

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

TITLE V/STATE OPERATING PERMIT

ISSUE DATE: June 1, 2000

EFFECTIVE DATE: July 1, 2000

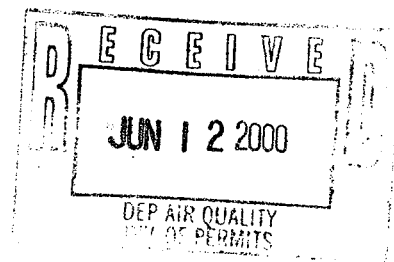
EXPIRATION DATE: June 30, 2005

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 the site inventory list. 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 as "State-Only" requirements.

TITLE V PERMIT NO: 46-00089
TAX-ID/PLANT CODE 23-1612277/01

OWNER SPRA FIN INC
MAILING 177 WISSAHICKON AVE
ADDRESS NORTH WALES, PA. 19454



PLANT NORTH WALES
LOCATION 46 Montgomery County 46953 Upper Gwynedd Twp
SIC CODE 3479 Manufacturing - Metal Coating And Allied Services

RESPONSIBLE OFFICIAL
NAME MIKE HELMERS
TITLE PRESIDENT

PERMIT CONTACT PERSON
NAME MIKE HELMERS
TITLE PRESIDENT
PHONE (215)541-4488

[SIGNATURE] *Francine Carlini*
FRANCINE CARLINI, SOUTHEAST REGION AIR PROGRAM MANAGER

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

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SECTION A. Site Inventory List**05/23/00 PAGE: 5****46-00089**

ID	Source Name	Capacity	Fuel/Material
101	MAIN LINE	100.0 Lbs/HR	POWDER COATINGS
102	SPINDLE LINE	100.0 Lbs/HR	LIQUID COATINGS
S01			
S02			
S10			

```
Proc    EP
101  -->S01
      |
      EP
      -->S10
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Proc    EP
102  -->S02
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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 25 Pa. Code § 121.1.

#002 [25 Pa. Code §127.512(c)(4)]
Property Rights

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

#003 [25 Pa. Code §127.446(a) and (c)]
Permit Expiration

This permit is issued for a fixed term of 5 years from the effective date shown on page 2 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#004 [25 Pa. Code §§127.412, 127.413, 127.414, 127.446(e) & 127.503]
Permit Renewal

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least 6 months, and not more than 18 months, before the expiration date of this permit. The permittee shall submit a timely and complete application to the Department's Regional Air Program Manager. The renewal application is timely if a complete application is submitted to the Department within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.

(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#005 [25 Pa. Code §§127.450(a)(4) & 127.464(a)]
Transfer of Ownership or Operational Control

(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:

(1) The Department determines that no other change in the permit is necessary;

(2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and

(3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.

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

#006 [25 Pa. Code §127.513, 35 P.S. §4008 and §114 of the CAA]
Inspection and Entry

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

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

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

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

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

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder.

(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 §§127.25, 127.444, & 127.512(c)(1)]
Compliance Requirements

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

(1) Enforcement action

(2) Permit termination, revocation and reissuance or modification

(3) Denial of a permit renewal application

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

Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit. 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 §127.512(c)(2)]
Need to Halt or Reduce Activity Not a Defense

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

#009 [25 Pa. Code §§127.411(d) & 127.512(c)(5)]
Duty to Provide Information

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#010 [25 Pa. Code §§127.463, 127.512(c)(3) & 127.542]
Reopening and Revising the Title V Permit for Cause

(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of 3 or more years prior to the expiration date of this permit. The permit revision shall be completed within 18 months after promulgation of the applicable requirement. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#011 [25 Pa. Code §127.543]
Reopening a Title V Permit for Cause by EPA

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

#012 [25 Pa. Code §127.541]
Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541.

#013 [25 Pa. Code §§121.1 & 127.462]
Minor Operating Permit Modifications

(a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(b) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to an operational flexibility change authorized by 25 Pa. Code § 127.462.

#014 [25 Pa. Code §127.450]
Administrative Operating Permit Modifications

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations thereunder from being processed as an administrative amendment.

(b) Upon taking final action granting a request for an administrative permit amendment in accordance with § 127.450(c), the Department will allow coverage under 25 Pa. Code § 127.516 (relating to permit shield) for administrative permit amendments which meet the relevant requirements of 25 Pa. Code Article III, unless precluded by the Clean Air Act or the regulations thereunder.

#015 [25 Pa. Code §127.512(b)]
Severability Clause

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

#016 [25 Pa. Code §§127.704, 127.705 & 127.707]
Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).
- (b) **Emission Fees.** The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) **Late Payment.** Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.
- (f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

#017 [25 Pa. Code §§127.14(b) & 127.449]
Authorization for De Minimis Emission Increases

- (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with 7 days prior written notice before commencing any de minimis emissions increase

that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

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

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

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

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

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

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

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

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

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

(c) The permittee is authorized to install the following minor sources without the need for a plan approval:

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

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

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

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

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

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

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

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

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

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.

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

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

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

#018 [25 Pa. Code §§127.11a & 127.215]
Reactivation of Sources

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

(b) Pursuant to 25 Pa. Code § 127.11a(b), a source which has been out of operation or production for more than five years but less than ten years may be reactivated if the conditions of (b)(1) and (b)(2) are satisfied.

#019 [25 Pa. Code §§121.9 & 127.216]
Circumvention

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

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

technique may be used for control of malodors.

#020 [25 Pa. Code §§127.402(d) & 127.513(1)]
Submissions

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

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

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

Enforcement Programs Section (3AT13)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d).

(d) Unless otherwise required by the Clean Air Act or regulations adopted thereunder, a responsible official of the facility shall certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

#021 [25 Pa. Code §127.441(c) & Chapter 139; §§114(a)(3), 504(b) of the CAA]
Sampling, Testing and Monitoring Procedures

(a) The permittee shall perform all applicable emissions monitoring and analysis procedures or test methods, including procedures and methods under Sections 114(a)(3) or 504(b) of the Clean Air Act.

(b) 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 monitoring requirements of 40 CFR Part 64, if applicable.

(c) 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.

#022 [25 Pa. Code §§127.511 & Chapter 135]
Recordkeeping Requirements

(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 the required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#023 [25 Pa. Code §§ 127.411(d), 127.442 & 127.511(c)]
Reporting Requirements

- (a) The permittee shall comply with the applicable reporting requirements of this Title V permit including Sections C and D, the Clean Air Act and the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) Pursuant to 25 Pa. Code § 127.511(c), the reporting requirements for the Title V facility shall include the following:
- (1) Submittal of reports of required monitoring at least every six months. The reports shall include instances of deviations (as defined in 25 Pa. Code §121.1) from the requirements of this Title V permit.
- (2) The permittee shall report deviations (as defined in 25 Pa. Code § 121.1) from permit requirements within the timeframes specified in this permit. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventive measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source.
- (c) 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.
- (d) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Condition #020 (relating to submissions) of this permit.
- (e) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act consistent with Sections 112(d) and 114(c) of the Clean Air Act, or 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#024 [25 Pa. Code §127.513]
Compliance Certification

- (a) Within one year from the date of issuance of the Title V permit and each year thereafter, the permittee shall submit to the Department and

EPA Region III a certification of compliance with the terms and conditions in this permit including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
 - (2) A description of the means used to monitor compliance with the emission limitations, standards and work practices, consistent with 25 Pa. Code Article III.
 - (3) The compliance status.
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period.
 - (5) Whether compliance was continuous or intermittent.
 - (6) Other facts the Department may require to determine the compliance status of a source.
- (b) The compliance certification shall be submitted to the Department and EPA in accordance with the submission requirements specified in permit condition #020 of this section.

#025 [25 Pa. Code §127.3]
Operational Flexibility

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

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

(6) Section 127.462 (relating to minor operating permit amendments)

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

(b) Unless precluded by the Clean Air Act or the regulations adopted thereunder, the permit shield authorized under 25 Pa. Code § 127.516 shall extend to operational flexibility changes made at this Title V facility pursuant to this permit condition and other applicable operational flexibility terms and conditions of this permit.

#026 [25 Pa. Code §§127.441(d), 127.512(i) and 40 CFR Part 68]
Risk Management

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

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

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

(i) June 21, 1999;

(ii) Three years after the date on which a regulated substance is first listed under § 68.130; or

(iii) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

checklist addressing the required elements of a complete RMP.

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

(d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

(1) Submit a compliance schedule for satisfying the requirements 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or

(2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

(e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five years in accordance with 40 CFR § 68.200.

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

(1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #24 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#027 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

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

#028 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]
Permit Shield

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code §121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department on minor or significant permit modifications, and operational flexibility changes shall be covered by the permit shield. Upon taking final action granting a request for an administrative permit amendment, the Department will allow coverage of the amendment by the permit shield in § 127.516 for administrative amendments which meet the relevant requirements of 25 Pa. Code Article III.

(d) The permit shield authorized under § 127.516 is in effect for the permit terms and conditions in this Title V permit, including administrative operating permit amendments and minor operating permit modifications.

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §121.7]

Prohibition of air pollution.

The permittee may not permit the presence in the outdoor atmosphere of any form of contaminant, including, but not limited to, the discharging from stacks, chimneys, openings, buildings, structures, open fires, vehicles, processes or any other source of any smoke, soot, fly ash, dust, cinders, dirt, noxious or obnoxious acids, fumes, oxides, gases, vapors, odors, toxic, hazardous or radioactive substances, waste or other matter in a place, manner or concentration inimical or which may be inimical to public health, safety or welfare or which is or may be injurious to human, plant or animal life or to property or which unreasonably interferes with the comfortable enjoyment of life or property.

#002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee may not permit the emission into the outdoor atmosphere of a 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 (see 25 PA Code Section 129.14).
- (g) Sources and classes of sources other than those identified in (a) - (f) above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1 (b), that fugitive emissions from the source, after appropriate control, meet the following requirements:

- (1) The emissions are of minor significance with respect to causing air pollution; and

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

#003 [25 Pa. Code §123.2]

Fugitive particulate matter

The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Condition #002, of this Section, if such emissions are visible at the point the emissions pass outside the property on which the source(s) is being operated.

#004 [25 Pa. Code §123.31]

Limitations

[Malodor Emissions]

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

#005 [25 Pa. Code §123.41]

Limitations

[Visible Emissions]

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

(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.

#006 [25 Pa. Code §123.42]

Exceptions

[Visible Emissions]

The limitations of Condition #005, of this Section, shall not apply to a visible emission in any of the following instances:

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

(b) When the emission results from sources specified in Condition #002 of this Section.

#007 [25 Pa. Code §129.14]

Open burning operations

The permittee may not permit the open burning of material except when the open burning operations result from:

(a) 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.

(b) A fire set for the purposes of instructing personnel in fire fighting, when approved by the Department.

(c) A fire set for the prevention and control of disease or pests, when approved by the Department.

II. TESTING REQUIREMENTS.

#008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 127.512]

(a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A of this Permit may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.

#009 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions, pursuant to Condition #005 of this Section, 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 qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

#010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 127.511, 123.1, 123.2, 123.31]

(a) The permittee shall monitor, at a minimum, once per shift, the facility for the following:

- (1) Malodors.
- (2) Visible emissions (from stacks).
- (3) Fugitive emissions.

(b) All detected emissions from stacks that exceed the opacity limitations of condition #005 of this section, and/or malodors and fugitive emissions that originated on site, shall:

- (1) Be investigated as soon as possible.
- (2) Be reported to the plant manager.
- (3) Have appropriate corrective action taken.
- (4) Be recorded in a permanently bound log book.

IV. RECORDKEEPING REQUIREMENTS.

#011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) Records of the monitoring data and supporting information required by this Permit shall be maintained for a minimum of five (5) years.

(b) Within 30 days of Permit issuance the permittee shall submit, to the Department for approval, the formats that records required in subparagraph (a) above are to be kept in.

#012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall record, at a minimum, the following information relating to reports of malodors, fugitive particulate emission not authorized by Condition #002 of this Section and/or exceedances of the visible emissions standard from any sources listed in Section A of this Permit:

- (a) Date, time, place of incident(s).
- (b) Results of the investigation.
- (c) Any corrective action taken.

V. REPORTING REQUIREMENTS.

#013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The permittee shall notify the Department by telephone at (610) 832-6241, within two (2) hours of occurrence of any malfunction(s), of the source(s), listed in Section A of this Permit, or associated air cleaning device(s) which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this Permit or in 25 Pa. Code Article III.

(b) Malfunction(s) which occur(s) at this Title V facility, and pose(s) an imminent danger to public health, safety, welfare and the environment, and would violate Permit conditions if the source continued to operate after the malfunction(s), shall immediately be reported to the Department by telephone at the above number.

(c) A written report describing the malfunction(s) shall be submitted to the Department within two (2) working days following the notification by telephone required under subsections (a) and (b) above. This report shall describe, at a minimum, the malfunction(s), the emission(s), the

duration, and the corrective action(s) taken.

#014 [25 Pa. Code §127.513]

Compliance certification.

The permittee shall annually, on or before the last day of the month preceding the anniversary of the permit issue date, certify compliance with all terms and conditions contained in the permit using forms provided by the Department, as per 25 PA Code Section 127.513(5).

#015 [25 Pa. Code §135.3]

Reporting

The permittee shall submit, by March 1 of each year, an Air Information Management System (AIMS) inventory report for the preceding calendar year.

#016 [25 Pa. Code §135.21]

Emission statements

The permittee shall submit, by March 1 of each year, an annual emission statement for the preceding calendar year. Additionally, a description of the method used to calculate the emissions shall be included. The statement shall contain a certification by a company officer or the plant manager that the information contained in the statement is true and accurate.

VI. WORK PRACTICE STANDARDS.

#017 [25 Pa. Code §121.7]

Prohibition of air pollution.

The permittee shall make every reasonable attempt to operate the facility in a manner that avoids the creation of air pollution.

#018 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in condition #002 of this section shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (a) Use, where possible, of water or suitable chemicals, as approved by the Department, 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, water, or suitable chemicals, as approved by the Department, 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 §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 127.512].

(a) The permittee may not modify any source identified in Section A, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition #017(g), of Section B, of this permit.

(b) If an unauthorized modification of any source occurs at this facility, then this permit shall be suspended and the source(s) shall not be operated until authorized by the Department.

#020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 127.512].

The permittee shall ensure that the air cleaning devices and sources, listed in Section A, of this Permit, are operated and maintained in a manner consistent with good operating and maintenance practices to control and minimize malodor, fugitive particulate emissions and visible emissions.

#021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this Permit condition is also derived from 25 Pa. Code § 127.512].

The permittee shall immediately upon discovery implement measures, including the installation of air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A of this Permit is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to, 25 Pa. Code Article III or any other applicable rule promulgated under the Clean Air Act as stated in this Permit.

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit on or before 06/01/2001 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and annually thereafter.

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

***** PERMIT SHIELD IN EFFECT. *****

Source ID: 101

Source Name: MAIN LINE

SOURCE CAPACITY:

100.0 Lbs/HR POWDER COATINGS

Proc EP
101 -->S01
 |
 EP
 -->S10

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §129.52]

Surface coating processes

{Liquid Coatings}

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from this source, unless the weight of VOCs per gallon of coating (minus water) is equal to or less than the level specified below after adjustment to a standard solvent density of 7.36 pounds per gallon and to a solids basis.

Surface Coating Process	pounds per gallon
Air-Dried Coatings	3.50
Extreme Performance Coatings	3.50
All Other Coatings	3.00

#002 ELECTIVE RESTRICTION

The permittee shall ensure that volatile organic compound (VOC) emissions from this source (including hazardous air pollutants - HAPs) do not exceed 10 tons in any consecutive 12-month period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor parameters of this source on a daily basis to determine the emissions of Volatile Organic Compounds (VOCs) including hazardous air pollutants (HAPs). The parameters shall include, but not be limited to, the quantity of coatings used, the VOC content of the coatings, and the quantity of solvents used.

IV. RECORDKEEPING REQUIREMENTS.

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain daily records of the gallons of coating used, the coating density before and after addition of diluents, the gallons of diluents used and the density of the diluents, the gallons of water contained in the coating and the weight percent of the organic volatiles in the coating.

(b) The permittee shall maintain records that document the weight percent of the organic volatiles of all coatings used. Certification from the manufacturer shall be sufficient to demonstrate compliance with this condition.

(c) The permittee shall maintain all records for 5 years.

#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Powder Coatings]

(a) The permittee shall maintain daily records of the quantity of coatings used and the VOC content of the coatings.

(b) The permittee shall maintain these records for 5 years.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE STANDARDS.

#006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the water curtain whenever this source is in operation.

VII. ADDITIONAL REQUIREMENTS.

#007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This process consists of a cleaning oven, drying oven, 2-Water Fall Type Spray Booths and a drying oven. The drying ovens are fired on natural gas and are listed under Section H - Miscellaneous.

***** PERMIT SHIELD IN EFFECT. *****

Source ID: 102
Source Name: SPINDLE LINE

SOURCE CAPACITY: 100.0 Lbs/HR LIQUID COATINGS

Proc EP
102 -->S02

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §129.52]

Surface coating processes

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from this source, unless the weight of VOCs per gallon of coating (minus water) is equal to or less than the levels specified below after adjustment to a standard solvent density of 7.36 pounds per gallon and to a solids basis.

Surface Coating Process	pounds per gallon
Air-Dried Coatings	3.50
Extreme Performance Coatings	3.50
All Other Coatings	3.00

#002 ELECTIVE RESTRICTION

The permittee shall not emit in excess of 10 tons of volatile organic compounds (VOCs) including hazardous air pollutants (HAPs) from this source in any consecutive 12-month period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor parameters of this source on a daily basis to determine the emissions of VOCs and HAPs. These parameters shall include, but not be limited to, the quantity of coatings used, the VOC

content of the coatings, and the quantity of any solvents used.

IV. RECORDKEEPING REQUIREMENTS.

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain daily records of the gallons of coatings used, the coating density before and after addition of diluents, the gallons of diluents used and the density of the diluents, the gallons of water contained in the coating and the weight percent of the organic volatiles in the coating.

(b) The permittee shall maintain records that can document the weight percent of the organic volatiles of all coatings used. Certification of VOC content by the manufacturer shall be sufficient to demonstrate compliance with this condition.

(c) The permittee shall maintain these records for a period of 5 years.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE STANDARDS.

#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use the water curtain whenever this source is in operation.

VII. ADDITIONAL REQUIREMENTS.

#006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This process consists of a Water Fall Type Spray Booth and drying oven. The drying oven is fired on natural gas and is listed in Section H - Miscellaneous.

***** PERMIT SHIELD IN EFFECT. *****

SECTION C.
Emission Restriction Summary

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DEP ID	Source Description	Emission Limit	Pollutant
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No Emission Restrictions listed in this section of the permit.

The Department has determined that the following sources are insignificant sources with respect to emissions of air pollutants. They are however, still subject to the Site Level Requirements of this Operating Permit, as well as any other Federal, State or local regulations that may apply.

- (1) 1-0.30 MMBtu/hr Natural Gas fired Cleaning Oven.
- (2) 1-0.35 MMBtu/hr Natural Gas fired Parts Washer.
- (3) 2-0.25 MMBtu/hr Natural Gas fired Dry-Off Oven.
- (4) 2-0.50 MMBtu/hr Natural Gas fired Bake Ovens.