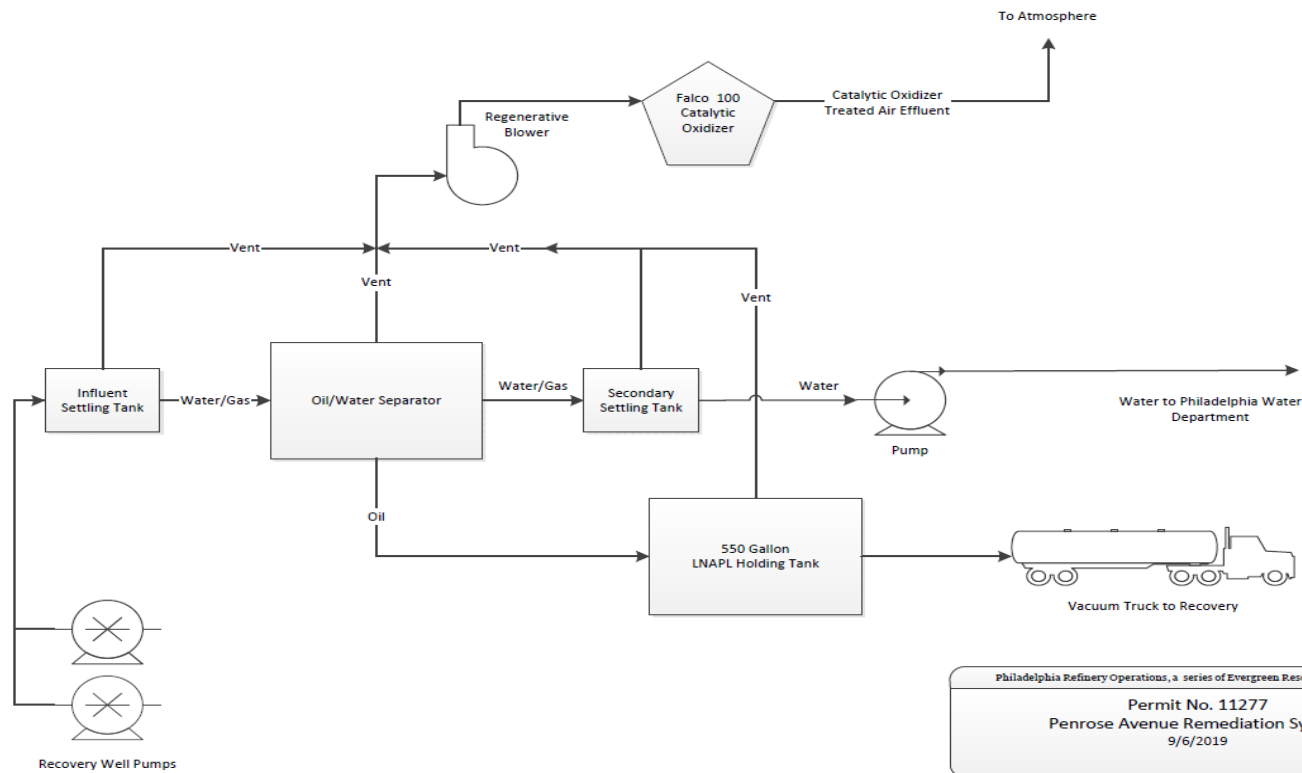
PROCESS FLOW DIAGRAM FOR PHILADELPHIA REFINERY OPERATIONS - EVERGREEN RESOURCES  
**Biofilter** POINT BREEZE REMEDIATION STSTEM



PROCESS FLOW DIAGRAM FOR PHILADELPHIA REFINERY OPERATIONS - EVERGREEN RESOURCES  
BELMONT TERMINAL REMEDIATION SYSTEM



# PROCESS FLOW DIAGRAM FOR PHILADELPHIA REFINERY OPERATIONS - EVERGREEN RESOURCES PENROSE AVENUE REMEDIATION SYSTEM Remediation System



Philadelphia Refinery Operations, a series of Evergreen Resources Group, LLC  
Permit No. 11277  
Penrose Avenue Remediation System  
9/6/2019



## **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]

This operating permit is issued for a fixed term of five (5) years. 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 in the amount of

\$375.00 for the processing of the application as specified in 25 Pa Code §127.703(b). The fee shall be made payable to "The City of Philadelphia".

- (d) 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 Philadelphia 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, on or before September 1 of each year, pay applicable annual operating permit administration fees as specified in 25 Pa Code §127.703(c).

#### 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 Philadelphia 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 a 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 AMR 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 application.
- (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.
- (c) 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.

## 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, or the installation permit.
- (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. Administrative amendment procedures may not be used for any amendment precluded by the Clean Air Act or regulations promulgated thereunder from being processed as an administrative amendment.
- (c) The Permittee shall make minor permit modifications (as defined in 25 Pa Code §121.1) only in accordance with 25 Pa Code §127.462.
- (d) Permit modifications which do not qualify as minor permit modifications under 25 Pa Code §127.462 or an administrative amendment described in 25 Pa Code

§127.450 are authorized in accordance with 25 Pa Code §127.541.

### 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 Philadelphia Code §3-306]

- (a) The Permittee shall provide AMS with a written notice seven 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 natural 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:
- (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.
- (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.
- (b) The Permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to 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 years, but less than 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. 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.

## 18. 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.

## 19. 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.

## 20. 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(d) of the Air Management Code.
- (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]

The Permittee shall not permit the ignition or continuation of open burning of any materials.

## 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 C.F.R. 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) 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. 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.

#### 11. Emission Statement

[25 Pa Code §135.21, and AMR I Sec. II.B. 2]

When notified, the Permittee shall provide AMS with an emission statement by March 1<sup>st</sup>, in a form as AMS may prescribe, for classes or categories of sources, showing the actual emissions from each source for the previous calendar year and a description of the method used to calculate the emissions. The statement shall contain emission information for the following pollutants:

- (a) 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.
- (b) Total suspended particulate, PM-10, sulfur oxides, carbon monoxide, hazardous air pollutants, and any other pollutants or information requested by AMS.

## 12. 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 possibly 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.

## 13. Submissions

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

- (a) 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

Notifications to EPA, pursuant to 25 PA Code §127.462(c), and copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted to the following EPA e-mail box:  
R3\_Air\_Apps\_and\_Notices@epa.gov. Please place the following in the subject line: TV [permit number], [Facility Name].

- (b) Compliance-related reports and notifications, including Monitoring Report Forms, Title V Compliance Certifications, 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

The Permittee may forward EPA Region III annual and semi-annual Title V Compliance Certification Reports (as defined in Condition C.13(c) of this existing Title V Operating Permit electronically, in lieu of a hard copy version to the email address: R3\_APD\_Permits@epa.gov. Please place the following in the subject line: TV [permit number], [Facility Name].

- (c) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Section Chief  
U.S. Environmental Protection Agency Region III  
Enforcement and Compliance Assurance Division  
Air Section (3ED21)  
1650 Arch Street  
Philadelphia, PA 19103-2029

- (d) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain a certification by a responsible official as to the truth, accuracy, and completeness as required under 25 Pa Code §127.402(d).
- (e) Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

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

### **1. Emission Limitations**

- (a) Point Breeze Remediation System  
(1) None
- (b) Belmont Terminal Remediation System  
(1) None

- (c) Penrose Ave Remediation System [AMS Permit IP18-000431 dated 2/21/2019]
  - (1) Actual VOC emissions from the soil and groundwater remediation systems shall be less than 2.7 tons per rolling 12-month period.
  - (2) Actual HAP emission from the remediation system shall be less than 1 ton per rolling 12-month period.
  - (3) During operation of the VEGE and control device, the Permittee shall comply with one of the following:
    - (i) The total Volatile Organic Compound (VOC) content in the effluent stream shall not exceed 200 ppmv at any time.
    - (ii) The minimum VOC destruction efficiency for the Catalytic Oxidizer shall be 90%.

## 2. Work Practice Standards

### (a) Facility

- (1) Each remediation system shall be installed, operated, and maintained in accordance with the manufacturer's specifications, and the specifications in the associate installation permit application, and with good operating practices.

### (b) Point Breeze Remediation System

- (1) The Permittee shall perform all routine maintenance procedures to the Biofilter according to the attached modified weekly maintenance schedule log (See Attachment A, including but not limited to annual maintenance/testing of the heating coil and air distribution piping). This maintenance schedule includes changes to the monitoring requirements presented in the November 29, 2016 Installation Permit [AMS Plan Approval 15302 dated 11/29/2016]

### (c) Belmont Terminal Remediation System

- (1) The Biofilter shall be installed, operated and maintained according to Best Management Practices to maximize odor reduction for the air stream it controls.
- (2) Odors from the process shall not cause odor nuisance outside the boundary of the property.
- (3) The Permittee shall smoke test the piping of the biofilter to ensure proper distribution of the influent vapors. The smoke testing shall be repeated annually.

### (d) Penrose Ave Remediation System. [AMS Permit IP18-000431 dated 2/21/2019]

- (1) All vapors from the closed-vent groundwater remediation system shall pass through the catalytic oxidizer prior to discharge to the atmosphere. The temperatures in the influent air stream, the catalyst bed, and the effluent air stream shall be continuously monitored by the equipment and the system shall shut down upon detection of any operating temperatures which are out of the range of the following catalytic oxidizer specifications:



Temperature Position	Low Operating Range	High Operating Range
Catalyst Bed Influent (T1)	270° C	505° C
Catalyst Bed Effluent (T2)	N/A	620° C
Catalyst Bed (T3)	N/A	600° C

(2) The catalytic oxidizer shall operate at a minimum pre-catalyst (T1) set point temperature of 626 ° F (330° C) and a minimum operating temperature of 270 ° C.

### 3. Testing Requirements

[25 Pa Code §139]

- (a) The following performance tests methods shall be used to demonstrate compliance with the emission limitations:
  - (1) U.S. EPA Reference Method 25A shall be used for VOCs.
  - (2) 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.
  - (3) 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.
  - (4) Compliance determination shall consist of the arithmetic means of results of three separate runs for each source test using U.S. EPA Reference Method 25A. The source test shall be consistent with U.S. EPA designated test methods and 25 Pa Code Chapter 139. The Permittee shall submit a test protocol to AMS for approval at least 30 days before the test date. A test report shall be submitted to AMS within 60 days of completion of testing.
  - (5) 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.
- (b) 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 test are deemed necessary by AMS to determine the actual emission rate(s).

### 4. Monitoring Requirements

[25 Pa Code §§127.511 & 139, §§114(a)(3) & 504(b) of Clean Air Act]

The Permittee shall monitor and record the following:

- (a) Point Breeze Remediation System
  - (1) Weekly monitoring of the steam injection system.

- (2) Weekly temperature of the inlet gas to the Biofilter.
- (3) Weekly maintenance schedule log.
- (4) Monthly checklists for fan current and fan differential pressure.
- (5) Monthly checklists for steam valve positions and Biofilter cell pressures.
- (6) Quarterly checks of blower fan performance.
- (7) Quarterly checks of pH cell beds.
- (8) Annual inspection and calibration of the humidification and temperature control systems.
- (9) Annual inspection of the stem valve position.
- (b) Belmont Terminal Remediation System
  - (1) Weekly blower flow rate, influent vacuum, and effluent pressure
  - (2) Weekly treatment bed temperatures, and influent pressure.
  - (3) Weekly influent concentration at the Shunk St. Sewer blower and the effluent concentration from the top of each bed.
  - (4) Humidity and temperature of the influent stream weekly.
  - (5) pH of the filter media quarterly.
- (c) Penrose Ave Remediation System. [IP18-000431 dated 2/21/2019]
  - (1) The Permittee shall monitor the influent and effluent streams at least biweekly (twice each month) with a photoionization detector (PID) to demonstrate compliance with Condition D.1(d)(3)(a) or (b) based on an instantaneous determination. [AMS Approval letter dated 3/29/2019]

## 5. Recordkeeping Requirements

[25 Pa Code §§127.511, 135.21, 135.5 & 139]

The Permittee shall keep the following records:

- (a) Point Breeze Remediation System
  - (1) Weekly monitoring of the steam injection system.
  - (2) Weekly temperature of the inlet gas to the Biofilter.
  - (3) Weekly Maintenance Schedule Log .
  - (4) Monthly checklists for fan current and fan differential pressure.
  - (5) Monthly checklists for steam valve positions and Biofilter cell pressures.
  - (6) Quarterly checks of blower fan performance.
  - (7) Quarterly checks of pH cell beds.
  - (8) Annual inspection and calibration of the humidification and temperature control systems.
  - (9) Annual inspection of the stem valve position.
- (b) Belmont Terminal Remediation System
  - (1) Weekly blower flow rate, influent vacuum, and effluent pressure
  - (2) Weekly treatment bed temperatures, and influent pressure
  - (3) Weekly influent concentration at the Shunk St. Sewer blower and the effluent concentration from the top of each bed.

- (4) Humidity and temperature of the influent stream weekly.
- (5) pH of the filter media quarterly.
- (c) Penrose Ave Remediation System. [AMS IP18-000431 dated 2/21/2019]
  - (1) For each day of monitoring as required by Section D.4.(d)(1), the Permittee shall keep records the following:
    - (i) The pre-catalyst temperature set point upon arrival and departure from the site.
    - (ii) The actual pre-catalyst operating temperature.
    - (iii) Date of monitoring and the influent and effluent concentrations.

## 6. Reporting Requirements

[25 Pa Code §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.15 shall be reported (by phone call or facsimile transmission) to AMS within 24 hours of detection and followed by written notification within thirty-one (31) days.
  - (1) A description of any deviations from permit requirements that occurred during the six-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 six-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.

## ATTACHMENT A. WEEKLY MAINTENANCE SCHEDULE LOG

Philadelphia Weekly System Field Observations						
Week Of:		Aug 28-30, 2019			Stantec	
<b>AOI-1</b>						
<b>Point Breeze Biofilter</b>				<b>Maintenance Schedule and Observed Data</b>		
Date	Time Start	Last Annual Smoke Test		8/29/2019		
8/29/2019	8:00 AM	System Visual Inspection for leaks (M)		9/3/2019		
System Status Upon Arrival	No Alarms	System PID survey for leaks (A)		1/23/2019		
Influent	26th Street Sewer	Packer Ave Sewer	System Effluent to Beds		Temperature	
Influent Vac (in H2O)	0.9	0.7	Rh	66.2	TI4 (temp)	80
Influent Temp (F)	70	66	Temp (F)	82.1	TI5 (temp)	80
Influent PID (ppm)	10.0	15.0	Temp diff (F)	69.7		
Influent Flow (CFM)	13750.0	7915.0				
Isolation Valve Position	Open	Open				
Combined Effluent Flow (CFM)	14,400					
<b>Blowers</b>						
Blower On (Y/N)	Blower 1	Blower 2	Blower 3			
	no	yes	yes			
Diff Pres 1	0.00	0.00	0.80			
Diff Pres 2	0.00	0.40	0.20			
Elf pressure	0.00	6.80	7.20			
Blower Inspection (Quarterly)	Date Completed		9/3/2019			
Blower Vibration	Satisfactory	Satisfactory	Satisfactory			
Anchor Bolts Tightened	Satisfactory	Satisfactory	Satisfactory			
V belt condition	Satisfactory	Satisfactory	Satisfactory			
Bearing Lubrication	Satisfactory	Satisfactory	Satisfactory			
Blower Maintenance Required	No	No	No			
<b>Biofilter Beds</b>						
	Cell 1	Cell 2	Cell 3	Cell 4		
Status	Active	Active	Not operated	Not Operated		
Moisture Inspection	Completed	Completed	NA	NA		
Signs of bed collapse	No	No	No	No		
Pressure	4.00	4.60	NA	NA		
Temp	60	70	NA	NA		
Odor Observed Odor	No	No	NA	NA		
<b>pH Readings</b>						
Quarterly Cell Media pH						
Date	Cell 1	Cell 2	Cell 3	Cell 4		
8/20/2019	6.76	6.98	na	na		
Monthly Leachate pH						
Date	Leachate pH					
8/20/2019	7.01					
<b>Steam Operation (weekly check)</b>						
Steam Status (on/off)	off					
Valve position (annual)	off					
Steam trap blow down drains	ok					
<b>System Parameters</b>				Frequency	Date Last Inspected	
Inspection and calibration of the temperature control systems.				Annual		
Inspection and calibration of the humidification control systems.				Annual		
Check fan current and fan differential pressure.				Monthly		
Check for steam valve positions and Biofilter cell pressures.				Monthly		
Checks of blower fan performance.				Quarterly		
<b>Comments</b>						
Week 1	Week 1 Notes					
Week 2	Week 2 Notes					

PID/Benzene Readings			
Location	PID Data Frequency	PID (ppm)	Benzene (ppm)
ST1	Weekly	0	
1 North	Weekly	0	
1 South	Weekly	0	
2 North	Weekly	0	
2 South	Weekly	0	
26th St MH	Weekly	2.00	0.050
MH-1	Weekly	10.00	0.150
MH-2N	Weekly	2.00	0.050
MH-3S	If requested		
MH-4S	If requested		
MH-5S	If requested		
MH-6S	If requested		
MH-7N	If requested		
MH-8N	If requested		
MH-9N	If requested		
MH-10N	If requested		
MH-11N	If requested		
MH-12N	If requested		