



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: February 27, 2019 Effective Date: March 1, 2019

Expiration Date: February 28, 2024

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. 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.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

State Only Permit No: 25-00591

Federal Tax Id - Plant Code: 25-1069263-1

	Owner Information
Name: SEAWAY IND PAINT CO	
Mailing Address: 2250 E 33RD ST	
ERIE, PA 16510-2556	
	Plant Information
Plant: SEAWAY MFG CORP/ERIE	
Location: 25 Erie County	25001 Erie City
SIC Code: 3442 Manufacturing - Metal Doors, S	ash, And Trim
	Responsible Official
Name: PATRICK M. GOODRICH	
Title: DIR OF OPERATIONS	
Phone: (814) 898 - 2255	
,	Permit Contact Person
	Permit Contact Person
Name: ZACHARY MCCARTNEY	
Title: ENGINEERING MANAGER	
Phone: (814) 898 - 2255 Ext.328	
[Signature]	
ERIC A. GUSTAFSON, NORTHWEST REGION A	IR PROGRAM MANAGER



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Note: These same sub-sections are repeated for each source!

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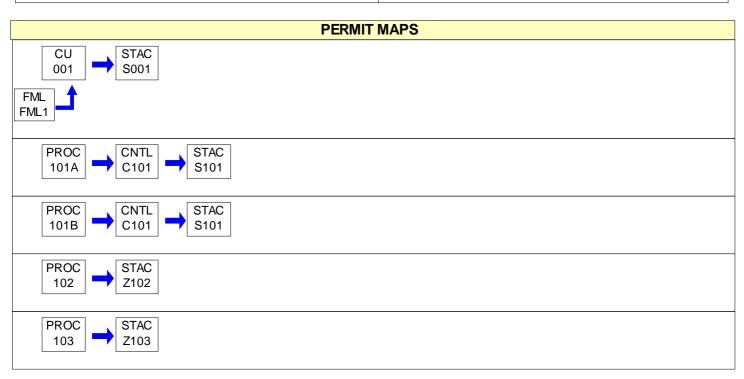
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SECTION A. Site Inventory List

Source	ID Source Name	Capacity/Throughput	Fuel/Material
001	MISC. NAT. GAS COMBUSTION UNITS	11.000 MMBTU/HR	
		N/A	Natural Gas
101A	SURFACE COATING (METAL ONLY)	N/A	VOC
101B	SURFACE COATING (VINYL ONLY)	N/A	VOC
102	PARTS SANDING (AREA)	N/A	
103	SOLVENT EVAPORATION (EQUIP. CLEAN-UP & DISTILLATION)	N/A	SOLVENT
C101	PANEL FILTERS		
FML1	NATURAL GAS SUPPLY LINE		
S001	MISC. COMBUSTION EXHAUST		
S101	SURFACE COATING STACKS		
Z102	FUGITIVE EMISSIONS - PARTS SANDING AREA		
Z103	FUGITIVE VOC		





#001 [25 Pa. Code § 121.1]

Definitions.

Words and terms that are not otherwise defined 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.

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)]

Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) 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 as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,



modification, revision, renewal, and re-issuance of each operating permit or part thereof.

- (b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).
 - (1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.
 - (2) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.
- (c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund".

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

Transfer of Operating Permits.

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.
- (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 the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]

- Inspection and Entry.
 - (a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:
 - (1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
 - (2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - (3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
 - (4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
 - (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or 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 provisions of the Clean Air Act.

#007 [25 Pa. Code §§ 127.441 & 127.444]

Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes



a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:

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

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

#009 [25 Pa. Code §§ 127.442(a) & 127.461]

Duty to Provide Information.

- (a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.
- (b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450 & 127.462]

Operating Permit Modifications

(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) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]

Severability Clause.

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.

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
 - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (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 NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 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, the regulations thereunder or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 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, the regulations thereunder or 25 Pa. Code Article III.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:



- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) 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 a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (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 this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

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:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)



- (6) Section 127.462 (relating to minor operating permit modifications)
- (7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11]

Reactivation

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (b) A source which has been out of operation or production for more than five (5) 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).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

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

#017 [25 Pa. Code § 121.9]

Circumvention.

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 the Department, the device or technique may be used for control of malodors.

#018 [25 Pa. Code §§ 127.402(d) & 127.442]

Reporting Requirements.

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given in the permit transmittal letter, or otherwise notified)

- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such



records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#019 [25 Pa. Code §§ 127.441(c) & 135.5]

Sampling, Testing and Monitoring Procedures.

- (a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
- (b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, 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.

#020 [25 Pa. Code §§ 127.441(c) and 135.5]

Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, 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 the analyses.
 - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any 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 the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) 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, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, 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.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

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.



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the act.

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

No person may permit the emission into the outdoor atmosphere of 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) Open burning operations.
 - (7) Not applicable
 - (8) Not applicable
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department 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; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]

Limitations

A person may 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 person on whose land the source is being operated.

005 [25 Pa. Code §123.41]

Limitations

A person 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 three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.



006 [25 Pa. Code §123.42]

Exceptions

The limitations of 123.41 shall not apply to a visible emission in any of the following instances:

- (1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).
- (4) Not applicable

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

- (1) A device approved by the Department 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 any devices approved by the Department.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in subsections (a)(1) -- (7) or (9) (condition #001) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be 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, erosion by water, or other means.

009 [25 Pa. Code §129.14]

Open burning operations

- (a) No person may permit the open burning of material in an air basin.
- (b) Not applicable
- (c) Exceptions: The requirements of subsection (a) do not apply where the open burning operations result from:
- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
 - (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
 - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
 - (4) Not applicable
 - (5) Not applicable
 - (6) A fire set solely for recreational or ceremonial purposes.
 - (7) A fire set solely for cooking food.
 - (d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:
 - (1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

- (2) Subsection (a) notwithstanding, clearing and grubbing wastes may be burned in a basin subject to the following requirements:
 - (i) Air curtain destructors shall be used when burning clearing and grubbing wastes.
- (ii) Each proposed use of air curtain destructors shall be reviewed and approved by the Department in writing with respect to equipment arrangement, design and existing environmental conditions prior to commencement of burning. Proposals approved under this subparagraph need not obtain plan approval or operating permits under Chapter 127 (relating to construction modification, reactivation and operation of sources).
- (iii) Approval for use of an air curtain destructor at one site may be granted for a specified period not to exceed 3 months, but may be extended for additional limited periods upon further approval by the Department.
- (iv) The Department reserves the right to rescind approval granted if a determination by the Department indicates that an air pollution problem exists.
 - (3) Not applicable



(4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

[This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act.]

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to State Only General Requirements).

IX. COMPLIANCE SCHEDULE.

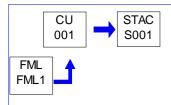
No compliance milestones exist.



Source ID: 001 Source Name: MISC. NAT. GAS COMBUSTION UNITS

Source Capacity/Throughput: 11.000 MMBTU/HR

N/A Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.22]

Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from a combustion unit in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



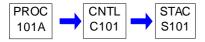
Source ID: 101A Source Name: SURFACE COATING (METAL ONLY)

Source Capacity/Throughput: N/A VOC

Conditions for this source occur in the following groups: 1) PROCESS PM LIMIT

2) SPRAY EXHAUST FILTER MAINT.

3) 129.52D



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).



SEAWAY MFG CORP/ERIE



SECTION D. Source Level Requirements

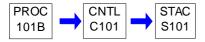
Source ID: 101B Source Name: SURFACE COATING (VINYL ONLY)

Source Capacity/Throughput: N/A VOC

Conditions for this source occur in the following groups: 1) PROCESS PM LIMIT

2) SPRAY EXHAUST FILTER MAINT.

3) 129.52D



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

A facility, regardless of the facility's annual emission rate, which contains surface coating processes shall maintain records sufficient to demonstrate compliance with §129.52. At a minimum, a facility shall maintain daily records of:

- (1) The following parameters for each coating, thinner and other component as supplied:
- (i) The coating, thinner or component name and identification number.
- (ii) The volume used.
- (iii) The mix ratio.
- (iv) The density or specific gravity.
- (v) The weight percent of total volatiles, water, solids and exempt solvents.
- (vi) The volume percent of solids for Table I surface coating process categories 1 10.
- (2) The VOC content of each coating, thinner and other component as supplied.
- (3) The VOC content of each as-applied coating.

The records shall be maintained for 5 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.



V. REPORTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall notify the Department in writing within 30 days if it is determined that the §129.52(a) applicability thresholds have been exceeded for this process (vinyl coating). These thresholds are: 3 pounds VOC per hour; 15 pounds VOC per day; or 2.7 tons VOC per year.

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

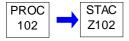
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).



Source ID: 102 Source Name: PARTS SANDING (AREA)

Source Capacity/Throughput: N/A

Conditions for this source occur in the following groups: 1) PROCESS PM LIMIT



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

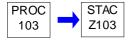
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).



Source ID: 103 Source Name: SOLVENT EVAPORATION (EQUIP. CLEAN-UP & DISTILLATION)

Source Capacity/Throughput: N/A SOLVENT

Conditions for this source occur in the following groups: 3) 129.52D



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Records shall be kept of the quantity of each solvent lost to evaporation during equipment clean-up, solvent distillation, and other activities, i.e. other than the quantities used to reduce (thin) coatings.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).



Group Name: 1) PROCESS PM LIMIT
Group Description: 123.13 limit of 0.04 grain

Sources included in this group

ID	Name
101A	SURFACE COATING (METAL ONLY)
101B	SURFACE COATING (VINYL ONLY)
102	PARTS SANDING (AREA)

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this process, at any time, in such a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



Group Name: 2) SPRAY EXHAUST FILTER MAINT.

Group Description: 127.441 req. for filter maint.

Sources included in this group

ID	ID Name		
101A SURFACE COATING (METAL ONLY)			
101B SURFACE COATING (VINYL ONLY)			

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Panel filters shall be in place to control particulate emissions in the exhaust whenever spray coating is being performed. These filters shall be properly maintained and disposed of in accordance with Department regulations.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



Group Name: 3) 129.52D

Group Description: Requirements from 25 Pa. Code 129.52D

Sources included in this group

ID	Name	
101A	SURFACE COATING (METAL ONLY)	
101B SURFACE COATING (VINYL ONLY)		
103	SOLVENT EVAPORATION (EQUIP. CLEAN-UP & DISTILLATION)	

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface:

If Total Actual VOC emiissions from activities subject to 129.52d are >= 2.7 tons per 12-month rolling period, then paragraphs (a)(1), (a)(3), (d), (e)(1) & (g) of this condition apply.

If Total Actual VOC emissions from activities subject to 129.52d are < 2.7 tons per 12-month rolling period, then paragraphs (a)(2) & (e)(1) of this condition apply.]

- (a) Applicability.
- (1) This section applies to the owner and operator of a miscellaneous metal part surface coating process or miscellaneous plastic part surface coating process, or both, if the total actual VOC emissions from all miscellaneous metal part coating units and miscellaneous plastic part coating units, including related cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls.
- (2) This section applies, as specified, to the owner and operator of a miscellaneous metal part surface coating process or miscellaneous plastic part surface coating process, or both, if the total actual VOC emissions from all miscellaneous metal part coating units and miscellaneous plastic part coating units, including related cleaning activities, at the facility are below 2.7 tons per 12-month rolling period, before consideration of controls.
- (3) Compliance with the VOC emission limits and other requirements of this section assures compliance with the VOC emission limits and other requirements of § 129.52 (relating to surface coating processes) for the miscellaneous metal parts and products surface coating processes as specified in § 129.52, Table I, Category 10.
 - (4) [Paragraph (a)(4) is not applicable to this facility.]
 - (5) This section does not apply to an owner or operator in the use or application of the following:
- (i) Aerosol coatings that meet the requirements of 40 CFR Part 59, Subpart E (relating to National volatile organic compound emission standards for aerosol coatings).
 - (ii) Aerospace coatings.
 - (iii) Architectural coatings.
 - (iv) Automobile refinishing coatings.
 - (v) Auto and light-duty truck assembly coatings.
 - (vi) Can, coil or magnet wire coatings.
- (vii) Coating applied to a test panel or coupon, or both, in research and development, quality control or performance testing activities, if records are maintained as required under subsections (e) and (f).
 - (viii) Fiberglass boat manufacturing materials.
 - (ix) Flat wood paneling coatings.
 - (x) Large appliance coatings.
 - (xi) Metal furniture coatings.
 - (xii) Miscellaneous industrial adhesives.
 - (xiii) Paper, film and foil coatings.
 - (xiv) Shipbuilding and repair coatings.
 - (xv) Wood furniture coatings.



- (b) [Refer to ADDITIONAL REQUIREMENTS in this section of permit for the definitions of paragraph (b) of the regulation.]
- (c) [Not applicable.]
- (d) Emission limitations. Beginning January 1, 2017, a person subject to subsection (a)(1) may not cause or permit the emission into the outdoor atmosphere of VOCs from a miscellaneous metal part coating unit or miscellaneous plastic part coating unit, or both, unless emissions of VOCs are controlled in accordance with paragraph (1), (2) or (3).
- (1) Compliant materials option. The VOC content of each miscellaneous metal part coating or each miscellaneous plastic part coating, as applied, excluding water and exempt compounds, is equal to or less than the VOC content limit for the applicable coating category specified in the applicable table of VOC content limits in Tables I V. [Note: Table I is applicable to sources at this facility and is printed in this section of the permit; Table II may be applicable and is also printed in this section of the permit. Tables III V are not applicable.]
 - (2) [Paragraph (d)(2) is not applicable to this facility.]
 - (3) [Paragraph (d)(3) is not applicable to this facility.]
- (4) Least restrictive VOC limit. If more than one VOC content limit or VOC emission rate limit applies to a specific coating, then the least restrictive VOC content limit or VOC emission rate limit applies.
- (5) Coatings not listed in Table I, II, VI or VII. For a miscellaneous metal part or miscellaneous plastic part coating that does not meet the coating categories listed in Table I, II, VI or VII, the VOC content limit or VOC emission rate limit shall be determined by classifying the coating as a general one component coating or general multicomponent coating. The corresponding general one component coating or general multicomponent coating limit applies. [Note, only Table I applies to this facility; Tables II, VI, and VII do not apply.]
 - (6) [Paragraph (d)(6) is not applicable to this facility.]
- (e) Compliance and monitoring requirements.
- (1) All owners and operators. Regardless of the facility's VOC emissions, the owner or operator of a miscellaneous metal part surface coating process or miscellaneous plastic part surface coating process, or both, subject to subsection (a)(1) or (2), shall comply with this section as specified throughout this section. For an owner or operator subject only to subsection (a)(2), the compliance requirements are the recordkeeping requirements in subsection (f)(2).
 - (2) [Paragraph (e)(2) is not applicable to this facility.]
- (f) [Paragraph (f) is printed under RECORDKEEPING REQUIREMENTS in this section of permit.]
- (g) Coating application methods. A person subject to subsection (a)(1) may not cause or permit the emission into the outdoor atmosphere of VOCs from a miscellaneous metal part coating unit or miscellaneous plastic part coating unit, or both, unless the coatings are applied using one or more of the following coating application methods:
 - (1) Electrostatic coating.
 - (2) Flow coating.
 - (3) Dip coating, including electrodeposition.
 - (4) Roll coating.
 - (5) High volume-low pressure (HVLP) spray coating.
 - (6) Airless spray coating.
 - (7) Air-assisted airless spray coating.
 - (8) Other coating application method if approved in writing by the Department prior to use.
- (i) The coating application method must be capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spray coating.
 - (ii) The owner or operator shall submit the request for approval to the Department in writing.
- (h) Exempt coatings and exempt coating unit operations.



- (1) The requirements of subsections (d) and (g) do not apply to the application of the following coatings to a metal part:
 - (i) Stencil coating.
 - (ii) Safety-indicating coating.
 - (iii) Solid-film lubricant.
 - (iv) Electric-insulating and thermal-conducting coating.
 - (v) Magnetic data storage disk coating.
 - (vi) Plastic extruded onto metal parts to form a coating.
 - (vii) Powder coating.
- (2) The requirements of subsection (d) do not apply to the application of the following coatings to a plastic part:
 - (i) Touch-up and repair coating.
 - (ii) Stencil coating applied on a clear or transparent substrate.
 - (iii) Clear or translucent coating.
 - (iv) Coating applied at a paint manufacturing facility while conducting performance tests on coating.
 - (v) Reflective coating applied to highway cones.
- (vi) Mask coating, if the coating is less than 0.5 millimeter thick (dried) and the area coated is less than 25 square inches.
 - (vii) EMI/RFI shielding coating.
- (viii) Heparin-benzalkonium chloride (HBAC)-containing coating applied to a medical device, provided that the total usage of HBAC-containing coatings does not exceed 100 gallons in 1 calendar year at the facility.
 - (ix) Powder coating.
- (x) An individual coating category used in an amount less than 50 gallons in 1 calendar year provided that the total usage of all of the coatings, combined, does not exceed 200 gallons per year at the facility. This exception applies only if substitute compliant coatings are not available.
 - (3) [Paragraph (h)(3) is not applicable to this facility.]
 - (4) The requirements of subsection (g) do not apply to the following activities:
 - (i) Application of a touch-up coating, repair coating or textured finish to a metal part.
 - (ii) Application of a powder coating to the following:
 - (A) Plastic part.
 - (B) Automotive-transportation plastic part.
 - (C) Business machine plastic part.
 - (iii) Airbrush application of coating to a metal part or plastic part using no more than 5 gallons of coating per year.
 - (iv) Use of an add-on air pollution control device to comply with subsection (d).
 - (v) Application of extreme high-gloss coating in a pleasure craft surface coating operation.
- (i) [Paragraph (i) is printed under WORK PRACTICE REQUIREMENTS in this section of permit.]
- (j) [Paragraph (j) is printed under WORK PRACTICE REQUIREMENTS in this section of permit.]
- (k) [Paragraph (k) is printed under RECORDKEEPING REQUIREMENTS in this section of permit.]

[Source: The provisions of this § 129.52d adopted October 21, 2016, effective October 22, 2016, 46 Pa.B. 6758.]

002 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface

[Note: This Table is applicable if Total Actual VOC emissions from activities subject to 129.52d are >= 2.7 tons per 12-month rolling period, as referenced by paragraphs (d)(1) and (a)(1) of Condition #001 in this section of permit.]

Table I. VOC Content Limits for Metal Parts and Products Surface Coatings

Weight of VOC per Volume of Coating,





Less Water and Exempt Compounds, as Applied

	Air Dried		Baked	
Coating Category	kg VOC/	lb VOC/	kg VOC/	Ib VOC/
	liter coating	gal coating	liter coating	gal coating
General One-component	0.34	2.8	0.28	2.3
General Multicomponent	0.34	2.8	0.28	2.3
Camouflage	0.42	3.5	0.42	3.5
Electric-insulating Varnish	0.42	3.5	0.42	3.5
Etching Filler	0.42	3.5	0.42	3.5
Extreme High-gloss	0.42	3.5	0.36	3.0
Extreme Performance	0.42	3.5	0.36	3.0
Heat-resistant	0.42	3.5	0.36	3.0
High-performance Architectural	0.74	6.2	0.74	6.2
High-temperature	0.42	3.5	0.42	3.5
Metallic	0.42	3.5	0.42	3.5
Military Specification	0.34	2.8	0.28	2.3
Mold-seal	0.42	3.5	0.42	3.5
Pan-backing	0.42	3.5	0.42	3.5
Prefabricated Architectural Multicomponent	0.42	3.5	0.28	2.3
Prefabricated Architectural One-component	0.42	3.5	0.28	2.3
Pretreatment	0.42	3.5	0.42	3.5
Touch-up and Repair	0.42	3.5	0.36	3.0
Silicone-release	0.42	3.5	0.42	3.5
Solar-absorbent	0.42	3.5	0.36	3.0
Vacuum-metalizing	0.42	3.5	0.42	3.5
Drum Coating, New, Exterior	0.34	2.8	0.34	2.8
Drum Coating, New, Interior	0.42	3.5	0.42	3.5
Drum Coating, Reconditioned, Exterior	0.42	3.5	0.42	3.5
Drum Coating, Reconditioned, Interior	0.50	4.2	0.50	4.2

[Source: The provisions of this § 129.52d adopted October 21, 2016, effective October 22, 2016, 46 Pa.B. 6758.]

003 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface

[Note: This Table is applicable if Total Actual VOC emissions from activities subject to 129.52d are >= 2.7 tons per 12-month rolling period, as referenced by paragraphs (d)(1) and (a)(1) of Condition #001 in this section of permit.]

Table II. VOC Content Limits for Plastic Parts and Products
Surface Coatings

Weight of VOC per Volume of Coating, Less Water and Exempt Compounds, as Applied

Coating Category	kg VOC/	Ib VOC/
	liter coating	gal coating
General One-component	0.28	2.3
General Multicomponent	0.42	3.5
Electric Dissipating and Shock-free	0.80	6.7
Extreme Performance (2-pack coatings)	0.42	3.5
Metallic	0.42	3.5
Military Specification (1-pack)	0.34	2.8
Military Specification (2-pack)	0.42	3.5
Mold-seal	0.76	6.3
Multicolored	0.68	5.7
Optical	0.80	6.7
Vacuum-metalizing	0.80	6.7



[Source: The provisions of this § 129.52d adopted October 21, 2016, effective October 22, 2016, 46 Pa.B. 6758.]

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.

[From § 129.52d(f). Refer to Emission Restrictions in this section of permit for remaining paragraphs of § 129.52d.]

[Note:

Paragraph (f)(1) is applicable if Total Actual VOC emissions from activities subject to 129.52d are >= 2.7 tons per 12-month rolling period.]

Paragraph (f)(2) is applicable if Total Actual VOC emissions from activities subject to 129.52d are < 2.7 tons per 12-month rolling period.]

- (f) Recordkeeping and reporting requirements.
- (1) The owner or operator of a miscellaneous metal part coating unit or miscellaneous plastic part coating unit, or both, subject to subsection (a)(1) shall maintain monthly records sufficient to demonstrate compliance with this section. The records must include the following information:
 - (i) The following parameters for each coating, thinner, component and cleaning solvent as supplied:
 - (A) Name and identification number of the coating, thinner, other component or cleaning solvent.
 - (B) Volume used.
 - (C) Mix ratio.
 - (D) Density or specific gravity.
 - (E) Weight percent of total volatiles, water, solids and exempt solvents.
 - (F) Volume percent of total volatiles, water and exempt solvents for the applicable table of limits in Tables I—V.
 - (G) [Paragraph (G) is not applicable to this facility because Tables VI IX are not applicable to this facility.]
 - (ii) The VOC content of each coating, thinner, other component and cleaning solvent as supplied.
 - (iii) The VOC content of each as applied coating or cleaning solvent.
 - (iv) The calculations performed for each applicable requirement under subsections (d) and (e).
 - (v) The information required in a plan approval issued under subsection (e)(2).
- (2) An owner or operator subject to subsection (a)(2), or otherwise claiming an exemption or exception in this section, shall maintain records sufficient to verify the applicability of subsection (a)(2), the exemption or exception. Records maintained for compliance demonstrations may include purchase, use, production and other records.
- (3) [This paragraph of the regulation is streamlined out of the operating permit in favor of the more restriction § 127.441 condition requiring that records be maintained for 5 years.]



(4) The records shall be submitted to the Department in an acceptable format upon receipt of a written request from the Department.

[Source: The provisions of this § 129.52d adopted October 21, 2016, effective October 22, 2016, 46 Pa.B. 6758.]

005 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.

[From § 129.52d(k). Refer to Emission Restrictions in this section of permit for remaining paragraphs of § 129.52d.]

- (k) Measurements and calculations. To determine the properties of a coating or component used in a miscellaneous metal parts surface coating process or miscellaneous plastic parts surface coating process, measurements and calculations shall be performed according to one or more of the following:
- (1) EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, found at 40 CFR Part 60, Subpart D, Appendix A, including updates and revisions.
 - (2) Manufacturer's formulation data.
 - (3) Sampling and testing done in accordance with the procedures and test methods specified in Chapter 139.
- (4) Other test method demonstrated to provide results that are acceptable for purposes of determining compliance with this section if prior approval is obtained in writing from the Department.
- (5) Add-on air pollution control devices shall be equipped with the applicable monitoring equipment according to manufacturers' specifications. The monitoring equipment shall be installed, calibrated, operated and maintained according to manufacturers' specifications at all times the add-on air pollution control device is in use.
 - (6) EPA calculations information in the following:
 - (i) A Guideline for Surface Coating Calculations, EPA-340/1-86-016, including updates and revisions.
- (ii) Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings, EPA-450/3-84-019, including updates and revisions.

[Source: The provisions of this § 129.52d adopted October 21, 2016, effective October 22, 2016, 46 Pa.B. 6758.]

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.

[From § 129.52d(i) & (j). Refer to Emission Restrictions in this section of permit for remaining paragraphs of § 129.52d.]

- (i) Work practice requirements for coating-related activities. The owner or operator of a miscellaneous metal part coating unit or miscellaneous plastic part coating unit, or both, subject to subsection (a)(1) shall comply with the following work practices for coating-related activities:
 - (1) Store all VOC-containing coatings, thinners or coating-related waste materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC-containing coatings, thinners or coating-related waste materials are kept closed at all times, except when depositing or removing these coatings, thinners or waste materials.
 - (3) Minimize spills of VOC-containing coatings, thinners or coating-related waste materials and clean up spills



immediately.

- (4) Convey VOC-containing coatings, thinners or coating-related waste materials from one location to another in closed containers or pipes.
- (j) Work practice requirements for cleaning materials. The owner or operator of a miscellaneous metal part coating unit or miscellaneous plastic part coating unit subject to subsection (a)(1) shall comply with the following work practices for cleaning materials:
 - (1) Store all VOC-containing cleaning materials and used shop towels in closed containers.
- (2) Ensure that mixing vessels and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (3) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.
 - (4) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- (5) Minimize VOC emissions from cleaning of application, storage, mixing or conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

[Source: The provisions of this § 129.52d adopted October 21, 2016, effective October 22, 2016, 46 Pa.B. 6758.]

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §129.52d]

Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.

[Selected definitions from 25 Pa. Code § 129.52d(b) are printed below. Refer to regulation for remaining definitions.]

(b) Definitions. The following words and terms, when used in this section, have the following meanings unless the context clearly indicates otherwise:

Adhesion primer — A coating applied to a polyolefin part to promote the adhesion of a subsequent coating. This type of coating is clearly identified on its accompanying MSDS by this term or as an adhesion promoter.

Air-dried coating — A coating that is cured or dried at a temperature below 90°C (194°F).

Baked coating — A coating cured at a temperature at or above 90°C (194°F).

Cleaning material or cleaning solvent — A material used during cleaning activities or cleaning operations to remove residue or other unwanted materials from equipment.

Clear coating —

- (i) A colorless coating that contains binders, but no pigment, and is formulated to form a transparent film.
- (ii) The term includes a transparent coating that uses the undercoat as a reflectant base or undertone color.

Coating —

- (i) A material applied onto or into a substrate for protective, decorative or functional purposes.
- (ii) The term includes paints, sealants, caulks, primers, inks and maskants.
- (iii) The term does not include protective oils, acids or bases, or combinations of these materials.

Coating unit — A series of one or more coating applicators and associated drying area or oven or both wherein a coating is applied and dried or cured, or both. The unit ends at the point where the coating is dried or cured, or prior to subsequent



application of a different coating.

Drum — A cylindrical metal shipping container larger than 12 gallons capacity but not larger than 110 gallons capacity.

EMI/RFI shielding coating — A coating used on electrical or electronic equipment to provide shielding against electromagnetic interference, radio frequency interference or static discharge.

Electric dissipating coating — A coating that rapidly dissipates a high voltage electric charge.

Electric-insulating varnish — A non-convertible-type coating applied to electric motors, components of electric motors or power transformers to provide electrical, mechanical or environmental protection or resistance

Extreme high-gloss coating — A coating that achieves the following:

- (i) For miscellaneous metal part surface coatings or miscellaneous plastic part surface coatings, other than pleasure craft surface coatings, a coating when tested by the American Society for Testing Material Test Method D-523-08 shows a reflectance of at least 75% on a 60° meter.
 - (ii) [Non-applicable; this facility does not apply coatings to pleasure crafts.]

Extreme-performance coating —

- (i) A coating used on a metal or plastic surface where the coated surface is, in its intended use, subject to one or more of the following:
- (A) Chronic exposure to corrosive, caustic or acidic agents, chemicals, chemical fumes, chemical mixtures or solutions.
 - (B) Repeated exposure to temperatures in excess of 250°F.
- (C) Repeated heavy abrasion, including mechanical wear and repeated scrubbing with industrial grade solvents, cleansers or scouring agents.
 - (ii) The term includes coatings applied to locomotives, railroad cars, farm machinery and heavy duty trucks.

Finish primer/surfacer — A coating applied with a wet film thickness of less than 10 mils prior to the application of a topcoat for purposes of providing corrosion resistance, adhesion of subsequent coatings, a moisture barrier or promotion of a uniform surface necessary for filling in surface imperfections.

Heat-resistant coating — A coating that must withstand a temperature of at least 400°F during normal use.

Heavier vehicle — A self-propelled vehicle designed for transporting persons or property on a street or highway that has a gross vehicle weight rating over 8,500 pounds.

High bake coating — A coating designed to cure only at temperatures of more than 90°C (194°F).

High build primer/surfacer — A coating applied with a wet film thickness of 10 mils or more prior to the application of a topcoat for purposes of providing corrosion resistance, adhesion of subsequent coatings, a moisture barrier or promotion of a uniform surface necessary for filling in surface imperfections.

Mask coating — A thin film coating applied through a template to coat a small portion of a substrate.

Miscellaneous metal parts and miscellaneous plastic parts — Metal or plastic components of parts or products, as well as the parts or products themselves, constructed either entirely or partially from metal or plastic, or both, including the following:

- (i) Fabricated metal products.
- (ii) Molded plastic parts.



- (iii) Farm machinery.
- (iv) Commercial and industrial machinery and equipment.
- (v) Automotive or transportation equipment.
- (vi) Interior or exterior automotive parts.
- (vii) Construction equipment.
- (viii) Motor vehicle accessories.
- (ix) Bicycles and sporting goods.
- (x) Toys.
- (xi) Recreational vehicles.
- (xii) Watercraft.
- (xiii) Extruded aluminum structural components.
- (xiv) Railroad cars.
- (xv) Heavier vehicles.
- (xvi) Lawn and garden equipment.
- (xvii) Business machines.
- (xviii) Laboratory and medical equipment.
- (xix) Electronic equipment.
- (xx) Steel drums.
- (xxi) Metal pipes.

Multicomponent coating — A coating requiring the addition of a separate reactive resin, commonly known as a catalyst or hardener, before application to the substrate to form an acceptable dry film.

One-component coating — A coating that is ready for application as it comes out of its container to form an acceptable dry film. A thinner may be added to reduce the viscosity, but is not considered a component.

Pretreatment coating — A coating that contains no more than 12% solids by weight and at least 0.5% acid by weight that is used to provide surface etching and that is applied directly to metal surfaces to provide corrosion resistance, adhesion and ease of stripping.

Pretreatment wash primer — A coating that contains no more than 12% solids by weight and at least 0.5% acid by weight that is used to provide surface etching and that is applied directly to fiberglass and metal surfaces to provide corrosion resistance and adhesion of subsequent coatings.

Repair coating — A coating used to recoat portions of a previously coated product that has sustained mechanical damage to the coating following normal coating operations.

Topcoat — A final coating applied in a surface coating process that applies two or more coatings.

[Source: The provisions of this § 129.52d adopted October 21, 2016, effective October 22, 2016, 46 Pa.B. 6758.]



SEAWAY MFG CORP/ERIE



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.



${\bf SECTION\,G.} \quad {\bf Emission\,Restriction\,Summary.}$

Source Id	Source Description		
001	MISC. NAT. GAS COMBUSTION UNITS		
Emission Limit		Pollutant	
4.000	Lbs/MMBTU any 1-hour period	SOX	
101A	SURFACE COATING (METAL ONLY)		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	TSP	
101B	SURFACE COATING (VINYL ONLY)		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	TSP	
102	PARTS SANDING (AREA)		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	TSP	

Site Emission Restriction Summary

Emission Limit	Pollutant
EIIIISSIUII EIIIIII	FUIIUIAIII



SEAWAY MFG CORP/ERIE



SECTION H. Miscellaneous.

- a) Source 001 accounts for natural gas used for space heating, drying ovens and heating of the pretreatment dip tanks.
- b) This permit was reissued on February 27, 2018. It will take effect on March 1, 2019 and expire on February 28, 2024.





***** End of Report ******