PLAIN N FANCY KITCHENS/SCHAEFFERSTOWN



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: June 13, 2023 Effective Date: August 1, 2023

Expiration Date: July 31, 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 applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 38-05011

Federal Tax Id - Plant Code: 23-2080674-1

Owner Information			
Name: PLAIN N FANCY KITCHENS INC			
Mailing Address: 2550 STIEGEL PIKE			
SCHAEFFERSTOWN, PA 17088			
	Plant Information		
Plant: PLAIN N FANCY KITCHENS/SCHAEFFER	STOWN		
Location: 38 Lebanon County	38910 Heidelberg Township		
SIC Code: 2434 Manufacturing - Wood Kitchen Cabin	nets		
	Responsible Official		
Name: RICK L YOHN			
Title: PLANT COORDINATOR			
Phone: (717) 949 - 6571	Email: ricky@plainfancy.com		
P	Permit Contact Person		
Name: RICK L YOHN			
Title: PLANT COORDINATOR			
Phone: (717) 949 - 6571	Email: ricky@plainfancy.com		
[Signature]			
WILLIAMR. WEAVER, SOUTHCENTRAL REGION A	IR PROGRAM MANAGER		



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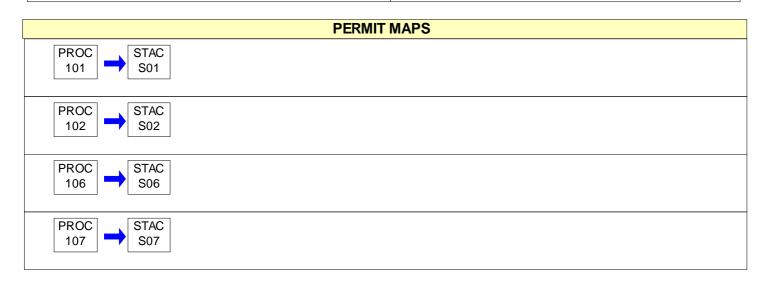






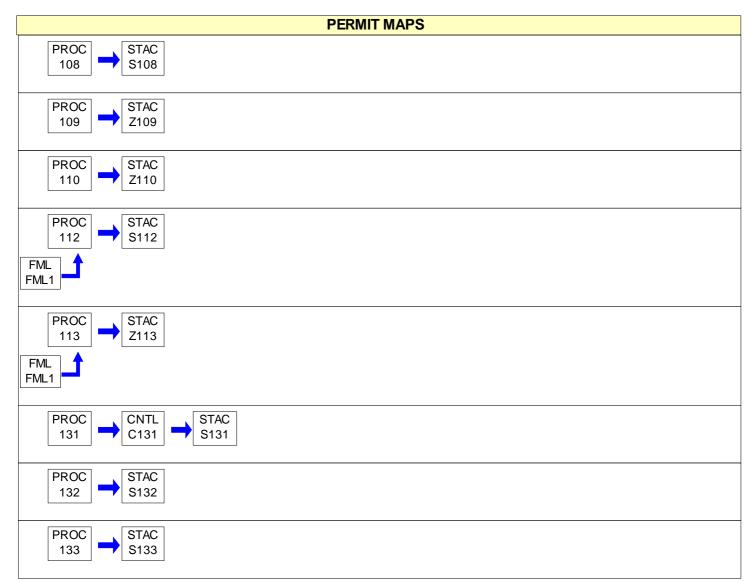
SECTION A. Site Inventory List

Source	ID Source Name	Capacity/	Throughput	Fuel/Material
101	KOCH STAIN BOOTH	42.000	Lbs/HR	SOLVENT VOC
102	KOCH SEALER BOOTH	32.200	Lbs/HR	SOLVENT VOC
106	PAINT BOOTH/CLEARTONE	12.500	Lbs/HR	SOLVENT VOC
107	PAINT BOOTH (R&D/TOUCH-UP)	12.500	Lbs/HR	SOLVENT VOC
108	TEST LAB, BENCH	1.000	Lbs/HR	SOLVENT VOC
109	CLEANING AND THINNING	4.450	Lbs/HR	SOLVENT VOC
110	HAND-WIPED GLAZES AND STAINS	3.500	Lbs/HR	SOLVENT VOC
112	HEATERS,AIR MAKE-UP #1 THROUGH #4	10.000	Gal/HR	LPG
113	SHOP HEATERS "24"	6.000	Gal/HR	LPG
131	CEFLA COATING SYSTEM, ROC3, LINE 1	80.000	Lbs/HR	SOLVENTS
132	PNEUMECH, LINE 2	60.000	Lbs/HR	SOLVENTS
133	PNEUMECH, LINE 3	60.000	Lbs/HR	SOLVENTS
C131	CONTROL, WATER CURTAIN, CEFLA			
FML1	PROPANE TANK			
S01	STACK, DEVILBISS			
S02	STACK, KOCH			
S06	STACK, DEVILBISS			
S07	STACK, R&D/TOUCH-UP			
S108	STACK, TEST LAB BENCH			
S112	STACK, HEATER AIR MAKE-UP			
S131	STACK, CEFLA, LINE 1			
S132	STACK, PNEUMECH, LINE 2			
S133	STACK, PNEUMECH, LINE 3			
Z109	FUGITIVE			
Z110	FUGITIVE, HANDWIPED			
Z113	FUGITIVE, HEATERS 24			













#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 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 121.7]

Prohibition of Air Pollution

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

#003 [25 Pa. Code § 127.512(c)(4)]

Property Rights

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

#004 [25 Pa. Code § 127.446(a) and (c)]

Permit Expiration

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. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V 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. 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.

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e), 127.503 & 127.704(b)]

Permit Renewal

- (a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.
- (b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (c) 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. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).
- (d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]

Transfer of Ownership or Operational Control

- (a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:
 - (1) The Department determines that no other change in the permit is necessary;
- (2) 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,
 - (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by



the Department.

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

Inspection and Entry

- (a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a Title V 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 or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, 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, 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.
- (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.

#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

Compliance Requirements

- (a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) 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 to the source are 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 Title V permit.

#009 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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





#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

Duty to Provide Information

- (a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.
- (b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

- (a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.
- (b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:
- (1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.
- (2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.
- (3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- (4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.
- (d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#012 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

#013 [25 Pa. Code § 127.522(a)]

Operating Permit Application Review by the EPA

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].



#014 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#015 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#016 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

#017 [25 Pa. Code § 127.512(b)]

Severability Clause

The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction, or US EPA to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). 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.
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.



- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.
- (1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.
- (2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.
- (3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

#019 [25 Pa. Code §§ 127.14(b) & 127.449]

Authorization for De Minimis Emission Increases

- (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. 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.

The Department may disapprove or condition de minimis emission increases at any time.

- (b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit 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 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 or 25 Pa. Code Article III.
- (c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:
- (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, liquefied petroleum gas 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.
- (d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(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 the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.
- (e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).
- (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 allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical 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.

#020 [25 Pa. Code §§ 127.11a & 127.215]

Reactivation of Sources

- (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.
- (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).

#021 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the



phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]

Submissions

(a) 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 on the permit transmittal letter, or otherwise notified)

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

Enforcement & Compliance Assurance Division Air, RCRA and Toxics Branch (3ED21) Four Penn Center 1600 John F. Kennedy Boulevard Philadelphia, PA 19103-2852

The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

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

#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

Sampling, Testing and Monitoring Procedures

- (a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#024 [25 Pa. Code §§ 127.511 & Chapter 135]

Recordkeeping Requirements

- (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:
 - (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.



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- (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 the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes 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. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

- (a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.
- (c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.
- (d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#026 [25 Pa. Code § 127.513]

Compliance Certification

- (a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:
- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.





#027 [25 Pa. Code § 127.3]

Operational Flexibility

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

- (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 amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

#028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

Risk Management

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:
- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.



- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
- (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.
- (2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

Permit Shield

- (a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:
 - (1) The applicable requirements are included and are specifically identified in this permit.
- (2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.
- (b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.
 - (2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.
 - (4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.
- (c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

#031 [25 Pa. Code §135.3]

Reporting

- (a) 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 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.

#032 [25 Pa. Code §135.4]

Report Format

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.





SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

38-05011

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

No person shall permit the emission into the outdoor atmosphere of any fugitive air contaminant from a source other than the following:

- (a) Construction or demolition of building or structure.
- (b) Grading, paying and maintenance of roads and streets.
- (c) 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.
- (d) Clearing of land.
- (e) Stockpiling of material.
- (f) Open burning operations.
- (g) Sources and classes of sources other than those identified in part (a) through (e), above, for which the operator has obtained a determination from the Department, in accordance with §123.1(b), that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution.
 - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air standard.

002 [25 Pa. Code §123.2]

Fugitive particulate matter

No person shall emit particulate matter into the outdoor atmosphere from a source specified in Section C, Condition #001 if the emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

No person shall 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 person's property.

004 [25 Pa. Code §123.41]

Limitations

No person shall 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:

- (a) Equal to or greater than 20 percent for a period or periods aggregating more than three minutes in any one hour.
- (b) Equal to or greater than 60 percent at any time.

005 [25 Pa. Code §123.42]

Exceptions

The emission limitation of 25 Pa. Code §123.41 shall not apply when:

- (a) The presence of uncombined water is the only reason for failure of the emission to meet the limitation.
- (b) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) The emission results from sources specified in Section C, Condition #001.





SECTION C. Site Level Requirements

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the facility's volatile organic compounds (VOCs) emissions to 70 tpy (from the RACT Plan Approval No. 38-02011), based on any consecutive 12-month rolling total.

II. TESTING REQUIREMENTS.

007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The Department reserves the right to require exhaust stack testing of sources as necessary during the permit term to verify emissions for purposes including permit condition violations, emission fees or malfunctioning.

III. MONITORING REQUIREMENTS.

008 [25 Pa. Code §123.43]

Measuring techniques

Visible air contaminants may be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurement.
- (b) Observers, trained and certified in EPA Method 9 to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall conduct a monthly inspection around the plant periphery during daylight hours when the plant is in production to detect visible emissions, fugitive visible emissions and malodorous emissions as follows:

- (a) Visible emissions in excess of the limits stated in Section C, Condition #004. Visible emissions may be measured according to the methods specified in Section C, Condition #009. Alternatively, plant personnel who observe such emissions may report the incidence of visible emissions to the Department within two hours of each incident and make arrangements for a certified observer to verify the visible emissions.
- (b) The presence of fugitive visible emissions beyond the plant property boundaries, as stated in Section C, Condition #002.
- (c) The presence of malodorous air contaminants beyond the plant property boundaries as stated in Section C, Condition #003.

IV. RECORDKEEPING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a record of the monthly inspection referenced in Section C, Condition #010. The logbook shall include the name of the company representative, date and time of the monitoring and wind direction.

011 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain a record of the monthly VOC emissions from the facility to demonstrate compliance with Section C, Condition #006.

V. REPORTING REQUIREMENTS.

012 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The permittee shall report malfunctions which occur at the Title V facility to the Department. A malfunction is defined as any sudden, infrequent and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:





SECTION C. Site Level Requirements

- (a) Malfunctions which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two hours after discovery of the incident. Telephone reports can be made to the Reading District Office at (610) 916-0100 during normal business hours, or to the Department's Emergency Hotline at any time. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.
- (b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirement of subsection (a) above, shall be reported to the Department, in writing, within five (5) days of malfunction discovery.

VI. WORK PRACTICE REQUIREMENTS.

013 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from a source identified in Section C, Condition #001 from becoming airborne, as per the §123.1(c). These actions shall include, but are not limited to, the following:

- (a) 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.
- (b) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (c) Paving and maintenance of roadways.
- (d) 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.

VII. ADDITIONAL REQUIREMENTS.

014 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The sources shall be operated and maintained in accordance with the manufacturers' specifications, or operational instructions, or as specified in Section B, Condition #007(b).

015 [25 Pa. Code §129.14]

Open burning operations

- (a) No person shall conduct open burning of materials in such 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 and property.
 - (4) The emission 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) 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





SECTION C. **Site Level Requirements**

public official.

- (2) Any 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 solely for recreational or ceremonial purposes.
- (5) A fire set solely for cooking food.
- (c) 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.

016 [25 Pa. Code §135.21]

Emission statements

Per Site Level Category VIII COMPLIANCE CERTIFICATION below, forward EPA the annual compliance certification report electronically, in lieu of a hard copy version, to the email address: R3_APD_Permits@epa.gov

VIII. **COMPLIANCE CERTIFICATION.**

The permittee shall submit within thirty days of 01/01/2024 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #026 of section B of this permit, and annually thereafter.

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Effect ***

DEP Auth ID: 1425882



38-05011



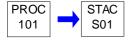
SECTION D. Source Level Requirements

Source ID: 101 Source Name: KOCH STAIN BOOTH

Source Capacity/Throughput: 42.000 Lbs/HR SOLVENT VOC

Conditions for this source occur in the following groups: GROUP 001

GROUP 002



I. RESTRICTIONS.

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



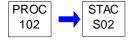


Source ID: 102 Source Name: KOCH SEALER BOOTH

Source Capacity/Throughput: 32.200 Lbs/HR SOLVENT VOC

Conditions for this source occur in the following groups: GROUP 001

GROUP 002



I. RESTRICTIONS.

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



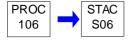


Source ID: 106 Source Name: PAINT BOOTH/CLEARTONE

Source Capacity/Throughput: 12.500 Lbs/HR SOLVENT VOC

Conditions for this source occur in the following groups: GROUP 001

GROUP 002



I. RESTRICTIONS.

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



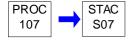


Source ID: 107 Source Name: PAINT BOOTH (R&D/TOUCH-UP)

Source Capacity/Throughput: 12.500 Lbs/HR SOLVENT VOC

Conditions for this source occur in the following groups: GROUP 001

GROUP 002



I. RESTRICTIONS.

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



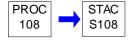


Source ID: 108 Source Name: TEST LAB, BENCH

> Source Capacity/Throughput: 1.000 Lbs/HR SOLVENT VOC

Conditions for this source occur in the following groups: GROUP 001

GROUP 002



RESTRICTIONS. I.

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

TESTING REQUIREMENTS.

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

MONITORING REQUIREMENTS. III.

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

RECORDKEEPING REQUIREMENTS. IV.

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

REPORTING REQUIREMENTS.

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

WORK PRACTICE REQUIREMENTS. VI.

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

ADDITIONAL REQUIREMENTS. VII.

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



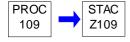


Source ID: 109 Source Name: CLEANING AND THINNING

Source Capacity/Throughput: 4.450 Lbs/HR SOLVENT VOC

Conditions for this source occur in the following groups: GROUP 001

GROUP 002



I. RESTRICTIONS.

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



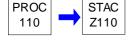


Source ID: 110 Source Name: HAND-WIPED GLAZES AND STAINS

Source Capacity/Throughput: 3.500 Lbs/HR SOLVENT VOC

Conditions for this source occur in the following groups: GROUP 001

GROUP 002



I. RESTRICTIONS.

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

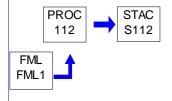
VII. ADDITIONAL REQUIREMENTS.

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



Source ID: 112 Source Name: HEATERS,AIR MAKE-UP #1 THROUGH #4

Source Capacity/Throughput: 10.000 Gal/HR LPG



RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

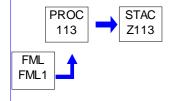
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

*** Permit Shield in Effect. ***



Source ID: 113 Source Name: SHOP HEATERS "24"

Source Capacity/Throughput: 6.000 Gal/HR LPG



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



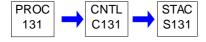


Source ID: 131 Source Name: CEFLA COATING SYSTEM, ROC3, LINE 1

Source Capacity/Throughput: 80.000 Lbs/HR SOLVENTS

Conditions for this source occur in the following groups: GROUP 001

GROUP 002



I. RESTRICTIONS.

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



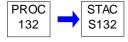


Source ID: 132 Source Name: PNEUMECH, LINE 2

> Source Capacity/Throughput: 60.000 Lbs/HR **SOLVENTS**

Conditions for this source occur in the following groups: GROUP 001

GROUP 002



RESTRICTIONS. I.

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

TESTING REQUIREMENTS.

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

MONITORING REQUIREMENTS. III.

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

RECORDKEEPING REQUIREMENTS. IV.

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

REPORTING REQUIREMENTS.

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

WORK PRACTICE REQUIREMENTS. VI.

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

ADDITIONAL REQUIREMENTS. VII.

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







Source ID: 133 Source Name: PNEUMECH, LINE 3

Source Capacity/Throughput: 60.000 Lbs/HR SOLVENTS

Conditions for this source occur in the following groups: GROUP 001

GROUP 002



I. RESTRICTIONS.

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



Group Name: GROUP 001

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Group Description: 25 PA CODE 127 & 129

Sources included in this group

ID	Name
101	KOCH STAIN BOOTH
102	KOCH SEALER BOOTH
106	PAINT BOOTH/CLEARTONE
107	PAINT BOOTH (R&D/TOUCH-UP)
108	TEST LAB, BENCH
109	CLEANING AND THINNING
110	HAND-WIPED GLAZES AND STAINS
131	CEFLA COATING SYSTEM, ROC3, LINE 1
132	PNEUMECH, LINE 2
133	PNEUMECH, LINE 3

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §129.101]

General provisions and applicability

- (a) The permittee shall comply with the more stringent emissions limitation or applicable requirement for wood furniture manufacturing operations contained in 25 Pa. Code §129.52, §129.101 through §129.107.
- (b) The VOC standards in §129.102 Table IV and §129.52 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 permittee requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

[As per §129.101(e) and(f)]

002 [25 Pa. Code §129.102]

Emission Standards

The permittee shall limit VOC emissions from sources in this group by applying either waterborne topcoats or a combination of sealers and topcoats and strippable spray booth coatings with a VOC content equal to or less than the following limits in the Table IV (as applied to the substrate, minus water and exempt VOCs), expressed in units of pounds VOC per pound coating solids:

TABLE IV

- (1) waterborne topcoats = 0.8
- (2) high solids coating systems
 - (i) sealer = 1.9
 - (ii) topcoat = 1.8
- (3) acid-cured alkyd amino systems
- (i) acid-cured alkyd amino sealer = 2.3



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acid-cured alkyd amino conversion varnish topcoat = 2.0

- (ii) other sealer = 1.9 acid-cured alkyd amino conversion varnish topcoat = 2.0
- (iii) acid-cured alkyd amino sealer = 2.3 other topcoat = 1.8
- (4) waterborne strippable spray booth coating = 0.8

003 [25 Pa. Code §129.52]

Surface coating processes

- (a) The permittee shall not cause or permit the emission into the outdoor atmosphere of VOCs from any woodwoorking surface coatings applied at the sources in this group in excess of the following limits (as applied to the substrate, minus water and exempt VOCs), expressed in units of pounds VOC per pound coating solids [as per §129.52, Table I(11)]:
 - (1) Topcoats and enamels -3.0
 - (2) Washcoat -14.3
 - (3) Final repair coat -3.3
 - (4) Basecoats -2.2
 - (5) Cosmetic specialty coatings -14.3
 - (6) Sealers -3.9
- (b) The VOC content of the as applied coating, expressed in units of weight of VOC per weight of coating solids, shall be calculated as follows, as per §129.52(b)(1)(iii):

VOC = (Wo)/(Wn)

Where:

VOC = VOC content in lb VOC/lb of coating solids

Wo = Weight percent of VOC (Wv-Ww-Wex)

Wv = Weight percent of total volatiles (100%-weight percent solids)

Ww = Weight percent of water

Wex = Weight percent of exempt solvents

Wn = Weight percent of solids of the as applied coating

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

[25 Pa. Code §129.104]

Compliance procedures and monitoring requirements.

- (a) Compliance methods. An owner or operator of a facility subject to the emission standards in 129.102 (relating to emission standards) shall demonstrate compliance with those provisions by using one or more of the following methods:
- (1) To support that each sealer, topcoat and strippable spray booth coating meets the requirements of 129.102(1) (relating to emission standards):





- (i) Maintain certified product data sheets (CPDSs) for each of the coatings.
- (ii) Maintain documentation showing the VOC content of the as applied coating in lbs VOC/lb solids, if solvent or other VOC is added to the coating before application.
- (iii) Perform sampling and testing in accordance with the procedures and test methods in Chapter 139 (relating to sampling and testing).
 - (2) To comply through the use of a control system as described in 129.102(3):
 - (i) Calculate the required overall control efficiency needed to demonstrate compliance using the following equation:

 $O = (1 - E/C) \times 100$

Where:

C = the VOC content of the as applied coating, lbs VOC/lb solids

E = the Table IV emission limit which shall be achieved by the affected emission point(s), lbs VOC/lb solids

O = the overall control efficiency of the control system, expressed as a percentage

- (ii) Document that the value of C in the equation in subparagraph (i) is obtained from the VOC and solids content of the as applied coating.
 - (iii) N/A NO CONTROL SYSTEM

(b)(1) - (b)(4)

N/A - INITIAL COMPLIANCE PERIOD FOR THIS FACILITY IS IN THE PAST

- (c) Continuous compliance demonstrations. An owner or operator of a facility subject to the requirements of this section and 129.101-129.103 and 129.105-129.107 shall submit, in writing, to the Department a compliance certification with the semiannual report required by 129.106(b).
- (1) Compliant coatings. An owner or operator of a facility subject to 129.102 that is complying through the procedures specified in subsection (a)(1) shall demonstrate continuous compliance by the following:
 - (i) Using compliant coatings.
 - (ii) Maintaining records that demonstrate the coatings are compliant.
- (iii) Submitting a compliance certification which states that compliant sealers, topcoats, or both, and strippable spray booth coatings have been used each day in the semiannual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.
 - (2) N/A NO CONTINUOUS COATERS USED
 - (3) N/A NO CONTROL SYSTEM
- (4) Work practice implementation plan. An owner or operator of a facility subject to the work practice standards of 129.103 shall demonstrate continuous compliance by following the work practice implementation plan and submitting a compliance certification which states that the work practice implementation plan is being followed, or should otherwise identify the periods of noncompliance with the work practice standards and the reasons for noncompliance.
- (d) Compliance certification requirements. The compliance certification shall be signed by a responsible official of the company that owns or operates the facility. In addition to the certification requirements of this section, the certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the





documents are true, accurate and complete.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §129.105]

Recordkeeping requirements

- (a) Requirement. The owner or operator of a wood furniture manufacturing operation shall keep records to demonstrate compliance with this section and 129.101-129.104, 129.106 and 129.107. The records shall be maintained for at least 5 years.
- (b) Compliant coatings. The following records shall be maintained to demonstrate compliance with 129.102 (relating to emission standards).
- (1) A certified product data sheet (CPDS) for each coating and strippable spray booth coating subject to the emission limits of 129,102.
- (2) The VOC content as applied, lbs VOC/lb solids (kg VOC/kg solids), of each coating and strippable spray booth coating subject to the emission limits of 129.102, and copies of data sheets documenting how the as applied values were determined.
- (c) N/A NO CONTINUOUS COATERS USED
- (d) N/A NO CONTROL SYSTEM
- (e) Work practice implementation plan. The owner or operator of a facility subject to the work practice standards of 129.103 (relating to work practice standards) shall maintain onsite copies of the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including:
 - (1) Records demonstrating that the operator training program is in place.
 - (2) Records maintained in accordance with the leak inspection and maintenance plan.
 - (3) Records associated with the cleaning and washoff solvent accounting system.
- (4) Records associated with the limitation on the use of conventional air spray guns showing total coating usage and the percentage of coatings applied with conventional air spray guns for each semiannual reporting period.
- (5) Records showing the VOC content of compounds used for cleaning booth components, except for solvent used to clean conveyors, continuous coaters and their enclosures or metal filters.
- (6) Copies of logs and other documentation developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (f) In addition to the recordkeeping requirements of subsection (a), the owner or operator of a facility that complies with 129.103 or 129.104(a)(1) shall maintain a copy of the compliance certifications submitted in accordance with 129.106(b) (relating to reporting requirements) for each semiannual period following the compliance date.
- (g) The owner or operator of a facility shall maintain a copy of the other information submitted with the initial status report required by 129.106(a) and the semiannual reports required by 129.106(b).

006 [25 Pa. Code §129.52]

Surface coating processes

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:

(a) The following parameters for each coating, thinner and other component as supplied:



- (1) The coating, thinner or component name and identification number.
- (2) The volume used.
- (3) The mix ratio.
- (4) The density or specific gravity.
- (5) The weight percent of total volatiles, water, solids and exempt solvents.
- (b) The VOC content of each coating, thinner and other component as supplied.
- (c) The VOC content of each as applied coating.

[As per §129.52(c)]

V. REPORTING REQUIREMENTS.

007 [25 Pa. Code §129.106]

Reporting requirements

- (a) N/A INITIAL COMPLIANCE PERIOD FOR THIS FACILITY IS IN THE PAST
- (b) Semiannual compliance report dates. When demonstrating compliance in accordance with §129.104(a)(1) or (2), a semiannual report covering the previous 6 months of wood furniture manufacturing operations shall be submitted to the Department according to the following schedule:
- (1) The first report shall be submitted within 30 calendar days after the end of the first 6-month period following the compliance date specified in §129.101(b) and (c).
- (2) Subsequent reports shall be submitted within 30 calendar days after the end of each 6-month period following the first report.
- (3) Each semiannual report shall include the information required by §129.104(c) and (d), a statement of whether the facility was in compliance or noncompliance and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.444]

Compliance requirements.

The permittee shall operate and maintain sources in this group in accordance with the manufacturer's specification, or as per the operational manual.

009 [25 Pa. Code §129.103]

Work practice standards

- (a) Work practice implementation plan. Within 60 days after the compliance date specified in 129.101(b) or (c) (relating to general provisions and applicability), an owner or operator of a facility subject to the requirements in this section and 129.101, 129.102 and 129.104-129.107 shall:
- (1) Prepare and maintain a written work practice implementation plan that defines work practices for each wood furniture manufacturing operation and addresses the provisions in subsections (b)-(j). The owner or operator of the facility shall comply with the work practice implementation plan.
- (2) Make available the written work practice implementation plan for inspection by the Department upon request. If the Department determines that the work practice implementation plan does not adequately address the criteria specified in subsections (b)-(j), the Department may require that the facility owner or operator modify the plan.
- (b) Operator training program. New and existing personnel, including contract personnel, who are involved in coating, cleaning or washoff operations or implementation of the requirements of this section, 129.101, 129.102 and 129.104-129.107 shall complete an operator training program.





- (1) For a facility subject to 129.101(b), new personnel hired after June 10, 2000, shall be trained upon hiring. For a facility subject to the requirements of 129.101(c), new personnel shall be trained upon hiring.
- (2) For a facility subject to 129.101(b), existing personnel hired before June 10, 2000, shall be trained by December 11, 2000. For a facility subject to 129.101(c), existing personnel shall be trained at least 6 months before the compliance date.
 - (3) Personnel shall be given refresher training annually.
- (4) A copy of the written operator training program shall be maintained with the work practice implementation plan. The operator training program shall include the following:
 - (i) A list of all current personnel by name and job description that are required to be trained.
- (ii) An outline of the subjects to be covered in the initial and annual refresher training sessions for each position or group of personnel.
- (iii) Lesson plans for courses to be given at the initial and annual refresher training sessions that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize coating usage and overspray and appropriate management of cleanup wastes.
- (iv) A description of the methods to be used at the completion of the initial or annual refresher training sessions to demonstrate and document successful completion.
 - (v) A record of the date each employe is trained.
- (c) Leak inspection and maintenance plan. An owner or operator of a facility shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan which shall include the following:
- (1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings or solvents.
 - (2) An inspection schedule.
 - (3) The methods for documenting the date and results of each inspection and any repairs that were made.
 - (4) The time frame between identifying a leak and making the repair, which shall adhere to the following schedule:
- (i) A first attempt at repairs, including tightening of packing glands, shall be made within 5 working days after the leak is detected.
- (ii) Final repairs shall be made within 15 working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.
- (d) Cleaning and washoff solvent accounting system. A solvent accounting form shall be developed to account for solvents used in cleaning and washoff operations. The information recorded on the form shall include the following:
- (1) The total number of pieces processed through washoff operations each month and the reason for the washoff operations.
 - (2) The name and total quantity of each solvent used each month for:
 - (i) Cleaning activities.
 - (ii) Washoff operations.
 - (3) The name and total quantity of each solvent evaporated to the atmosphere each month from:



(i) Cleaning activities.

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- (ii) Washoff operations.
- (e) Spray booth cleaning. An owner or operator of a facility may not use compounds containing more than 8.0% by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, the facility shall use no more than 1.0 gallon of solvent to prepare the booth prior to applying the booth coating.
- (f) Storage requirements. An owner or operator of a facility shall use normally closed containers for storing coating, cleaning and washoff materials.
- (g) Application equipment requirements. An owner or operator of a facility may not use conventional air spray guns to apply coatings except under any of the following circumstances:
 - (1) To apply coatings that have a VOC content no greater than 1.0 lb VOC/lb solids (1.0 kg VOC/kg solids), as applied.
 - (2) For touch-up and repair coatings under one of the following circumstances:
 - (i) The coatings are applied after completion of the wood furniture manufacturing operation.
- (ii) The coatings are applied after the stain and before any other type of coating is applied, and the coatings are applied from a container that has a volume of no more than 2.0 gallons.
 - (3) The spray is automated, that is, the spray gun is aimed and triggered automatically, not manually.
 - (4) The emissions from the surface coating process are directed to a VOC control system.
- (5) The conventional air spray gun is used to apply coatings and the cumulative total usage of those coatings is no more than 5.0% of the total gallons of coating used during each semiannual reporting period.
- (6) The conventional air spray gun is used to apply stain on a part for which the Department notifies the operator, in writing, of its determination that it is technically or economically infeasible to use any other spray application technology. To support the facility's claim of technical or economic infeasibility, a videotape, a technical report or other documentation shall be submitted to the Department showing either independently or in combination, the following:
- (i) The production speed is too high or the part shape is too complex for one operator to coat the part, and the application station is not large enough to accommodate an additional operator.
 - (ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- (h) Line cleaning. The solvent used for line cleaning shall be pumped or drained into a normally closed container.
- (i) Spray gun cleaning. The solvent used to clean spray guns shall be collected into a normally closed container.
- (j) Washoff operations. The emissions from washoff operations shall be controlled by the following:
 - (1) Using normally closed containers for washoff operations.
 - (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

VII. ADDITIONAL REQUIREMENTS.

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





*** Permit Shield in Effect. ***

DEP Auth ID: 1425882

DEP PF ID:





Group Name: GROUP 002

Group Description: 40 CFR 63 SUBPART JJ SOURCES

Sources included in this group

ID	Name
101	KOCH STAIN BOOTH
102	KOCH SEALER BOOTH
106	PAINT BOOTH/CLEARTONE
107	PAINT BOOTH (R&D/TOUCH-UP)
108	TEST LAB, BENCH
109	CLEANING AND THINNING
110	HAND-WIPED GLAZES AND STAINS
131	CEFLA COATING SYSTEM, ROC3, LINE 1
132	PNEUMECH, LINE 2
133	PNEUMECH, LINE 3

I. RESTRICTIONS.

Emission Restriction(s).

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.802]

Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations Emission limits

(a)(1) The permittee, shall limit emission of volatile hazardous air pollutants (VHAPS, as identified in Table 2) from each of the existing wood finishing sources identified above, by meeting the VHAP emission limitations specified in Table 3 (relating to summary of emission limits) of Subpart JJ. In determining VHAP emissions from finishing materials containing formaldehyde or styrene, the permittee shall use the methods (identified in Section 63.803(I)(2), of Subpart JJ) for determining styrene and formaldehyde usage.

Table 3 to Subpart JJ of Part 63—Summary of Emission Limits (Emission point Existing source New source)

Finishing Operations:

((a)) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied

Existing source New source
1.0 (see (aa) below) 0.8 (see (aa) below)

((b)) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):

----stains

Existing source New source
1.0 (see (aa) below) 1.0 (see (aa) below)

----washcoats

Existing source New source

1.0 (see (aa) and (bb) below) 0.8 (see (aa) and (bb) below)

----sealers

Existing source New source
1.0 (see (aa) below) 0.8 (see (aa) below)

----topcoats

Existing source New source





1.0 (see (aa) below) 0.8 (see (aa) below)

----basecoats

Existing source New source

1.0 (see (aa) and (bb) below) 0.8 (see (aa) and (bb) below)

----enamels

Existing source New source

1.0 (see (aa) and (bb) below) 0.8 (see (aa) and (bb) below)

----thinners (maximum percent VHAP allowable); or

Existing source New source

10.0 10.0

((c)) As an alternative, use control device; or

Existing source New source 1.0 (see (cc) below) 0.8 (see (cc) below)

((d)) Use any combination of ((a)), ((b)), and ((c))

Existing source New source

1.0 0.8

Cleaning Operations:

Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])

Existing source New source

0.8 0.8

Contact Adhesives:

(((a))) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:

i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates

Existing source New source NA (see (dd) below) NA (see (dd) below)

ii. For foam adhesives used in products that meet flammability requirements

Existing source New source

1.8 0.2

iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or

Existing source New source

0.2 1.0

(((b))) Use a control device

Existing source New source 1.0 (see (ee) below) 0.2 (see (ee) below)

All Finishing Operations and Contact Adhesives:

((((a)))) Achieve total free formaldehyde emissions across all finishing operations and contact adhesives, lb per rolling 12





month period, as applied

Existing source New source

400 400

((((b)))) Use coatings and contact adhesives only if they are low-formaldehyde coatings and contact adhesives

Existing source New source 1.0 (see (ff) below) 1.0 (see (ff) below)

- (aa) The limits refer to the VHAP content of the coating, as applied.
- (bb) Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent VHAP by weight.
- (cc) The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.
- (dd) There is no limit on the VHAP content of these adhesives.
- (ee) The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.
- (ff) The limits refer to the formaldehyde content by weight of the coating or contact adhesive, as specified on certified product data sheets.

 $[60\ FR\ 62936, Dec.\ 7, 1995, as\ amended\ at\ 62\ FR\ 30260, June\ 3, 1997; 76\ FR\ 72073, Nov.\ 21, 2011]$

- (a)(2)(i) N/A THE FACILITY DOES NOT USE ADHESIVES FOR UPHOLSTERY OPERATIONS
- (a)(2)(ii) The permittee shall limit the emission of VHAPs (identified in Table 2) from existing adhesive operations associated with the above sources by complying with the VHAP emission limitations in Table 3 of Subpart JJ (1.0 lb VHAP/lb solids, as applied).
- (a)(3) The permittee shall limit the emission of VHAPs (identified in Appendix A, Table 2, Subpart JJ) from existing strippable booth coating operations associated with the above sources to a maximum VOC content of 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids).
- (a)(4) Limit formaldehyde emissions by complying with the provisions specified in either paragraph (a)(4)(i) or (a)(4)(ii) of this section.
- (a)(4)(i) Limit total formaldehyde (Ftotal) use in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.
- (a)(4)(ii) Use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operations.
- (b) N/A THIS GROUP'S SOURCES ARE NOT "NEW"
- (c) At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of



operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72072, Nov. 21, 2011]

II. TESTING REQUIREMENTS.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.805] Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations Performance test methods

- (a)(1) The EPA Method 311 of Appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall not be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).
- (2) Performance tests shall be conducted under such conditions as the Administrator specifies to the owner or operator based on representative performance of the affected source for the period being tested. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests.
- (b) (e) N/A SINCE THERE IS NO CONTROL DEVICE

III. MONITORING REQUIREMENTS.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.804] Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations Compliance procedures and monitoring requirements

- (a) The owner or operator of an existing affected source subject to 63.802(a)(1) shall comply with those provisions using any of the methods presented in 63.804(a)(1) through (a)(4).
- (1) Calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 1.0.
- (2) Use compliant finishing materials according to the following criteria:
- (i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining VOC/HAP data sheets for each coating and thinner;
- (ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining VOC/HAP data sheets for each coating and thinner; and
- (iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.





(3) N/A - THE FACILITY DOES NOT USE CONTROL DEVICE FOR COMPLIANCE PURPOSES

- (4) Use any combination of an averaging approach, as described in paragraph (a)(1) of this section, compliant finishing materials, as described in paragraph (a)(2) of this section, and a control system, as described in paragraph (a)(3) of this section.
- (b) N/A THE FACILITY DOES NOT USE CONTACT ADHESIVES FOR UPHOLSTERY OPERATIONS
- (c) The owner or operator of an affected source subject to 63.802(a)(2)(ii) shall comply with those provisions by using either of the methods presented in 63.804(c)(1) and (c)(2).
- (1) Use compliant contact adhesives with a VHAP content no greater than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied; or
- (2) N/A THE FACILITY DOES NOT USE CONTROL DEVICES FOR COMPLIANCE PURPOSES
- (d) N/A THIS GROUP'S SOURCES ARE NOT "NEW"
- (e) N/A THIS GROUP'S SOURCES ARE NOT "NEW"
- (f) N/A INITIAL COMPLIANCE HAS BEEN PREVIOUSLY ACHIEVED
- (g) Continuous compliance demonstrations.
- (1) Owners or operators of an affected source subject to the provisions of 63.802(a)(1) or (b)(1) that comply through the procedures established in 63.804(a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by 63.807(c).
- (i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
- (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (2) Owners or operators of an affected source subject to the provisions of 63.802(a)(1) or (b)(1) that comply through the procedures established in 63.804(a)(2) or (d)(2) shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required by 63.807(c).
- (i) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.
- (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (3) N/A NO CONTINUOUS COATERS USED
- (4) N/A THE FACILITY DOES NOT USE CONTROL DEVICES FOR COMPLIANCE PURPOSES
- (5) Owners or operators of an affected source subject to the provisions of 63.802(a)(2(i)) or (ii) or (b)(2) that comply through the procedures established in 63.804(b), (c)(1), or (e)(1), shall submit a compliance certification with the semiannual report



required by 63.807(c).

- (i) The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.
- (ii) the compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (6) N/A THE FACILITY DOES NOT USE CONTROL DEVICES FOR COMPLIANCE PURPOSES.
- (7) Owners or operators of an affected source subject to the provisions of 63.802(a)(3) or (b)(3) shall submit a compliance certification with the semiannual report required by 63.807(c).
- (i) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.
- (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (8) Owners or operators of an affected source subject to the work practice standards in 63.803 shall submit a compliance certification with the semiannual report required by 63.807(c).
- (i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
- (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (9) Continuous compliance requirements. You must demonstrate continuous compliance with the emissions standards and operating limits by using the performance test methods and procedures in §63.805 for each affected source.
- (i) General requirements.
- (A) You must monitor and collect data, and provide a site specific monitoring plan as required by §§63.804, 63.806 and 63.807.
- (B) Except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, calibration checks and required zero and span adjustments), you must operate the monitoring system and collect data at all required intervals at all times the affected source is operating and periods of malfunction. Any period for which data collection is required and the operation of the CEMS is not otherwise exempt and for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.
- (C) You may not use data recorded during monitoring system malfunctions, repairs associated with monitoring system malfunctions, or required monitoring system quality assurance or control activities in calculations used to report emissions or operating levels. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. The owner or operator must use all the data collected during all other periods in assessing the operation of the control device and associated control system.
 - (ii) [Reserved]
- (h) The owner or operator of an existing or new affected source subject to §63.802(a)(4) or (b)(4) shall comply with those





provisions by using either of the methods presented in §63.804(h)(1) and (2) if complying with §63.802(a)(4)(i) or (b)(4)(i) or by using the method presented in §63.804(h)(3) if complying with §63.802(a)(4)(ii) or (b)(4)(ii).

- (1) Calculate total formaldehyde emissions from all finishing materials and contact adhesives used at the facility using Equation 5 and maintain a value of Ftotalno more than 400 pounds per rolling 12 month period.
- (2) Use a control system with an overall control efficiency (R) such that the calculated value of Ftotalin Equation 6 is no more than 400 pounds per rolling 12 month period.
- (3) Demonstrate compliance by use of coatings and contact adhesives only if they are low-formaldehyde coatings and contact adhesives maintaining a certified product data sheet for each coating and contact adhesive used, as required by §63.806(b)(1), and submitting a compliance certification with the semiannual report required by §63.807(c).
- (i) The compliance certification shall state that low-formaldehyde coatings and contact adhesives, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a coating or contact adhesive that is not low-formaldehyde, as demonstrated by records or by a sample of the coating or contact adhesive, is used. Use of a noncompliant coating or contact adhesive is a separate violation for each day the noncompliant coating or contact adhesive is used.
- (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72073, Nov. 21, 2011]

IV. RECORDKEEPING REQUIREMENTS.

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.806] Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations Recordkeeping requirements

- (a) The owner or operator of an affected source subject to this subpart shall fulfill all recordkeeping requirements of 63.10 of subpart A, according to the applicability criteria in 63.800(d) of this subpart.
- (b) The owner or operator of an affected source subject to the emission limits in 63.802 of this subpart shall maintain records of the following:
- (1) A certified product data sheet (CPDS) for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in 63.802; and
- (2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in 63.802; and
- (3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in 63.802(a)(3) or (b)(3).
- (4) The formaldehyde content, in lb/gal, as applied, of each finishing material and contact adhesive subject to the emission limits in §63.802(a)(4) or (b)(4) and chooses to comply with the 400 lb/yr limits on formaldehyde in §63.802(a)(4) (i) or (b)(4)(i).
- (c) The owner or operator of an affected source following the compliance method in 63.804(a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
- (d) N/A NO CONTINUOUS COATERS USED
- (e) The owner or operator of an affected source subject to the work practice standards in 63.803 of this subpartshall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:



- (1) Records demonstrating that the operator training program required by 63.803(b) is in place;
- (2) Records collected in accordance with the inspection and maintenance plan required by 63.803(c);
- (3) Records associated with the cleaning solvent accounting system required by 63.803(d);
- (4) [Reserved]
- (5) Records associated with the formulation assessment plan required by 63.803(I); and
- (6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (f) NOT APPLICABLE THE FACILITY DOES NOT USE CONTROL DEVICES FOR COMPLIANCE PURPOSES
- (g) NOT APPLICABLE THE FACILITY DOES NOT USE CONTROL DEVICES FOR COMPLIANCE PURPOSES
- (h) The owner or operator of an affected source subject to the emission limits in 63.802 and following the compliance provisions of 63.804(f)(1), (2), (3), (5), (7) and (8) and 63.804(g)(1), (2), (3), (5), (7), and (8) shall maintain records of the compliance certifications submitted in accordance with 63.807(c) for each semiannual period following the compliance date.
- (i) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b) and the semiannual reports required by 63.807(c).
- (j) The owner or operator of an affected source shall maintain all records in accordance with the requirements of 63.10(b)(1).
- (k) The owner or operator of an affected source subject to this subpart shall maintain records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. The owner or operator shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.802(c), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72074, Nov. 21, 2011]

V. REPORTING REQUIREMENTS.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.807] Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations Reporting requirements

- (a) The owner or operator of an affected source subject to this subpart shall fulfill all reporting requirements of 63.7 through 63.10 of subpart A (General Provisions) according to the applicability criteria in 63.800(d) of this subpart.
- (b) The owner or operator of an affected source demonstrating compliance in accordance with §63.804(f) (1), (2), (3), (5), (7) and (8) shall submit the compliance status report required by §63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by §63.804(f) (1), (2), (3), (5), (7), and (8) of this subpart.
- (c) The owner or operator of an affected source demonstrating compliance in accordance with $\S63.804(g)(1)$, (2), (3), (5), (7), (8), (h)(1), and (h)(3) shall submit a report covering the previous 6 months of wood furniture manufacturing operations.
- (1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
- (2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
- (3) The semiannual reports shall include the information required by §63.804(g) (1), (2), (3), (5), (7), (8), (h)(1), and (h)(3), a





statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance. If there was a malfunction during the reporting period, the report shall also include the number, duration and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.802(c), including actions taken to correct a malfunction.

- (4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.
- (d) N/A NO CONTROL SYSTEM
- (e) The owner or operator of an affected source required to provide a written notification under 63.803(I)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72074, Nov. 21, 2011]

VI. WORK PRACTICE REQUIREMENTS.

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.803]
Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations
Work practice standards

- (a) Work practice implementation plan.
- (1) Each owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of this section. The plan shall be developed no more than 60 days after the compliance date.
- (2) The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.
- (3) The inspection and maintenance plan required by paragraph (c) of this section and the formulation assessment plan for finishing operations required by paragraph (l) of this section are also reviewable by the Administrator (or delegated State, local or Tribal authority).
- (b) Operator training course. Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
- (1) A list of all current personnel by name and job description that are required to be trained;
- (2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
- (3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
- (4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.



- (c) Inspection and maintenance plan. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
- (1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;
- (2) An inspection schedule;
- (3) Methods for documenting the date and results of each inspection and any repairs that were made;
- (4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
- (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected: and
- (ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- (d) Cleaning and washoff solvent accounting system. Each owner or operator of an affected source shall develop an organic solvent accounting form to record:
- (1) The quantity and type of organic solvent used each month for washoff and cleaning, as defined in 63.801 of this subpart;
- (2) The number of pieces washed off, and the reason for the washoff; and
- (3) The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- (e) Chemical composition of cleaning and washoff solvents. Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this subpart, in concentrations subject to MSDS reporting as required by OSHA.
- (f) Spray booth cleaning. Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- (g) Storage requirements. Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- (h) Application equipment requirements. Each owner or operator of an affected source shall not use conventional air spray guns except when all emissions from the finishing application station are routed to a functioning control device.
- (i) Line cleaning. Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
- (j) Gun cleaning. Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
- (k) Washoff operations. Each owner or operator of an affected source shall control emissions from washoff operations by:
- (1) Using normally closed tanks for washoff; and
- (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.





- (I) Formulation assessment plan for finishing operations. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
- (1) Identifies VHAP from the list presented in Table 5 of this subpart that are being used in finishing operations by the affected source:
- (2) Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (I)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (I)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in 63.805(d) or (e).
- (3) Tracks the annual usage of each VHAP identified in (I)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.
- (4) If, after November 1998, the annual usage of the VHAP identified in paragraph (I)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
 - (i) The exceedance is no more than 15.0 percent above the baseline level;
- (ii) Usage of the VHAP is below the de minimis level presented in Table 5 of this subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in 63.805(d) or (e);
 - (iii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
- (iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.
- (5) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- (6) If after November 1998, an affected source uses a VHAP of potential concern listed in table 6 of this subpart for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in table 6 of this subpart for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraphs (I)(4)(i) through (I)(4)(iv), the affected source shall follow the procedures established in (I)(5).

VII. ADDITIONAL REQUIREMENTS.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.800]
Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations
Applicability.

Owners or operators of affected sources shall also comply with the requirements of subpart A of this part (General





Provisions), according to the applicability of subpart A to such sources, as identified in Table 1 of this subpart.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.802]
Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations
Emission limits

All provisions of 40 CFR Part 63, Subpart JJ, and Subpart A that are applicable to the operations of the facility are incorporated by reference even if not specifically mentioned in these conditions.

*** Permit Shield in Effect. ***



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

DEP Auth ID: 1425882



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.



SECTION H. Miscellaneous.

38-05011

#001. This permit supersedes Title V Operating Permit No. 38-05011, issued on 07/06/2018.

#002. The following sources do not require any work practice standards or testing, monitoring, recordkeeping and reporting requirements:

- (a) Water Heater, 0.028 mmbtu/hr, LPG fired.
- (b) Office Furnace, 0.075 mmbtu/hr, LPG fired.
- (c) Four Office Furnaces, each 0.1 mmbtu/hr, LPG fired.
- (d) Three UPS Area Heaters, each 0.2 mmbtu/hr, LPG fired.
- (e) One LPG fired PneuMech Offline Oven, capacity 880,000 btu/hr, Source ID D02.
- (f) Saw Dust Handling System, Source ID 120.
- (g) Shaving Storage Bin, Source ID 121.
- (h) Boiler (Caravan) for heat, LPG fired, 1.4 mmbtu/hr.
- (i) Environmental Sanding Room (77' by 36' by 8') controlled with 3 modules of cartridge filters cleaned by pulsed air, and fans of 16,000 cfm each and exhausted indoor.
- (j) Three curing ovens, each of 2,300 cfm air flow, with combined total heat input of 1.3 mmbtu/hr from boiler steam heat and electrical infrered heat, as designated below:
 - (1) CEFLA PF2000 multi level curing oven, steam heated, 0.53 mmbtu/hr.
 - (2) Two infrared curing ovens, electrically heated, 0.38 mmbtu/hr.
 - (3) Infrared curing oven, 0.38 mmbtu/hr.
- (k) Two dust collectors (formally listed as "C03" and "C04") from the facility's Door Plant that were exempted from permitting requirements in 2004.
- (I) Woodworking Shop, Source ID 100 with indoor vented collectors (formally listed as "C01" and "C02").





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