



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: October 16, 2024

Effective Date: April 17, 2026

Revision Date: February 9, 2026

Expiration Date: November 16, 2026

Revision Type: Extension

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 construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval 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 plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 09-0030B

Federal Tax Id - Plant Code: 25-1808556-2

Owner Information

Name: BRIGHTSMITH LLC

Mailing Address: 120 ENTERPRISE AVE
MORRISVILLE, PA 19067-3703

Plant Information

Plant: BRIGHTSMITH LLC/FALLS TWP

Location: 09 Bucks County 09002 Falls Township

SIC Code: 3479 Manufacturing - Metal Coating And Allied Services

Responsible Official

Name: JIM BUS

Title: PRES

Phone: (610) 395 - 8445 Ext.211

Email: jbus@atas.com

Plan Approval Contact Person

Name: MICK DELORENZO

Title: DIR OF OPS

Phone: (215) 337 - 7115

Email: mdelorenzo@brightsmithcoaters.com

[Signature] _____

JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



[Plan Approval Description](#)

This plan approval is for the replacement of the Prime Oven and Finish Oven Oxidizers.



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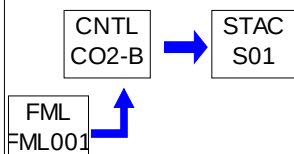
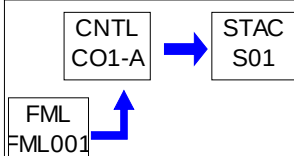
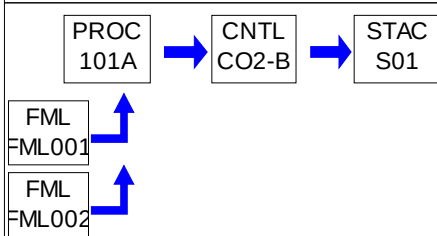
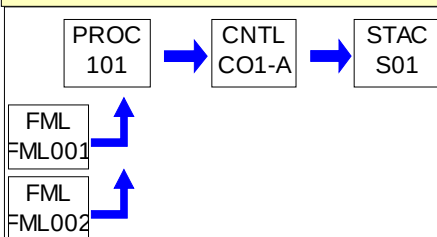
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**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	PAINT BAKE OVEN-PRIME	25.630 MCF/HR 987.000 Gal/HR 1,545.000 Lbs/HR	NATURAL GAS Propane PAINT & SOLVENT
101A	PAINT BAKE OVEN-FINISH	25.630 MCF/HR 987.000 Gal/HR 2,060.000 Lbs/HR	NATURAL GAS Propane PAINT & SOLVENT
CO1-A	PRIME OVEN OXIDIZER	20,000.000 CF/HR	Natural Gas
CO2-B	FINISH OVEN OXIDIZER	20,000.000 CF/HR	Natural Gas
FML001	NATURAL GAS PIPELINE		
FML002	PROPANE TANKS		
S01	OXIDIZER STACK		

PERMIT MAPS

**SECTION B. General Plan Approval Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

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

#002 [25 Pa. Code § 127.12b (a) (b)]**Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]**Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]**Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]**Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.12b]**Plan Approval Terms and Conditions**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

#007 [25 Pa. Code § 127.32]**Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(a)(4) & 35 P.S. § 4008 & § 114 of the CAA]**Inspection and Entry**

(a) 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.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

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

#009 [25 Pa. Code 127.13a]**Plan Approval Changes for Cause**

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

(a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.

(b) 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.

(c) The permittee fails to submit a report required by this plan approval.

(d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

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

#011 [25 Pa. Code § 127.12c]**Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

Regional Air Program Manager

PA Department of Environmental Protection

(At the address given on the plan approval transmittal letter or otherwise notified)

#012 [25 Pa. Code § 127.12(a)(9) & 40 CFR Part 68]**Risk Management**

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:

**SECTION B. General Plan Approval Requirements**

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or the Environmental Protection Agency concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this plan approval condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

#013 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

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

#014 [25 Pa. Code § 127.25]**Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.



SECTION C. Site Level Plan Approval Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

[Additional authority for this permit condition is derived from 40 C.F.R. § 63.5120(a)(1) and 40 C.F.R. § 63.5170 Table 1(3)]

The permittee shall limit organic HAP emissions from the Prime Oven Oxidizer and the Finish Oven Oxidizer to the level no more than two (2) percent of the organic HAP applied for each month during each 12 month compliance period (98% reduction of HAPs).

[Compliance with 98% reduction of HAP's shall be demonstrated through stack testing]

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

[Additional Authority for this permit condition is also derived from 25 Pa. Code 127.512(h), 25 Pa. Code 139.11 and 40 C.F.R. 63.5160(D)(1)(vii)]

(a) The permittee shall perform a stack test using Department-approved procedures within 180 days after startup of the new Prime and Finish Oven Oxidizers. In accordance with 25 Pa. Code § 139.11(1), performance tests shall be conducted while the source is operating at normal operations at the facility. Brightsmith shall test under the following condition:

1. While the Finish Line Oxidizer is operating independently and
2. While the Prime Line Oxidizer and Finish Line Oxidizer are operating simultaneously.

Refer to PADEP Source Testing Program website online for further information related to source testing including Source Testing FAQ and the PADEP Source Testing Manual.

(b) The stack test shall, at a minimum, test for:

- (i) The NO_x emission rate in lb/hr - The NO_x concentrations and emission rate shall be determined in accordance with EPA Method 7E at the combined oxidizer outlet with each oxidizer running simultaneously.
- (ii) Overall destruction efficiency for HAP's (using VOC's as the surrogate) to demonstrate compliance with condition number 001 in Section C of this plan approval, and
- (iii) The capture and destruction efficiency to demonstrate compliance with condition number 004 in Section D, Source ID CO1-A and CO2-B for both the Prime and Finish Oven Oxidizer.

Tests shall be conducted in accordance with the provisions of EPA Method/s or other Department approved methodology and 25 Pa. Code Chapter 139. Tests shall also be conducted in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance.

(c) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(e) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

**SECTION C. Site Level Plan Approval Requirements****# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region
RA-EPSEstacktesting@pa.gov

Central Office
RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.

1. Test Date(s)

- a. For protocols, provide the proposed date on which testing will commence or "TBD"
- b. For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

4. Testing Requirements (all that apply)

- a. Plan approval number(s)
- b. Operating permit number
- c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- d. Special purpose(s) (Consent Order, RFD, RACT, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).



SECTION C. Site Level Plan Approval Requirements

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall ensure that the source(s) and air pollution control device(s), listed in this plan approval, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with the manufacturer's design specifications.

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all of the existing requirements of its current Title V permit, No. 09-00030, unless specifically revised in this plan approval. The provisions in this plan approval shall be construed to supersede any contrary provisions in any previous operating permit.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 101

Source Name: PAINT BAKE OVEN-PRIME

Source Capacity/Throughput:

25.630 MCF/HR

NATURAL GAS

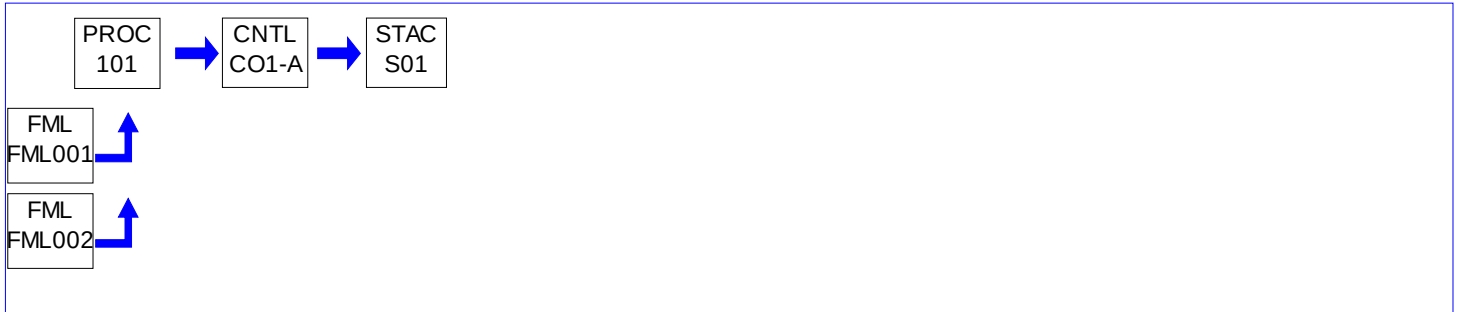
987.000 Gal/HR

Propane

1,545.000 Lbs/HR

PAINT & SOLVENT

Conditions for this source occur in the following groups: GRP1

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall keep records of the amount and type of fuel used monthly and on a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The requirements under this Source ID (101) applies to the following:

- The Prime Coating Line
- The Prime Oven
- The Prime Quench

**SECTION D. Source Level Plan Approval Requirements**

Conditions for this Source ID are located in Section E of the plan approval under Group 1.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 101A

Source Name: PAINT BAKE OVEN-FINISH

Source Capacity/Throughput:

25.630 MCF/HR

NATURAL GAS

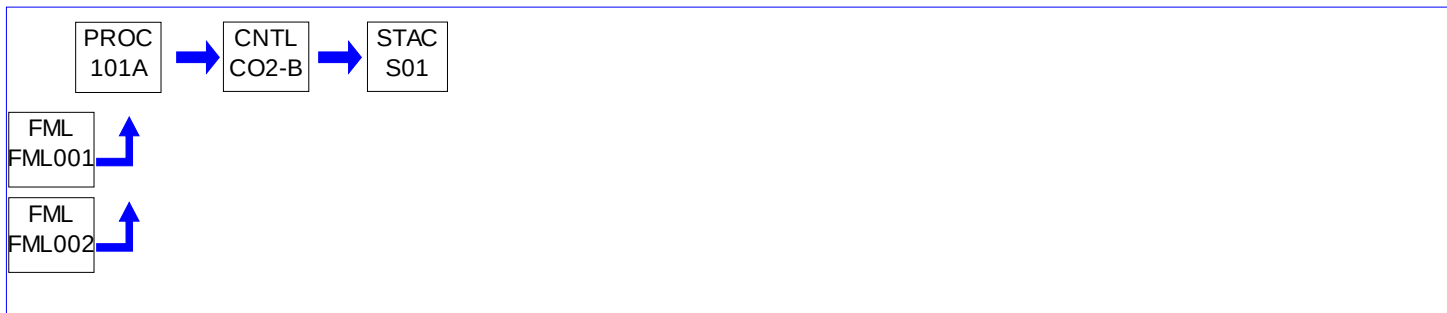
987.000 Gal/HR

Propane

2,060.000 Lbs/HR

PAINT & SOLVENT

Conditions for this source occur in the following groups: GRP1

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall keep records of the amount and type of fuel used monthly and on a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The requirements under this Source ID (101A) applies to the following:

- The Finish coating line
- The Finish oven
- The Finish Quench

**SECTION D. Source Level Plan Approval Requirements**

Conditions for this Source ID are located in Section E of the plan approval under Group 1.

**SECTION D. Source Level Plan Approval Requirements**

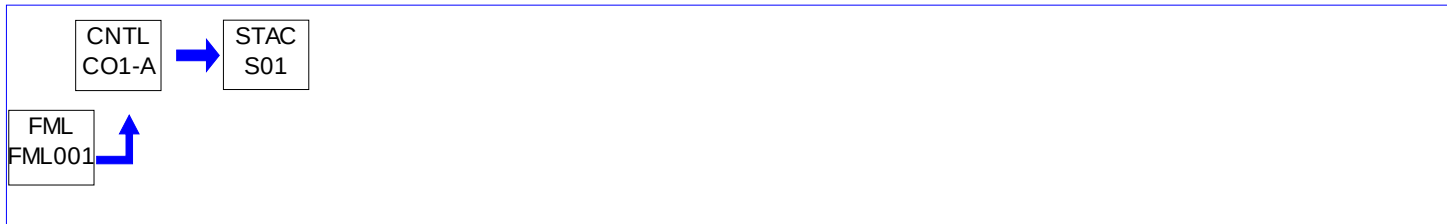
Source ID: CO1-A

Source Name: PRIME OVEN OXIDIZER

Source Capacity/Throughput: 20,000.000 CF/HR

Natural Gas

Conditions for this source occur in the following groups: GRP3
SUBPART SSSS

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a). The permittee shall not start the production on the coil coating lines until the Oxidizer combustion chamber temperatures reaches the minimum operating temperature according to condition 003 for this source.

(b). The minimum combustion chamber temperature for the Oxidizer shall be maintained at 600 °F during cleanup operations.

002 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a). The permittee shall limit the combined NOx emission rate (lb/hr) from the Prime Oven Oxidizer and the Finish Oven Oxidizer during production to less than 10.0 lb/hr.

(b) The permittee shall limit the combined NOx emissions, during production and clean up, in tons per year (tpy) from the Prime Oven Oxidizer and the Finish Oven Oxidizer to less than 28.7 tons per year calculated on a 12-month rolling sum.

[Compliance with this condition, paragraph (a), shall be demonstrated through stack testing]

003 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

[Additional authority for this permit condition is derived from 40 C.F.R. § 63.5150]

(a). The minimum combustion chamber temperature of the oxidizer shall be 1400°F or the average temperature of the latest passing Department approved and accepted stack test (average of the three 1-hour test runs), during coating operations, whichever is greater.

(b). Compliance with (a) shall be determined based on 3-hour block averaging periods starting at midnight.

(c). When calculating the 3-hour block average temperature, the permittee shall not include temperature recordings when no coating is taking place.

Control Device Efficiency Restriction(s).**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

This source shall have a minimum overall control efficiency (capture and destruction) of at least 90% for VOC's, the Prime and Finish Oxidizers combined.

**SECTION D. Source Level Plan Approval Requirements****II. TESTING REQUIREMENTS.**

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

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall continuously monitor the temperature of the combustion chamber for this source while operating.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall monitor the hours of operation of this source on a daily and monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall keep records of the oxidizer temperature during clean-up operations.

008 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall continuously record the temperature of the combustion chamber temperature for this source while operating.

009 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.5190]

To determine compliance with the 3 hour block average temperature limit, the permittee shall average the temperature of the oxidizer during coating operations only and keep records of the 3-hr block averages.

The temperature recorded during times when no coating is taking place, shall not be included in the 3-hour block averages.

010 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall record the date, time, type of coating being applied, and VOC content of the coating if the Oxidizer drops below the minimum operating temperature. The data shall be recorded and made available to the Department upon request.

NOTE: This requirement is intended to ensure that there is sufficient information to calculate actual emissions from the facility and in no way relieves the facility of their responsibility to always operate the oxidizer at the minimum temperature as required elsewhere in this permit.

011 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall keep records of the hours of operation for this Source on a daily basis and compile the total hours on a monthly basis.

V. REPORTING REQUIREMENTS.

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

**SECTION D. Source Level Plan Approval Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.93]

(a) The Prime Oven Oxidizer shall be operated and maintained in accordance with the manufacturer's design specifications and good air pollution control practices.

(b) The Prime Oven Oxidizer shall be equipped with a temperature measuring and recording device which continuously indicates and records the temperature of the combustion chamber.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Plan Approval Requirements**

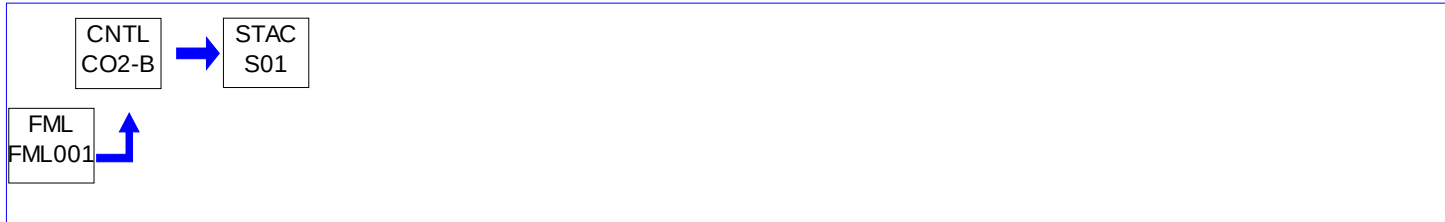
Source ID: CO2-B

Source Name: FINISH OVEN OXIDIZER

Source Capacity/Throughput: 20,000.000 CF/HR

Natural Gas

Conditions for this source occur in the following groups: GRP3
SUBPART SSSS

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Additional authority for this permit condition is derived from 40 C.F.R. § 63.5150]

(a). The minimum combustion chamber temperature of the oxidizer shall be 1400°F or the average temperature of the latest passing Department approved and accepted stack test (average of the three 1-hour test runs), during coating operations, whichever is greater.

(b). Compliance with (a) shall be determined based on 3-hour block averaging periods starting at midnight.

(c). When calculating the 3-hour block average temperature, the permittee shall not include temperature recordings when no coating is taking place.

002 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a). The permittee shall limit the combined NOx emission rate (lb/hr) from the Prime Oven Oxidizer and the Finish Oven Oxidizer during production to less than 10.0 lb/hr.

(b) The permittee shall limit the combined NOx emissions, during production and clean up, in tons per year (tpy) from the Prime Oven Oxidizer and the Finish Oven Oxidizer to less than 28.7 tons per year calculated on a 12-month rolling sum.

[Compliance with this condition, paragraph (a), shall be demonstrated through stack testing]

003 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a). The permittee shall not start the production on the coil coating lines until the Oxidizer combustion chamber temperatures reaches the minimum operating temperature according to condition 001 for this source.

(b). The minimum combustion chamber temperature for the Oxidizer shall be maintained at 600 °F during cleanup operations.

Control Device Efficiency Restriction(s).**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

This source shall have a minimum overall control efficiency (capture and destruction) of at least 90% for VOC's.

**SECTION D. Source Level Plan Approval Requirements****II. TESTING REQUIREMENTS.**

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

III. MONITORING REQUIREMENTS.**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall continuously monitor the temperature of the combustion chamber for this source while operating.

006 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall monitor the following on a daily basis:

- a. The hours of operation of this source when operating simultaneously with Source ID: 101/CO1-A
- b. The hours of operation of this source when operating independently.

IV. RECORDKEEPING REQUIREMENTS.**# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall record the date, time, type of coating being applied, and VOC content of the coating if the Oxidizer drops below the minimum operating temperature. The data shall be recorded and made available to the Department upon request.

NOTE: This requirement is intended to ensure that there is sufficient information to calculate actual emissions from the facility and in no way relieves the facility of their responsibility to always operate the oxidizer at the minimum temperature as required elsewhere in this permit.

008 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

[Additional authority for this permit condition is also derived from 40 C.F.R. § 63.5190]

To determine compliance with the 3 hour block average temperature limit, the permittee shall average the temperature of the oxidizer during coating operations only and keep records of the 3-hr block averages

The temperature recorded during times when no coating is taking place, shall not be included in the 3-hour block averages.

009 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall keep records of the oxidizer temperature during clean-up operations.

010 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall continuously record the temperature of the combustion chamber temperature for this source while operating.

011 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall keep records of the following on a daily basis and compile the total hours on a monthly basis:

- a. The hours of operation of this source when operating simultaneously with Source ID: 101/CO1-A
- b. The hours of operation of this source when operating independently.

**SECTION D. Source Level Plan Approval Requirements****V. REPORTING REQUIREMENTS.**

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

VI. WORK PRACTICE REQUIREMENTS.

012 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code §129.93]

(a) The Finish Oven oxidizer shall be operated and maintained in accordance with the manufacturer's design specifications and good air pollution control practices.

(b) The Finish Oven oxidizer shall be equipped with a temperature measuring and recording device which continuously indicates and records the temperature of the combustion chamber.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**SECTION E. Source Group Plan Approval Restrictions.**

Group Name: GRP1

Group Description: Paint Bake Ovens

Sources included in this group

ID	Name
101	PAINT BAKE OVEN-PRIME
101A	PAINT BAKE OVEN-FINISH

I. RESTRICTIONS.**Operation Hours Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

1. The Finish Oven Thermal oxidizer (CO2-B) is to operate at all times when coating is being applied at source 101A Paint Bake Oven-Finish.
2. The Prime Oven Thermal oxidizer (CO1-A) and Finish Oven Thermal oxidizer (CO2-B) are to operate at all times when coatings are being applied at source 101 Paint Bake Oven-Prime and source 101A Paint Bake Oven-Finish.

Throughput Restriction(s).**# 002 [25 Pa. Code §129.52]****Surface coating processes**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.512(h)]

The permittee shall ensure that:

The water-based coatings as applied, shall not contain a VOC content in excess of 2.6 pounds per gallon of coating minus water or 4.02 lbs VOC per gal coating solids (0.48 kg per liter coating solids) when operating.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.**# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall monitor and calculate the following for each line (Paint Bake Oven Prime Line and the Paint Bake Oven Finish Line):

- (1) The amount of coatings as applied (in gallons) on a daily basis
- (2) The VOC content of each coating as applied on a daily basis (may be demonstrated by certified product data sheets)
- (3) The VOC emissions for each line (Paint Bake Oven Prime and Paint Bake Oven Finish) monthly and on a 12-month rolling sum using the data collected in paragraphs (1) and (2) above and the overall control efficiency from the respective oxidizer.

(The permittee shall use the Finish Oxidizer control efficiency when the finish line is operating independently from the Prime Oxidizer, when both oxidizers are operating the permittee shall use the combined control efficiency) The control efficiency will be determined from the most recent stack test.

- (4) The VOC content from the amount of cleanup solvent used, the amount of clean up solvent waste shipped out and the date of the shipment, monthly.

[Compliance with this condition assures compliance with 25 Pa. Code 129.52(c) and 40 C.F.R. 63.5120(a)(1)]

**SECTION E. Source Group Plan Approval Restrictions.****# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

1. The permittee shall monitor, using a Department approved method, the amount and type of fuel used for the paint bake oven prime and paint bake oven finish line monthly and on a 12-month rolling sum.
2. The permittee shall calculate the NOx emissions from the paint bake oven prime and paint bake oven finish line monthly and on a 12-month rolling sum.

IV. RECORDKEEPING REQUIREMENTS.**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall keep records of the VOC emission calculations for each operating line (Paint Bake Oven Prime and Paint Bake Oven Finish), monthly and on a 12-month rolling sum.

006 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall keep records of the following:

1. The amount and type of fuel used for the paint bake oven prime and paint bake oven finish line monthly and on a 12-month rolling sum.
2. The NOx emissions from the paint bake oven prime and paint bake oven finish line monthly and on a 12-month rolling sum.

007 [25 Pa. Code §129.52]**Surface coating processes**

[Additional Authority for this permit condition is also derived from 25 Pa. Code § 129.52(c)(1-3) and 25 Pa. Code § 129.95]

(a) For each Line, (Paint Bake Oven Prime and Paint Bake Oven Finish) the permittee shall maintain records to demonstrate compliance with 25 Pa. Code § 129.52. The permittee shall maintain daily records of:

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

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

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

(3) The VOC content of each as applied coating in pounds per gallon of coating minus water or pounds of VOC per gallon coating solids.

(b) The permittee shall maintain monthly records of the amount of cleanup solvent used, the amount of solvent waste shipped out and the date of the shipment.

**SECTION E. Source Group Plan Approval Restrictions.****V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION E. Source Group Plan Approval Restrictions.**

Group Name: GRP3

Group Description: Oxidizers

Sources included in this group

ID	Name
CO1-APRIME OVEN OXIDIZER	
CO2-B FINISH OVEN OXIDIZER	

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.**# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a). The permittee shall monitor the fuel usage monthly.

(b). The permittee shall calculate the NO_x emissions (tpy) monthly and on a 12-month rolling sum using the calculated emission factor from the most recently passed Department approved and accepted stack test.

IV. RECORDKEEPING REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a). The permittee shall keep records of the NO_x emissions (tpy) monthly and on a 12-month rolling sum.

(b). The permittee shall keep records of the fuel usage on a monthly basis.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION E. Source Group Plan Approval Restrictions.**

Group Name: SUBPART SSSS

Group Description: monitoring plan and 3 month testing

Sources included in this group

ID	Name
CO1-APRIME OVEN OXIDIZER	
CO2-B FINISH OVEN OXIDIZER	

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.**# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Additional Authority for this permit condition is also derived from 40 C.F.R. § 63.5150]

The permittee shall maintain and keep on site, a capture system monitoring plan containing the information specified in paragraphs (i) and (ii) of this condition. The permittee shall make the monitoring plan available for inspection by the permitting authority upon request.

(i) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.

(ii) The plan also must specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in 40 C.F.R. § 63.5120. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.

(iii) The permittee must conduct monitoring in accordance with the plan.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.5150(a)(4)]

IV. RECORDKEEPING REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Additional Authority for this permit condition is also derived from 40 C.F.R. § 63.5150]

The permittee shall keep records of when the calibration of the chart recorder, data logger, or temperature indicator was verified, every 3 months; or when the chart recorder, data logger, or temperature indicator was replaced.

003 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall keep on site a copy of the capture system monitoring plan as required by 40 C.F.R. § 63.5150.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

**SECTION E. Source Group Plan Approval Restrictions.**

[Additional Authority for this permit condition is also derived from 40 C.F.R. § 63.5150]

(a). The permittee shall Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced.

(b). The permittee shall replace the equipment either if you choose not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 °Celsius, whichever is greater.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.5150(a)(3)]

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.



SECTION H. Miscellaneous.



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