

NOVAE LLC



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date: June 27, 2023 Effective Date: June 27, 2023

Expiration Date: June 27, 2028

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: 40-00134

Synthetic Minor

Federal Tax Id - Plant Code: 36-4714537-1

Owner Information		
Name: NOVAE LLC		
Mailing Address: PO BOX 339		
BRISTOL, IN 46507-0339		
Plant Information		
Plant: NOVAE LLC		
Location: 40 Luzerne County	40972 Wright Township	
SIC Code: 3799 Manufacturing - Transportation Equip	ment, Nec	
R	esponsible Official	
Name: RANDY HINOJOSA		
Title: CORP ENV COMPLIANCE MGR		
Phone: (260) 758 - 9838	Email: randy.hinojosa@novaecorp.com	
Permit Contact Person		
Name: BILL DEWEY		
Title: PLT MGR		
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[Signature]		
MARK J. WEJKSZNER, NORTHEAST REGION AIR PROGRAM MANAGER		



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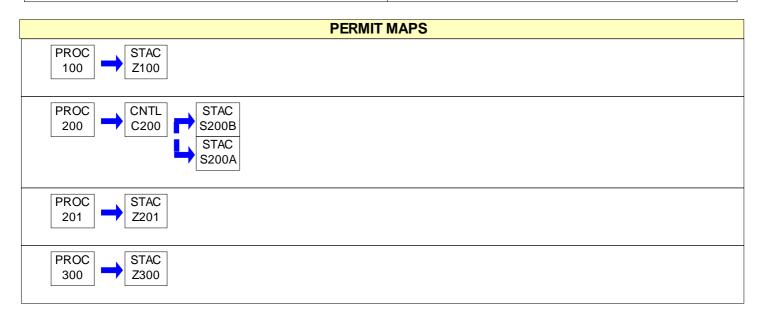
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SECTION A. Site Inventory List

Source I	ID Source Name	Capacity/Throughput	Fuel/Material
100	WELDING OPERATIONS-10 BOOTHS		
200	SPRAY BOOTH		
201	SEALING & FINISHING		
300	WOOD CUTTING OPERATION		
C200	PANEL FILTERS		
S200A	SPRAY BOOTH STACK A		
S200B	SPRAY BOOTH STACK B		
Z100	FUGITIVE		
Z201	FUGITIVE		
Z300	FUGITIVE		





#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)]

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 as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (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 the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
 - (1) For a synthetic minor facility, a fee equal to:
 - (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
 - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
 - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.



- (2) For a facility that is not a synthetic minor, a fee equal to:
 - (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
 - (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
 - (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.
- (b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#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, 127.465 & 127.703]

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:

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SECTION B. General State Only Requirements

- (b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.
- (e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#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.



#023 [25 Pa. Code §135.3]

Reporting

- (a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.
- (b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]

Report Format

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



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

- (a) 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) (8) N/A
- (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.

002 [25 Pa. Code §123.2]

Fugitive particulate matter

No person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, Condition #001 if such emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

The permittee shall not permit the emissions 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.

004 [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.

005 [25 Pa. Code §123.42]

Exceptions

The limitations of Section C, Condition #004 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.

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SECTION C. Site Level Requirements

(3) When the emission results from sources specified in Section C, Condition #001.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The VOC emissions for the facility shall be limited to less than 50 tons per year based on a 12-month rolling sum.
- (b) The Hazardous Air Pollutant (HAP) emissions shall be limited to less than 10 tons of any individual HAP, and less than 25 ton of a combination of HAP's based on a 12-month rolling sum.

007 [25 Pa. Code §129.52]

Surface coating processes

Pursuant to the requirement of 25 PA Code, Chapter 129.52, the facility shall use coatings as applied which contains the weight of VOCs (volatile organic compounds) per volume of coating solids is equal to or less than the level specified in Table I of Chapter 129.52 for the respective application.

II. TESTING REQUIREMENTS.

008 [25 Pa. Code §139.14]

Emissions of VOCs.

At the request of the Department the permittee shall perform testing of all VOC based coatings in accordance with Reference Method 24, 40 CFR PArt 60, Appendix A, and 25 PA., Code 139.14(a)(1).

009 [25 Pa. Code §139.14]

Emissions of VOCs.

The permittee shall comply with one of the following:

- (1) The permittee shall perform annual testing on all coatings in accordance with reference method 24, 40 CFR Part 60, Appendix A, and 25 Pa., Code 139.14a)(1).
- (2) The permittee shall obtain certifications of reference method 24, 40 CFR Part 60, Appendix A directly from the coating manufacturers or suppliers of each coating. These certifications shall be obtained each year and each time the manufacturer or supplier changes.

III. MONITORING REQUIREMENTS.

010 [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.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) A visual inspection of the facility shall be performed on a weekly basis to determine if visible emissions and fugitive emissions are detectable outside the plant.
- (b) Visible emissions may be measured according to the methods specified in Section C, Condition #010, or alternatively, plant personnel who observe any visible emissions will report the incident of visible emissions to the Department within four (4) hours of each incident and make arrangements for a certified observer to verify the opacity of the visible emissions.



IV. RECORDKEEPING REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a monthly basis the permittee shall:

- (a) Update the VOC emissions and calculate the annual VOC emission based on a 12-month rolling sum.
- (b) Update the Hazardous Air Pollutants (HAP) emissions and calculate the annual HAP's emission based on a 12-month rolling sum.
- (c) Calculate the total usage of each coating to include weight of VOC/gal., including any organic compound (VOC) solvents.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The facility shall keep on hand chemical composition data for all of the coatings used in the paint spray booths, and shall record on a daily basis the amount of these coatings and any volatile organic compound (VOC) solvent or thinner usage.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The facilities emissions shall be updated monthly and maintained on a 12-month rolling sum.
- (b) All records shall be maintained for a minimum of 5 years.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a record of all reports of fugitive and visible emissions and the corrective action taken to abate the deviation or prevent future occurrences.

V. REPORTING REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Authority for this condition is also derived from 25 Pa Code, Section 129.95]

The permittee shall report on a quarterly basis the total VOC emissions emitted, the total usage of each coating to include weight of VOC/gal., any organic compound (VOC) solvents, fuel usage, and any maintenance/calibration checks performed on all equipment which is subject to this permit.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee, within one (1) hour of discovery of an occurrence, shall notify the Department (either by phone at 570-826-2511, facsilime at 570-826-2357, or email to the Regional Air Manager) of any malfunction, recordkeeping or reporting error, or other possible non-compliance issue, which reasonably is believed to either result in, or possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulations contained in Article III of the Rules and Regulations of the Department of Environmental Protection.

A written report shall be submitted to the Department within five (5) working days following the initial notification describing the incident and the corrective actions taken or to be taken. The Department may take enforcement action for any violations of the applicable standards.

018 [25 Pa. Code §135.3]

Reporting

- (a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the proceeding calendar year and sources modified during the same period which were not previously reported.
- (b) A person who receives initial notification by the Department that a source report is necessary shall submit an initial source report within 60 days after receiving the notification or by March 1 of the year following the year for which the report is



required, whichever is later.

(c) A source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

VI. WORK PRACTICE REQUIREMENTS.

019 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permitte 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.

020 [25 Pa. Code §123.2]

Fugitive particulate matter

The permittee shall prevent fugitive particulate matter by the application of water on the roadways and sweeping of roads.

021 [25 Pa. Code §129.14]

Open burning operations

- (a) No person may permit the open burning of material in an area outside of air basins in a manner that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life or property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health.
- (b) Exceptions: The requirements of subsection (a) does 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) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (5) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of such structure.



- (6) A fire set solely for recreational or ceremonial purposes.
- (7) A fire set solely for cooking food.

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.



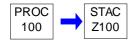
NOVAE LLC



SECTION D. Source Level Requirements

Source ID: 100 Source Name: WELDING OPERATIONS-10 BOOTHS

Source Capacity/Throughput:



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.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (1) The company shall keep adequate records of welding rod usage containing one or more MFHAP on a monthly basis.
- (2) All logs and required records shall be maintained on site, or at an alternative location acceptable to the Department, for a minimum of five years and shall be made available to the Department upon request.

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).



NOVAE LLC



SECTION D. Source Level Requirements

Source ID: 200 Source Name: SPRAY BOOTH

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1



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).



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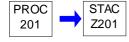


SECTION D. Source Level Requirements

Source ID: 201 Source Name: SEALING & FINISHING

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1



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).



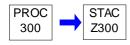
NOVAE LLC



SECTION D. Source Level Requirements

Source ID: 300 Source Name: WOOD CUTTING OPERATION

Source Capacity/Throughput:



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.

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: GROUP 1
Group Description: Surface Coating

Sources included in this group

ID	Name
200	SPRAY BOOTH
201	SEALING & FINISHING
C200	PANEL FILTERS

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 in a manner that the concentration of particulate matter in the effluent gas exceeds any of the following:

(i) 0.04 grain per dry standard cubic foot.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The VOC standards do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Pursuant to the requirement of 25 PA Code, Chapter 129, Section129.52, the company shall not use any coating as applied which contain volatile organic compounds (VOCs) in excess of 5.06 lbs VOC per gallon coating solids.

004 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

The company shall not use or apply an adhesive or sealant products containing more than 0.3 lb VOC/gal less water and exempt compounds at the facility.

II. TESTING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use one of the following procedures to demonstrate compliance with the requirements for VOCs contained in coatings:

- (1) The permittee shall perform annual testing on all coatings as applied in accordance with reference method 24, 40 CFR Part 60, Appendix A, and 25 Pa. Code 139.14(a)(1).
- (2) The permittee shall obtain certifications of reference Method 24, 40 CFR Part 60, Appendix A directly from the coating manufacturers or suppliers of each coating. These certifications shall be obtained each year and each time the manufacturer or supplier changes.

006 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

The VOC and solids content of nonaerosol adhesives (including one-part moisture cure urethane adhesives and silicone adhesives), sealants, adhesive primers, sealant primers, surface preparation solvents and cleanup solvents shall be



determined using one 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 60, Subpart D, Appendix A, including updates and revisions.
- (2) SCAQMD Method 304, Determination of Volatile Organic Compounds (VOC) in Various Materials, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

007 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

The weight volatile matter content and weight solids content for one-part or multiple part reactive adhesives, except one-part moisture cure urethane adhesives and silicone adhesives, shall be determined using the EPA Reference Method, Determination of Weight Volatile Matter Content and Weight Solids Content of Reactive Adhesives, found at 40 CFR 63 Subpart PPPP, Appendix A, including updates and revisions.

008 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

- (a) The identity and concentration of exempt organic compounds shall be determined using one of the following:
- (1) ASTM D4457, Standard Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA including updates and revisions.
- (2) SCAQMD Method 303, Determination of Exempt Compounds, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (b) The VOC content of a plastic cement welding adhesive or primer shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (c) To determine if a diluent is a reactive diluent, the percentage of the reactive organic compound that becomes an integral part of the finished material shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

III. MONITORING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall ensure that the spray booth is equipped with the applicable monitoring equipment (pressure drop gauge) and the monitoring equipment are installed, calibrated, operated, and maintained according to the vendor's specifications at all times the spray booth is in use.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall monitor the pressure drop on paint booth on a daily basis while the source(s) is in operation.

IV. RECORDKEEPING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall maintain records in accordance with the recordkeeping requirements of this operating permit and shall include as a minimum the following:

- (a) The records shall provide sufficient data to clearly demonstrate that the requirement of VOC content limitations as specified in condition above for each coatings are met.
- (b) The company shall keep adequate records to verify daily coating usage, the coating density before and after addition of diluents, the gallons diluents used and the density of the diluents, the gallons of water contained in the coating and the weight of the organic volatiles in the coating.



(c) The company shall maintain records of the total gallons of coating, gluing, sealer, cleaning, and washoff materials used each month, and upon request submit such records to the Department. These records shall be maintained for five years.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep on hand chemical composition data for all of the coatings used in the paint spray booth, and shall record on a daily basis the amount of these coatings and any volatile organic compound (VOC) solvent or thinner usage for the booth.

013 [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 this section. At a minimum, a facility shall maintain daily records of the gallons of coating used, the coating density before and after addition of diluents, the gallons of diluents used and the density of the diluents, the gallons of water contained in the coating and the weight percent of the organic volatiles in the coating. The records shall be maintained for 5 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) Records shall be maintained indicating when filters are replaced.
- (b) These records shall be kept for a five (5) year minimum period and shall be made available to the Department upon request.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The facility shall keep records to verify compliance with the volatile organic compound content of coatings as specified in 25 Pa. Code Sections 129.52.
- (b) These records shall be kept for a five (5) year minimum period and be made available to the Department upon request.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (1) The company shall maintain a file containing all records and other data that are required to be collected pursuant to the various provisions of this operating permit. The file shall include, but not be limited to: all air pollution control systems performance evaluations and records of calibration checks, adjustments and maintenance performed on all equipment which is subject to this operating permit. All measurements, records and other data required to be maintained by the company shall be retained for at least two years following the date on which such measurements, records or data are recorded.
- (2) The company shall record the pressure drop across the spray booth. At a minimum these recordings shall be taken once per day, while the source and collector(s) is in operation. The recordings shall be maintained in a logbook and made available to the Department upon request.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep up-to-date records of Certified Product Data Sheets (CPDSs) or Material Safety Data Sheets (MSDSs) that identify the volatile organic compound (VOC) content and hazardous air pollutant (HAP) content of each VOC and/or HAP containing material used at the facility.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall keep records of the supporting calculations on a monthly basis for VOCs, and HAPs emissions from all sources at the facility in any 12 consecutive month period.
- (b) These records shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records showing the coating, thinner, and cleaning solvent usage and VOC emissions on a 12-month rolling sum.

020 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

The company shall keep following records.

- (1) A list of each adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent and cleanup solvent product in use and in storage.
- (2) A data sheet or material list which provides the product name, manufacturer identification and use or material application for each product included on the list required under paragraph (1).
 - (3) The VOC content of each product on the list required under paragraph (1), as supplied.
 - (4) Catalysts, reducers or other components used and the mix ratio.
- (5) The VOC content or vapor pressure of each product on the list required by paragraph (1), as applied, if solvent or other VOC is added to the product before application.
 - (6) The volume purchased or produced of each product on the list required under paragraph (1).
- (7) The monthly volume used or applied as part of a manufacturing process at the facility of each product on the list required under paragraph (1).

V. REPORTING REQUIREMENTS.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Any changes in the location of the aforementioned source, or any changes in the process or control equipment would be consider a modification and would require the submittal of an amended application for plan approval in accordance with the provisions of 25 PA Code 127.11 and 127.12.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Any notification as a result of any condition herein should be directed to:

Mark J Wejkszner, P.E.

Air Quality Program Manager

Department of Environmental Protection

2 Public Square

Wilkes-Barre, PA 18701-1915

VI. WORK PRACTICE REQUIREMENTS.

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (1) The aforementioned source(s) may only be operated as long as the associated air pollution control device(s) are operated and maintained in accordance with the specifications set forth in the respective operating permit, and the application submitted for said operating permit (as approved by the Department), and in accordance with any conditions set forth herein.
- (2) The permittee shall keep on hand a sufficient quantity of spare filters associated with the aforementioned source(s) in order to be able to immediately replace any filters requiring replacement due to deterioration resulting from routine operation of the source(s).
- (3) The company shall maintain and operates the air pollution control equipment and sources in accordance with good



engineering practice.

024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All clean-up solvent operations must comply with Best Available Technology to minimize VOC emissions. All cleaning operations must store new and used cleaning solvents in closed containers. A record of the quantity of all VOC's used in clean-up operations must be calculated on a monthly basis (12-month rolling sum).

025 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) Paint booth filters shall be replaced as per manufacturer's specifications.
- (b) Only air assisted spray guns are to be used for coating application in the spray booth.

026 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The source and any associated air cleaning devices shall be:

- (1) Operated in such a manner as not to cause air pollution.
- (2) Operated and maintained in a manner consistent with good operating and maintenance practices.
- (3) Operated and maintained in accordance with manufacturer's specifications.

027 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Spray guns must be cleaned in a device that minimizes solvent evaporation during cleaning, rinsing, and draining operations. The device must be capable of recirculating solvent during cleaning so it can be reused and collecting the spent solvent in an enclosed system for proper disposal or recycling.

028 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Spray booth filters must include sufficient layers of dry fiber mat to achieves a particulate control efficiency of at least 98% by weight. Filter material must be maintained and disposed in accordance with all applicable DEP regulations.

VII. ADDITIONAL REQUIREMENTS.

029 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

- (e) An owner or operator of a facility subject to this section using or applying a surface preparation solvent or cleanup solvent at the facility may not:
- (1) Except as provided in paragraph (2) for single-ply roof membrane, use materials containing VOCs for surface preparation, unless the VOC content of the surface preparation solvent is less than 70 grams per liter of material or 0.6 pound of VOC per gallon of material.
- (2) Use materials containing VOCs for surface preparation or cleanup when applying single-ply roof membrane, unless the composite partial vapor pressure, excluding water and exempt compounds, of the surface preparation solvent or cleanup solvent is less than or equal to 45 mm mercury at 20° C.
- (3) Except as provided in subsection (b), use cleanup solvent materials containing VOCs for the removal of adhesives, sealants, adhesive primers or sealant primers from surfaces, other than from the parts of spray application equipment, unless the composite partial vapor pressure of the solvent is less than or equal to 45 mm mercury at 20° C.
- (f) Removal of an adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment shall be performed by one or more of the following methods:
 - (1) Using an enclosed cleaning system, or an equivalent cleaning system as determined by the test method identified in



subsection below.

- (2) Using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material or 0.6 pound of VOC per gallon of material.
- (3) Soaking parts containing dried adhesive in a solvent if the composite partial vapor pressure of the solvent, excluding water and exempt compounds, is less than or equal to 9.5 mm mercury at 20° C and the parts and solvent are in a closed container that remains closed except when adding parts to or removing parts from the container.
- (h) An owner or operator of a facility subject to this section shall store or dispose of all absorbent materials, including cloth or paper, which are moistened with adhesives, sealants, primers, surface preparation solvents or cleanup solvents subject to this section, in nonabsorbent containers at the facility that are kept closed except when placing materials in or removing materials from the container.
- (j) An owner or operator of a facility subject to this section who uses or applies an adhesive, sealant, adhesive primer or sealant primer subject to this section may not add solvent to the adhesive, sealant, adhesive primer or sealant primer in an amount in excess of the manufacturer's recommendation for application, if this addition causes the adhesive, sealant, adhesive primer or sealant primer to exceed the applicable VOC content limit.
- (n) This section does not apply to the use or application of a noncomplying adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent if the total volume of noncomplying adhesives, sealants, primers, surface preparation and cleanup solvents used or applied facility-wide does not exceed 55 gallons per calendar year. An owner or operator of a facility claiming exemption under this subsection shall record and maintain operational records sufficient to demonstrate compliance with this exemption.
- (z) The active and passive solvent losses from the use of an enclosed spray gun cleaning system or equivalent cleaning system, as listed above, shall be determined using the SCAQMD method, General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems, dated October 3, 1989, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (1) The test solvent for this determination shall be a lacquer thinner with a minimum vapor pressure of 105 mm of mercury at 20° C.
 - (2) The minimum test temperature shall be 15° C.
- (aa) Another test method may be used to determine the VOC or solids content of a product if the request for approval of the test method meets the following requirements:
 - (1) The request is submitted to the Department in writing.
- (2) The request demonstrates that the test method provides results that accurately determine the concentration of VOCs in the product or its emissions.
 - (3) The Department approves the request in writing.
- (bb) For adhesive, sealant, adhesive primer or sealant primer products that do not contain reactive diluents, grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation:

\/m - \/w

Vm - Vw - Ve

Where:

Ws = weight of volatile compounds, in grams.

Ww = weight of water, in grams.

We = weight of exempt compounds, in grams.

Vm = volume of material, in liters.



Vw = volume of water, in liters.

Ve = volume of exempt compounds, in liters.

(cc) For adhesive, sealant, adhesive primer or sealant primer products that contain reactive diluents, the VOC content of the product is determined after curing. The grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation:

Grams of VOC per liter of product, as applied = Wrs - Wrw - Wre

Vrm - Vrw - Vre

Where:

Wrs = weight of volatile compounds not consumed during curing, in grams.

Wrw = weight of water not consumed during curing, in grams.

Wre = weight of exempt compounds not consumed during curing, in grams.

Vrm = volume of material not consumed during curing, in liters.

Vrw = volume of water not consumed during curing, in liters.

Vre = volume of exempt compounds not consumed during curing, in liters.

(dd) For low-solids adhesive, sealant, adhesive primer or sealant primer products, grams of VOC per liter of product thinned to the manufacturer's recommendation, including the volume of water and exempt compounds, shall be calculated according to the following equation:

Grams of VOC per liter of product, as applied = Ws - Ww - We

Vm

Where:

Ws = weight of volatile compounds, in grams.

Ww = weight of water, in grams.

We = weight of exempt compounds, in grams.

Vm = volume of material, in liters.

(ee) Percent VOC by weight shall be calculated according to the following equation:

% VOC by weight = $[(Wv/W)] \times 100$

Where:

Wv = weight of VOCs, in grams.

W = weight of material, in grams.

(ff) To convert from grams per liter (g/l) to pounds per gallon (lb/gal), multiply the result (VOC content) by 8.345 x 10-3 (lb/gal/g/l).



NOVAE LLC



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.



NOVAE LLC



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.



NOVAE LLC



SECTION H. Miscellaneous.

The Synthetic Minor Operating Permit application was received on June 16, 2022. The annual operating permit maintenance fee shall be submitted to the Department in accordance with 25 Pa. Code, Chapter 127, Section 127.703. The annual maintenance fees are due no later than December 31, annually.

Plan Approvals include: 40-00134A 40-00134B

Request for Determination's (RFD's)

40-0947 was approved on June 3, 2016 for the construction of three sources (Sealing and Finishing; Welding; Misc. Natural Gas Combustion Source).

40-0986 was approved on April 11, 2017 for the use of a noncompliant adhesive for adherring the back side of aluminum sheets to the interior of special order trailers.

40-1056 was approved on August 19, 2019 to increase the usage of weld wire and to remove NESHAP XXXXXX from their SOOP.





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