

Issue Date:

March 19, 2024

March 19, 2024



#### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY NATURAL MINOR OPERATING PERMIT

Effective Date:

| Expiration Date: February 28, 2029                                                                                                                                                                                                                                      |                                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| amended, and 25 Pa. Code Chapter 1<br>permittee) identified below is authorized<br>operate the air emission source(s) more<br>conditions specified in this permit. Nothir<br>with all applicable Federal, State and Loc<br>The regulatory or statutory authority for ea | ach permit condition is set forth in brackets. All terms and conditions |
| in this permit are federally enforceable un                                                                                                                                                                                                                             | Iless otherwise designated.                                             |
| <u>Sta</u>                                                                                                                                                                                                                                                              | te Only Permit No: 25-00591                                             |
| Eederal                                                                                                                                                                                                                                                                 | Natural Minor<br>Tax Id - Plant Code: 25-1069263-1                      |
|                                                                                                                                                                                                                                                                         | Taxid - Tiant Code. 23-1009203-1                                        |
|                                                                                                                                                                                                                                                                         | Owner Information                                                       |
| Name: SEAWAY MANUFACTURING                                                                                                                                                                                                                                              | CORPORATION                                                             |
| Mailing Address: 2250 E 33RD ST                                                                                                                                                                                                                                         |                                                                         |
| ERIE, PA 16510-2556                                                                                                                                                                                                                                                     |                                                                         |
|                                                                                                                                                                                                                                                                         | Plant Information                                                       |
| Plant: SEAWAY MFG CORP/ERIE                                                                                                                                                                                                                                             |                                                                         |
| Location: 25 Erie County                                                                                                                                                                                                                                                | 25001 Erie City                                                         |
| SIC Code: 3442 Manufacturing - Metal Doors, Sa                                                                                                                                                                                                                          | ash, And Trim                                                           |
|                                                                                                                                                                                                                                                                         | Responsible Official                                                    |
| Name: PATRICK M. GOODRICH                                                                                                                                                                                                                                               |                                                                         |
| Title: PRESIDENT                                                                                                                                                                                                                                                        |                                                                         |
| Phone: (814) 898 - 2255                                                                                                                                                                                                                                                 | Email: pgoodrich@seawaymfg.com                                          |
|                                                                                                                                                                                                                                                                         | Permit Contact Person                                                   |
| Name: ZACHARY MCCARTNEY<br>Title: ENGINEERING MANAGER<br>Phone: (814) 898 - 2255 Ext.328                                                                                                                                                                                | Email: zmccartney@seawaymfg.com                                         |
|                                                                                                                                                                                                                                                                         |                                                                         |

ERIC A. GUSTAFSON, NORTHWEST REGION AIR PROGRAM MANAGER





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

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SEAWAY MFG CORP/ERIE



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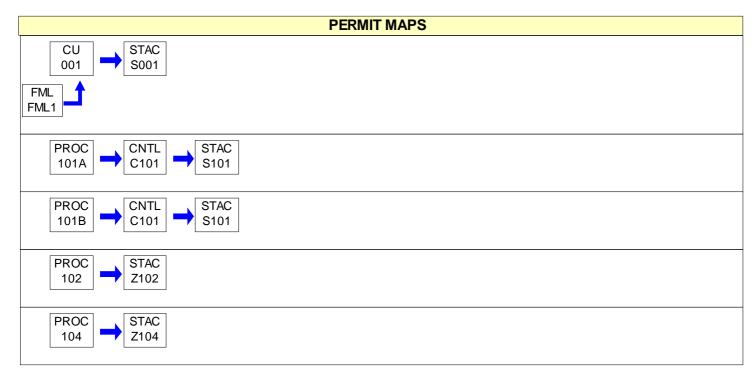
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SECTION A. Site Inventory List

| Source I | D Source Name                           | Capacity/ | Throughput | Fuel/Material         |
|----------|-----------------------------------------|-----------|------------|-----------------------|
| 001      | MISC. NAT. GAS COMBUSTION UNITS         | 11.000    | MMBTU/HR   |                       |
|          |                                         | 1.000     | MCF/HR     | Natural Gas           |
| 101A     | SURFACE COATING OF METAL PARTS          | 1.000     | Lbs/HR     | COATING               |
| 101B     | SURFACE COATING OF VINYL PARTS          | 1.000     | Lbs/HR     | COATINGS              |
| 102      | PARTS SCUFFING/SANDING FOR COATING PREP | 1.000     | Lbs/HR     | METAL AND VINYL PARTS |
| 104      | HAND-WIPE PROFILES AND WINDOWS WITH     | 1.000     | Lbs/HR     | ISOPROPYL ALCOHOL     |
|          | ISOPROPYL ALCOHOL                       |           |            |                       |
| C101     | PANEL FILTERS                           |           |            |                       |
| FML1     | NATURAL GAS SUPPLY LINE                 |           |            |                       |
| S001     | MISC. COMBUSTION EXHAUST                |           |            |                       |
| S101     | SURFACE COATING STACKS                  |           |            |                       |
| Z102     | FUGITIVE EMISSIONS - PARTS SANDING AREA |           |            |                       |
| Z104     | FUGITIVES FROM ACETONE OR ISOPROPYL     |           |            |                       |
|          | ALCOHOL IN PARTS PREP                   |           |            |                       |







# #001 [25 Pa. Code § 121.1] Definitions. Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1. #002 [25 Pa. Code § 127.446] **Operating Permit Duration.** (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. #003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)] Permit Renewal. (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit. (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official. (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office. (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j). (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application. #004 [25 Pa. Code § 127.703] **Operating Permit Fees under Subchapter I.** (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year. (1) For a synthetic minor facility, a fee equal to: (i) Four thousand dollars (\$4,000) for calendar years 2021-2025. (ii) Five thousand dollars (\$5,000) for calendar years 2026-2030. (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.





(2) For a facility that is not a synthetic minor, a fee equal to:

(i) Two thousand dollars (\$2,000) for calendar years 2021-2025.

(ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026-2030.

(iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.

(b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

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

## Transfer of Operating Permits.

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

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

## Inspection and Entry.

(a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:

(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

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

Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:





- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#### #008 [25 Pa. Code § 127.441]

#### Need to Halt or Reduce Activity Not a Defense.

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

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

#### Duty to Provide Information.

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#### #010 [25 Pa. Code § 127.461]

## Revising an Operating Permit for Cause.

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

(1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.

(2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.

(4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#### #011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]

#### **Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:





(b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.

(e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

## #012 [25 Pa. Code § 127.441]

Severability Clause.

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

#### #013 [25 Pa. Code § 127.449]

#### De Minimis Emission Increases.

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

(c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:





(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

## #014 [25 Pa. Code § 127.3]

#### **Operational Flexibility.**

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

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





| Ż               | 25-00591                                                                                                                                                                                                                                                                                                       | SEAWAY MFG CORP/ERIE                                                                         |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| SECT            | ION B. General State Only Requirements                                                                                                                                                                                                                                                                         |                                                                                              |
|                 | (6) Section 127.462 (relating to minor operating permit modifications)                                                                                                                                                                                                                                         |                                                                                              |
|                 | (7) Subchapter H (relating to general plan approvals and general opera                                                                                                                                                                                                                                         | ating permits)                                                                               |
| #015<br>Reactiv | [25 Pa. Code § 127.11]<br>ation                                                                                                                                                                                                                                                                                |                                                                                              |
|                 | (a) The permittee may not reactivate a source that has been out of opera<br>the reactivation is conducted in accordance with a plan approval granted<br>reactivation and maintenance plans developed and approved by the Dep<br>127.11a(a).                                                                    | by the Department or in accordance with                                                      |
|                 | (b) A source which has been out of operation or production for more tha<br>reactivated and will not be considered a new source if the permittee sati<br>127.11a(b).                                                                                                                                            |                                                                                              |
| #016            | [25 Pa. Code § 127.36]                                                                                                                                                                                                                                                                                         |                                                                                              |
| Health I        | Risk-based Emission Standards and Operating Practice Requirements.                                                                                                                                                                                                                                             |                                                                                              |
|                 | (a) When needed to protect public health, welfare and the environment f<br>from new and existing sources, the permittee shall comply with the heal<br>practice requirements imposed by the Department, except as precluded<br>Control Act [35 P.S. § 4006.6(d)(2) and (3)].                                    | th risk-based emission standards or operation                                                |
|                 | (b) A person challenging a performance or emission standard establish demonstrate that performance or emission standard does not meet the Act.                                                                                                                                                                 |                                                                                              |
| #017            | [25 Pa. Code § 121.9]                                                                                                                                                                                                                                                                                          |                                                                                              |
| Circum          | vention.                                                                                                                                                                                                                                                                                                       |                                                                                              |
|                 | No person may permit the use of a device, stack height which exceeds or<br>dispersion technique or other technique which, without resulting in redu<br>emitted, conceals or dilutes an emission of air contaminants which wou<br>Article III, except that with prior approval of the Department, the device or | ction of the total amount of air contaminants<br>Id otherwise be in violation of 25 Pa. Code |

#### **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<br>and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any<br>emissions data generated for the facility.                                                                                                                                                                                                                                                                                                                                            |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| #019     | [25 Pa. Code §§ 127.441(c) & 135.5]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Samplin  | g, 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]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Record   | eeping.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|          | (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 | r Rights.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|          | This permit does not convey any property rights of any sort, or any exclusive privileges.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| #022     | [25 Pa. Code § 127.447]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Alternat | ve Operating Scenarios.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|          | The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |





#### #023 [25 Pa. Code §135.3]

#### Reporting

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

## #024 [25 Pa. Code §135.4]

#### **Report Format**

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





## I. RESTRICTIONS.

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

## # 001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P. S. § § 4001–4015).

#### # 002 [25 Pa. Code §123.1] Prohibition of certain fugitive emissions

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations.
- (7) [Not applicable]
- (8) [Not applicable]

(9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(i) the emissions are of minor significance with respect to causing air pollution; and

(ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

(b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) [Paragraph (c) of the regulation is printed under WORK PRACTICE REQUIREMENTS in this section of permit.]

(d) [Paragraph (d) of the regulation is not applicable to this facility.]

## # 003 [25 Pa. Code §123.2]

#### Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a)(1) - (9) (relating to prohibition of certain fugitive emissions) [Condition #002 above] if such emissions are visible at the point the emissions pass outside the person's property.





## # 004 [25 Pa. Code §123.31]

#### Limitations

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

#### # 005 [25 Pa. Code §123.41] Limitations

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

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

(2) Equal to or greater than 60% at any time.

## # 006 [25 Pa. Code §123.42]

#### Exceptions

The limitations of 25 Pa. Code § 123.41 (relating to limitations) [Condition #005 above] shall not apply to a visible emission in any of the following instances:

(1) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.

(2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

(3) When the emission results from sources specified in 25 Pa. Code § 123.1(a)(1) - (9) (relating to prohibition of certain fugitive emissions). [123.1(a)(1) - (9) are printed under Emission Restrictions of Condition #002 in this section of permit.]

(4) [Not applicable]

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

# # 007 [25 Pa. Code §123.43]

## Measuring techniques

Visible emissions may be measured using either of the following:

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

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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





#### VI. WORK PRACTICE REQUIREMENTS.

# 008 [25 Pa. Code §123.1]

#### Prohibition of certain fugitive emissions

(a) - (b) [Paragraphs (a) and (b) of 25 Pa. Code § 123.1 are printed under Emission Restrictions in this section of permit.]

(c) A person responsible for any source specified in 25 Pa. Code § 123.1(a)(1) - (7) or (9) [Condition 002 above] shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(3) Paving and maintenance of roadways.

(4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

(d) [Paragraph (d) of the regulation is not applicable to this facility.]

# # 009 [25 Pa. Code §129.14]

Open burning operations

(a) Air basins. No person may permit the open burning of material in an air basin.

(b) Outside of air basins. [Paragraph (b) of the regulation is not applicable to this facility.]

(c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:

(1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.

(2) A fire set for the purpose of instructing personnel in fire-fighting, when approved by the Department.

- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) [Not applicable]
- (5) [Not applicable]

(6) A fire set solely for recreational or ceremonial purposes.

(7) A fire set solely for cooking food.

(d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:

(1) As used in this subsection the following terms shall have the following meanings:

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

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

(2) [Not applicable]





(3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:

(i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.

(ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.

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

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

#### VII. ADDITIONAL REQUIREMENTS.

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

#### VIII. COMPLIANCE CERTIFICATION.

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

#### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

| 25-00591                 |                               |                  | SEAWAY MFG CORP/ERIE |  |
|--------------------------|-------------------------------|------------------|----------------------|--|
| SECTION D. Source        | ce Level Requirements         |                  |                      |  |
| Source ID: 001           | Source Name: MISC. NAT. GAS C | COMBUSTION UNITS |                      |  |
|                          | Source Capacity/Throughput:   | 11.000 MMBTU/HR  |                      |  |
|                          |                               | 1.000 MCF/HR     | Natural Gas          |  |
| CU<br>001 → STAC<br>S001 |                               |                  |                      |  |
|                          |                               |                  |                      |  |
|                          |                               |                  |                      |  |

## I. RESTRICTIONS.

#### Emission Restriction(s).

## # 001 [25 Pa. Code §123.11]

#### Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the rate of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of BTUs per hour is greater than 2.5 but less than 50.

#### # 002 [25 Pa. Code §123.22] Combustion units

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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





## SECTION D. Source Level Requirements

### VII. ADDITIONAL REQUIREMENTS.

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

| 25-00591                                                                                                                                                        |                  |                                                                         | SEAWAY MFG CORP/ERIE | Ž |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------------------------------------------------------------|----------------------|---|
| SECTION D. Source Level Requirements                                                                                                                            | i                |                                                                         |                      |   |
| Source ID: 101A Source Name: SUR                                                                                                                                | FACE COATIN      | IG OF METAL PARTS                                                       |                      |   |
| Source Capacity/Th                                                                                                                                              | roughput:        | 1.000 Lbs/HR                                                            | COATING              |   |
| Conditions for this source occur in the following g                                                                                                             | 2 - SF<br>3 - Sl | ROCESS PM LIMIT<br>PRAY EXHAUST FILTER<br>JRFACE COATING 129.5<br>9.52D |                      |   |
| $\begin{array}{c} PROC \\ 101A \end{array} \longrightarrow \begin{array}{c} CNTL \\ C101 \end{array} \longrightarrow \begin{array}{c} STAC \\ S101 \end{array}$ |                  |                                                                         |                      |   |

#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

## # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall notify the Department in writing within 30 days if it is determined that the 129.52d(a)(1) applicability threshold has been exceeded for this process (metal coating).

The threshold of §129.52d(a)(1) is 2.7 tons per 12-month rolling period.

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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

| 25-00591                  |                             |                                                 | SEAWAY MFG CORP/ERIE | Ž |
|---------------------------|-----------------------------|-------------------------------------------------|----------------------|---|
| SECTION D. Sourc          | e Level Requirements        |                                                 |                      |   |
| Source ID: 101B           | Source Name: SURFACE COATIN | G OF VINYL PARTS                                |                      |   |
|                           | Source Capacity/Throughput: | 1.000 Lbs/HR                                    | COATINGS             |   |
| Conditions for this sourc | 2 - SF                      | ROCESS PM LIMIT<br>PRAY EXHAUST FILTER<br>9.52D | MAINT.               |   |
| PROC<br>101B              | STAC<br>S101                |                                                 |                      |   |
|                           |                             |                                                 |                      |   |

#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

# 001 [25 Pa. Code §127.441] Operating permit terms and conditions.

- (a) The permittee shall maintain daily records of the following for the vinyl coating process:
  - (1) The following parameters for each coating, thinner and other component as supplied:
    - (i) The coating, thinner or component name and identification number.
    - (ii) The volume used.
    - (iii) The mix ratio.
    - (iv) The density or specific gravity.
    - (v) The weight percent of total volatiles, water, solids and exempt solvents.
    - (vi) The volume percent of solids for Table I surface coating process categories 1 10.
  - (2) The VOC content of each coating, thinner and other component as supplied.
  - (3) The VOC content of each as-applied coating.
- (b) The records shall be maintained for 5 years and shall be submitted to the Department upon request.





## SECTION D. Source Level Requirements

#### V. REPORTING REQUIREMENTS.

#### # 002 [25 Pa. Code §127.441] Operating permit terms and conditions.

The permittee shall notify the Department in writing within 30 days if it is determined that the §129.52(a)(1) or §129.52d(a)(1) applicability thresholds have been exceeded for this process (vinyl coating).

The thresholds of §129.52(a)(1) are: 3 pounds VOC per hour; 15 pounds VOC per day; or 2.7 tons VOC per calendar year.

The threshold of §129.52d(a)(1) is 2.7 tons per 12-month rolling period.

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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

| SEAWAY MFG CORP/ERIE |
|----------------------|
|----------------------|



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## SECTION D. Source Level Requirements

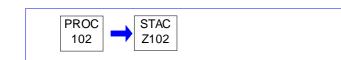
Source ID: 102

Source Name: PARTS SCUFFING/SANDING FOR COATING PREP

Source Capacity/Throughput:

1.000 Lbs/HR

METAL AND VINYL PARTS



## I. RESTRICTIONS.

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

## II. TESTING REQUIREMENTS.

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

## III. MONITORING REQUIREMENTS.

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

## IV. RECORDKEEPING REQUIREMENTS.

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

## V. REPORTING REQUIREMENTS.

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

## VI. WORK PRACTICE REQUIREMENTS.

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

## VII. ADDITIONAL REQUIREMENTS.

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

SEAWAY MFG CORP/ERIE



SECTION D. Source Level Requirements

Source ID: 104

25-00591

Source Name: HAND-WIPE PROFILES AND WINDOWS WITH ISOPROPYL ALCOHOL

Source Capacity/Throughput:

1.000 Lbs/HR

ISOPROPYL ALCOHOL

Conditions for this source occur in the following groups: 4 - 129.52D



#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

# 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

(a) The permittee shall maintain records of the quantities of isopropyl alcohol used for prepping the parts for painting.

(b) Records of isopropyl alcohol consumption shall be maintained for at least 5 years and be made available to the Department upon request.

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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





#### Group Name: 1 - PROCESS PM LIMIT

Group Description: 123.13 limit of 0.04 grain

#### Sources included in this group

| ID   | Name                           |
|------|--------------------------------|
| 101A | SURFACE COATING OF METAL PARTS |
| 101B | SURFACE COATING OF VINYL PARTS |

#### I. RESTRICTIONS.

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

#### # 001 [25 Pa. Code §123.13]

#### Processes

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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







Group Name: 2 - SPRAY EXHAUST FILTER MAINT.

Group Description: 127.441 req. for filter maint.

Sources included in this group

| 101A SURFACE COATING OF METAL PARTS | ID   | Name                           |
|-------------------------------------|------|--------------------------------|
| 101B SURFACE COATING OF VINYL PARTS | 101A | SURFACE COATING OF METAL PARTS |
|                                     | 101B | SURFACE COATING OF VINYL PARTS |

#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 001 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

#### VII. ADDITIONAL REQUIREMENTS.

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



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## SECTION E. Source Group Restrictions.

Group Name: 3 - SURFACE COATING 129.52 STANDARDS

Group Description: Requirements from 25 Pa. Code §§ 129.52

Sources included in this group

ID Name

101A SURFACE COATING OF METAL PARTS

### I. RESTRICTIONS.

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

# 001 [25 Pa. Code §129.52]

#### Surface coating processes

(a) This section applies as follows to the owner and operator of a:

(1) Surface coating process category listed in Table I, categories 1—11, regardless of the size of the facility, which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year since January 1, 1987.

(2) [Paragraph (a)(2) of the regulation is not applicable to this source.]

(b) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from a surface coating process category listed in Table I, unless one of the following limitations is met:

(1) The VOC content of each as applied coating is equal to or less than the standard specified in Table I.

(i) The VOC content of the as applied coating, expressed in units of weight of VOC per volume of coating solids, shall be calculated as follows:

VOC = (Wo)(Dc)/Vn

Where:

VOC = VOC content in lb VOC/gal 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 solvent(s) Dc = Density of coating, lb/gal, at 25°C Vn = Volume percent of solids of the as applied coating

(ii) [Paragraph (b)(1)(ii) of the regulation is not applicable to this source.]

(iii) [Paragraph (b)(1)(iii) of the regulation does not apply to this source because only Categories 4 and 10 of Table I apply and Categories 4 and 10 limits in Table I are only expressed in units of weight of VOC per volume of coating solids, not in units of weight of VOC per weight of coating solids.]

(iv) Sampling and testing shall be done in accordance with the procedures and test methods specified in Chapter 139 (relating to sampling and testing).

(2) [Paragraph (b)(2) of the regulation is not applicable to this source.]

(c) [Paragraph (c) of the regulation is printed under RECORDKEEPING REQUIREMENTS in this section of the permit.]

(d) [Paragraph (d) of the regulation is not applicable to these sources which do not use the solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride.]

(e) If more than one emission limitation under miscellaneous metal parts and products applies to a specific coating, the least stringent emission limitation applies.





| [                                                                                                                                                                                                       |                                                |                                                                                          |                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|------------------------------------------------------------------------------------------|------------------------------|
| (f) [Paragraph (f) of the regulation is not appli                                                                                                                                                       | cable to this source.]                         |                                                                                          |                              |
| (g) [Paragraph (g) of the regulation is printed                                                                                                                                                         | under RECORDKEEP                               | NG REQUIREMENTS in this section of the                                                   | permit.]                     |
| (h) The VOC standards in Table I do not appl acceptance, touch-up and repair and other sn                                                                                                               |                                                |                                                                                          | commercial                   |
| (1) The quantity of coating used does not year for all coatings combined for the facility.                                                                                                              | exceed 50 gallons per                          | year for a single coating and a total of 200                                             | gallons per                  |
| (2) The owner or operator of the facility re to use of the coating.                                                                                                                                     | quests, in writing, and                        | the Department approves, in writing, the ex                                              | emption prior                |
| (i) - (j) [Paragraphs (i) and (j) of the regulation                                                                                                                                                     | are not applicable to t                        | his source.]                                                                             |                              |
| (k) Section 129.52d(a)(5)(i) (relating to controprocesses, miscellaneous plastic parts surfacoating processes regulated under Table I, C meet the requirements of 40 CFR Part 59, Su aerosol coatings). | ce coating processes<br>ategory 10, miscellane | and pleasure craft surface coatings) applie<br>ous metal parts and products. Aerosol coa | es to surface<br>atings must |
| *******                                                                                                                                                                                                 | *****                                          | **********                                                                               |                              |
| [Only the categories from Table I that apply to                                                                                                                                                         | this facility are printed                      | below; non-applicable categories are omitt                                               | ed.]                         |
| Table<br>Emission Limits of VOCs in Su<br>Weight of VOC per Vo                                                                                                                                          |                                                |                                                                                          |                              |
|                                                                                                                                                                                                         | lbs VOC                                        | kg VOC                                                                                   |                              |
| Surface Costing Process Cotagon                                                                                                                                                                         | per gal                                        | per liter                                                                                |                              |
| Surface Coating Process Category<br>4. Vinyl coating                                                                                                                                                    | coating solids<br>7.69                         | coating solids<br>0.92                                                                   |                              |
| 10. Miscellaneous metal parts & products                                                                                                                                                                | 1.05                                           | 0.52                                                                                     |                              |
| (d) clear coatings                                                                                                                                                                                      | 10.34                                          | 1.24                                                                                     |                              |
| (e) air-dried coatings                                                                                                                                                                                  | 6.67                                           | 0.80                                                                                     |                              |
| Air dried coating Coatings which are<br>by the use of air or forced warm air at<br>temperatures up to 194°F.                                                                                            | dried                                          |                                                                                          |                              |
| (f) extreme performance coatings                                                                                                                                                                        | 6.67                                           | 0.80                                                                                     |                              |
| (g) all other coatings                                                                                                                                                                                  | 5.06                                           | 0.61                                                                                     |                              |
| Categories 1—9 were adopted on April 17, 19<br>Category 10 was adopted on April 21, 1981                                                                                                                | 079                                            |                                                                                          |                              |
| [Categories 11 (Wood furniture manufacturing apply to this facility.]                                                                                                                                   | g operations) and 12 (S                        | Shipbuilding and ship repair coatings) of Ta                                             | ble I do not                 |
| [This regulation is printed in this operating pe                                                                                                                                                        | rmit as amended Janu                           | ary 21, 2023, in 53 Pa. B. 465.]                                                         |                              |
| TESTING REQUIREMENTS.                                                                                                                                                                                   |                                                |                                                                                          |                              |
| lo additional testing requirements exist except                                                                                                                                                         | as provided in other s                         | ections of this permit including Section B (S                                            | State Only                   |
| General Requirements).                                                                                                                                                                                  |                                                |                                                                                          | 2                            |





#### III. MONITORING REQUIREMENTS.

25-00591

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

#### IV. RECORDKEEPING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Records maintained to demonstrate compliance with 25 Pa. Code §§ 129.52 and 129.52d shall be maintained for 5 years.

[Compliance with this operating permit condition assures compliance with 25 Pa. §§ Code 129.52(g) and 129.52d(f)(3).]

#### # 003 [25 Pa. Code §129.52] Surface coating processes

(a) - (b) [Paragraphs (a) and (b) of the regulation are printed under RESTRICTIONS in this section of the permit.]

(c) 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:

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

- (i) The coating, thinner or component name and identification number.
- (ii) The volume used.
- (iii) The mix ratio.
- (iv) The density or specific gravity.
- (v) The weight percent of total volatiles, water, solids and exempt solvents.
- (vi) The volume percent of solids for Table I surface coating process categories 1 10.

(2) The VOC content of each coating, thinner and other component as supplied.

(3) The VOC content of each as applied coating.

(d) - (f) [Paragraphs (d)-(f) of the regulation are printed under RESTRICTIONS in this section of the permit.]

(g) [Paragraph (g) is streamlined out of the permit in favor of an operating permit condition for this source requiring that records be maintained for 5 years.]

(h) - (j) [Paragraphs (h)-(j) of the regulation are printed under RESTRICTIONS in this section of the permit.]

[This regulation is printed as amended January 21, 2023, in 53 Pa. B. 465.]

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

#### # 004 [25 Pa. Code §121.1 A - L] Definitions.

[Selected definitions from 25 Pa. Code § 121.1 are printed below, as the regulation was amended January 20, 2023. Refer to regulation for remaining definitions.]

Air dried coating -- Coatings which are dried by the use of air or forced warm air at temperatures up to 194°F.





Clear coat -- A coating which lacks opacity or which is transparent and uses the undercoat as a reflectant base or undertone color, except for extreme performance coatings.

Coating line -- The equipment and activities of the manufacturing process used to apply coatings onto or into a substrate.

Coating solids or solids -- For purposes of wood furniture manufacturing under §§ 129.101 - 129.107, the part of the coating which remains after the coating is dried or cured. Solids content is determined using data from the EPA Reference Method 24 or an alternative method approved by the Administrator of the EPA.

Cosmetic specialty coatings -- Materials including padding stains, shading stains, sap stains, spatter stains, fillers, waxes and inks applied to enhance wood finishes.

Extreme performance coatings -- Coatings designed and used for harsh exposure or extreme environmental conditions.

Miscellaneous metal parts and products -- Items made of ferrous or nonferrous metals, including large farm machinery, small farm machinery, small appliances, commercial and industrial machinery, fabricated metal products and items listed under the Standard Industrial Classification Codes 3300—3999. The term does not include cans, coils, automobiles, light-duty trucks, metal furniture, magnet wire, large appliances, aerospace vehicles or components and automobile refinishing and customized top coating of automobiles and trucks, if production since January 1, 1987, has not exceeded 34 vehicles per day.

Surface preparation solvent -- A solvent used to remove dirt, oil and other contaminants from a substrate prior to the application of an adhesive, sealant, adhesive primer or sealant primer.

[The selected definitions are printed here from the regulation as current with the amendment January 21, 2023, in 53 Pa. B. 465.]





#### Group Name: 4 - 129.52D

Group Description: Recordkeeping requirement from 129.52d while VOC < 2.7 tons per 12 months

#### Sources included in this group

| ID   | Name                                                  |
|------|-------------------------------------------------------|
| 101A | SURFACE COATING OF METAL PARTS                        |
| 101B | SURFACE COATING OF VINYL PARTS                        |
| 104  | HAND-WIPE PROFILES AND WINDOWS WITH ISOPROPYL ALCOHOL |

#### I. RESTRICTIONS.

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

## # 001 [25 Pa. Code §129.52d]

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

[Note: Because Total Actual VOC emissions from activities at this facility subject to 129.52d are < 2.7 tons per 12-month rolling period, then paragraphs (a)(2) & (e)(1) & (f)(2) & (f)(4) of Pa. Code § 129.52d apply.]

(a) Applicability.

(1) [Not applicable]

(2) This section applies, as specified, to the owner and operator of a miscellaneous metal part surface coating process or miscellaneous plastic part surface coating process, or both, if the total actual VOC emissions from all miscellaneous metal part coating units and miscellaneous plastic part coating units, including related cleaning activities, at the facility are below 2.7 tons per 12-month rolling period, before consideration of controls.

(3) - (5) [Paragraphs (a)(3) through (a)(5) of the regulation do not apply this facility.]

(b) [Refer to the regulation for definitions of paragraph (b) of the regulation.]

- (c) [Not applicable.]
- (d) [Paragraph (a)(4) is not applicable to this facility.]

(e) Compliance and monitoring requirements.

(1) All owners and operators. Regardless of the facility's VOC emissions, the owner or operator of a miscellaneous metal part surface coating process or miscellaneous plastic part surface coating process, or both, subject to subsection (a)(1) or (2), shall comply with this section as specified throughout this section. For an owner or operator subject only to subsection (a)(2), the compliance requirements are the recordkeeping requirements in subsection (f)(2).

(2) [Paragraph (e)(2) is not applicable to this facility.]

(f) [Paragraph (f) is printed under RECORDKEEPING REQUIREMENTS in this section of permit.]

(g) - (k) [Paragraphs (g) through (k) do not apply to this facility.]

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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





## IV. RECORDKEEPING REQUIREMENTS.

## # 002 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Records maintained to demonstrate compliance with 25 Pa. Code §§ 129.52 and 129.52d shall be maintained for 5 years.

[Compliance with this operating permit condition assures compliance with 25 Pa. §§ Code 129.52(g) and 129.52d(f)(3).]

# 003 [25 Pa. Code §129.52d]

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

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

[Note: Because Total Actual VOC emissions from activities at this facility subject to 129.52d are < 2.7 tons per 12-month rolling period, then paragraphs (a)(2) & (e)(1) & (f)(2) & (f)(4) of Pa. Code § 129.52d apply.]

- (f) Recordkeeping and reporting requirements.
  - (1) [Not applicable]

(2) An owner or operator subject to subsection (a)(2), or otherwise claiming an exemption or exception in this section, shall maintain records sufficient to verify the applicability of subsection (a)(2), the exemption or exception. Records maintained for compliance demonstrations may include purchase, use, production and other records.

(3) [This paragraph of the regulation is streamlined out of the operating permit in favor of the more restriction § 127.441 condition requiring that records be maintained for 5 years.]

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

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

## V. REPORTING REQUIREMENTS.

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

## VI. WORK PRACTICE REQUIREMENTS.

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

## VII. ADDITIONAL REQUIREMENTS.

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



SEAWAY MFG CORP/ERIE



# SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





## SECTION G. Emission Restriction Summary.

| Source Id             | Source Descriptior              |                                       |           |
|-----------------------|---------------------------------|---------------------------------------|-----------|
| 001                   | MISC. NAT. GAS COMBUSTION UNITS |                                       |           |
| <b>Emission Limit</b> |                                 |                                       | Pollutant |
| 4.000                 | Lbs/MMBTU                       | any 1-hour period [25 Pa Code 123.22] | SOX       |
| 0.400                 | Lbs/MMBTU                       | of heat input [25 Pa Code 123.11]     | TSP       |
| 101A                  | SURFACE COATING OF METAL PARTS  |                                       |           |
| <b>Emission Limit</b> |                                 |                                       | Pollutant |
| 0.040                 | gr/DRY FT3                      | [25 Pa Code 123.13]                   | TSP       |
| 101B                  | SURFACE COATING OF VINYL PARTS  |                                       |           |
| <b>Emission Limit</b> |                                 |                                       | Pollutant |
| 0.040                 | gr/DRY FT3                      | [25 Pa Code 123.13]                   | TSP       |

## Site Emission Restriction Summary

**Emission Limit** 

Pollutant





## SECTION H. Miscellaneous.

 (a) This facility consists of 3 buildings on the same city block. The 3 buildings have separate street addresses. The address for the main plant and the corporate offices is: 2250 East 33rd Street, Erie, PA 16510. The address for the paint shop is: 2112 East 30th Street, Erie, PA 16510. The address for the warehouse is: 2915 McCain Avenue, Erie, PA 16510.

This facility is a NATURAL MINOR with respect to Potential Emissions of regulated air pollutants.

The following eFACTS ID's are assigned to this facility for this permit issuance:

Permit number: 25-00591 eFACTS Site Name: Seaway Mfg Corp APS ID: 486869 Master Auth ID: 507170 Client ID: 116529 Site ID: 249021 Primary Facility (PF) ID: 517697

(b) The Capacity/Throughput numbers listed in Section A, the Site Inventory List, and provided in Section D of this permit for individual sources are for informational purposes only and are not to be considered enforceable limits. The actual enforceable emission and operating limits for each source, with the correct number of significant digits, are listed in Sections C, D, and E of this permit. The Emission Restriction Summary in Section G of this permit is for information purposes only and is not to be used to establish enforceable limits.

(c) Abbreviations used in this permit:

Schematics:

- FML: Fuel material location
- CU: Combustion Unit
- PROC: Process
- CNTL: Control device
- STAC: Stack. The stack can represent either the emission point or fugitive emissions in a permit map.

Pollutants:

- CO: Carbon Monoxide
- NOx: Nitrogen Oxides
- SOx: Sulfur Oxides
- TSP: Total Suspended Particulate (includes both filterable and condensable)
- PM10: Particulate Matter less than 10 microns
- PM2.5: Particulate Matter less than 2.5 microns
- VOC: Volatile Organic Compounds
- HAP: Hazardous Air Pollutant

Source ID: Department assigned ID number for the source

Source Name: Department assigned name for the source

Capacity/Throughput: The maximum rated capacity or throughput for the source. The maximum rated capacity or throughput is not considered an enforceable limit. Enforceable limits are contained within the conditions of the permit.

Fuel/Material: The fuel/material assigned to SCC for the source

AIMS: Air Information Management System -- the DEP electronic database for permitting and emission reports

CFR: Code of Federal Regulations

Department: Pennsylvania Department of Environmental Protection (the DEP)

eFacts: Environmental Facility Application Compliance Tracking System -- the DEP electronic database for inspection reports NESHAP: National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63)

NSPS: New Source Performance Standards (40 CFR Part 60)

NWRO: Northwest Regional Office of PADEP

RFD: Request for Determination of Changes of Minor Significance & Exemption from plan approval.

SCC: Source Classification Code as defined by EPA

Source: An air contamination source (25 Pa. Code § 121.1).

(d) All reports, submittals, and other communications required by this permit shall be submitted electronically to the PADEP Northwest Regional office located at the following address. Web addresses for electronic submittals to this office are below.





## SECTION H. Miscellaneous.

Bureau of Air Quality Department of Environmental Protection 230 Chestnut Street Meadville, PA 16335 814-332-6940 (phone) 814-332-6121 (fax) Office Hours 8 a.m. - 4 p.m. 800-541-2050 (after hours)

(i) Spills and other emergencies should be reported immediately to DEP by telephone at 800-541-2050.

(ii) Submittals of Asbestos Abatements and Demolition/Renovation Notification Forms should be made via the Online Asbestos Notification System. Information and links are located at this web address:

https://www.dep.pa.gov/Business/Air/BAQ/BusinessTopics/Pages/Asbestos.aspx

(iii) Submittals of Annual emissions inventory, if required, must be made via the DEP's AES\*Online secure website. Information and links are located at this web address:

https://www.dep.pa.gov/Business/Air/BAQ/BusinessTopics/Emission/Pages/default.aspx

(iv) Submittals pertaining to emissions testing, specifically test protocols and test reports, shall be made by emailing electronic copies submissions to both PSIMS Administration in Central Office and to Regional Office AQ Program at the following e-mail addresses:

CENTRAL OFFICE: RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE: RA-EPNWstacktesting@pa.gov

(v) The 15-day advance notifications of emissions testing dates and supplemental testing information shall be submitted directly to:

(1) the DEP's OnBase electronic upload website where it will be forwarded to the Northwest Regional Office Air Quality Inspector. Upload the written notification at this web address:

https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx

(2) IF the Protocol Reviewer at Central Office Division of Source Testing requested a copy of the notification, then submit a copy to the email address provided by the protocol reviewer.

(vi) Submittals of RFD's shall be made via the DEP's Greenport website at https://greenport.pa.gov

(vii) All other submittals to this office should be made via the DEP's OnBase electronic upload website at this web address:

https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx

(e) [Reserved for EPA address in the event that EPA submittals become required in the future.]

(f) The permitted sources are further decribed as follows.

(1) Source 001 consist of natural gas combustion from space heating units and a 6 million Btu/hour heated air make-up unit located in the paint shop.

(2) Sources 101A & 101B consist of 2 automatic paint booths which are side-by-side through which aluminum and vinyl parts pass through on a conveyor. The facility personnel refer to the 2 booths as a single paint booth. Source 101A represents the process of coating of metal profiles. Source 101B represents the coating of vinyl parts. Sources 101A & 101B & the fibre filters of C101 were authorized (post-construction) with the 10/22/1981 issuance of plan approval 25-318-073

(3) Source 102 is the parts sanding process. The parts sanding is where parts are 'scuffed' for preparation of painting and is done in the parts-prep area of the paint shop. There is no longer an enclosure associated with this process.

(4) Source 104 is comprised of 2 activities.

(i) the activity of hand-wiping parts with Castle Double Dry C1201 (isopropyl alcohol, a VOC, but not a HAP) used for parts-prep to hand-wipe the aluminum and vinyl profiles prior to painting. This activity is done in the paint shop.





## SECTION H. Miscellaneous.

(ii) the activity of wiping down completed vinyl windows before they are wrapped for shipment.

(g) The following sources/activities have been determined to be of minor significance with respect to emissions of regulated air pollutants and have no applicable emission, testing, monitoring, recordkeeping, or reporting requirements.

- Acetone (an exempt VOC, not a HAP), used for parts-prep to hand-wipe the metal and vinyl profiles prior to painting.
- (h) Permitting History:
  - (1) This new natural minor State Only operating permit is issued and effective on March 5, 2004.
  - (2) This operating permit is renewed on March 10, 2009.
  - (3) This operating permit is renewed on March 10, 2014.
  - (4) This permit was reissued on February 27, 2018. It will take effect on March 1, 2019 and expire on February 28, 2024.
  - (5) This operating permit renewal, effective March 19, 2024, is issued on March 19, 2024.





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