

ALLEGHENY COUNTY HEALTH DEPARTMENT



AIR QUALITY PROGRAM
301 39th Street, Bldg. #7
Pittsburgh, PA 15201-1891

Synthetic Minor Source *Operating Permit*

<u>Issued To:</u>	Quala Services, LLC	<u>ACHD Permit No.:</u>	0417b
		<u>Date of Issuance:</u>	March 16, 2010
<u>Facility:</u>	Quala Services, LLC 320 Pittsburgh Street Coraopolis, PA, 15108	<u>Date of Revision:</u>	April 23, 2013
		<u>Expiration Date:</u>	March 15, 2015
		<u>Renewal Date:</u>	September 16, 2014

Issued By: 
Sandra L. Etzel
Air Pollution Control Mgr.

Prepared By: Michael Dorman
Air Quality Engineer

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DATE SECTION(S)

11/21/2012	All Sections: Changed Permit No. 0417a to Permit No.0417b
3/21/2011	§I: Changed name of Responsible Official from Charles D. Boyd
3/21/2011	All Sections: Changed all instances of PSC Container Services LLC to Quala Services, LLC



I. CONTACT INFORMATION

Facility Location: **Quala Services, LLC**
320 Pittsburgh Street
Coraopolis, PA, 15108

Permittee/Owner: **Quala Services, LLC**
101 SS. Franklin Street
Suite 101
Tampa, FL 33602

Responsible Official: **Richard T. Kelec**
Title: Chief Financial Officer
Company: Quala Services, LLC
Address: 101 S. Franklin Street
Suite101
Tampa, FL 33602

Telephone Number: (813) 397-1235
Fax Number: (813) 221-1701

Facility Contact: **John May**
Title: Facility Manager
Telephone Number: (412) 262-2300
Fax Number: (412) 262-5323
E-mail Address: jmay@PSCNow.com

AGENCY ADDRESSES:

ACHD Contact: **Chief Engineer**
Allegheny County Health Department
Air Quality Program
301 39th Street, Building #7
Pittsburgh, PA 15201-1891

II. FACILITY DESCRIPTION

[This section is provided for informational purposes only and is not intended to be an applicable requirement.]

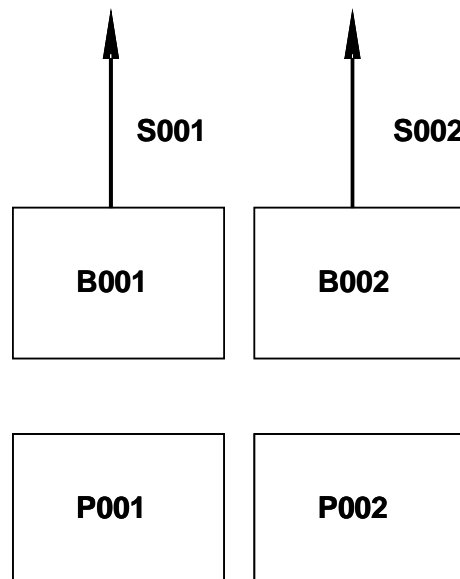
Quala Services, LLC is in the business of cleaning a wide variety of interior and exterior bulk transportation containers (tank trucks) and operates eight (8) truck cleaning bays. The facility does not clean railcars or drums. The facility uses steam and cleaning agents such as sodium hydroxide detergent and diesel fuel to sterilize the tank trucks; fugitive emissions are released into the atmosphere as the container is flushed with cleaning solution. The cleaning solutions are reused, and then eventually sent to a pretreatment process prior to releasing to a city treatment plant. Note: the dirty tank trucks may contain a single ingredient or a mixture of chemicals/compounds. The facility keeps records of the contents cleaned from each tank truck.

The emission units regulated by this permit are summarized in Table II-1:

TABLE II-1: Emission Unit Identification

ID	SOURCE DESCRIPTION	CONTROL DEVICE(S)	MAXIMUM CAPACITY	FUEL/RAW MATERIAL	STACK ID
P001	Container Cleaning Operations: Eight (8) Truck Cleaning Bays	Uncontrolled	1 truck/hr per bay	Various Dirty Tank Trucks	N/A
P002	Wastewater Pretreatment	Uncontrolled	N/A	Various Wastewater	N/A
B001	York Shippley Boiler C100NS-9422-24555	Uncontrolled	3.50 MMBtu/hr	Natural Gas	S001
B002	Cleaver Brooks Boiler CB400-250	Uncontrolled	8.40 MMBtu/hr	Natural Gas	S002

PROCESS FLOW DIAGRAM



DECLARATION OF POLICY

Pollution prevention is recognized as the preferred strategy (over pollution control) for reducing risk to air resources. Accordingly, pollution prevention measures should be integrated into air pollution control programs wherever possible, and the adoption by sources of cost-effective compliance strategies, incorporating pollution prevention, is encouraged. The Department will give expedited consideration to any permit modification request based on pollution prevention principles.

The permittee is subject to the terms and conditions set forth below. These terms and conditions constitute provisions of *Allegheny County Health Department Rules and Regulations, Article XXI Air Pollution Control*. The subject equipment has been conditionally approved for operation. The equipment shall be operated in conformity with the plans, specifications, conditions, and instructions which are part of your application, and may be periodically inspected for compliance by the Department. In the event that the terms and conditions of this permit or the applicable provisions of Article XXI conflict with the application for this permit, these terms and conditions and the applicable provisions of Article XXI shall prevail. Additionally, nothing in this permit relieves the permittee from the obligation to comply with all applicable Federal, State and Local laws and regulations.

III. GENERAL CONDITIONS - Minor Source

1. Prohibition of Air Pollution (§2101.11)

It shall be a violation of this permit to fail to comply with, or to cause or assist in the violation of, any requirement of this permit, or any order or permit issued pursuant to authority granted by Article XXI. The permittee shall not willfully, negligently, or through the failure to provide and operate necessary control equipment or to take necessary precautions, operate any source of air contaminants in such manner that emissions from such source:

- a. Exceed the amounts permitted by this permit or by any order or permit issued pursuant to Article XXI;
- b. Cause an exceedance of the ambient air quality standards established by Article XXI §2101.10; or
- c. May reasonably be anticipated to endanger the public health, safety, or welfare.

2. Definitions (§2101.20)

- a. Except as specifically provided in this permit, terms used retain the meaning accorded them under the applicable provisions and requirements of Article XXI or the applicable federal or state regulation. Whenever used in this permit, or in any action taken pursuant to this permit, the words and phrases shall have the meanings stated, unless the context clearly indicates otherwise.
- b. Unless specified otherwise in this permit or in the applicable regulation, the term “year” shall mean any twelve (12) consecutive months.

3. Conditions (§2102.03.c)

It shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02, for any person to fail to comply with any terms or conditions set forth in this permit.

4. Certification (§2102.01)

Any report, or compliance certification submitted under this permit shall contain written certification by a responsible official as to truth, accuracy, and completeness. This certification and any other certification required under this permit shall be signed by a responsible official of the source, and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

5. Transfers (§2102.03.e)

This permit shall not be transferable from one person to another, except in accordance with Article XXI §2102.03.e and in cases of change-in-ownership which are documented to the satisfaction of the Department, and shall be valid only for the specific sources and equipment for which this permit was issued. The transfer of permits in the case of change-in-ownership may be made consistent with the administrative permit amendment procedure of Article XXI §2103.14.b The required documentation and fee must be received by the Department at least 30 days before the intended transfer date.

6. Term (§2103.12.e, §2103.13.a)

- a. This permit shall remain valid for five (5) years from the date of issuance, or such other shorter period if required by the Clean Air Act, unless revoked. The terms and conditions of an 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 Article XXI Part C, and the Department through no fault of the permittee is unable to issue or deny a new permit before the expiration of the previous permit.
- b. Expiration. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with the requirements of Article XXI Part C.

7. Need to Halt or Reduce Activity Not a Defense (§2103.12.f.2)

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.

8. Property Rights (§2103.12.f.4)

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

9. Duty to Provide Information (§2103.12.f.5)

- a. The permittee shall furnish to the Department in writing within a reasonable time, any information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of any records required to be kept by the permit.
- b. Upon cause shown by the permittee the records, reports, or information, or a particular portion thereof, claimed by the permittee to be confidential shall be submitted to the Department in accordance with the requirements of Article XXI, §2101.07.d.4. Information submitted to the

Department under a claim of confidentiality, shall be available to the US EPA and the PADEP upon request and without restriction. Upon request of the permittee the confidential information may be submitted to the USEPA and PADEP directly. Emission data or any portions of any draft, proposed, or issued permits shall not be considered confidential.

10. Modification of Section 112(b) Pollutants which are VOCs or PM₁₀ (§2103.12.f.7)

Except where precluded under the Clean Air Act or federal regulations promulgated under the Clean Air Act, if this permit limits the emissions of VOCs or PM₁₀ but does not limit the emissions of any hazardous air pollutants, the mixture of hazardous air pollutants which are VOCs or PM₁₀ can be modified so long as no permit emission limitations are violated. A log of all mixtures and changes shall be kept and reported to the Department with the next report required after each change.

11. Right to Access (§2103.12.h.2)

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized Department and other federal, state, county, and local government representatives to:

- a. Enter upon the permittee's premises where a permitted source is located or an emissions-related activity is conducted, or where records are or should be kept under the conditions of the permit;
- b. Have access to, copy and remove, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by either Article XXI or the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

12. Certification of Compliance (§2103.12.h.5)

- a. The permittee shall submit on an annual basis, certification of compliance with all terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification of compliance shall be made consistent with General Condition 4 above and shall include the following information at a minimum:
 - 1) The identification of each term or condition of the permit that is the basis of the certification;
 - 2) The compliance status;
 - 3) Whether any noncompliance was continuous or intermittent;
 - 4) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with the provisions of this permit; and
 - 5) Such other facts as the Department may require to determine the compliance status of the source.
- b. All certifications of compliance must be submitted to the Department by May 31 of each year for the time period beginning April 1 of the previous year and ending March 31 of the same year. The first report shall be due May 31, 2014 for the time period beginning on the issuance date of this permit through March 31, 2014.

13. Record Keeping Requirements (§2103.12.j.1)

- a. The permittee shall maintain records of required monitoring information that include the following:
The date, place as defined in the permit, and time of sampling or measurements;
 - 1) The date(s) analyses were performed;
 - 2) The company or entity that performed the analyses;
 - 3) The analytical techniques or methods used;
 - 4) The results of such analyses; and
 - 5) The operating parameters existing at the time of sampling or measurement.
- b. The permittee shall maintain and make available to the Department, upon request, records including computerized records that may be necessary to comply with the reporting and emission statements in Article XXI §2108.01.e. Such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

14. Retention of Records (§2103.12.j.2)

The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

15. Reporting Requirements (§2103.12.k)

- a. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the Responsible Official.
- b. Prompt reporting of deviations from permit requirements is required, including those attributable to upset conditions as defined in this permit and Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.
- c. All reports submitted to the Department shall comply with the certification requirements of General Condition III.4 above.
- d. Semiannual reports required by this permit shall be submitted to the Department as follows:
 - 1) One semiannual report is due by October 31 of each year for the time period beginning April 1 and ending September 30.
 - 2) One semiannual report is due by April 30 of each year for the time period beginning October 1 and ending March 31.
 - 3) The first semiannual report shall be due October 31, 2013 for the time period beginning on the issuance date of this permit through September 30, 2013.
- e. Annual reports required by this permit shall be submitted to the Department by April 30 of each year for the time period beginning April 1 of the previous year through March 31 of the current year. The first annual report shall be due April 30, 2014 for the time period beginning on the issuance date of this permit through March 31, 2014.

16. Severability Requirement (§2103.12.1)

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.

17. Existing Source Reactivations (§2103.13.d)

The permittee shall not reactivate any source that has been out of operation or production for a period of one year or more unless the permittee has submitted a reactivation plan request to, and received a written reactivation plan approval from, the Department. Existing source reactivations shall meet all requirements of Article XXI §2103.13.d.

18. Administrative Permit Amendment Procedures (§2103.14.b)

An administrative permit amendment may be made consistent with the procedures of Article XXI §2103.14.b and §2103.24.b. Administrative permit amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations there under.

19. Revisions and Minor Permit Modification Procedures (§2103.14.c)

Sources may apply for revisions and minor permit modifications on an expedited basis in accordance with Article XXI §2103.14.c and §2103.24.a.

20. Significant Permit Modifications (§2103.14.d)

Significant permit modifications shall meet all requirements of the applicable subparts of Article XXI, Part C, including those for applications, fees, public participation, review by affected States, and review by EPA, as they apply to permit issuance and permit renewal. The approval of a significant permit modification, if the entire permit has been reopened for review, shall commence a new full five (5) year permit term. The Department shall take final action on all such permits within nine (9) months following receipt of a complete application.

21. Duty to Comply (§2103.12.f.1)

The permittee shall comply with all permit conditions and all other applicable requirements at all times. Any permit noncompliance constitutes a violation of the Clean Air Act, the Air Pollution Control Act, and Article XXI and is grounds for any and all enforcement action, including, but not limited to, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

22. Renewals (§2103.13.b.)

Renewal of this permit is subject to the same fees and procedural requirements, including those for public participation and affected State and EPA review, that apply to initial permit issuance. The application for renewal shall be submitted at least six (6) months but not more than eighteen (18) months prior to expiration of this permit. The application shall also include submission of a supplemental compliance review as required by Article XXI §2102.01.

23. Reopenings for Cause (§2103.15, §2103.12.f.3)

- a. This permit shall be reopened and reissued under any of the following circumstances:
- 1) Additional requirements under the Clean Air Act become applicable to a major source with a remaining permit term of three (3) or more years. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended solely due to the failure of the Department to act on a permit renewal application in a timely fashion.
 - 2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.
 - 3) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
 - 4) The Administrator or the Department determines that this permit must be reissued or revoked to assure compliance with the applicable requirements.
- b. This permit may be modified; revoked, reopened, and reissued; or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in this permit.

24. Annual Operating Permit Administration Fee (§2103.40)

In each year during the term of this permit, on or before the last day of the month in which the application for this permit was submitted, the permittee shall submit to the Department, in addition to any other applicable administration fees, an Annual Operating Permit Administration Fee in accordance with §2103.40. by check or money order payable to the “Allegheny County Air Pollution Control Fund” in the amount specified in the fee schedule applicable at that time.

25. Other Requirements not Affected (§2104.08, §2105.02)

Compliance with the requirements of this permit shall not in any manner relieve any person from the duty to fully comply with any other applicable Federal, State, or County statute, rule, regulation, or the like, including but not limited to the odor emission standards under Article XXI §2104.04, any applicable NSPSs, NESHAPs, MACTs, or Generally Achievable Control Technology (GACT) standards now or hereafter established by the EPA, and any applicable requirements of BACT or LAER as provided by Article XXI, any condition contained in any applicable Installation or Operating Permit and/or any additional or more stringent requirements contained in an order issued to such person pursuant to Article XXI Part I.

26. Termination of Operation (§2108.01.a)

In the event that operation of any source of air contaminants is permanently terminated, the person responsible for such source shall so report, in writing, to the Department within 60 days of such termination.

27. Tests by the Department (§2108.02.d)

Notwithstanding any tests conducted pursuant to Article XXI §2108.02, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the person responsible for such source or equipment shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.

28. Other Rights and Remedies Preserved (§2109.02.b)

Nothing in this permit shall be construed as impairing any right or remedy now existing or hereafter created in equity, common law or statutory law with respect to air pollution, nor shall any court be deprived of such jurisdiction for the reason that such air pollution constitutes a violation of this permit.

29. Enforcement and Emergency Orders (§2109.03, §2109.05)

- a. The person responsible for this source shall be subject to any and all enforcement and emergency orders issued to it by the Department in accordance with Article XXI §2109.03, §2109.04 and §2109.05.
- b. Upon request, any person aggrieved by an Enforcement Order or Emergency Order shall be granted a hearing as provided by Article XXI §2109.03.d; provided however, that an Emergency Order shall continue in full force and effect notwithstanding the pendency of any such appeal.
- c. Failure to comply with an Enforcement Order or immediately comply with an Emergency Order shall be a violation of this permit thus giving rise to the remedies provided by Article XXI §2109.02.

30. Penalties, Fines, and Interest (§2109.07.a)

A source that fails to pay any fee required under this permit when due shall pay a civil penalty of 50% of the fee amount, plus interest on the fee amount computed in accordance with Article XXI §2109.06.a.4 from the date the fee was required to be paid. In addition, the source may have this permit revoked for failure to pay any fee required.

31. Appeals (§2109.10)

In accordance with State Law and County regulations and ordinances, any person aggrieved by an order or other final action of the Department issued pursuant to Article XXI or any unsuccessful petitioner to the Administrator under Article XXI Part C, Subpart 2, shall have the right to appeal the action to the Director in accordance with the applicable County regulations and ordinances.

32. Risk Management (§2104.08, 40 CFR Part 68)

Should this stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by *General Condition III.12* above.

33. Circumvention (§2101.14)

For purposes of determining compliance with the provisions of this permit and Article XXI, no credit shall be given to any person for any device or technique, including but not limited to the operation of any source with unnecessary amounts of air, the combining of separate sources except as specifically permitted by Article XXI and the Department, the use of stacks exceeding Good Engineering Practice height as defined by regulations promulgated by the US EPA at 40 CFR §§51.100 and 51.110 and Subpart I, and other dispersion techniques, which without reducing the amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise violate the provisions of this Article; except that, for purposes of determining compliance with Article §2104.04 concerning odors, credit for such devices or techniques, except for the use of a masking agent, may be given.

34. Duty to Supplement and Correct Relevant Facts (§2103.12.d.2)

- a. The permittee shall provide additional information as necessary to address requirements that become applicable to the source after the date it files a complete application but prior to the Department taking action on the permit application.
- b. The permittee shall provide supplementary fact or corrected information upon becoming aware that incorrect information has been submitted or relevant facts were not submitted.
- c. Except as otherwise required by this permit and Article XXI, the Clean Air Act, or the regulations thereunder, the permittee shall submit additional information as necessary to address changes occurring at the source after the date it files a complete application but prior to the Department taking action on the permit application.
- d. The applicant shall submit information requested by the Department which is reasonably necessary to evaluate the permit application.

35. Effect (§2102.03.g.)

- a. Except as specifically otherwise provided under Article XXI, Part C, issuance of a permit pursuant to Article XXI Part B or Part C shall not in any manner relieve any person of the duty to fully comply with the requirements of this permit, Article XXI or any other provision of law, nor shall it in any manner preclude or affect the right of the Department to initiate any enforcement action whatsoever for violations of this permit or Article XXI, whether occurring before or after the issuance of such permit. Further, except as specifically otherwise provided under Article XXI Part C the issuance of a permit shall not be a defense to any nuisance action, nor shall such permit be construed as a certificate of compliance with the requirements of this permit or Article XXI.

36. Installation Permits (§2102.04.a.1.)

It shall be a violation of this permit giving rise to the remedies set forth in Article XXI Part I for any person to install, modify, replace, reconstruct, or reactivate any source or air pollution control equipment which would require an installation permit or permit modification in accordance with Article XXI Part B or Part C.

IV. SITE LEVEL TERMS AND CONDITIONS

1. Reporting of Upset Conditions (§2103.12.k.2)

The permittee shall promptly report all deviations from permit requirements, including those attributable to upset conditions as defined in Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.

2. Visible Emissions (§2104.01.a)

Except as provided for by Article XXI §2108.01.d pertaining to a cold start, no person shall operate, or allow to be operated, any source in such manner that the opacity of visible emissions from a flue or process fugitive emissions from such source, excluding uncombined water:

- a. Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or,
- b. Equal or exceed an opacity of 60% at any time.

3. Odor Emissions (§2104.04) (County-only enforceable)

No person shall operate, or allow to be operated, any source in such manner that emissions of malodorous matter from such source are perceptible beyond the property line.

4. Materials Handling (§2104.05)

The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line.

5. Operation and Maintenance (§2105.03)

All air pollution control equipment required by this permit or any order under Article XXI, and all equivalent compliance techniques approved by the Department, shall be properly installed, maintained, and operated consistently with good air pollution control practice.

6. Open Burning (§2105.50)

No person shall conduct, or allow to be conducted, the open burning of any material, except where the Department has issued an Open Burning Permit to such person in accordance with Article XXI §2105.50 or where the open burning is conducted solely for the purpose of non-commercial preparation of food for human consumption, recreation, light, ornament, or provision of warmth for outside workers, and in a manner which contributes a negligible amount of air contaminants.

7. Breakdowns (§2108.01.c)

- a. In the event that any air pollution control equipment, process equipment, or other source of air contaminants breaks down in such manner as to have a substantial likelihood of causing the emission of air contaminants in violation of this permit, or of causing the emission into the open air of potentially toxic or hazardous materials, the person responsible for such equipment or source shall immediately, but in no event later than sixty (60) minutes after the commencement of

the breakdown, notify the Department of such breakdown and shall, as expeditiously as possible but in no event later than seven (7) days after the original notification, provide written notice to the Department.

- b. To the maximum extent possible, all oral and written notices required shall include all pertinent facts, including:
 - 1) Identification of the specific equipment which has broken down, its location and permit number (if permitted), together with an identification of all related devices, equipment, and other sources which will be affected.
 - 2) The nature and probable cause of the breakdown.
 - 3) The expected length of time that the equipment will be inoperable or that the emissions will continue.
 - 4) Identification of the specific material(s) which are being, or are likely to be emitted, together with a statement concerning its toxic qualities, including its qualities as an irritant, and its potential for causing illness, disability, or mortality.
 - 5) The estimated quantity of each material being or likely to be emitted.
 - 6) Measures, including extra labor and equipment, taken or to be taken to minimize the length of the breakdown, the amount of air contaminants emitted, or the ambient effects of the emissions, together with an implementation schedule.
 - 7) Measures being taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impractical to shut down the source(s), or any part thereof, during the breakdown.
- c. Notices required shall be updated, in writing, as needed to advise the Department of changes in the information contained therein. In addition, any changes concerning potentially toxic or hazardous emissions shall be reported immediately. All additional information requested by the Department shall be submitted as expeditiously as practicable.
- d. Unless otherwise directed by the Department, the Department shall be notified whenever the condition causing the breakdown is corrected or the equipment or other source is placed back in operation by no later than 9:00 AM on the next County business day. Within seven (7) days thereafter, written notice shall be submitted pursuant to Paragraphs a and b above.
- e. Breakdown reporting shall not apply to breakdowns of air pollution control equipment which occur during the initial startup of said equipment, provided that emissions resulting from the breakdown are of the same nature and quantity as the emissions occurring prior to startup of the air pollution control equipment.
- f. In no case shall the reporting of a breakdown prevent prosecution for any violation of this permit or Article XXI.

8. Cold Start (§2108.01.d)

In the event of a cold start on any fuel-burning or combustion equipment, except stationary internal combustion engines and combustion turbines used by utilities to meet peak load demands, the person responsible for such equipment shall report in writing to the Department the intent to perform such cold start at least 24 hours prior to the planned cold start. Such report shall identify the equipment and fuel(s) involved and shall include the expected time and duration of the startup. Upon written application from the person responsible for fuel-burning or combustion equipment which is routinely used to meet peak load demands and which is shown by experience not to be excessively emissive during a cold start, the

Department may waive these requirements and may instead require periodic reports listing all cold starts which occurred during the report period. The Department shall make such waiver in writing, specifying such terms and conditions as are appropriate to achieve the purposes of Article XXI. Such waiver may be terminated by the Department at any time by written notice to the applicant.

9. Monitoring of Malodorous Matter Beyond Facility Boundaries (§2104.04)

The permittee shall take all reasonable action as may be necessary to prevent malodorous matter from becoming perceptible beyond facility boundaries. Further, the permittee shall perform such observations as may be deemed necessary along facility boundaries to insure that malodorous matter beyond the facility boundary in accordance with Article XXI §2107.13 is not perceptible and record all findings and corrective action measures taken.

10. Emissions Inventory Statements (§2108.01.e)

- a. Emissions inventory statements in accordance with §2108.01.e shall be submitted to the Department by March 15 of each year for the preceding calendar year. The Department may require more frequent submittals if the Department determines that more frequent submissions are required by the EPA or that analysis of the data on a more frequent basis is necessary to implement the requirements of Article XXI or the Clean Air Act.
- b. The failure to submit any report or update within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

11. Orders (§2108.01.f)

In addition to meeting the requirements of General Condition III.26 and Site Level Conditions IV.7 through IV.10, inclusive, the person responsible for any source shall, upon order by the Department, report to the Department such information as the Department may require in order to assess the actual and potential contribution of the source to air quality. The order shall specify a reasonable time in which to make such a report.

12. Violations (§2108.01.g)

The failure to submit any report or update thereof required by General Condition III.26 and Site Level Conditions IV.7 through IV.11 above, inclusive, within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

13. Emissions Testing (§2108.02)

- a. **Orders.** The person responsible for any source shall, upon order by the Department, conduct, or cause to be conducted, such emissions tests as specified by the Department within such reasonable time as is specified by the Department. Test results shall be submitted in writing to the Department within 20 days after completion of the tests, unless a different period is specified in the Department's order. Emissions testing shall comply with all applicable requirements of Article XXI §2108.02.e.

- b. **Tests by the Department.** Notwithstanding any tests conducted pursuant to this permit, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.
- c. **Testing Requirements.** No later than 45 days prior to conducting any tests required by this permit, the person responsible for the affected source shall submit for the Department's approval a written test protocol explaining the intended testing plan, including any deviations from standard testing procedures, the proposed operating conditions of the source during the test, calibration data for specific test equipment and a demonstration that the tests will be conducted under the direct supervision of persons qualified by training and experience satisfactory to the Department to conduct such tests. In addition, at least 30 days prior to conducting such tests, the person responsible shall notify the Department in writing of the time(s) and date(s) on which the tests will be conducted and shall allow Department personnel to observe such tests, record data, provide pre-weighed filters, analyze samples in a County laboratory and to take samples for independent analysis. Test results shall be comprehensively and accurately reported in the units of measurement specified by the applicable emission limitations of this permit.
- d. Test methods and procedures shall conform to the applicable reference method set forth in this permit or Article XXI Part G, or where those methods are not applicable, to an alternative sampling and testing procedure approved by the Department consistent with Article XXI §2108.02.e.2.
- e. **Violations.** The failure to perform tests as required by this permit or an order of the Department, the failure to submit test results within the time specified, the knowing submission of false information, the willful failure to submit complete results, or the refusal to allow the Department, upon presentation of a search warrant, to conduct tests, shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

14. Abrasive Blasting (§2105.51)

- a. Except where such blasting is a part of a process requiring an operating permit, no person shall conduct or allow to be conducted, abrasive blasting or power tool cleaning of any surface, structure, or part thereof, which has a total area greater than 1,000 square feet unless such abrasive blasting complies with all applicable requirements of Article XXI §2105.51.
- b. In addition to complying with all applicable provisions of §2105.51, no person shall conduct, or allow to be conducted, abrasive blasting of any surface unless such abrasive blasting also complies with all other applicable requirements of Article XXI unless such requirements are specifically addressed by §2105.51.

15. Asbestos Abatement (§2105.62, §2105.63)

In the event of removal, encasement, or encapsulation of Asbestos-Containing Material (ACM) at a facility or in the event of the demolition of any facility, the permittee shall comply with all applicable provisions of Article XXI §2105.62 and §2105.63.

16. Fugitive Emissions (§2105.49)

The person responsible for a source of fugitive emissions, in addition to complying with all other applicable provisions of this permit shall take all reasonable actions to prevent fugitive air contaminants from becoming airborne. Such actions may include, but are not limited to:

- a. The use of asphalt, oil, water, or suitable chemicals for dust control;
- b. The paving and maintenance of roadways, parking lots and the like;
- c. The prompt removal of earth or other material which has been deposited by leaks from transport, erosion or other means;
- d. The adoption of work or other practices to minimize emissions;
- e. Enclosure of the source; and
- f. The proper hooding, venting, and collection of fugitive emissions.

17. Episode Plans (§2106.02)

The permittee shall upon written request of the Department, submit a source curtailment plan, consistent with good industrial practice and safe operating procedures, designed to reduce emissions of air contaminants during air pollution episodes. Such plans shall meet the requirements of Article XXI §2106.02.

18. New Source Performance Standards (§2105.05)

- a. It shall be a violation of this permit giving rise to the remedies provided by §2109.02 of Article XXI for any person to operate, or allow to be operated, any source in a manner that does not comply with all requirements of any applicable NSPS now or hereafter established by the EPA, except if such person has obtained from EPA a waiver pursuant to Section 111 or Section 129 of the Clean Air Act or is otherwise lawfully temporarily relieved of the duty to comply with such requirements.
- b. Any person who operates, or allows to be operated, any source subject to any NSPS shall conduct, or cause to be conducted, such tests, measurements, monitoring and the like as is required by such standard. All notices, reports, test results and the like as are required by such standard shall be submitted to the Department in the manner and time specified by such standard. All information, data and the like which is required to be maintained by such standard shall be made available to the Department upon request for inspection and copying.



**EMISSION UNIT LEVEL
TERMS AND
CONDITIONS**

**Quala Services, LLC
Operating Permit No. 0417b**

V. EMISSION UNIT LEVEL TERMS AND CONDITIONS

A. Container Cleaning Operations: Eight (8) Truck Cleaning Bays (P001)

ID	SOURCE DESCRIPTION	CONTROL DEVICE(S)	MAXIMUM CAPACITY	FUEL/RAW MATERIAL	STACK ID
P001	Container Cleaning Operations: Eight (8) Truck Cleaning Bays	Uncontrolled	1 truck/hr per bay	Various Dirty Tank Trucks	N/A

1. Restrictions:

- a. The permittee shall not exceed 70,080 tank trucks cleaned per any twelve (12) consecutive month period. Of the 70,080 tank trucks cleaned, the permittee shall not exceed 18,000 tank trucks cleaned per any twelve (12) consecutive month period that previously contained liquids different than latex, waxes, and plasticizers. (§2103.12.a.2.B, §2103.20.b.4)
- b. The container cleaning operations (P001) shall not exceed 7.03 tons of VOC per any twelve (12) consecutive month period and 7.03 tons of HAP per any twelve (12) consecutive month period using the emission limitations provided in Emission Unit Level Condition V.A.1.c. (§2103.12.a.2.B, §2103.20.b.4)
- c. The permittee shall not cause or allow the cleaning of tank trucks that previously contained liquids different than latex, waxes, and plasticizers unless the tank trucks are evacuated through a scrubber designed to neutralize and deodorize the liquids and fumes generated during cleaning. (§2103.12.a.2.B, §2103.20.b.4)
- d. The permittee shall maintain a minimum pH of 11.0 in the scrubber solution at all times during cleaning operations. (§2103.12.a.2.B, §2103.20.b.4)
- e. The container cleaning operations (P001) shall not exceed the emissions limitations in Table V-A-1 below. (§2103.12.a.2.B, §2103.20.b.4)

TABLE V-A-1: Emission Limitations for Container Cleaning Operations (P001)

Tank Cleaning Process	VOC/HAP Emission Limit (lb/tank truck)
Tank trucks that previously contained liquids different than latex, waxes, and plasticizers	0.545
All other tank trucks	0.082

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13. (§2103.12.h.1, §2108.02.c)

3. Monitoring Requirements:

The permittee shall monitor the pH of the scrubbing solution in the scrubber at the beginning of each shift. (§2103.12.i)

4. Record Keeping Requirements:

- a. The permittee shall record the total amount and types of tank trucks cleaned on a monthly basis. (§2103.12.a.2.B, §2103.20.b.4, §2103.12.j)
- b. The permittee shall calculate VOC and HAP emissions from the container cleaning operations (P001) on a monthly basis. (§2103.12.a.2.B, §2103.20.b.4, §2103.12.j)
- c. The permittee shall record the pH of the scrubber solution on the appropriate form. (§2103.12.j)
- d. Records shall be kept by the permittee for at least five (5) years. (§2103.12.j)

5. Reporting Requirements:

- a. The permittee shall submit semi-annual reports of the amount and type of tank trucks cleaned, and VOC and HAP emissions from the container cleaning operations (P001), to the Department in accordance with General Condition III.15.d above. (§2103.12.k)
- b. The permittee shall report instances of non-compliance with the conditions of this permit to the Department on a semiannual basis. (§2103.12.k)
- c. Reporting instances of non-compliance does not relieve the Permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7 above, if appropriate. (§2102.04.b.6 and §2103.12.k)

6. Work Practice Standards:

- a. At the beginning of each shift the permittee shall: (§2102.04.b.6, §2103.11.b.3.F, §2103.12.a.2.J)
 - 1) Test the pH of the scrubber solution. (§2102.04.b.6, §2103.11.b.3.F, §2103.12.a.2.J)
 - a) If the pH of the scrubber solution is below 11.0 the permittee shall adjust the pH to 12.5 or higher using sodium hydroxide and Acronel WS-27; and (§2102.04.b.6, §2103.11.b.3.F, §2103.12.a.2.J))
 - b) If the pH of the scrubber solution is equal to or above 11.0, the permittee may proceed with tank truck cleaning. (§2102.04.b.6, §2103.11.b.3.F, §2103.12.a.2.J))



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B. Wastewater Pretreatment (P002)

ID	SOURCE DESCRIPTION	CONTROL DEVICE(S)	MAXIMUM CAPACITY	FUEL/RAW MATERIAL	STACK ID
P002	Wastewater Pretreatment	Uncontrolled	N/A	Various Wastewater	N/A

1. Restrictions:

The wastewater delivered to the wastewater pretreatment operations (P002) shall not exceed 2.56 tpy of either VOC's or HAP's at this facility per any twelve (12) consecutive month period. (§2103.12.a.2.B, §2103.20.b.4)

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13. (§2103.12.h.1, §2108.02.c)

3. Monitoring Requirements:

The permittee shall record the monthly inlet water usage at the facility and delivered to the wastewater pretreatment operations (P002). (§2103.12.a.2.B)

4. Record Keeping Requirements:

The permittee shall record monthly inlet water usage and multiply by 1,000 ppmw in order to obtain the monthly VOC and HAP concentrations for P002 (§2103.12.a.2.B, §2103.12.j)

5. Reporting Requirements:

The permittee shall report all records from Emission Unit Level Condition V.B.4 in the semiannual compliance report required by General Condition III.15.d above. (§2103.12.k)

6. Work Practice Standards:

None except as provided elsewhere.

C. Natural Gas Boilers (B001 and B002)

ID	SOURCE DESCRIPTION	CONTROL DEVICE(S)	MAXIMUM CAPACITY	FUEL/RAW MATERIAL	STACK ID
B001	York Shippley Boiler C100NS-9422-24555	Uncontrolled	3.50 MMBtu/hr	Natural Gas	S001
B002	Cleaver Brooks Boiler CB400-250	Uncontrolled	8.40 MMBtu/hr	Natural Gas	S002

1. Restrictions:

- a. Only natural gas shall be combusted in the boilers (B001 and B002). (§2103.12.a.2.B, §2104.03.a.2.A)
- b. Particulate emissions from boilers B001 and B002, shall each not exceed 0.008 lbs/MMBtu of actual heat input at any time while combusting natural gas. (§2104.02.a.1)

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13. (§2103.12.h.1, §2108.02.c)

3. Monitoring Requirements:

The permittee shall install and maintain the necessary meter(s) to determine and to record the daily amount of fuel usage. Daily fuel usage can also be determined from utility fuel records and boilers operating records. (§2103.12.i)

4. Record Keeping Requirements:

- a. Records of fuel consumption shall be kept by the facility and the name of natural gas supplier shall be kept to demonstrate compliance with all applicable requirements of this permit. (§2103.12.j)
- b. Records of all cold starts shall be kept by the facility. (§2103.12.j)
- c. A cold start record shall include at a minimum, the date, time and cause for the cold start. (§2103.12.j)

5. Reporting Requirements:

- a. The permittee shall submit annual reports to the Department in accordance with General Condition III.15.e above. (§2103.12.k)
- b. The annual report shall include the following information: (§2103.12.k)
 - 1) Calendar dates covered in the reporting period; (§2103.12.k)
 - 2) Reasons for any noncompliance with the emission standards; and (§2103.12.k)
 - 3) A certified statement signed by the responsible official that the records of fuel supplier



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certifications submitted represent all of the fuel combusted during the month. (§2103.12.k)

- c. The permittee shall submit copies of all requests, reports, applications, submittals, and other communications to the Department. (§2103.12.k)
- d. The Department waives the 24-hour notification of all cold starts. This waiver may be terminated by the Department at any time by written notice to the applicant. (§2108.08.d, §2103.12.k)

6. Work Practice Standards:

The boilers (B001 and B002) shall be: (§2103.12.a.2.B)

- a. Operated in such a manner as not to cause air pollution; (§2103.12.a.2.B)
- b. Operated and maintained in a manner consistent with good operating and maintenance practices; and (§2103.12.a.2.B)
- c. Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit. (§2103.12.a.2.B)

VI. MISCELLANEOUS

The miscellaneous sources located at this facility have no applicable requirements.



**ALTERNATIVE
OPERATING
SCENARIOS**

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VII. ALTERNATIVE OPERATING SCENARIOS

No alternative operating scenarios exist for this operation.

VIII. EMISSIONS LIMITATIONS SUMMARY

[This section is provided for informational purposes only and is not intended to be an applicable requirement.]

The annual emission limitations for the Quala Services, LLC are summarized in the following table:

TABLE VIII-1 - Emission Limitations Summary

POLLUTANT	ANNUAL EMISSION LIMIT (tons/year)¹
PM	2.07
PM10	0.89
SO ₂	0.04
NO _x	5.88
VOC	9.92
CO	4.94
Total HAPs	9.70

¹ A year is defined as any consecutive 12-month period.