



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES



Lee Park, Suite 6010  
555 North Lane  
Coateshocken, PA 19422  
215 832-6212

May 3, 1991

RECEIVED  
5/14

Mr. Herbert N. Rudolph  
President  
MG Industries  
2460 Boulevard of the General  
P.O. Box 945  
Valley Forge, PA 19482

Dear Mr. Rudolph:

In response to your letter of April 17, 1991 approval is granted for you to accept compressed gas cylinders from off-site facilities for processing residual gas remaining in the cylinders before they are refilled with gas products at your cylinder fill facility located in Fairless Hills, Falls Township, Bucks County.

This must be done in accordance with your air quality permit No. 09-313-056.

This proposal does not require a hazardous waste permit.

Very truly yours,

LAWRENCE H. LUNSK  
Facilities Manager

cc: Mr. McGinley  
Ms. Kurtz  
Mr. Lee - EPA Philadelphia  
Re 30 (4)120.16

Send to  
Los Alamos  
NITL Lab  
Enclosure



TL 1 TO

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF AIR QUALITY CONTROL

**ATG**

OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Resources, the Department hereby issues this permit for the operation of the air contamination source(s) described below.

Permit No.	<u>09-313-056</u>	Source(s)	<u>Residual Cylinder Gases</u>
Owner	<u>M G Industries</u>	Air	<u>See Attached Sheet</u>
Address	<u>P.O. Box 849</u>	Cleaning	<u>.</u>
	<u>Morrisville, PA 19067</u>	Device	<u>.</u>
Attention	<u>Mr. Robert T. Woodbury</u>	Location	<u>Steel Road</u>
	<u>Manager of Engineering</u>		<u>Falls Township</u>
			<u>Bucks County</u>

This permit is subject to the following conditions:

- (1) That the source(s) and any associated air cleaning devices are to be:
  - (a) operated in such a manner as not to cause air pollution;
  - (b) in compliance with the specifications and conditions of the plan approval issued under the same number;
  - (c) operated and maintained in a manner consistent with good operating and maintenance practices.
- (2) This permit is valid only for the specific equipment, location and owner named above.

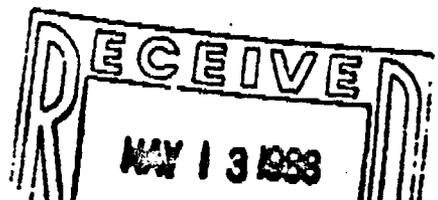
(SEE THE ATTACHED ADDITIONAL CONDITIONS)

Failure to comply with the conditions placed on this permit is a violation of Section 127.25. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Resources will result in suspension or revocation of this permit or prosecution under Section 9 of the Air Pollution Control Act.

Issued May 11, 1988  
Expires 05/31/93

N. Rao Kona  
N. RAO KONA  
Regional Air Pollution Control Engineer

Central Office  
Norristown Regional Office



Operating Permit Conditions  
Application No. 09-313-056  
M G Industries

Conditions (continued):

- (3) The control devices covered under this Operating Permit consist of 10 packed tower scrubbers followed by a PPS countercurrent scrubber.
- (4) The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
- (5) The company shall immediately notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Resources.
- (6) If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Resources, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Resources, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.
- (7) The aforementioned source(s) may be operated and used only so long as any associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.
- (8) M G Industries shall limit their production of arsine to 0.0485 ppm for a maximum of 13.3 hours per month.
- (9) M G Industries shall limit the production of total fluoride compounds to eight hours per day.
- (10) M G Industries shall do twice daily testing of the caustic and prescrubbers causting solution by titration with with hydrochloric acid and verified via pH. The scrubber solution must be changed with 10% aqueous NaOH solution when the solution reaches 1% NaOH.

Operating Permit Conditions  
Application No. 09-313-056  
M G Industries

Conditions (continued):

- (11) M G Industries must do a twice daily testing on the hydrochloric acid solution in the acid pre-scrubber performed by titration and verified via pH. The scrubber solution must be changed when the concentration reaches 1% HCl. The new solution shall be 10% aqueous HCl.
- (12) M G Industries must do a daily testing of the  $KMnO_4$  solution in the potassium permanganate scrubber solution. When the permanganate solution reaches 4%, more  $KMnO_4$  will be added to raise the concentration to 7%. The  $MnO_2$  formed during the scrubber operation shall be filtered out. When the pressure drop over the filter reaches 5 psi the solution and filter shall be changed.
- (13) M G Industries must keep records of all data and maintenance checks required by conditions 7 through 11 and make these records available to the Department on request.

(AQPC)