

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date: November 24, 2020 Effective Date: June 26, 2024
Revision Date: June 26, 2024 Expiration Date: November 30, 2025

Revision Type: Modification

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

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

State Only Permit No: 36-05166

Synthetic Minor

Federal Tax Id - Plant Code: 92-1352370-1

Owner Information

Name: RUTT QUALITY CABINETRY LLC

Mailing Address: 215 DILLER AVE

NEW HOLLAND, PA 17557-1611

Plant Information

Plant: RUTT QUALITY CABINETRY LLC/NEW HOLLAND

Location: 36 Lancaster County 36923 Earl Township

SIC Code: 2434 Manufacturing - Wood Kitchen Cabinets

Responsible Official

Name: CLAUDE SAPP

Title: MANAGING DIRECTOR

Phone (775) 247 - 5362 Email: csapp@ruttcabinetry.com

Permit Contact Person

Name: CLAUDE SAPP

Title: MANAGING DIRECTOR

Phone: (775) 247 - 5362 Email: csapp@ruttcabinetry.com

[Signature]

WILLIAM R. WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER



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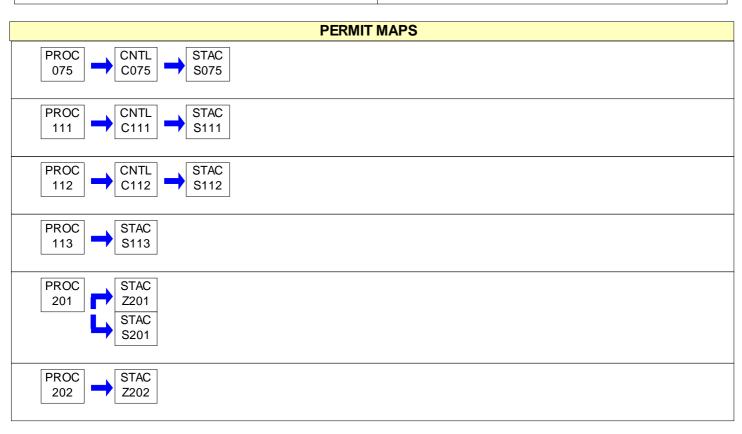
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SECTION A. Site Inventory List

Source ID	Source Name	Capacity	Throughput Throughput	Fuel/Material
075	RUTT FINISHING BOOTHS (2)	25.000	Lbs/HR	VOC
111	WOODWORKING AREA 1	2,000.000	Lbs/HR	SAWDUST
112	WOODWORKING AREA 2	100.000	Lbs/HR	SAWDUST
113	ADHESIVES APPLICATION BOOTH	5.000	Lbs/HR	VOC
201	SOLVENT & PAINT STORAGE ROOM	50.000	Lbs/HR	VOC
202	FACILITY MAINTENANCE AND ARCHITECTURAL COATINGS			
C075	RUTT FINISHING AIR FILTERS (2)			
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#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)





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

#015 [25 Pa. Code § 127.11]

Reactivation

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

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

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

#017 [25 Pa. Code § 121.9]

Circumvention.

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

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

Reporting Requirements.

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

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

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



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

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

Sampling, Testing and Monitoring Procedures.

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

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

Recordkeeping.

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

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

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

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#023 [25 Pa. Code §135.3]

Reporting

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

#024 [25 Pa. Code §135.4]

Report Format

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





I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

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

002 [25 Pa. Code §123.2]

Fugitive particulate matter

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

003 [25 Pa. Code §123.31]

Limitations

No person shall permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

004 [25 Pa. Code §123.41]

Limitations

No person shall permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

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

005 [25 Pa. Code §123.42]

Exceptions

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

- (a) The presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of





visible emissions.

(c) The emission results from sources specified in Section C, Condition #001.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit emissions from the facility to less than the following during any consecutive 12-month period:

- a. PM-10 100 tons
- b. PM-2.5 100 tons
- c. Sulfur Dioxide 100 tons
- d. Nitrogen Oxides 100 tons
- e. Carbon Monoxide 100 tons
- f. Volatile Organic Compounds (VOC) 50 tons
- g. Hazardous Air Pollutants (HAP)
- 1. 10 tons of any individual
- 2. 25 tons total of all

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is derived from RACT Operating Permit No. 36-2005 and the EPA's CTG Document.]

VOC emissions shall be limited to 2.3 pounds VOC per pound solids for "acid-cured alkyd amino-based" sealers as applied, and 2.0 pounds VOC per pound solids for "acid-cured alkyd amino-based" topcoats as applied.

008 [25 Pa. Code §129.14]

Open burning operations

- (a) No person may permit the open burning of material in a manner that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life or property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health.
- (b) The requirements of subsection (a) do not apply where the open burning operations result from:
- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
 - (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
 - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
 - (4) A fire set solely for recreational or ceremonial purposes.
 - (5) A fire set solely for cooking food.

This permit does not constitute authorization to burn solid waste pursuant to section 610 (3) of the Solid Waste Management Act (SWMA). 35 PS Section 6018.610 (3) or any other provision of the SWMA.



II. TESTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Department reserves the right to require exhaust performance testing of any source and Method 24 testing of any coating as necessary during the permit term to verify emissions for purposes including emission fees, malfunctions or permit condition violations.

010 [25 Pa. Code §139.1]

Sampling facilities.

Upon the request of the Department, the person responsible for a source shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such source. The Department will set forth, in the request, the time period in which the facilities shall be provided as well as the specifications for such facilities.

III. MONITORING REQUIREMENTS.

011 [25 Pa. Code §123.43]

Measuring techniques

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

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

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (1) Visible emissions in excess of the limits stated in Section C, Condition #004. Visible emissions may be measured according to the methods specified in Section C, Condition #011. As an alternative, plant personnel who observe such visible emissions shall report each incident to the Department within four hours of the occurrence and arrange for a certified observer to read the visible emissions.
- (2) Presence of fugitive emissions beyond the plant property boundaries, as stated in Section C, Condition #002.
- (3) Presence of malodorous air contaminants beyond the plant property boundaries as stated in Section C, Condition #003.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall perform monthly calculations for all the air contaminants listed in Section C, Condition 006 to demonstrate compliance with the 12-month rolling totals.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain record of the results of all observations of visible, fugitive and malodorous air emissions. The permittee shall record, at minimum, the following information:

- 1. The name of the company representative making the observation.
- 2. The date and time of the observation.
- 3. The wind direction during each observation.
- 4. A description of any emissions and/or malodors observed and actions taken to mitigate them. If none, record "NONE."





015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Unless otherwise noted, all records required by this and subsequent operating permits shall be maintained for the most recent five-year period and shall be readily available to the Department upon request. The most recent two years of records must be retained at the facility. The remaining three years of records may be retained off site. The records may be retained on paper, microfilm, microfiche or computer disks. If the records are retained on computer disks, the records must be in commonly available software. Commonly available software is usually compatible with a Microsoft application such as Word or Excel. For records kept off site, readily available is defined as available within one business day.

V. REPORTING REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) Any malfunction which poses an imminent danger to the public health, safety, welfare, and environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two (2) hours after the incident. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.
- (b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirement of subsection (a) above, shall be reported to the Department, in writing, within five (5) days of malfunction discovery.
- (c) Unless otherwise approved by DEP, all malfunctions shall be reported through the Department's Greenport PUP system available through: https://greenport.pa.gov/ePermitPublicAccess/PublicSubmission/Home
- (d) Telephone reports can be made to the Reading District Office at (610) 916-0100 during normal business hours or to the Department's Emergency Hotline at any time. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at

https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx.

VI. WORK PRACTICE REQUIREMENTS.

017 [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. Section 4003).

018 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from the sources identified in the Site Level Requirements, Condition #001, from becoming airborne. These actions shall include, but not be limited to, the following:

- (a) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (b) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
 - (c) Paving and maintenance of roadways.
- (d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.



019 [25 Pa. Code §127.444]

Compliance requirements.

The permittee shall maintain and operate the sources and the air cleaning devices consistent with good operating and maintenance practices and operate in a manner as not to cause air pollution.

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.

36-05166





SECTION D. **Source Level Requirements**

Source ID: 075 Source Name: RUTT FINISHING BOOTHS (2)

> Source Capacity/Throughput: 25.000 Lbs/HR VOC

Conditions for this source occur in the following groups: 01A

80

11



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).

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).

WORK PRACTICE REQUIREMENTS. VI.

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

VII. ADDITIONAL REQUIREMENTS.

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





Source ID: 111 Source Name: WOODWORKING AREA 1

> Source Capacity/Throughput: 2,000.000 Lbs/HR SAWDUST

Conditions for this source occur in the following groups: 03



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).

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).

MONITORING REQUIREMENTS. III.

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).

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).

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).

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).

ADDITIONAL REQUIREMENTS. VII.

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

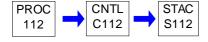




Source ID: 112 Source Name: WOODWORKING AREA 2

Source Capacity/Throughput: 100.000 Lbs/HR SAWDUST

Conditions for this source occur in the following groups: 03



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



Source ID: 113 Source Name: ADHESIVES APPLICATION BOOTH

Source Capacity/Throughput: 5.000 Lbs/HR VOC

Conditions for this source occur in the following groups: 01A

08 11

PROC STAC



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

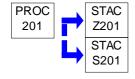
VII. ADDITIONAL REQUIREMENTS.

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



Source ID: 201 Source Name: SOLVENT & PAINT STORAGE ROOM

Source Capacity/Throughput: 50.000 Lbs/HR VOC



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).

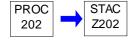




Source ID: 202 Source Name: FACILITY MAINTENANCE AND ARCHITECTURAL COATINGS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 09



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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





Group Name: 01A
Group Description: BOOTHS
Sources included in this group

ID	Name
075	RUTT FINISHING BOOTHS (2)
113	ADHESIVES APPLICATION BOOTH

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person shall permit the emission into the outdoor atmosphere of particulate matter from these sources in a manner that the concentration of the particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

002 [25 Pa. Code §129.52]

Surface coating processes

- (1) The coatings, as applied, for wood furniture operation shall be in compliance with 25 Pa. Code, Section 129.52, Table 1, Item No. 11. For wood furniture manufacturing operations, the pounds VOC per pound coating solids (kg VOC per kg coating solids) shall be equal to or less than the following:
- (a) Topcoats and enamels 3.0
- (b) Washcoat 14.3
- (c) Final repair coat 3.3
- (d) Basecoats 2.2
- (e) Cosmetic specialty coatings 14.3
- (f) Sealers 3.9
- (2) No person shall permit the emission into the outdoor atmosphere of VOCs from the application of wood furniture coatings unless the coatings are applied using electrostatic, airless, curtain coating, roller coating, hand roller, hand brush, flow coating, dip coating or high volume-low pressure application equipment. Air atomized sprays may be used to apply cosmetic specialty coatings if the volume of the cosmetic specialty coatings is less than 5% by volume of the total coating used at the facility or to apply final repair coatings.

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.

003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall demonstrate the VOC/HAP content of each surface coating by one of the following methods:

- (a) For surface coatings applied as they are received from the manufacturer, the permittee may demonstrate compliance with the applicable standard by obtaining EPA Method 24 certification testing from the manufacturer, or by maintaining VOC/HAP data sheets from the manufacturer.
- (b) In the absence of EPA Method 24 certification testing from the manufacturer, or VOC/HAP data sheets from the manufacturer, allowed under part (a), above, the permittee shall perform EPA Method 24 certification testing on all surface coatings applied as received from the manufacturer.
- (c) The permittee may use calculated VOC content values in lieu of EPA Method 24 certification testing for multi-part surface coatings where the permittee maintains VOC/HAP data sheets for all surface coating constituents (i.e. coatings, pigments, thinners/cutting solvents), and also maintains documentation from the manufacturer as to the recommended mix ratio of the parts. In the event of any inconsistency between the calculated VOC content and data obtained from EPA Method 24



certification testing, the latter shall take precedence.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- (a) The permittee shall maintain an organic solvent accounting form to record quantity and type of solvent used, quantity of spent organic solvent generated, disposed off-site and recycled on-site, etc.
- (b) Manufacturer supplied VOC Data Sheets and/or Material Safety Data Sheets and/or Certified Product Data Sheets for all coatings applied at this facility within the most recent five years shall be maintained on-site and be made available to the Department at any time during normal business hours.
- (c) All records shall be maintained for each calendar year (January 1 through December 31) and retained for at least five years.

005 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The permittee shall record the pressure drop across each filter. At a minimum, the pressure drop across each filter shall be recorded once per week while its paint booth is in operation.

006 [25 Pa. Code §129.52]

Surface coating processes

The permittee shall maintain a daily record of coating usage. These records shall include 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 VOC content of each coating, thinner and other component as supplied.
- (vii) The VOC content of each as applied coating.

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.

007 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The exhaust fan shall be in operation and the filters in place whenever a booth is in use.

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: 03

Group Description: WOODWORKING AREAS

Sources included in this group

IE) Name	
11	1 WOODWORKING AREA 1	
11	2 WOODWORKING AREA 2	

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person shall permit the emission into the outdoor atmosphere of particulate matter from each woodworking area in a manner that the concentration of the 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.

002 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The permitee shall maintain detailed records of all maintenance performed on the baghouses. The permitee shall retain these records for a minimum of five (5) years and shall make them available to the Department upon its request.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The permitee shall operate a baghouse at all times that its source is operating.

004 [25 Pa. Code §127.512]

Operating permit terms and conditions.

The permitee shall operate each baghouse with its source in accordance with the manufacturer's specifications.

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: 0

80

Group Description: 25 Pa. 129.77 Adhesives, Sealants, Primers and Solvents

Sources included in this group

I	D	Name
0	75	RUTT FINISHING BOOTHS (2)
1	13	ADHESIVES APPLICATION BOOTH

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §129.77.]

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

- (a) On or after January 1, 2012, an owner or operator of a facility may not use or apply at the facility an adhesive, sealant, adhesive primer or sealant primer that exceeds the applicable VOC content limits, expressed as lbs VOC / gallon product, less water and exempt compounds, as specified in Tables V & VI of 25 Pa Code 129.77:
- (1) Table V VOC Content Limits for Adhesives, Sealants, Adhesive Primers and Sealant Primers, As Applied:
- (A) Contact Bond Adhesive 2.1 (250 grams VOC per liter, less water and exempt compounds)
- (2) Table VI VOC Content Limits for Adhesive or Sealant Products Applied to Particular Substrates, As Applied:
- (A) Porous Material Substrates 1.0 (120 grams VOC per liter, less water and exempt compounds)

Note: Reference Tables V & VI from the regulation for the complete list of adhesives, sealants, adhesive primers, sealant primers and substrates.

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.

002 [25 Pa. Code §129.77.]

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

(a) This section applies to the owner or operator of a facility that uses or applies one or more of the following at the facility on or after January 1, 2012:





- (1) An adhesive, sealant, adhesive primer or sealant primer subject to the VOC content limits in Table V.
- (2) An adhesive or sealant product applied to the listed substrate subject to the VOC content limits in Table VI.
- (3) A surface preparation solvent or cleanup solvent.
- (b) On or after January 1, 2012, an owner or operator of a facility may not use or apply at the facility an adhesive, sealant, adhesive primer or sealant primer that exceeds the applicable VOC content limit in Table V or VI, except as provided elsewhere in this section.
- (c) On or after January 1, 2012, an owner or operator of a facility may not use or apply at the facility a surface preparation or cleanup solvent that exceeds the applicable VOC content limit or composite partial vapor pressure requirements of this section, except as provided elsewhere in this section.
- (d) The VOC content limits in Table VI for adhesives or sealants applied to particular substrates apply as follows:
- (1) If an owner or operator of a facility uses or applies at the facility an adhesive or sealant subject to a specific VOC content limit in Table V, the specific limit is applicable rather than the adhesive-to-substrate limit in Table VI.
- (2) If an owner or operator of a facility uses or applies at the facility an adhesive to bond dissimilar substrates together, the applicable substrate category with the highest VOC content limit is the limit for this use.
- (e) An owner or operator of a facility subject to this section using or applying a surface preparation solvent or cleanup solvent at the facility may not:
- (1) Except as provided in paragraph (2) for single-ply roof membrane, use materials containing VOCs for surface preparation, unless the VOC content of the surface preparation solvent is less than 70 grams per liter of material or 0.6 pound of VOC per gallon of material.
- (2) Use materials containing VOCs for surface preparation or cleanup when applying single-ply roof membrane, unless the composite partial vapor pressure, excluding water and exempt compounds, of the surface preparation solvent or cleanup solvent is less than or equal to 45 mm mercury at 20° C.
- (3) Except as provided in subsection (f), use cleanup solvent materials containing VOCs for the removal of adhesives, sealants, adhesive primers or sealant primers from surfaces, other than from the parts of spray application equipment, unless the composite partial vapor pressure of the solvent is less than or equal to 45 mm mercury at 20° C.
- (f) Removal of an adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment shall be performed by one or more of the following methods:
- (1) Using an enclosed cleaning system, or an equivalent cleaning system as determined by the test method identified in subsection (z).
- (2) Using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material or 0.6 pound of VOC per gallon of material.
- (3) Soaking parts containing dried adhesive in a solvent if the composite partial vapor pressure of the solvent, excluding water and exempt compounds, is less than or equal to 9.5 mm mercury at 20° C and the parts and solvent are in a closed container that remains closed except when adding parts to or removing parts from the container.
- (g) An owner or operator of a facility using or applying at the facility an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent subject to the VOC content limits of this section may comply with the requirements of this section through the use of add-on air pollution control equipment if the following requirements are met:
- (1) The VOC emissions from the use of all noncomplying as applied adhesives, sealants, adhesive primers, sealant primers, surface preparation solvents and cleanup solvents subject to this section are reduced by an overall efficiency of at least 85%, by weight.





- (i) The capture efficiency of the system shall be determined in accordance with subsection (y)(1).
- (ii) The control efficiency of the system shall be determined in accordance with subsection (y)(2).
- (2) The combustion temperature is continuously monitored and recorded daily if a thermal incinerator is operated.
- (3) Inlet and exhaust gas temperatures are continuously monitored and recorded daily if a catalytic incinerator is operated.
- (4) Control device efficiency is monitored continuously and recorded daily if a carbon absorber or control device other than a thermal or catalytic incinerator is operated.
- (5) Operation records sufficient to demonstrate compliance with the requirements of this section are maintained in accordance with subsections (o), (p) and (q).
 - (6) The following information is also recorded and maintained:
- (i) Daily records of the volume used each day of each noncomplying as applied adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent and cleanup solvent.
 - (ii) Daily records of the hours of operation of the add-on air pollution control equipment.
- (iii) Records of all maintenance performed on the add-on air pollution control equipment, including the date and type of maintenance.
 - (7) The control equipment is approved, in writing, by the Department in an operating permit.
- (8) The owner or operator of a facility that intends to comply with this section using add-on air pollution control equipment may apply to the Department for an extension to the compliance date specified in subsections (a)—(c).
 - (i) The Department will approve the extension request if the request meets the requirements in subparagraph (ii).
 - (ii) The extension request must:
 - (A) Be received, in writing, by January 1, 2012.
 - (B) Include the date by which a permit application or request for plan approval will be submitted.
 - (C) Demonstrate to the Department's satisfaction that an extension is necessary.
 - (iii) An extension will be automatically revoked if the recipient fails to comply with its terms by the dates specified in it.
- (h) An owner or operator of a facility subject to this section shall store or dispose of all absorbent materials, including cloth or paper, which are moistened with adhesives, sealants, primers, surface preparation solvents or cleanup solvents subject to this section, in nonabsorbent containers at the facility that are kept closed except when placing materials in or removing materials from the container.
- (i) An owner or operator of a facility subject to this section may not solicit, require or specify the use or application of an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent if the use or application would result in a violation of this section, unless the emissions are controlled through the use of add-on air pollution control equipment as specified in subsection (g). The prohibition of this subsection applies to all written or oral contracts created on or after January 1, 2012, under which an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent subject to this section is to be used or applied at a facility in this Commonwealth.
- (j) An owner or operator of a facility subject to this section who uses or applies an adhesive, sealant, adhesive primer or sealant primer subject to this section may not add solvent to the adhesive, sealant, adhesive primer or sealant primer in an amount in excess of the manufacturer's recommendation for application, if this addition causes the adhesive, sealant,



adhesive primer or sealant primer to exceed the applicable VOC content limit listed in Table V or VI, unless the emissions are controlled through the use of add-on air pollution control equipment as specified in subsection (g).

- (k) This section does not apply to the use or application of the following compounds or products:
- (1) Adhesives, sealants, adhesive primers or sealant primers being tested or evaluated in a research and development, quality assurance or analytical laboratory, if records are maintained as required in subsections (p) and (q).
- (2) Adhesives, sealants, adhesive primers or sealant primers that are subject to other sections in this chapter or Chapter 130 (relating to standards for products).
- (3) Adhesives and sealants that contain less than 20 grams of VOC per liter of adhesive or sealant, less water and less exempt compounds, as applied.
 - (4) Cyanoacrylate adhesives.
- (5) Adhesives, sealants, adhesive primers or sealant primers that are sold or supplied by the manufacturer or supplier in containers with a net volume of 16 fluid ounces or less, or a net weight of 1 pound or less, except plastic cement welding adhesives and contact adhesives.
- (6) Contact adhesives that are sold or supplied by the manufacturer or supplier in containers with a net volume of 1 gallon or less.
- (I) This section does not apply to the use of adhesives, sealants, adhesive primers, sealant primers, surface preparation solvents or cleanup solvents in the following operations:
 - (1) Tire repair operations, if the label of the adhesive states, "For tire repair only."
 - (2) The assembly, repair and manufacture of aerospace components or undersea-based weapons systems.
 - (3) The manufacture of medical equipment.
- (4) Plaque laminating operations in which adhesives are used to bond clear, polyester acetate laminate to wood with lamination equipment installed prior to July 1, 1992. An owner or operator claiming an exemption under this paragraph shall record and maintain operational records sufficient to demonstrate compliance with this exemption, in accordance with subsections (o)—(q).
- (m) This section does not apply if the total VOC emissions from all adhesives, sealants, adhesive primers and sealant primers used or applied at the facility are less than 200 pounds or an equivalent volume, per calendar year. An owner or operator of a facility claiming exemption under this subsection shall record and maintain operational records sufficient to demonstrate compliance with this exemption, in accordance with subsections (o)—(q).
- (n) This section does not apply to the use or application of a noncomplying adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent if the total volume of noncomplying adhesives, sealants, primers, surface preparation and cleanup solvents used or applied facility-wide does not exceed 55 gallons per calendar year. An owner or operator of a facility claiming exemption under this subsection shall record and maintain operational records sufficient to demonstrate compliance with this exemption, in accordance with subsections (o)—(q).
- (o) Except as provided in subsection (p), each owner or operator subject to this section shall maintain records demonstrating compliance with this section, including the following information:
- (1) A list of each adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent and cleanup solvent product in use and in storage.
- (2) A data sheet or material list which provides the product name, manufacturer identification and use or material application for each product included on the list required under paragraph (1).



- (3) The VOC content of each product on the list required under paragraph (1), as supplied.
- (4) Catalysts, reducers or other components used and the mix ratio.
- (5) The VOC content or vapor pressure of each product on the list required by paragraph (1), as applied, if solvent or other VOC is added to the product before application.
 - (6) The volume purchased or produced of each product on the list required under paragraph (1).
- (7) The monthly volume used or applied as part of a manufacturing process at the facility of each product on the list required under paragraph (1).
- (p) For an adhesive, sealant, adhesive primer and sealant primer product subject to the laboratory testing exemption of subsection (k)(1), the person conducting the testing shall make and maintain records of all products used, including the following information:
 - (1) The product name.
 - (2) The product category of the material or type of application.
 - (3) The VOC content of the material.
- (q) Records made to determine compliance with this section shall be:
- (1) Maintained onsite for 5 years from the date the record is created.
- (2) Made available to the Department upon receipt of a written request.
- (r) Except as otherwise provided in this section, the VOC and solids content of nonaerosol adhesives (including one-part moisture cure urethane adhesives and silicone adhesives), sealants, adhesive primers, sealant primers, surface preparation solvents and cleanup solvents shall be determined using one of the following:
- (1) EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.
- (2) SCAQMD Method 304, Determination of Volatile Organic Compounds (VOC) in Various Materials, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (s) The weight volatile matter content and weight solids content for one-part or multiple part reactive adhesives, except one-part moisture cure urethane adhesives and silicone adhesives, shall be determined using the EPA Reference Method, Determination of Weight Volatile Matter Content and Weight Solids Content of Reactive Adhesives, found at 40 CFR 63, Subpart PPPP, Appendix A, including updates and revisions.
- (t) The identity and concentration of exempt organic compounds shall be determined using one of the following:
- (1) ASTM D4457, Standard Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA including updates and revisions.
- (2) SCAQMD Method 303, Determination of Exempt Compounds, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (u) The VOC content of a plastic cement welding adhesive or primer shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (v) To determine if a diluent is a reactive diluent, the percentage of the reactive organic compound that becomes an integral





part of the finished material shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

- (w) The composite partial vapor pressure of organic compounds in cleaning materials shall be determined by the following procedure:
- (1) Quantifying the amount of each compound in the blend using gas chromatographic analysis, using the following methods:
- (i) ASTM E260, Standard Practice for Packed Column Gas Chromatography, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, for organic content, including updates and revisions.
- (ii) ASTM D3792, Standard Test Method for Water Content of Coatings by Direct Injection Into a Gas Chromatograph, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, for water content, including updates and revisions.
- (2) Calculating the composite partial vapor pressure using the following equation:

REFER TO REGULATION FOR EQUATION

- (x) The vapor pressure of each single component compound shall be determined from one or more of the following:
- (1) ASTM D2879, Standard Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, including updates and revisions.
 - (2) The most recent edition of one or more of the following sources:
 - (i) Vapour Pressures of Pure Substances, Boublik, Elsevier Scientific Publishing Company, New York.
 - (ii) Perry's Chemical Engineers' Handbook, Green and Perry, McGraw-Hill Book Company.
 - (iii) CRC Handbook of Chemistry and Physics, CRC Press.
 - (iv) Lange's Handbook of Chemistry, McGraw-Hill Book Company.
 - (v) Additional sources approved by the SCAQMD or other California air districts.
- (y) If air pollution control equipment is used to meet the requirements of this section, the owner or operator shall make both of the following determinations:
- (1) The measurement of capture efficiency shall be conducted and reported in accordance with the EPA Technical Document "Guidelines for Determining Capture Efficiency," issued January 9, 1995.
 - (2) The control efficiency shall be determined in accordance with one of the following:
- (i) EPA Reference Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.
- (ii) EPA Reference Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.
- (iii) EPA Reference Method 25B, Determination of Total Gaseous Organic Concentration Using a Nondispersive Infrared Analyzer, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.
 - (iv) CARB Method 100, Procedures for Continuous Gaseous Emission Stack Sampling, California Air Resources Board,





1001 "I" Street, Post Office Box 2815, Sacramento, CA 95812 USA, including updates and revisions.

- (z) The active and passive solvent losses from the use of an enclosed spray gun cleaning system or equivalent cleaning system, as listed in subsection (f)(1), shall be determined using the SCAQMD method, General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems, dated October 3, 1989, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (1) The test solvent for this determination shall be a lacquer thinner with a minimum vapor pressure of 105 mm of mercury at 20° C.
 - (2) The minimum test temperature shall be 15° C.
- (aa) Another test method may be used to determine the VOC or solids content of a product if the request for approval of the test method meets the following requirements:
 - (1) The request is submitted to the Department in writing.
- (2) The request demonstrates that the test method provides results that accurately determine the concentration of VOCs in the product or its emissions.
 - (3) The Department approves the request in writing.
- (bb) For adhesive, sealant, adhesive primer or sealant primer products that do not contain reactive diluents, grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation:

Grams of VOC per liter of product, as applied = (Ws - Ww - We)/(Vm - Vw - Ve)

Where:

Ws = weight of volatile compounds, in grams.

Ww = weight of water, in grams.

We = weight of exempt compounds, in grams.

Vm = volume of material, in liters.

Vw = volume of water, in liters.

Ve = volume of exempt compounds, in liters.

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

Grams of VOC per liter of product, as applied = (Wrs - Wrw - Wre)/(Vrm - Vrw - Vre)

Where:

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

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

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

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





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

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

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

Grams of VOC per liter of product, as applied = (Ws - Ww - We)/Vm

Where:

Ws = weight of volatile compounds, in grams.

Ww = weight of water, in grams.

We = weight of exempt compounds, in grams.

Vm = volume of material, in liters.

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

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

Where:

Wv = weight of VOCs, in grams.

W = weight of material, in grams.

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





Group Name: 09

Group Description: 25 Pa. 130 Architectural and Industrial Maintenance Coatings

Sources included in this group

Name

202 FACILITY MAINTENANCE AND ARCHITECTURAL COATINGS

RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Table 1 - VOC Content Limits for Architectural and Industrial Maintenance Coatings

The VOC content limits are effective on January 1, 2005, and are expressed in grams of VOC per liter of coating thinned to the manufacturer's maximum recommendation, excluding the volume of any water, exempt compounds, or colorant added to tint bases. "Manufacturer's maximum recommendation" means the maximum recommendation for thinning that is indicated on the label or lid of the coating container.

Industrial Maintenance Coatings - 340 VOC content limit

Note: Reference Table 1 of 25 Pa. 130.603 for the complete list of coatings.

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.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

§ 130.601. Applicability.

This subchapter applies to a person who supplies, sells, offers for sale, manufactures, blends or repackages an architectural or industrial maintenance coating for use within this Commonwealth, as well as a person who applies or solicits the application of an architectural or industrial maintenance coating within this Commonwealth except for:





- (1) An architectural or industrial maintenance coating that is sold or manufactured for use outside of this Commonwealth or for shipment to other manufacturers for reformulation or repackaging.
 - (2) An aerosol coating product.
- (3) An architectural or industrial maintenance coating that is sold in a container with a volume of 1 liter (1.057 quart) or less.
- § 130.602. Definitions.

REFER TO REGULATION FOR DEFINITIONS

- § 130.603. Standards.
- (a) VOC content limits. Except as provided in subsections (b), (c) and (g), a person after January 1, 2005, may not:
- (1) Manufacture, blend or repackage for sale within this Commonwealth a coating subject to this subchapter with a VOC content in excess of the corresponding limit specified in Table 1.
- (2) Supply, sell or offer for sale within this Commonwealth a coating subject to this subchapter with a VOC content in excess of the corresponding limit specified in Table 1.
- (3) Solicit for application or apply within this Commonwealth, a coating subject to this subchapter with a VOC content in excess of the corresponding limit specified in Table 1.
- (b) Most restrictive VOC limit. If on the container of an architectural or industrial maintenance coating, or a label or sticker affixed to the container, or in sales, advertising or technical literature supplied by a manufacturer or a person acting on their behalf, a representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in Table 1, then the most restrictive VOC content limit applies. This provision does not apply to the following coating categories:
 - (1) Lacquer coatings (including lacquer sanding sealers).
 - (2) Metallic pigmented coatings.
 - (3) Shellacs.
 - (4) Fire-retardant coatings.
 - (5) Pretreatment wash primers.
 - (6) Industrial maintenance coatings.
 - (7) Low-solids coatings.
 - (8) Wood preservatives.
 - (9) High-temperature coatings.
 - (10) Temperature-indicator safety coatings.
 - (11) Antenna coatings.
 - (12) Antifouling coatings.
 - (13) Flow coatings.



(14) Bituminous roof primers.

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- (15) Specialty primers, sealers and undercoaters.
- (16) Calcimine recoaters.
- (17) Impacted immersion coatings.
- (18) Nuclear coatings.
- (19) Thermoplastic rubber coatings and mastic.
- (c) Sell-through of architectural or industrial maintenance coatings. An architectural or industrial maintenance coating manufactured prior to January 1, 2005, may be sold, supplied, offered for sale or applied after January 1, 2005, so long as the architectural or industrial maintenance coating complied with the standards in effect at the time the coating was manufactured.
- (d) Thinning. A person may not apply or solicit the application of an architectural and industrial maintenance coating that is thinned to exceed the applicable VOC limit specified in Table 1.
- (e) Rust-preventive coatings. A person may not apply or solicit the application of a rust-preventive coating for industrial use, unless the rust-preventive coating complies with the industrial maintenance coating VOC limit specified in Table 1.
- (f) Coatings not listed in Table 1. For an architectural or industrial maintenance coating that does not meet the definitions for the specialty coatings categories listed in Table 1, the VOC content limit shall be determined by classifying the coating as a flat coating or a nonflat coating, based on its gloss as defined in § 130.602 (relating to definitions), and the corresponding flat or nonflat coating limit applies.
- (g) Lacquers. Notwithstanding the provisions of subsection (a), a person or facility may add up to 10% by volume of VOC to a lacquer to avoid blushing of the finish during days with relative humidity greater than 70% and temperature below 65°F, at the time of application, provided that the coating contains acetone and no more than 550 grams of VOC per liter of coating, less water and exempt compounds, prior to the addition of VOC.
- § 130.604. Container labeling requirements.
- NA NOT A COATING MANUFACTURER
- § 130.605. Reporting requirements.
- NA NOT A COATING MANUFACTURER
- § 130.606 thru 610
- NA NO VARIANCE PRESENTLY APPLIES
- § 130.611. Compliance provisions and test methods.
- (a) Calculation of VOC content. For the purpose of determining compliance with the VOC content limits in § 130.603 Table 1 (relating to VOC content limits for architectural and industrial maintenance coatings), the VOC content of a coating shall be determined by using the procedures described in this subsection or subsection (b), as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured.
- (1) With the exception of low solids coatings, determine the VOC content in grams of VOC per liter of coating thinned to the manufacturer's maximum recommendation, excluding the volume of water and exempt compounds. Determine the VOC content using Equation 1 as follows:

Equation 1:





VOC Content = (Ws - Ww - Wec)/(Vm - Vw - Vec)

Where:

VOC Content = grams of VOC per liter of coating

Ws = weight of volatiles, in grams

Ww = weight of water, in grams

Wec = weight of exempt compounds, in grams

Vm = volume of coating, in liters

Vw = volume of water, in liters

Vec = volume of exempt compounds, in liters

(2) For low solids coatings, determine the VOC content in units of grams of VOC per liter of coating thinned to the manufacturer's maximum recommendation, including the volume of any water and exempt compounds. Determine the VOC content using Equation 2 as follows:

Equation 2:

VOC Content (Is) = (Ws - Ww - Wec)/(Vm)

Where:

VOC Content (Is) = the VOC content of a low solids coating in grams of VOC per liter of coating

Ws = weight of volatiles, in grams

Ww = weight of water, in grams

Wec = weight of exempt compounds, in grams

Vm = volume of coating, in liters

- (b) VOC content of coatings. To determine the physical properties of a coating to perform the calculations in subsection (a), the reference method for VOC content is EPA Reference Method 24, except as provided in subsections (c) and (d). An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91, incorporated by reference in this section. The exempt compounds content shall be determined by SCAQMD Method 303-91, incorporated by reference in subsection (e). To determine the VOC content of a coating, the manufacturer may use EPA Reference Method 24, or an alternative method, as provided in subsection (c), formulation data, or another reasonable means for predicting that the coating has been formulated as intended—for example, quality assurance checks and recordkeeping. If there are inconsistencies between the results of a Reference Method 24 test and another means for determining VOC content, the Reference Method 24 results will govern, except when an alternative method is approved as specified in subsection (c). The Department may require the manufacturer to conduct a Reference Method 24 analysis.
- (c) Alternative test methods. Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with subsection (b) may be used if approved in writing by the Department and the EPA.

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(d) Methacrylate traffic coating markings. Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Reference Method 24 (found at 40 CFR 59, Subpart D, Appendix A), incorporated by reference in subsection (e)(13). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.





- (e) Test methods. The following test methods are incorporated herein by reference and the most up-to-date version of the test method shall be used to test coatings subject to this subchapter:
- (1) Flame spread index. The flame spread index of a fire-retardant coating shall be determined by ASTM E 84-99, "Standard Test Method for Surface Burning Characteristics of Building Materials."
- (2) Fire-resistance rating. The fire-resistance rating of a fire-resistive coating shall be determined by ASTM E 119-98, "Standard Test Methods for Fire Tests of Building Construction Materials."
- (3) Gloss determination. The gloss of a coating shall be determined by ASTM D 523-89, "Standard Test Method for Specular Gloss."
- (4) Metal content of coatings. The metallic content of a coating shall be determined by SCAQMD Method 318-95, "Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction," SCAQMD "Laboratory Methods of Analysis for Enforcement Samples."
- (5) Acid content of coatings. The acid content of a coating shall be determined by ASTM D 1613-96, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and Related Products."
- (6) Drying times. The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D 1640-95, "Standard Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature," (see § 130.602 (relating to definitions) for definitions of "quick-dry enamel" and "quick-dry primer, sealer and undercoater"). The tack-free time of a quick-dry enamel coating shall be determined by the mechanical test method of ASTM D 1640-95.
- (7) Surface chalkiness. The chalkiness of a surface shall be determined using ASTM D 4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films."
- (8) Exempt compounds—siloxanes. Exempt compounds that are cyclic, branched or linear, completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with this section by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," Bay Area Air Quality Management District (BAAQMD) Manual of Procedures, Volume III.
- (9) Exempt compounds—parachlorobenzotrifluoride (PCBTF). The exempt compound parachlorobenzotrifluoride shall be analyzed as an exempt compound for compliance with this section by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent-Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," found in BAAQMD Manual of Procedures, Volume III.
- (10) Exempt compounds. The content of compounds exempt under EPA Method 24 shall be analyzed by SCAQMD Method 303-91, "Determination of Exempt Compounds," found in SCAQMD "Laboratory Methods of Analysis for Enforcement Samples."
- (11) VOC content of coatings. The VOC content of a coating shall be analyzed by EPA Method 24 found in "Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings."
- (12) Alternative VOC content of coatings. The VOC content of coatings may be analyzed by either EPA Reference Method 24 or SCAQMD Method 304-91, "Determination of Volatile Organic Compounds (VOC) in Various Materials," found in "SCAQMD Laboratory Methods of Analysis for Enforcement Samples."
- (13) Methacrylate traffic marking coatings. The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR Part 59, Subpart D, Appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings."
- (14) Radiation resistance. The radiation resistance of a nuclear coating shall be determined by ASTM Method D 4082-89, "Standard Test Method for Effects of Gamma Radiation on Coatings for Use in Light-Water Nuclear Power Plants."
- (15) Chemical resistance. The chemical resistance of nuclear coatings shall be determined by ASTM Method D 3912-80, "Standard Test Method for Chemical Resistance of Coatings Used in Light-Water Nuclear Power Plants."



RUTT QUALITY CABINETRY LLC/NEW HOLLAND



SECTION E. **Source Group Restrictions.**

Group Name: 11

Group Description: Wood Finishing

Sources included in this group

ID	Name
075	RUTT FINISHING BOOTHS (2)
113	ADHESIVES APPLICATION BOOTH

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.

001 [25 Pa. Code §129.101]

General provisions and applicability

- § 129.101. General provisions and applicability.
- (a) Beginning June 10, 2000, this section and § \$ 129.102—129.107 apply to each wood furniture manufacturing facility located in a county included in the northeast ozone transport region or in a county designated as severe, serious, moderate or marginal ozone nonattainment that emits or has the potential to emit 25 tons or more per year of VOCs from wood furniture manufacturing operations.
- (b) [NA SUBJECT TO (c)]
- (c) An existing wood furniture manufacturing facility that increases its actual emissions or potential to emit to 25 tons per year or more of VOCs from wood furniture manufacturing operations shall comply with this section and § § 129.102—129.107 within 1 year after becoming subject to subsection (a), except for those facilities which have RACT determinations approved by the EPA as revisions to the SIP prior to June 10, 2000.
- (d) [NA EXISTING SOURCE]
- (e) The owner or operator of a wood furniture manufacturing facility subject to this section, § § 129.52 and 129.102—129.107 shall comply with the more stringent emissions limitation or applicable requirement for wood furniture manufacturing operations in § 129.52 or this section and § § 129.102—129.107.

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- (f) The VOC standards in § 129.102 Table IV do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:
- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.
- § 129.102. Emission standards.

An owner or operator of a facility subject to this section, § § 129.101 and 129.103—129.107 shall limit VOC emissions from wood furniture manufacturing operations by:

(1) Applying either waterborne topcoats or a combination of sealers and topcoats and strippable spray booth coatings with a VOC content equal to or less than the standards specified in Table IV:

TABLE IV REQUIREMENTS:

Emission Limits of VOC for Wood Furniture Manufacturing Sealers, Topcoats and Strippable Spray Booth Coatings As Applied, in Pounds of VOC Per Pound of Coating Solids (kg VOC/kg of Coating Solids), by Category

- (1) Waterborne Topcoats: 0.8
- (2)(i) High solids coating systems, Sealer: 1.9
- (2)(ii) High solids coating systems, Topcoat: 1.8
- (3)(i)(a) Acid-cured alkyd amino systems, Acid-cured alkyd amino sealer: 2.3
- (3)(i)(b) Acid-cured alkyd amino systems, Acid-cured alkyd amino conversion varnish topcoat: 2.0
- (3)(ii)(a) Acid-cured alkyd amino systems, Other sealer: 1.9
- (3)(ii)(b) Acid-cured alkyd amino systems, Acid-cured alkyd amino conversion varnish topcoat: 2.0
- (3)(iii)(a) Acid-cured alkyd amino systems, Acid-cured alkyd amino sealer: 2.3
- (3)(iii)(b) Acid-cured alkyd amino systems, Other topcoat: 1.8
- (4) Waterborne strippable spray booth coating: 0.8

END OF TABLE IV REQUIREMENTS:

- (2) Using an emissions averaging program which meets the requirements in § 129.107 (relating to special provisions for facilities using an emissions averaging approach).
- (3) [NA ADD-ON CONTROLS NOT USED]
- (4) [NA COMBO METHOD NOT USED]
- § 129.103. Work practice standards.
- (a) Work practice implementation plan. Within 60 days after the compliance date specified in § 129.101(b) or (c) (relating to general provisions and applicability), an owner or operator of a facility subject to the requirements in this section and § §



129.101, 129.102 and 129.104—129.107 shall:

- (1) Prepare and maintain a written work practice implementation plan that defines work practices for each wood furniture manufacturing operation and addresses the provisions in subsections (b)—(j). The owner or operator of the facility shall comply with the work practice implementation plan.
- (2) Make available the written work practice implementation plan for inspection by the Department upon request. If the Department determines that the work practice implementation plan does not adequately address the criteria specified in subsections (b)—(j), the Department may require that the facility owner or operator modify the plan.
- (b) Operator training program. New and existing personnel, including contract personnel, who are involved in coating, cleaning or washoff operations or implementation of the requirements of this section, § § 129.101, 129.102 and 129.104—129.107 shall complete an operator training program.
- (1) For a facility subject to § 129.101(b), new personnel hired after June 10, 2000, shall be trained upon hiring. For a facility subject to the requirements of § 129.101(c), new personnel shall be trained upon hiring.
- (2) For a facility subject to § 129.101(b), existing personnel hired before June 10, 2000, shall be trained by December 11, 2000. For a facility subject to § 129.101(c), existing personnel shall be trained at least 6 months before the compliance date.
- (3) Personnel shall be given refresher training annually.
- (4) A copy of the written operator training program shall be maintained with the work practice implementation plan. The operator training program shall include the following:
- (i) A list of all current personnel by name and job description that are required to be trained.
- (ii) An outline of the subjects to be covered in the initial and annual refresher training sessions for each position or group of personnel.
- (iii) Lesson plans for courses to be given at the initial and annual refresher training sessions that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize coating usage and overspray and appropriate management of cleanup wastes.
- (iv) A description of the methods to be used at the completion of the initial or annual refresher training sessions to demonstrate and document successful completion.
- (v) A record of the date each employe is trained.
- (c) Leak inspection and maintenance plan. An owner or operator of a facility shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan which shall include the following:
- (1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings or solvents.
- (2) An inspection schedule.
- (3) The methods for documenting the date and results of each inspection and any repairs that were made.
- (4) The time frame between identifying a leak and making the repair, which shall adhere to the following schedule:
- (i) A first attempt at repairs, including tightening of packing glands, shall be made within 5 working days after the leak is detected.
- (ii) Final repairs shall be made within 15 working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.



- (d) Cleaning and washoff solvent accounting system. A solvent accounting form shall be developed to account for solvents used in cleaning and washoff operations. The information recorded on the form shall include the following:
- (1) The total number of pieces processed through washoff operations each month and the reason for the washoff operations.
- (2) The name and total quantity of each solvent used each month for:
- (i) Cleaning activities.

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

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- (i) Spray gun cleaning. The solvent used to clean spray guns shall be collected into a normally closed container.
- (j) Washoff operations. The emissions from washoff operations shall be controlled by the following:
- (1) Using normally closed containers for washoff operations.
- (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
- § 129.104. Compliance procedures and monitoring requirements.
- (a) Compliance methods. An owner or operator of a facility subject to the emission standards in § 129.102 (relating to emission standards) shall demonstrate compliance with those provisions by using one or more of the following methods:
- (1) To support that each sealer, topcoat and strippable spray booth coating meets the requirements of § 129.102(1) (relating to emission standards):
- (i) Maintain CPDSs for each of the coatings.
- (ii) Maintain documentation showing the VOC content of the as applied coating in lbs VOC/lb solids, if solvent or other VOC is added to the coating before application.
- (iii) Perform sampling and testing in accordance with the procedures and test methods in Chapter 139 (relating to sampling and testing).
- (2) [NA ADD-ON CONTROLS NOT USED]
- (b) [INITIAL COMPLIANCE IS IN THE PAST]
- (c) Continuous compliance demonstrations. An owner or operator of a facility subject to the requirements of this section and § § 129.101—129.103 and 129.105—129.107 shall submit, in writing, to the Department a compliance certification with the semiannual report required by § 129.106(b).
- (1) Compliant coatings. An owner or operator of a facility subject to § 129.102 that is complying through the procedures specified in subsection (a)(1) shall demonstrate continuous compliance by the following:
- (i) Using compliant coatings.
- (ii) Maintaining records that demonstrate the coatings are compliant.
- (iii) Submitting a compliance certification which states that compliant sealers, topcoats, or both, and strippable spray booth coatings have been used each day in the semiannual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.
- (2) [NA NO CONTINUOUS COATERS]
- (3) [NA ADD-ON CONTROLS NOT USED]
- (4) Work practice implementation plan. An owner or operator of a facility subject to the work practice standards of § 129.103 shall demonstrate continuous compliance by following the work practice implementation plan and submitting a compliance certification which states that the work practice implementation plan is being followed, or should otherwise identify the periods of noncompliance with the work practice standards and the reasons for noncompliance.
- (d) Compliance certification requirements. The compliance certification shall be signed by a responsible official of the company that owns or operates the facility. In addition to the certification requirements of this section, the certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.





- § 129.105. Recordkeeping requirements.
- (a) Requirement. The owner or operator of a wood furniture manufacturing operation shall keep records to demonstrate compliance with this section and § § 129.101—129.104, 129.106 and 129.107. The records shall be maintained for at least 5 years.
- (b) Compliant coatings. The following records shall be maintained to demonstrate compliance with § 129.102 (relating to emission standards).
- (1) A certified product data sheet for each coating and strippable spray booth coating subject to the emission limits of § 129.102.
- (2) The VOC content as applied, lbs VOC/lb solids (kg VOC/kg solids), of each coating and strippable spray booth coating subject to the emission limits of § 129.102, and copies of data sheets documenting how the as applied values were determined.
- (c) [NA NO CONTINUOUS COATERS]
- (d) [NA ADD-ON CONTROLS NOT USED]
- (e) Work practice implementation plan. The owner or operator of a facility subject to the work practice standards of § 129.103 (relating to work practice standards) shall maintain onsite copies of the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including:
- (1) Records demonstrating that the operator training program is in place.
- (2) Records maintained in accordance with the leak inspection and maintenance plan.
- (3) Records associated with the cleaning and washoff solvent accounting system.
- (4) Records associated with the limitation on the use of conventional air spray guns showing total coating usage and the percentage of coatings applied with conventional air spray guns for each semiannual reporting period.
- (5) Records showing the VOC content of compounds used for cleaning booth components, except for solvent used to clean conveyors, continuous coaters and their enclosures or metal filters.
- (6) Copies of logs and other documentation developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (f) In addition to the recordkeeping requirements of subsection (a), the owner or operator of a facility that complies with § 129.103 or § 129.104(a)(1) shall maintain a copy of the compliance certifications submitted in accordance with § 129.106(b) (relating to reporting requirements) for each semiannual period following the compliance date.
- (g) The owner or operator of a facility shall maintain a copy of the other information submitted with the initial status report required by § 129.106(a) and the semiannual reports required by § 129.106(b).
- § 129.106. Reporting requirements.
- (a) [INITIAL COMPLIANCE IS IN THE PAST]
- (b) Semiannual compliance report dates. When demonstrating compliance in accordance with § 129.104(a)(1) or (2), a semiannual report covering the previous 6 months of wood furniture manufacturing operations shall be submitted to the Department according to the following schedule:
- (1) [INITIAL COMPLIANCE IS IN THE PAST]

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- (2) Subsequent reports shall be submitted within 30 calendar days after the end of each 6-month period following the first report.
- (3) Each semiannual report shall include the information required by § 129.104(c) and (d), a statement of whether the facility was in compliance or noncompliance and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.
- § 129.107. Special provisions for facilities using an emissions averaging approach.
- (a) Emissions averaging approach. An owner or operator of a facility subject to the emission limitations in § 129.102 (relating to emission standards) may use an emissions averaging approach which meets the equivalency requirements in § 129.51(a) (relating to general) to achieve compliance with § 129.52 (relating to surface coating processes) or this section and § § 129.101—129.106.
- (b) Additional requirement. When complying with the requirements of § 129.52 or this section and § § 129.101—129.106 through emissions averaging, an additional 10% reduction in emissions shall be achieved when compared to a facility using a compliant coatings approach to meet the requirements of this section and § § 129.101—129.106.
- (c) Program goals and rationale. When using an emissions averaging program, the following shall be submitted to the Department in writing:
- (1) A summary of the reasons why the facility would like to comply with the emission limitations through an equivalency determination using emissions averaging procedures.
 - (2) A summary of how averaging can be used to meet the emission limitations.
- (d) Program scope. A description of the types of coatings that will be included in the facility's emissions averaging program shall also be submitted to the Department in writing:
 - (1) Stains, basecoats, washcoats, sealers and topcoats may all be used in the emissions averaging program.
- (2) The owner or operator of the facility may choose other coatings for its emissions averaging program, if the program meets the equivalency requirements in § 129.51(a).
- (3) Coatings that are applied using continuous coaters may only be used in an emissions averaging program if the owner or operator of the facility can determine the amount of coating used each day.
 - (4) A daily averaging period shall be used, except under the following conditions:
- (i) A longer averaging period may be used if the owner or operator of the facility demonstrates in writing to the satisfaction of the Department that the emissions do not fluctuate significantly on a day-to-day basis.
- (ii) The owner or operator of the facility requests in writing and the Department approves in writing the longer averaging period.
- (e) Program baseline. The baseline for each coating included in the emissions averaging program shall be the lower of the actual or allowable emission rate as of June 10, 2000. The facility baseline emission rate may not be higher than what was presumed in the 1990 emissions inventory for the facility unless the Department has accounted for the increase in emissions as growth.
- (f) Quantification procedures. The emissions averaging program shall specify methods and procedures for quantifying emissions. Quantification procedures for VOC content are included in Chapter 139 (relating to sampling and testing). The quantification procedures shall also include methods to determine the usage of each coating and shall be accurate enough to ensure that the facility's actual emissions are less than the allowable emissions.
- (g) Monitoring, recordkeeping and reporting. A written summary of the monitoring, recordkeeping and reporting procedures



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that will be used to demonstrate compliance on a daily basis, when using an emissions averaging approach, shall be submitted to the Department.

- (1) The monitoring, recordkeeping and reporting procedures shall be structured so that inspectors and facility owners or operators can determine a facility's compliance status for any day.
- (2) The monitoring, recordkeeping and reporting procedures shall include methods for determining required data when monitoring, recordkeeping and reporting violations result in missing, inadequate or erroneous monitoring and recordkeeping.

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SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

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SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

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SECTION H. Miscellaneous.

This minor permit modification supersedes operating permit 36-05166 issued November 24, 2020 and amended August 30, 2023.

The capacities/throughputs listed in Section A are for informational use only and should not be used as enforceable limitations.

The following equipment and activities are not subject to any other specific work practices, testing, monitoring, record keeping, or reporting requirements:

One Weil McClain 1.7 MMBtu/hr natural gas-fired boiler. It is exempt from 40 CFR Part 63 Subpart JJJJJJ.

The facility receives various hardware, lumber, fabricated wood components and sheet goods such as plywood and particleboard. They produce cabinetry built to customer specifications. Production processes include wood fabrication, painting and assembly.

Source 075 is two spray paint booths (075B and 075D) exhausting through air filters (C075B and C075D) to atmosphere (S075B and S075D). Restrictions on Source 075 apply to Sources 075B and 075D.

Source 111 is air picked up from Woodworking Area #1 and blown through Baghouse C111 before exhausting to atmosphere (S111).

Source 112 is air picked up from Woodworking Area #2. Air from Area #2, Source 112, is blown through Baghouse C112 before exhausting to atmosphere S112. Baghouse C112 was installed in keeping with an RFD approved July 17, 2003.

Source 113 is an adhesives application booth exhausting to atmosphere (S113).

Source 201 is exhaust to atmosphere (S201) from the room where solvents, adhesives and paints are stored.

Source 202 represents the maintenance coatings.

For clarity, here is a list of sources, their control devices and their stacks:

ID#	SOURCE DESCRIPTION	CONTROL	CONTROL DESCRIPTION	STACK
075B	Rutt Finishing Line Booth B	C075B	Air Filter	S075B
075D	Rutt Finishing Line Booth D	C075D	Air Filter	S075D
111	Woodworking Area #1	C111	Baghouse	S111
112	Woodworking Area #2	C112	Baghouse	S112
113	Adhesives Application Booth			S113
201	Clean Up Solvent & Paint Storage			S201
202	Facility Maintenance Coatings			Z202

Note: The Onan, 15 kw, emergency generator is no longer owned by the facility.





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