

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

## STATE ONLY OPERATING PERMIT

Issue Date: January 5, 2016

May 31, 2016

Expiration Date: January 5, 2021

Effective Date:

Revision Type: Amendment

**Revision Date:** 

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

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

## State Only Permit No: 48-00104

Synthetic Minor

Federal Tax Id - Plant Code: 27-4270195-1

#### **Owner Information**

Name: KRANOS CORP Mailing Address: 710 INDUSTRIAL DR

LITCHFIELD, IL 62056-3030

#### Plant Information

Plant: KRANOS CORP DBA SCHUTT RECONDITIONING/EASTON

Location: 48 Northampton County 48926 Palmer Township

SIC Code: 3949 Manufacturing - Sporting And Athletic Goods, Nec

#### Responsible Official

Name: ROBERT ERB Title: CEO/PRESIDENT

Phone (610) 253 - 3400 Ext.1222

#### **Permit Contact Person**

Name: TINA HANKS

Title: ENV & SAFETY MANAGER

Phone: (217) 473 - 3139

[Signature]			

MARK J. WEJKSZNER, NORTHEAST REGION AIR PROGRAM MANAGER





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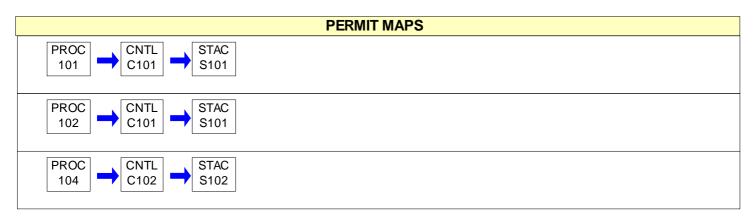
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# SECTION A. Site Inventory List

Source I	D Source Name	Capacity/Throughput	Fuel/Material
101	FOUR MANUAL SPRAY BOOTHS		
102	FIVE AUTOMATED SPRAY BOOTHS		
104	(11) HELMET BUFFERS		
C101	DRY FILTERS 9 TOTAL ONE FOR EACH BOOTH		
C102	CYCLONE		
S101	9 STACKS ONE FOR EACH PAINT BOOTH		
S102	STACK - CYCLONE		









#001 [25 Pa. Code § 121.1]

Definitions.

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]

**Operating Permit Duration.** 

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

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

Permit Renewal.

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

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

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

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







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

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

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

**Transfer of Operating Permits.** 

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

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

- (a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
  - (2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

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

Compliance Requirements.

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







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

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

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

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

**Duty to Provide Information.** 

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

#### #010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

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

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

#### **Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and







significant operating permit modifications, under this permit, as outlined below:

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

# #012 [25 Pa. Code § 127.441]

Severability Clause.

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

#### #013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
  - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:







- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
  - (4) Space heaters which heat by direct heat transfer.
  - (5) Laboratory equipment used exclusively for chemical or physical analysis.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

# #014 [25 Pa. Code § 127.3]

#### Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

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





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

#### #015 [25 Pa. Code § 127.11]

#### Reactivation

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#### #016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

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

## #017 [25 Pa. Code § 121.9]

#### Circumvention.

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

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

# Reporting Requirements.

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

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

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





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

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

#### Sampling, Testing and Monitoring Procedures.

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

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

#### Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
  - (1) The date, place (as defined in the permit) and time of sampling or measurements.
  - (2) The dates the analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of the analyses.
  - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#### #021 [25 Pa. Code § 127.441(a)]

**Property Rights.** 

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

#022 [25 Pa. Code § 127.447]

**Alternative Operating Scenarios.** 

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.







#### SECTION C. **Site Level Requirements**

#### I. RESTRICTIONS.

#### **Emission Restriction(s).**

#### # 001 [25 Pa. Code §123.1]

#### Prohibition of certain fugitive emissions

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

- (1) Construction or demolition of buildings or structures
- (2) Grading, paving and maintenance of roads and streets
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land
- (5) Stockpiling of materials.
- (6) Open burning operations.
- (7) Sources and classes of sources other than those identified above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
- (a) The emissions are of minor significance with respect to causing air pollution.
- (b) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

#### # 002 [25 Pa. Code §123.2]

#### **Fugitive particulate matter**

No person may permit fugitive particulate matter to be emitted 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

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

#### # 004 [25 Pa. Code §123.41]

#### Limitations

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.

#### TESTING REQUIREMENTS.

#### # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notified the company that testing is required.

#### III. MONITORING REQUIREMENTS.

#### # 006 [25 Pa. Code §123.43]

#### Measuring techniques

Visible emissions may be measured using either of the following:

(1) A device approved by the Department and maintained to provide accurate opacity measurements.





# **SECTION C.** Site Level Requirements

(2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

# # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- a) A visual inspection of the facility shall be performed on a weekly basis to determine if visible emissions are detectable outside the plant.
- b) Visible emissions may be measured according to the methods specified in Section C, Condition #006, or alternatively, plant personnel who observe any visible emissions will report the incident of visible emissions to the Department within four (4) hours of each incident and make arrangements for a certified observer to verify the opacity of the visible emissions.

#### IV. RECORDKEEPING REQUIREMENTS.

#### # 008 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The company shall maintain a file containing all records and other data that are required to be collected pursuant to the various provisions of this permit. The file shall include, but not be limited to: all air pollution controls systems performance evaluations and records of calibrations checks, adjustments and maintenance performed on all equipment which is subject to this permit. All measurements, records and other data required to be maintained by the company shall be retained for at least five (5) years following the date on which such measurements, records or data are recorded.

#### # 009 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

#### # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- a) The permittee shall keep updated records of Material Safety Data Sheets or Certified Product Data Sheets for all inks, coatings, primers, adhesives, solvents, cleaning solvents, wash down solvents and release agents containing Volatile Organic Compounds (VOCs) used at the facility.
- b) These records shall be kept and made available to the Department upon request.

#### V. REPORTING REQUIREMENTS.

#### # 011 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The company, within one hour of discovery of occurrence, shall notify the Department, at 610-861-2070, of any malfunction, recordkeeping and reporting errors, or other possible non-compliance issues, which result in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulations contained in Article III of the Rules and Regulations of the Department of Environmental Protection. A written report shall be submitted to the Department within five working days following the incident describing the malfunction, record keeping, and reporting error or other non-compliance issue and the corrective actions being taken. The Department may take enforcement action for any violations of the applicable standards.

#### # 012 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- a) Any changes in the location of any sources, or changes in the process or control equipment would be considered a modification and would require the submittal of an amended application for plan approval in accordance with the provisions of 25 Pa. Code Section 127.11 and 127.12.
- b) Any notification as a result of any condition herein should be directed to:

Air Quality Program Manager

2 Public Square

Wilkes-Barre, PA 18711-0790







# **SECTION C.** Site Level Requirements

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 013 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The sources within this permit may only be operated as long as the associated air pollution control device(s) are operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.

#### VII. ADDITIONAL REQUIREMENTS.

#### # 014 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The company shall maintain and operate the air pollution control equipment and sources in accordance with good engineering practices.

#### # 015 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall comply with all applicable requirements specified in 40 CFR Part 63 Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. Copies of all requests, reports, applications, submittals, and other communications shall be sent to both EPA and the Department. The EPA copies shall be forwarded to:

Air Protection Division US EPA, Region III (3AP00) 1650 Arch Street Philadelphia, PA 19103

and

Mark J Wejkszner Air Quality Program Manager Department of Environmental Protection 2 Public Square Wilkes-Barre, Pa 18701-1915

#### VIII. COMPLIANCE CERTIFICATION.

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

#### IX. COMPLIANCE SCHEDULE.

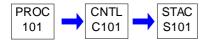
No compliance milestones exist.





Source ID: 101 Source Name: FOUR MANUAL SPRAY BOOTHS

Source Capacity/Throughput:



#### I. RESTRICTIONS.

#### **Emission Restriction(s).**

# # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Prohibited emissions. No person may permit the emission into the outdoor atmosphere of particulate matter from any process in a manner that the concentration of particulate matter in the effluent gas exceeds any of the following:

(i) .04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

#### # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

VOC emissions from the facility shall never equal to or exceed 50 TPY of VOC, based on a 12-month rolling sum. The HAPs from the facility must never equal to or exceed 10 TPY of any single HAP and must never equal

to or exceed 25 TPY of all aggregated HAPs, based on a 12-month rolling sum.

#### # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- 1. The aforementioned source(s) may only be operated as long as the associated air pollution control device is operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.
- 2. The company shall maintain and operate the air pollution control equipment and sources in accordance with good engineering practice.
- 3. All clean-up solvent operations must comply with Best Available Technology to minimize volatile organic compound (VOC) emissions. All cleaning operations must store new and used cleaning solvents in closed containers.

#### # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The facility shall comply with all applicable requirements of Pa Code 129.52 through 129.52c for surface coating processes.

#### # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall comply with all applicable requirements specified in 40 CFR Part 63 Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

# II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

## # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Mechanical gauges shall be installed and maintained to indicate, in inches of water column, the static pressure differential across the paint booths.







#### IV. RECORDKEEPING REQUIREMENTS.

#### # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- 1. 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:
- (i) The coating, thinner or component name and identification number.
- (ii) The volume used.
- (iii) The mix ratio.
- (iv) The density or specific gravity.
- (v) The weight percent of total volatiles, water, solids and exempt solvents.
- (vi) The volume percent of solids for Table I surface coating process categories 1-10.
- (B) The VOC content of each coating, thinner and other component as supplied.
- (C) The VOC content of each as applied coating.
- 2. The permittee shall record on a daily basis the coating usage in gallons on a log book, and also keep the chemical composition data for the coatings. The VOC emissions from the coatings shall be calculated on a monthly basis (12 month rolling sum).
- 3. The permittee shall record on a daily basis the cleaning solvents usage in gallons on a log book, and also keep the chemical composition data for the cleaning solvents. The VOC emissions from the cleaning solvents shall be calculated on a monthly basis (12 month rolling sum). All cleanup solvents must be kept in closed containers.

#### V. REPORTING REQUIREMENTS.

#### # 008 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

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

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- a) The paint booth shall be equipped with a full set of panel filters when the the paint booth is in use.
- b) Panel filters shall be inspected on a daily basis.
- c) Panel filters shall be operated, maintained and replaced according to manufacturer's specifications.
- d) The company shall keep an adequate supply of replacement panel filters on site.
- e) Records shall be maintained indicating when such filters are replaced.
- f) These records shall be kept by the permittee and shall be made available to the Department upon request.

#### # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Only high-volume, low pressure (HVLP) spray guns, or equivalent as determined by the Department, are to be used for coating applications in the spray booth(s) in accordance with the Best Available Technology provisions of 25 Pa. Code Section 127.1 and 127.12(a)(5).





# VII. ADDITIONAL REQUIREMENTS.

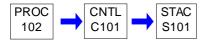
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





Source ID: 102 Source Name: FIVE AUTOMATED SPRAY BOOTHS

Source Capacity/Throughput:



#### I. RESTRICTIONS.

#### **Emission Restriction(s).**

# # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Prohibited emissions. No person may permit the emission into the outdoor atmosphere of particulate matter from any process in a manner that the concentration of particulate matter in the effluent gas exceeds any of the following:

(i) .04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

#### # 002 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

VOC emissions from the facility shall never equal to or exceed 50 TPY of VOC, based on a 12-month rolling sum. The HAPs from the facility must never equal to or exceed 10 TPY of any single HAP and must never equal to or exceed 25 TPY of all aggregated HAPs, based on a 12-month rolling sum.

#### # 003 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- 1. The aforementioned source(s) may only be operated as long as the associated air pollution control device is operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.
- 2. The company shall maintain and operate the air pollution control equipment and sources in accordance with good engineering practice.
- 3. All clean-up solvent operations must comply with Best Available Technology to minimize volatile organic compound (VOC) emissions. All cleaning operations must store new and used cleaning solvents in closed containers.

#### # 004 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The facility shall comply with all applicable requirements of Pa Code 129.52 through 129.52c for surface coating processes.

#### # 005 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall comply with all applicable requirements specified in 40 CFR Part 63 Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

# II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

## # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Mechanical gauges shall be installed and maintained to indicate, in inches of water column, the static pressure differential across the paint booths.





#### IV. RECORDKEEPING REQUIREMENTS.

#### # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- 1. 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:
- (i) The coating, thinner or component name and identification number.
- (ii) The volume used.
- (iii) The mix ratio.
- (iv) The density or specific gravity.
- (v) The weight percent of total volatiles, water, solids and exempt solvents.
- (vi) The volume percent of solids for Table I surface coating process categories 1-10.
- (B) The VOC content of each coating, thinner and other component as supplied.
- (C) The VOC content of each as applied coating.
- 2. The permittee shall record on a daily basis the coating usage in gallons on a log book, and also keep the chemical composition data for the coatings. The VOC emissions from the coatings shall be calculated on a monthly basis (12 month rolling sum).
- 3. The permittee shall record on a daily basis the cleaning solvents usage in gallons on a log book, and also keep the chemical composition data for the cleaning solvents. The VOC emissions from the cleaning solvents shall be calculated on a monthly basis (12 month rolling sum). All cleanup solvents must be kept in closed containers.

#### V. REPORTING REQUIREMENTS.

## # 008 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

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

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- a) The paint booth shall be equipped with a full set of panel filters when the the paint booth is in use.
- b) Panel filters shall be inspected on a daily basis.
- c) Panel filters shall be operated, maintained and replaced according to manufacturer's specifications.
- d) The company shall keep an adequate supply of replacement panel filters on site.
- e) Records shall be maintained indicating when such filters are replaced.
- f) These records shall be kept by the permittee and shall be made available to the Department upon request.

#### # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Only high-volume, low pressure (HVLP) spray guns, or equivalent as determined by the Department, are to be used for coating applications in the spray booth(s) in accordance with the Best Available Technology provisions of 25 Pa. Code Section 127.1 and 127.12(a)(5).







# VII. ADDITIONAL REQUIREMENTS.

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

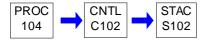






Source ID: 104 Source Name: (11) HELMET BUFFERS

Source Capacity/Throughput:



#### I. RESTRICTIONS.

#### **Emission Restriction(s).**

#### # 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

No person may permit the emission into the outdoor atmosphere of particulate matter from this source in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

#### # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Mechanical gauges shall be installed and maintained to indicate, in inches of water, the pressure differential within the cyclone.

# IV. RECORDKEEPING REQUIREMENTS.

#### # 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Pressure drop readings shall be recorded at least weekly in a log book. These records shall be kept for five (5) years.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Material collected in the cyclone shall be discharged into closed containers only.

#### VII. ADDITIONAL REQUIREMENTS.

#### # 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- 1. The aforementioned source(s) may only be operated as long as the associated air pollution control device is operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.
- 2. The company shall maintain and operate the air pollution control equipment and sources in accordance with good engineering practice.



48-00104



# **SECTION E.** Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





# **SECTION F.** Emission Restriction Summary.

No emission restrictions listed in this section of the permit.



48-00104



#### SECTION G. Miscellaneous.

The Synthetic Minor Operating Permit application was received on 11/10/2015. The facility shall pay an annual operating permit fee of Three-Hundred Seventy-Five dollars (\$375.00). The fee is due within thirty (30) days prior to the annual anniversary date of the issuance of the permit.

Plan Approvals incorporated into this Permit: 48-00104A 48-00104B

Request For Determination(s) (RFD) incorporated into this Permit: #48-0756 - Approved 12/31/2014 - Eight (8) natural gas-fired dryers





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