



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: January 22, 2003
Expiration Date: December 31, 2007

Effective Date: January 22, 2003

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

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

[TITLE V Permit No: 25-00316](#)

Federal Tax Id - Plant Code: 06-1420986-10

Owner Information

Name: ETHAN ALLEN INC, CHERRY HILL DIVISION
Mailing Address: 77 S MAIN ST
UNION CITY, PA 16438

Plant Information

Plant: ETHAN ALLEN INC CHER/UNION CITY PLT
Location: 25 Erie County 25807 Union City Boro
SIC Code: 2511 Manufacturing - Wood Household Furniture

Responsible Official

Name: MARK L PETERS
Title: PLANT MANAGER
Phone: (814) 438 - 3868

Permit Contact Person

Name: DAVID RHODES
Title: ENVIRONMENTAL COORDINATOR
Phone: (814) 438 - 3868

[Signature] _____
LARRY W WONDERS, NORTHWEST REGION AIR PROGRAM MANAGER



Section A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General Title V Requirements

- #001 Definitions
- #002 Property Rights
- #003 Permit Expiration
- #004 Permit Renewal
- #005 Transfer of Ownership or Operational Control
- #006 Inspection and Entry
- #007 Compliance Requirements
- #008 Need to Halt or Reduce Activity Not a Defense
- #009 Duty to Provide Information
- #010 Reopening and Revising the Title V Permit for Cause
- #011 Reopening a Title V Permit for Cause by EPA
- #012 Significant Operating Permit Modifications
- #013 Minor Operating Permit Modifications
- #014 Administrative Operating Permit Amendments
- #015 Severability Clause
- #016 Fee Payment
- #017 Authorization for De Minimis Emission Increases
- #018 Reactivation of Sources
- #019 Circumvention
- #020 Submissions
- #021 Sampling, Testing and Monitoring Procedures
- #022 Recordkeeping Requirements
- #023 Reporting Requirements
- #024 Compliance Certification
- #025 Operational Flexibility
- #026 Risk Management
- #027 Approved Economic Incentives and Emission Trading Programs
- #028 Permit Shield

Section C. Site Level Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

Section D. Source Level Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

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



Section A. Table of Contents

Section E. Source Group Restrictions

- E-I: Restrictions
- E-II: Testing Requirements
- E-III: Monitoring Requirements
- E-IV: Recordkeeping Requirements
- E-V: Reporting Requirements
- E-VI: Work Practice Standards
- E-VII: Additional Requirements

Section F. Alternative Operating Scenario(s)

- F-I: Restrictions
- F-II: Testing Requirements
- F-III: Monitoring Requirements
- F-IV: Recordkeeping Requirements
- F-V: Reporting Requirements
- F-VI: Work Practice Standards
- F-VII: Additional Requirements

Section G. Emission Restriction Summary

Section H. Miscellaneous



Section A. Site Inventory List

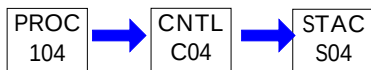
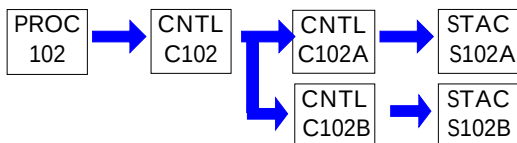
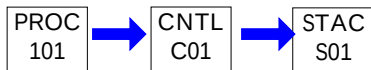
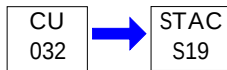
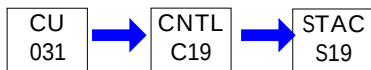
Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	WOOD FIRED BOILER	20.70 MMBTU / HR	
		1.00 Tons / HR	Wood
		25.00 Lbs / HR	Type 0 Waste
032	GAS FIRED BOILER	25.10 MMBTU / HR	
		25.10 MCF / HR	Natural Gas
101	CHAIR PLANT WOODWORKING AREA	2,000.00 Lbs / HR	WOOD
102	TABLE PLANT WOODWORKING AREA	300.00 Lbs / HR	
104	PLT 1 SEALER SPRAY BOOTH	26.00 Lbs / HR	SEALER
105	PLT 1 LACQUER SPRAY BOOTH NO. 1	19.00 Lbs / HR	LACQUER
107	PLT 1 PADDING STAIN SPRAY BOOTH	4.00 Lbs / HR	STAIN
108	PLT 1 SEALER SPRAY BOOTH (BENCH)	8.00 Lbs / HR	SEALER
109	PLT 1 LACQUER SPRAY BOOTH (BENCH)	8.00 Lbs / HR	LACQUER
110	PLT 1 PAINT SPRAY BOOTHS (2)	4.00 Lbs / HR	PAINT
111	PLT 1 SAP STAIN BOOTH	25.00 Lbs / HR	STAIN
112	PLT 1 LACQUER SPRAY BOOTH NO. 2	19.00 Lbs / HR	LACQUER
113	PLT 2 UTILITY BOOTH	15.00 Lbs / HR	LACQUER
114	PLT 1 FLOW COATING TANK	5.00 Lbs / HR	STAIN
115	PLT 1 FLOW COATING TANK	5.00 Lbs / HR	STAIN
117	PLT 1 STAIN FLOW COATING (BENCH)	12.00 Lbs / HR	STAIN
118	PLT 1 FLOW COATING TANK	5.00 Lbs / HR	STAIN
119	PARTS WASHER	N / A	
201	PLT 2 SAP STAIN SPRAY BOOTH	20.00 Lbs / HR	STAIN
202	PLT 2 WIPING STAIN SPRAY BOOTH	13.00 Lbs / HR	STAIN
203	PLT 2 SEALER SPRAY BOOTH	19.00 Lbs / HR	SEALER
204	PLT 2 LACQUER SPRAY BOOTH B	24.00 Lbs / HR	LACQUER
205	PLT 2 LACQUER SPRAY BOOTH A	24.00 Lbs / HR	LACQUER
206	ROBOTIC SURFACE COATING		
C01	WOODWORKING CYCLONES (2)		
C04	PANEL FILTERS		
C05	PANEL FILTERS		
C07	PANEL FILTERS		
C08	PANEL FILTERS		
C09	PANEL FILTERS		
C10	PANEL FILTERS		
C102	TABLE PLANT CYCLONE		
C102A	UNIT #1 BAGHOUSE		
C102B	UNIT #2 BAGHOUSE		
C11	PANEL FILTERS		
C12	PANEL FILTERS		
C13	PANEL FILTERS		
C19	BRESLONE FLYASH COLLECTOR		
C206	WATER CURTAIN		
D01	PANEL FILTERS		
D02	PANEL FILTERS		
D03	PANEL FILTERS		
D04	PANEL FILTERS		
D05	PANEL FILTERS		
S01	WOODWORKING PROC STACK		
S04	PLT 1 SEALER SPRAY STACK		



Section A. Site Inventory List

S05	PLT 1 LACQUER 1 STACK	
S07	PLT 1 PADDING STAIN STACK	
S08	PLT 1 BENCH SEALER STACK	
S09	PLT 1 BENCH LACQUER STACK	
S10	PLT 1 BENCH PAINT STACK	
S102A	UNIT #1 BAGHOUSE STACK	
S102B	UNIT #2 BAGHOUSE STACK	
S11	PLT 1 SAP STAIN STACK	
S12	PLT 1 LACQUER 2 STACK	
S13	PLT 1 LACQUER 3 STACK	
S14	PLT 1 FLOW COATING STACK	
S15	PLT 1 FLOW COATING STACK	
S17	PLT 1 BENCH STAIN STACK	
S18	PLT 1 FLOW COATING STACK	
S19	WOOD/GAS BOILER STACK	
S206A	WATER CURTAIN STACK 1	
S206B	WATER CURTAIN STACK 2	
S206C	WATER CURTAIN STACK 3	
S206D	WATER CURTAIN STACK 4	
S206E	WATER CURTAIN STACK 5	
T01	PLT 2 SAP STAIN STACK	
T02	PLT 2 WIPING STAIN STACK	
T03	PLT 2 SEALER SPRAY STACK	
T04	PLT 2 LACQUER B STACK	
T05	PLT 2 LACQUER A STACK	
Z01	FUGITIVE EMISSIONS	

PERMIT MAPS





PROC 105 → CNTL C05 → STAC S05

PROC 107 → CNTL C07 → STAC S07

PROC 108 → CNTL C08 → STAC S08

PROC 109 → CNTL C09 → STAC S09

PROC 110 → CNTL C10 → STAC S10

PROC 111 → CNTL C11 → STAC S11

PROC 112 → CNTL C12 → STAC S12

PROC 113 → CNTL C13 → STAC S13

PROC 114 → STAC S14

PROC 115 → STAC S15

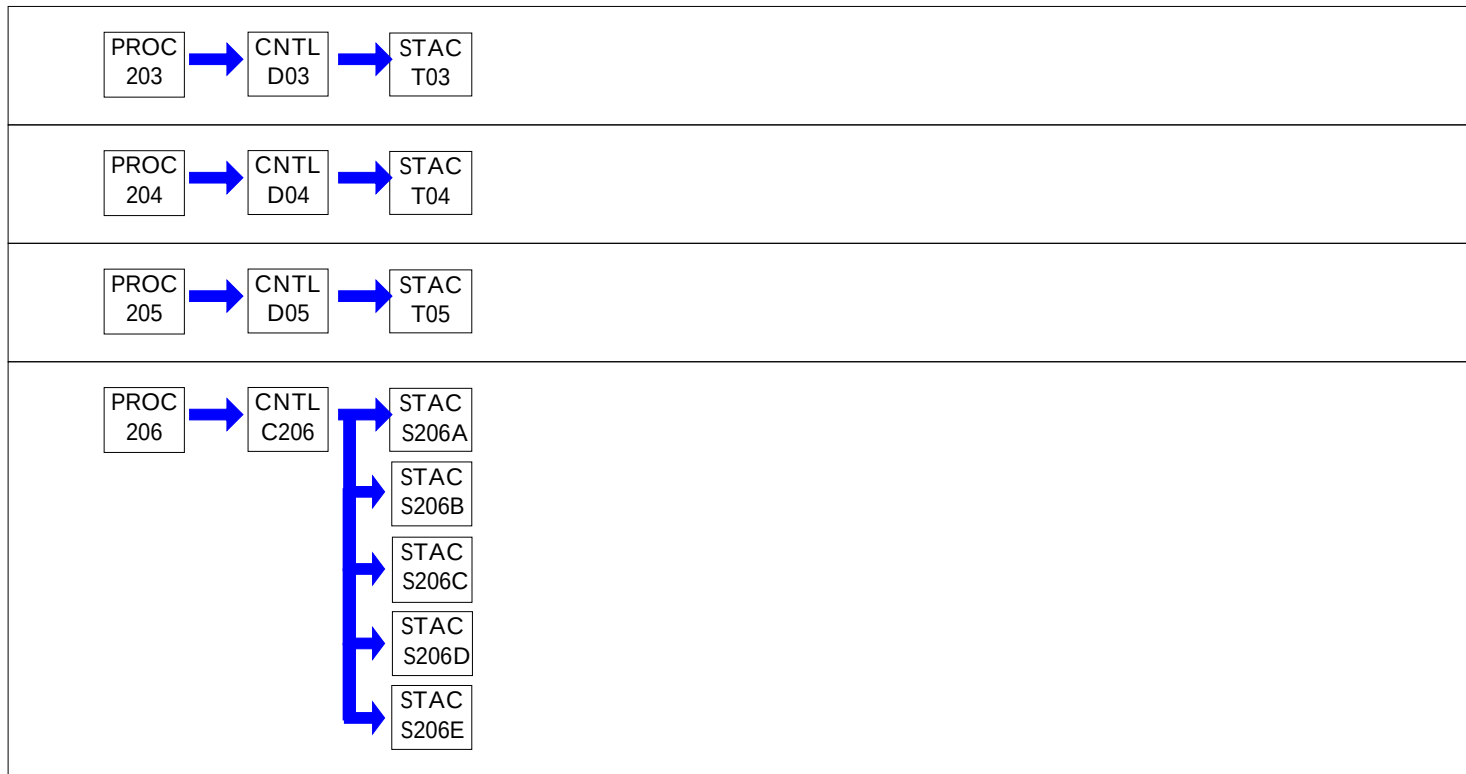
PROC 117 → STAC S17

PROC 118 → STAC S18

PROC 119 → STAC Z01

PROC 201 → CNTL D01 → STAC T01

PROC 202 → CNTL D02 → STAC T02



**Section B. General Title V Requirements**

#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 operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. 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 six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager 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.



Section B. General Title V Requirements

#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.

(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 (1) 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

**Section B. General Title V Requirements**

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 three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. 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.

**Section B. General Title V Requirements**

#014 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

(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 seven (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:

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

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

Section B. General Title V Requirements

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) In accordance with § 127.14, the permittee may 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.

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

(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 §



Section B. General Title V Requirements

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 same source.

#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 five (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) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#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:

Office of Enforcement and Permit Review (3AP10)
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 certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other

**Section B. General Title V Requirements**

certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#021 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

Sampling, Testing and Monitoring Procedures

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

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

Recordkeeping Requirements

(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:

- (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, 127.463(e) & 127.511(c)]

Reporting Requirements

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative 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.

**Section B. General Title V Requirements**

The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #020(c) of this permit.

(d) 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 and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 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) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, 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) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance to the Department and EPA in accordance with the submission requirements specified in 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



Section B. General Title V Requirements

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 submit the RMP to the federal Environmental Protection Agency 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) 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 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 of 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 (5) 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.



Section B. General Title V Requirements

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

(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.

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

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

002 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Condition #001, above, (relating to prohibition of certain fugitive emissions) if the emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

a) Limitations are as follows:

- (1) If control of malodorous air contaminants is required under subsection (b), emissions shall be incinerated at a minimum of 1200F for at least 0.3 seconds prior to their emission into the outdoor atmosphere.
 - (2) Techniques other than incineration may be used to control malodorous air contaminants if such techniques are equivalent to or better than the required incineration in terms of control of the odor emissions and are approved in writing by the Department.
- b) A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

c) Not applicable

004 [25 Pa. Code §123.41]

Limitations

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

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

**SECTION C. Site Level Requirements**

005 [25 Pa. Code §123.42]

Exceptions

The limitations of 25 PA Code 123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:

- (1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in 25 PA Code 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).
- (4) Not applicable

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

a) VOC emissions from the facility shall not exceed a plantwide applicability limit (PAL) of 206 tons per year expressed as a 12-month rolling total, calculated monthly in accordance with the provisions of Conditions #009 & #018. Any change that would result in an increase in VOC emissions over the PAL would be subject to the requirements of 25 PA Code Chapter 127, Subchapter E: New Source Review. [PA: PA-25-316B Condition 8(b)]

b) The PAL shall cover the following VOC sources at the facility:

1. Wood Fired Boiler (031)
2. Gas Fired Boiler (032)
3. Sealer Spray Booth (104)
4. Lacquer Spray Booth #1 (105)
5. Padding Stain Spray Booth (107)
6. Sealer Spray Booth (108)
7. Lacquer Spray Booth (109)
8. Pain Spray Booth (110)
9. Sap Stain Booth (111)
10. Lacquer Spray Booth #2 (112)
11. Lacquer Spray Booth #3 (113)
12. Flow Coating Tank (114)
13. Flow Coating Tank (115)
14. Stain Flow Coating (117)
15. Flow Coating Tank (118)
16. Sap Stain Booth (201)
17. Wiping Stain Spray Booth (202)
18. Sealer Spray Booth (203)
19. Lacquer Spray Booth B (204)
20. Lacquer Spray Booth A (205)
21. Robotic Spraying System (206)
22. Pre-Stain Booth - GS3 (206)
23. Wiping Stain Booth - GS4 (206)

[PA: PA-25-316B Condition 8(c)]

II. TESTING REQUIREMENTS.

007 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

All testing performed to determine compliance with the emission limits contained herein shall be performed in accordance with "Standards of Performance for New Stationary Sources", 40 CFR 60, Appendix A, Method 24 or other equivalent VOC test methods as approved under Appendix A, and with the provisions of 25 PA Code Chapter 139.

**SECTION C. Site Level Requirements**

[PA: PA-25-316B Condition 14]

008 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The Department reserves the right to require exhaust stack testing of any source(s) to verify emissions for purposes including determining the correct emission fee, malfunctions, or determining compliance with any applicable requirements.

III. MONITORING REQUIREMENTS.

009 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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

IV. RECORDKEEPING REQUIREMENTS.

010 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Compliance with the PAL, CTG and NESHAP emission limitations, and additional VOC containing material requirements, as defined herein, shall be demonstrated through recordkeeping. The facility shall maintain records that demonstrate compliance in accordance with 25 PA Code 129.52(c). At a minimum, 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. The records shall be maintained onsite for a minimum of 5 years, and shall be made available to the Department upon request.

[PA: PA-25-316B Condition 11]

011 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- a) The permittee shall maintain a record of the daily monitoring conducted to determine the presence of fugitive emissions, visible emissions, and odors.
- b) This recordkeeping shall contain a listing or notation of any and all sources of fugitive emissions, visible emissions, and odors; the cause of the fugitive emissions, visible emissions, or odors; duration of the emission or odor; and the corrective action taken to abate the deviation and prevent future occurrences.
- c) For the purposes of this condition, only odors which are not normally associated with the operation of this facility or have resulted in a complaint to the permittee from outside of the plant property need to be recorded.
- d) The permittee shall maintain records of deviations of Conditions #001, #002, #003 & #004, above, and the corrective action taken.

012 [25 Pa. Code §135.5]

Recordkeeping

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with 25 PA Code 135.21 (relating to reporting; and emission statements). These 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.

SECTION C. Site Level Requirements**V. REPORTING REQUIREMENTS.**

013 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall notify the Department, within seven (7) days, of deviations of Conditions #001, #002, #003 & #004, above, and the corrective action taken.

014 [25 Pa. Code §135.21]

Emission statements

a) Except as provided in subsection (d), this section applies to stationary sources or facilities:

(1) Located in an area designated by the Clean Air Act as a marginal, moderate, serious, severe or extreme ozone nonattainment area and which emit oxides of nitrogen or VOC.

(2) Not located in an area described in subparagraph (1) and included in the Northeast Ozone Transport Region which emit or have the potential to emit 100 tons or more oxides of nitrogen or 50 tons or more of VOC per year.

b) The owner or operator of each stationary source emitting oxides of nitrogen or VOC's shall provide the Department with a statement, in a form as the Department may prescribe, for classes or categories of sources, showing the actual emissions of oxides of nitrogen and VOCs from that source for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based. The statement shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.

c) Annual emission statements are due by March 1 for the preceding calendar year beginning with March 1, 1993, for calendar year 1992 and shall provide data consistent with requirements and guidance developed by the EPA. The guidance document is available from: United States Environmental Protection Agency, 401 M. Street, S.W., Washington, D.C. 20460. The Department may require more frequent submittals if the Department determines that one or more of the following applies:

(1) A more frequent submission is required by the EPA.

(2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the act.

d) Not applicable

015 [25 Pa. Code §135.3]

Reporting

a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the proceeding calendar year and sources modified during the same period which were not previously reported.

b) A person who receives initial notification by the Department that a source report is necessary shall submit an initial source report within 60 days after receiving the notification or by March 1 of the year following the year for which the report is required, whichever is later.

c) A source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

016 [25 Pa. Code §135.4]

Report format

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

SECTION C. Site Level Requirements**VI. WORK PRACTICE STANDARDS.**

017 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in Condition #001, above, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

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

018 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- a) The permittee shall conduct daily monitoring of the facility property, while the plant is in operation, to observe for the presence of fugitive emissions, visible emissions, and odors being emitted into the outdoor atmosphere.
- b) All detected fugitive emissions, visible emissions, and odors shall be reported to the appropriate person.

VII. ADDITIONAL REQUIREMENTS.

019 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- a) The permittee shall institute a plantwide applicability limit (PAL), for VOC emissions from the facility, in accordance with 25 PA Code 127.448. The PAL will be for the operation of VOC emitting sources at the facility including proposed and existing sources, and any other VOC emitting sources that are constructed, modified, or reactivated at the facility during the term of this permit pursuant to the additional conditions of this permit. [PA: PA-25-316B Condition 8(a)]
- b) Any new source or sources that are modified or reactivated at the facility during the term of this permit must obtain all required permits or approvals before construction, modification, reactivation, and operation, pursuant to all applicable US EPA and PA DEP major and minor new source review requirements, with the exception of 25 PA Code Chapter 127 Subchapter E: New Source Review, relative to VOC emissions. Compliance with the PAL for VOC and the terms and conditions of this permit shall constitute compliance with the requirements of 25 PA Code Chapter 127 Subchapter E for VOC. Types of changes that may occur at this facility pursuant to the provisions of this permit include, but are not limited to the following:
 1. Increased production through new coating technology
 2. Expansions/ physical modifications of existing VOC sources
 3. Addition of new miscellaneous small VOC sources such as natural gas combustion sources
 4. Use of alternative fuels or fuel firing systems, raw materials, and the manufacturing of other products[PA: PA-25-316B Condition 8(d)]
- c) The permittee shall perform the necessary calculations to determine compliance with the PAL, within 30 days of the end of each month, based on the prior 12 months of operations. Compliance calculations shall be submitted annually, by August 23 of each year, to the Department for review. [PA: PA-25-316B Condition 12]
- d) The permittee shall notify the Department in writing at least 10 days prior to making any changes or modifications to VOC emitting sources at the facility that do not require US EPA or the Department new source review, pursuant to the provisions of (b), above. In addition, the permittee shall maintain adequate records of all changes made to VOC emitting sources at the facility under the PAL to ensure proper recordkeeping and reporting, and shall update the facility VOC emitting source list at the time of permit renewal. [PA: PA-25-316B Condition 13]

**SECTION C. Site Level Requirements**

020 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

a) The 6-month deviation report, required under Section B Condition #023, shall be submitted to the Department within 30-days of the end of the reporting period. The 6-month deviation report shall cover the following periods unless otherwise approved by the Department:

1. May 1 through October 31
2. November 1 through April 30

b) The annual compliance certification report, required under Section B Condition #024, shall be submitted to both the Department and EPA within 30-days of the end of the reporting period. The annual compliance certification shall cover the period of May 1 through April 30 unless otherwise approved by the Department.

021 [25 Pa. Code §129.14]

Open burning operations

a) Not applicable

b) Outside of air basins. No person may permit the open burning of material in an area outside of air basins in a manner that:

(1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.

(2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.

(3) The emissions interfere with the reasonable enjoyment of life or property.

(4) The emissions cause damage to vegetation or property.

(5) The emissions are or may be deleterious to human or animal health.

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

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

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

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

(4) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

(5) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of such structure.

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

(7) A fire set solely for cooking food.

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

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

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

**SECTION C. Site Level Requirements**

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

(2) Not applicable

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

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

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

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

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Effect **

**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: WOOD FIRED BOILER

Source Capacity / Throughput:

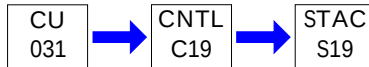
20.70 MMBTU / HR

1.00 Tons / HR

Wood

25.00 Lbs / HR

Type 0 Waste

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.11]

Combustion units

a) A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the following:

(1) The rate of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of Btus per hour is greater than 2.5 but less than 50.

002 [25 Pa. Code §123.22]

Combustion units

a) Nonair basin areas. Combustion units in nonair basin areas shall conform with the following:

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

[Compliance with the requirement specified in this streamlined permit condition assures compliance with the provisions specified in: SIP Approved SO₂ Limits 40 CFR 52.2020(c)(1)]

Throughput Restriction(s).

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall limit the total amount of lacquer filters, stain filters, and lacquer dust burned in the boiler to a maximum of 25 lbs/hr.

[PA: 25-302-020B Condition 2]

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.

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

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall keep records of date, time, and the weights of all materials burned in the boiler.

[PA: 25-302-020B Condition 3]

005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

a) The permittee shall maintain a log of all preventive maintenance inspections of the control device. The inspection log shall, at a minimum, contain the dates of the inspections, any potential problems or defects that were encountered, and the steps

**SECTION D. Source Level Requirements**

taken to correct them.

b) The permittee shall maintain a log of the following, at a minimum, from the operational inspections:

1. Pressure drop across the control device

V. REPORTING REQUIREMENTS.

006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall notify the Department, within seven (7) days, if the total amount of lacquer filters, stain filters, and lacquer dust burned in the boiler exceeds 25 lbs/hr. The notification shall include the following:

- 1) Date and time of exceedance
- 2) Weight of material burned
- 3) Reason for exceedance and corrective action taken

VI. WORK PRACTICE STANDARDS.

007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- a) The permittee shall perform a weekly operational inspection of the control device.
- b) The permittee shall maintain a manometer or similar device to measure the pressure drop across the control device.
- c) The permittee shall operate the control device at all times that the source is in operation.
- d) The source and control device shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 032

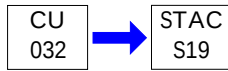
Source Name: GAS FIRED BOILER

Source Capacity / Throughput:

25.10 MMBTU / HR

25.10 MCF / HR

Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.11]

Combustion units

a) A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the following:

(1) The rate of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of Btus per hour is greater than 2.5 but less than 50.

002 [25 Pa. Code §123.22]

Combustion units

a) Nonair basin areas. Combustion units in nonair basin areas shall conform with the following:

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

[Compliance with the requirement specified in this streamlined permit condition assures compliance with the provisions specified in: SIP Approved SO₂ Limits 40 CFR 52.2020(c)(1)]

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The source shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: CHAIR PLANT WOODWORKING AREA

Source Capacity / Throughput: 2,000.00 Lbs/HR WOOD

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.13]

Processes

a) Subsections (b) and (c) apply to all processes except combustion units, incinerators and pulp mill smelt dissolving tanks.

b) Not applicable

c) For processes not listed in subsection (b)(1), including but not limited to, coke oven battery waste heat stacks and autogeneous zinc coker waste heat stacks, the following shall apply:

(1) Prohibited emissions. No person may permit the emission into the outdoor atmosphere of particulate matter from any process not listed in subsection (b)(1) in a manner that the concentration of particulate matter in the effluent gas exceeds any of the following:

(i) 0.04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

a) The permittee shall operate the control device at all times that the source is in operation.

b) The source and control device shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

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).

*** Permit Shield in Effect. ***

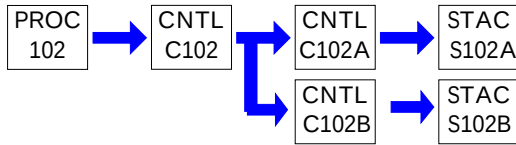
**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: TABLE PLANT WOODWORKING AREA

Source Capacity / Throughput:

300.00 Lbs/HR

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.13]

Processes

a) Subsections (b) and (c) apply to all processes except combustion units, incinerators and pulp mill smelt dissolving tanks.

b) Not applicable

c) For processes not listed in subsection (b)(1), including but not limited to, coke oven battery waste heat stacks and autogeneous zinc coker waste heat stacks, the following shall apply:

(1) Prohibited emissions. No person may permit the emission into the outdoor atmosphere of particulate matter from any process not listed in subsection (b)(1) in a manner that the concentration of particulate matter in the effluent gas exceeds any of the following:

(i) 0.04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

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.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall maintain records of deviations and corrective actions taken. The recordkeeping shall include a listing or notation of any and all sources of fugitive, visible, and odor emissions; the cause of the emissions; the duration of the emissions; and the corrective action taken to abate the deviation and prevent future occurrences. Records shall be maintained onsite and shall be made available to the Department upon request.

[PA: PA-25-316A Condition 11]

003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

a) The permittee shall maintain a log of all preventive maintenance inspections of the control device. The inspection log shall, at a minimum, contain the dates of the inspections, any potential problems or defects that were encountered, and the steps taken to correct them.

b) The permittee shall maintain a log of the following, at a minimum, from the operational inspections:

1. Pressure drop across the control device

**SECTION D. Source Level Requirements****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.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- a) The permittee shall maintain magnehelic gauges or equivalent on the baghouses in accessible locations to monitor pressure drop. The gauges shall be maintained and operated in accordance with the manufacturer's specifications. The gauges shall be maintained in working, readable condition at all times. [PA: PA-25-316A Condition 6]
- b) The permittee shall maintain sufficient replacement baghouse bags onsite, or shall have immediate access to sufficient replacement bags, at all times. [PA: PA-25-316A Condition 7]
- c) The permittee shall conduct daily monitoring of the source while it is in operation to observe for the presence of fugitive, visible, and odor emissions being emitted into the outdoor atmosphere. All detected fugitive, visible and odor emissions shall be reported to the appropriate person. [PA: PA-25-316A Condition 10]
- d) The permittee shall not cause or permit the operation of the source unless the source and air cleaning devices are maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices. [PA: PA-25-316A Condition 8]

005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- a) The permittee shall perform a daily, when operating, operational inspection of the control device.
- b) The permittee shall operate the control device at all times that the source is in operation.

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 104

Source Name: PLT 1 SEALER SPRAY BOOTH

Source Capacity / Throughput:

26.00 Lbs/HR

SEALER

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 105

Source Name: PLT 1 LACQUER SPRAY BOOTH NO. 1

Source Capacity / Throughput:

19.00 Lbs/HR

LACQUER

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: PLT 1 PADDING STAIN SPRAY BOOTH

Source Capacity / Throughput:

4.00 Lbs/HR

STAIN

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: PLT 1 SEALER SPRAY BOOTH (BENCH)

Source Capacity / Throughput:

8.00 Lbs/HR

SEALER

This source occurs in the following groups: 01
02
03
04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 109

Source Name: PLT 1 LACQUER SPRAY BOOTH (BENCH)

Source Capacity / Throughput:

8.00 Lbs/HR

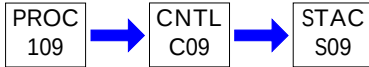
LACQUER

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 110

Source Name: PLT 1 PAINT SPRAY BOOTHS (2)

Source Capacity / Throughput:

4.00 Lbs/HR

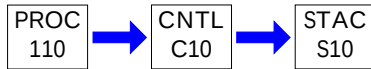
PAINT

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 111

Source Name: PLT 1 SAP STAIN BOOTH

Source Capacity / Throughput:

25.00 Lbs/HR

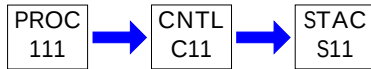
STAIN

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 112

Source Name: PLT 1 LACQUER SPRAY BOOTH NO. 2

Source Capacity / Throughput:

19.00 Lbs/HR

LACQUER

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 113

Source Name: PLT 2 UTILITY BOOTH

Source Capacity / Throughput:

15.00 Lbs/HR

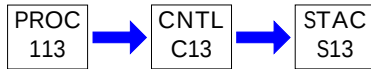
LACQUER

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 114

Source Name: PLT 1 FLOW COATING TANK

Source Capacity / Throughput:

5.00 Lbs/HR

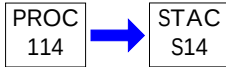
STAIN

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 115

Source Name: PLT 1 FLOW COATING TANK

Source Capacity / Throughput:

5.00 Lbs/HR

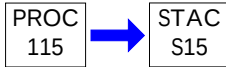
STAIN

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 117

Source Name: PLT 1 STAIN FLOW COATING (BENCH)

Source Capacity / Throughput:

12.00 Lbs/HR

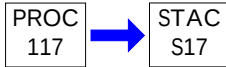
STAIN

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 118

Source Name: PLT 1 FLOW COATING TANK

Source Capacity / Throughput:

5.00 Lbs/HR

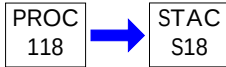
STAIN

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

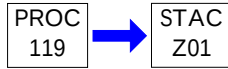
**SECTION D. Source Level Requirements**

Source ID: 119

Source Name: PARTS WASHER

Source Capacity / Throughput:

N / A

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The parts washer shall not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and /or drying agent.

002 [25 Pa. Code §129.63]

Degreasing operations

a) Cold cleaning machines. Except for those subject to the Federal National emissions standards for hazardous air pollutants (NESHAP) for halogenated solvent cleaners under 40 CFR Part 63 (relating to National emission standards for hazardous air pollutants for source categories), this subsection applies to cold cleaning machines that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.

(1) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.

(2) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:

(i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (3). In addition, the label shall include the following discretionary good operating practices:

(A) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.

(B) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.

(C) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.

**SECTION D. Source Level Requirements**

(ii) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.

(3) Cold cleaning machines shall be operated in accordance with the following procedures:

(i) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

(ii) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.

(iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.

(iv) Air agitated solvent baths may not be used.

(v) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

(4) After December 22, 2002, a person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.

(5) On and after December 22, 2002, a person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:

(i) The name and address of the solvent supplier.

(ii) The type of solvent including the product or vendor identification number.

(iii) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).

(6) A person who operates a cold cleaning machine shall maintain for at least 2 years and shall provide to the Department, on request, the information specified in paragraph (5). An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

(7) Paragraph (4) does not apply:

(i) To cold cleaning machines used in extreme cleaning service.

(ii) If the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with paragraph (4) will result in unsafe operating conditions.

(iii) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

(b) Not applicable

(c) Not applicable

(d) Not applicable

(e) Not applicable

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 201

Source Name: PLT 2 SAP STAIN SPRAY BOOTH

Source Capacity / Throughput:

20.00 Lbs/HR

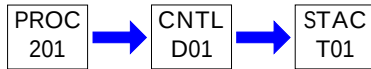
STAIN

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 202

Source Name: PLT 2 WIPING STAIN SPRAY BOOTH

Source Capacity / Throughput:

13.00 Lbs/HR

STAIN

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 203

Source Name: PLT 2 SEALER SPRAY BOOTH

Source Capacity / Throughput:

19.00 Lbs/HR

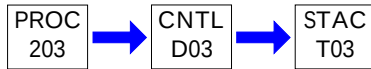
SEALER

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 204

Source Name: PLT 2 LACQUER SPRAY BOOTH B

Source Capacity / Throughput:

24.00 Lbs/HR

LACQUER

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 205

Source Name: PLT 2 LACQUER SPRAY BOOTH A

Source Capacity / Throughput:

24.00 Lbs/HR

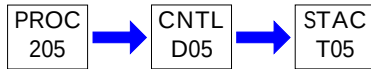
LACQUER

This source occurs in the following groups: 01

02

03

04

**I. RESTRICTIONS.**

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

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

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

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).

*** Permit Shield in Effect. ***

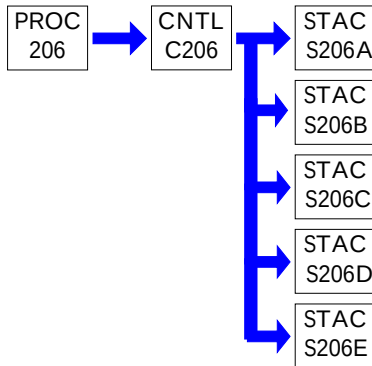
SECTION D. Source Level Requirements

Source ID: 206

Source Name: ROBOTIC SURFACE COATING

Source Capacity / Throughput:

This source occurs in the following groups: 01
02
04



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

a) The emission of VHAPs from this source shall be limited as follows:

1. Finishing Operations:

(a) Achieve a weighted average VHAP across all coatings of 0.8 (maximum kg VHAP/kg solids [lb VHAP/lb solids]), as applied, or

(b) Limit finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied), as follows:

Finishing Material	VHAP Content Limit (maximum)
Stains	1.0 kg VHAP/kg solids [lb VHAP/lb solids], as applied
Washcoats	0.8 kg VHAP/kg solids [lb VHAP/lb solids], as applied
Sealers	0.8 kg VHAP/kg solids [lb VHAP/lb solids], as applied
Topcoats	0.8 kg VHAP/kg solids [lb VHAP/lb solids], as applied
Basecoat	0.8 kg VHAP/kg solids [lb VHAP/lb solids], as applied
Enamels	0.8 kg VHAP/kg solids [lb VHAP/lb solids], as applied
Thinners	10.0% maximum VHAP allowable

[PA: PA-25-316B Condition 9(a)]

b) With the exception of topcoats and sealers, the source shall use coatings that are in compliance with 25 PA Code 129.52, Table 1(11), only as follows:

The weight of VOCs per gallon of coating (minus water) is equal to or less than the following after adjustment to a standard solvent density of 7.36 pounds per gallon and to a solids basis:

Table 1: Allowable Content of VOCs in Surface Coatings by Process

Allowable VOC Content: Weight of VOC per Volume of Coating (minus water)

Surface Coating Process

**SECTION D. Source Level Requirements**

- (11) Wood cabinet and furniture finishing adopted on May 7, 1988.
(b) wash coat 7.0 pounds per gallon 0.84 kg per liter
(c) final repair coat 6.0 pounds per gallon 0.72 kg per liter
(d) opaque ground coats and enamels 5.5 lbs/gal 0.66 kg per liter
(e) all other coating 7.0 pounds per gallon 0.84 kg per liter

[PA: PA-25-316B Condition 10]

c) Topcoat and sealer VOC contents shall conform to the US EPA issued Control Techniques Guideline (CTG), "Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations", EPA-453/R-96-007 (April 1996), and subsequent revisions. Current CTG defined VOC contents are 1.9 lb VOC/lb solids and 1.8 lb VOC/lb solids for sealers and topcoats, respectively.

[PA: PA-25-316B Condition 10]

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.

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

IV. RECORDKEEPING REQUIREMENTS.

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

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.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

a) The permittee shall conduct daily monitoring of the source while it is in operation to observe for the presence of fugitive, visible, and odor emissions being emitted into the outdoor atmosphere. All detected fugitive, visible, and odor emissions shall be reported to the appropriate person. [PA: PA-25-316B Condition 15]

b) The permittee shall maintain records of deviations to part (a), above, and the corrective action taken. The recordkeeping shall include a listing or notation of any and all sources of fugitive, visible, and odor emissions; the cause of the emissions; the duration of the emissions; and the corrective action taken to abate the deviation and prevent future occurrences. Records shall be maintained onsite for a minimum of 5 years and shall be made available to the Department upon request. [PA: PA-25-316B Condition 16]

VII. ADDITIONAL REQUIREMENTS.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

This source is subject to 40 CFR 63 Subpart JJ, "National Emission Standards for Wood Furniture Manufacturing Operations", and shall comply with all applicable requirements of this Subpart. 40 CFR 63.10 requires submission of copies of all requests, reports, applications, submittals, and other communications to both EPA and the Department. The EPA copies shall be forwarded to: Director; Air, Toxics and Radiation Division; US EPA, Region III; 1650 Arch Street; Philadelphia, PA 19103-2029.

[PA: PA-25-316B Condition 19]

*** Permit Shield in Effect. ***

**SECTION E. Source Group Restrictions.**

Group Name: 01

Group Description: Miscellaneous State Requirements

Sources included in this group:

ID	Name
104	PLT 1 SEALER SPRAY BOOTH
105	PLT 1 LACQUER SPRAY BOOTH NO. 1
107	PLT 1 PADDING STAIN SPRAY BOOTH
108	PLT 1 SEALER SPRAY BOOTH (BENCH)
109	PLT 1 LACQUER SPRAY BOOTH (BENCH)
110	PLT 1 PAINT SPRAY BOOTHS (2)
111	PLT 1 SAP STAIN BOOTH
112	PLT 1 LACQUER SPRAY BOOTH NO. 2
113	PLT 2 UTILITY BOOTH
114	PLT 1 FLOW COATING TANK
115	PLT 1 FLOW COATING TANK
117	PLT 1 STAIN FLOW COATING (BENCH)
118	PLT 1 FLOW COATING TANK
201	PLT 2 SAP STAIN SPRAY BOOTH
202	PLT 2 WIPING STAIN SPRAY BOOTH
203	PLT 2 SEALER SPRAY BOOTH
204	PLT 2 LACQUER SPRAY BOOTH B
205	PLT 2 LACQUER SPRAY BOOTH A
206	ROBOTIC SURFACE COATING

I. RESTRICTIONS.**Emission Restriction(s).**

001 [25 Pa. Code §123.13]

Processes

a) Subsections (b) and (c) apply to all processes except combustion units, incinerators and pulp mill smelt dissolving tanks.

b) Not applicable

c) For processes not listed in subsection (b)(1), including but not limited to, coke oven battery waste heat stacks and autogeneous zinc coker waste heat stacks, the following shall apply:

(1) Prohibited emissions. No person may permit the emission into the outdoor atmosphere of particulate matter from any process not listed in subsection (b)(1) in a manner that the concentration of particulate matter in the effluent gas exceeds any of the following:

(i) 0.04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

002 [25 Pa. Code §129.52]

Surface coating processes

a) This section applies to all surface coating processes, regardless of the size of the facility, which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 (2,455 kilograms) tons per year during any calendar year since January 1, 1987.

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

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

SECTION E. Source Group Restrictions.

(i) Not applicable

(ii) Not applicable

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

$$\text{VOCB} = (\text{Wo}) / (\text{Wn})$$

Where:

VOCB = VOC content in lb VOC / lb of coating solids

Wo = Weight percent of VOC (Wv-Ww-Wex)

Wv = Weight percent of total volatiles (100%-weight percent solids)

Ww = Weight percent of water

Wex = Weight percent of exempt solvents

Wn = Weight percent of solids of the as applied coating

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

(2) Not applicable

c) A facility, regardless of the facility's annual emission rate, which contains surface coating processes shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:

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

(i) The coating, thinner or component name and identification number.

(ii) The volume used.

(iii) The mix ratio.

(iv) The density or specific gravity.

(v) The weight percent of solids for Table I surface coating process categories 1 - 10.

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

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

d) The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this section and 25 PA Code 129.67 (relating to graphic arts systems). A surface coating process which seeks to comply with this section through the use of an exempt solvent may not be included in any alternative standards.

e) Not applicable

f) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from the application of wood furniture coatings unless the coatings are applied using electrostatic, airless, curtain coating, roll coating, hand roller, hand brush, flow coating, dip coating or high volume-low pressure application equipment. Air atomized sprays may be used to apply cosmetic specialty coatings if the volume of the cosmetic specialty coatings is less than 5% by volume of the total coating used at the facility or to apply final repair coatings.

g) The records shall be maintained for 5 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

h) The VOC standards in Table I do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

SECTION E. Source Group Restrictions.

(1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.

(2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

TABLE I
Emissions Limits of VOCs in Surface Coatings by Process Category
Weight of VOC per Volume of Coating Solids

Surface Coating Processes	lbs VOC per lbs coating solids	kg VOC per kg coating solids
11. Wood furniture manufacturing operations		
(a) Topcoats and enamels	3.0	3.0
(b) Washcoat	14.37	14.3
(c) Final repair coat	3.3	3.3
(d) Basecoats	2.2	2.2
(e) Cosmetic specialty coatings	14.3	14.3
(f) Sealers	3.9	3.9

Category 11 was adopted on May 7, 1988

[PA: 25-318-100 Conditions 2, 3, & 4]

[Compliance with the requirements specified in this streamlined permit condition assures compliance with the provisions in: PA: 25-318-100 Condition 2 and Revised RACT OP: 25-316 Conditions 5 & 11(c)]

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.

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

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

a) The permittee shall maintain a log of all preventative maintenance inspections of any associated control device. The inspection log shall, at a minimum, contain the dates of the inspections, any potential problems or defects that were encountered, and the steps taken to correct them.

b) The permittee shall maintain a log of the following, at a minimum, from the operational inspections:

1. Pressure drop across the control device

c) The permittee shall maintain records of each shipments certifications of the VOC content of each coating received. The certification must demonstrate that the VOC content was determined in accordance with 40 CFR 60, Appendix A - Reference Method 24.

d) The MSDS for each cleaning and washoff solvent shall be retained for a period of five years and submitted to the Department upon request.

V. REPORTING REQUIREMENTS.

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

**SECTION E. Source Group Restrictions.****VI. WORK PRACTICE STANDARDS.**

004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- a) The permittee shall perform a weekly operational inspection of any associated control device.
- b) The permittee shall maintain a manometer or similar device to measure the pressure drop across any associated control device.
- c) The permittee shall operate any associated control device at all times that the source is in operation.
- d) The source and any associated control device shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

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).

*** Permit Shield in Effect. ***

**SECTION E. Source Group Restrictions.**

Group Name: 02

Group Description: Federal Wood Furniture Requirements

Sources included in this group:

ID	Name
104	PLT 1 SEALER SPRAY BOOTH
105	PLT 1 LACQUER SPRAY BOOTH NO. 1
107	PLT 1 PADDING STAIN SPRAY BOOTH
108	PLT 1 SEALER SPRAY BOOTH (BENCH)
109	PLT 1 LACQUER SPRAY BOOTH (BENCH)
110	PLT 1 PAINT SPRAY BOOTHS (2)
111	PLT 1 SAP STAIN BOOTH
112	PLT 1 LACQUER SPRAY BOOTH NO. 2
113	PLT 2 UTILITY BOOTH
114	PLT 1 FLOW COATING TANK
115	PLT 1 FLOW COATING TANK
117	PLT 1 STAIN FLOW COATING (BENCH)
118	PLT 1 FLOW COATING TANK
201	PLT 2 SAP STAIN SPRAY BOOTH
202	PLT 2 WIPING STAIN SPRAY BOOTH
203	PLT 2 SEALER SPRAY BOOTH
204	PLT 2 LACQUER SPRAY BOOTH B
205	PLT 2 LACQUER SPRAY BOOTH A
206	ROBOTIC SURFACE COATING

I. RESTRICTIONS.**Emission Restriction(s).**

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.802]

Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations**Emission limits**

[Source 206 is considered a new affected source, while the other sources are considered existing affected sources]

a) Each owner or operator of an existing affected source subject to this subpart shall:

(1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources presented in Table 3 of this subpart, using any of the compliance methods in 40 CFR 63.804(a). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in 40 CFR 63.803(l)(2) for determining styrene and formaldehyde usage.

(2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:

(i) For foam adhesives (contact adhesives used for upholstery operations) used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies, the VHAP content of the adhesive shall not exceed 1.8 kg VHAP / kg solids (1.8 lb VHAP / lb solids), as applied; or

(ii) For all other contact adhesives (including foam adhesives used in products that do not meet the standards presented in paragraph (a)(2)(i) of this section, but excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP / kg solids (1.0 lb VHAP / lb solids), as applied.

(3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC / kg solids (0.8 lb VOC / lb solids), as applied.

**SECTION E. Source Group Restrictions.**

b) Each owner or operator of a new affected source subject to this subpart shall:

(1) Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of this subpart using any of the compliance methods in 40 CFR 63.804(d). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in 40 CFR 63.803(l)(2) for determining styrene and formaldehyde usage.

(2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, using either of the compliance methods in 40 CFR 63.804(e).

(3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

II. TESTING REQUIREMENTS.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.805]

Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations
Performance test methods

[Source 206 is considered a new affected source, while the other sources are considered existing affected sources]

a) The EPA Method 311 of Appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).

b) Not applicable

c) Not applicable

d) Not applicable

e) Not applicable

III. MONITORING REQUIREMENTS.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.804]

Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations
Compliance procedures and monitoring requirements

[Source 206 is considered a new affected source, while the other sources are considered existing affected sources]

a) The owner or operator of an existing affected source subject to 40 CFR 63.802(a)(1) shall comply with those provisions using any of the methods presented in 40 CFR 63.804(a)(1) through (a)(4).

(1) Calculate the average VHAP content for all finishing materials used at the facility using Equation 1 found in 40 CFR 63.804(a)(1), and maintain a value of E no greater than 1.0;

(2) Use compliant finishing materials according to the following criteria:

SECTION E. Source Group Restrictions.

(i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;

(ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and

(iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.

(3) Not applicable

(4) Use any combination of an averaging approach, as described in paragraph (a)(1) of this section, compliant finishing materials, as described in paragraph (a)(2) of this section, and a control system, as described in paragraph (a)(3) of this section.

b) The owner or operator of an affected source subject to 40 CFR 63.802(a)(2)(i) shall comply with the provisions by using compliant foam adhesives with a VHAP content no greater than 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied.

c) The owner or operator of an affected source subject to 40 CFR 63.802(a)(2)(ii) shall comply with those provisions by using either of the methods presented in 40 CFR 63.804(c)(1) and (c)(2).

(1) Use compliant contact adhesives with a VHAP content no greater than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied; or

(2) Not applicable

d) The owner or operator of a new affected source subject to 40 CFR 63.802(b)(1) may comply with those provisions by using any of the following methods:

(1) Calculate the average VHAP content across all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 0.8;

(2) Use compliant finishing materials according to the following criteria:

(i) Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;

(ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and

(iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.

(3) Not applicable

(4) Use any combination of an averaging approach, as described in (d)(1), compliant finishing materials, as described in (d)(2), and a control system, as described in (d)(3).

e) The owner or operator of a new affected source subject to 40 CFR 63.802(b)(2) shall comply with the provisions using either of the following methods:

(1) Use compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied; or

**SECTION E. Source Group Restrictions.**

(2) Not applicable

f) Initial compliance.

(1) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR 63.804(a)(1) or (d)(1) shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by 40 CFR 63.807(b). The first month's calculation shall include data for the entire month in which the compliance date falls. For example, if the source's compliance date is November 21, 1997, the averaging calculation shall include data from November 1, 1997 to November 30, 1997.

(2) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR 63.804(a)(2) or (d)(2) shall submit an initial compliance status report, as required by 40 CFR 63.807(b), stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, are being used by the affected source.

(3) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that are complying through the procedures established in 40 CFR 63.804(a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate initial compliance by:

(i) Submitting an initial compliance status report, as required by 40 CFR 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or

(ii) Submitting an initial compliance status report, as required by 40 CFR 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used; the viscosity of the coating in the reservoir is being monitored; and compliant thinners are being used. The affected source shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.

(4) Not applicable

(5) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(2) or (b)(2) that comply through the procedures established in 40 CFR 63.804(b), (c)(1), or (e)(1), shall submit an initial compliance status report, as required by 40 CFR 63.807(b), stating that compliant contact adhesives are being used by the affected source.

(6) Not applicable

(7) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(3) or (b)(3) shall submit an initial compliance status report, as required by 40 CFR 63.807(b), stating that compliant strippable spray booth coatings are being used by the affected source.

(8) Owners or operators of an affected source subject to the work practice standards in 40 CFR 63.803 shall submit an initial compliance status report, as required by 40 CFR 63.807(b), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

g) Continuous compliance demonstrations.

(1) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR 63.804(a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by 40 CFR 63.807(c).

(i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

**SECTION E. Source Group Restrictions.**

(2) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR 63.804(a)(2) or (d)(2) shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required by 40 CFR 63.807(c).

(i) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(3) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that are complying through the procedures established in 40 CFR 63.804(a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate continuous compliance by following the procedures in paragraph (g)(3) (i) or (ii) of this section.

(i) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the semiannual report required by 40 CFR 63.807(c).

(A) The compliance certification shall state that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

(B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(ii) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir, using compliant thinners, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintaining records of solvent additions, and submitting a compliance certification with the semiannual report required by 40 CFR 63.807(c).

(A) The compliance certification shall state that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period.

(B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(C) An affected source is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit established in 40 CFR 63.804(a)(2) or (d)(2), as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.

(4) Not applicable

(5) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(2)(i) or (ii) or (b)(2) that comply through the procedures established in 40 CFR 63.804(b), (c)(1), or (e)(1), shall submit a compliance certification with the semiannual report required by 40 CFR 63.807(c).

(i) The compliance certification shall state that compliant contact and / or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and / or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

**SECTION E. Source Group Restrictions.**

(6) Not applicable

(7) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(3) or (b)(3) shall submit a compliance certification with the semiannual report required by 40 CFR 63.807(c).

(i) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(8) Owners or operators of an affected source subject to the work practice standards in 40 CFR 63.803 shall submit a compliance certification with the semiannual report required by 40 CFR 63.807(c).

(i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

IV. RECORDKEEPING REQUIREMENTS.

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.806]

Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations
Recordkeeping requirements

[Source 206 is considered a new affected source, while the other sources are considered existing affected sources]

a) The owner or operator of an affected source subject to this subpart shall fulfill all recordkeeping requirements of 40 CFR 63.10 of subpart A, according to the applicability criteria in 40 CFR 63.800(d) of this subpart.

[Compliance with the requirements in part (a) of this streamlined permit condition assures compliance with the provisions in: Revised RACT OP: 25-316 Conditions 11(a) & (b)]

b) The owner or operator of an affected source subject to the emission limits in 40 CFR 63.802 of this subpart shall maintain records of the following:

(1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in 40 CFR 63.802; and

(2) The VHAP content, in kg VHAP / kg solids (lb VHAP / lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in 40 CFR 63.802; and

(3) The VOC content, in kg VOC / kg solids (lb VOC / lb solids), as applied, of each strippable booth coating subject to the emission limits in 40 CFR 63.802(a)(3) or (b)(3).

c) The owner or operator of an affected source following the compliance method in 40 CFR 63.804(a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1 [40 CFR 63.804(a)(1)].

d) The owner or operator of an affected source following the compliance procedures of 40 CFR 63.804(f)(3)(ii) and (g)(3)(ii) shall maintain the records required by 40 CFR 63.806(b) as well as records of the following:

(1) Solvent and coating additions to the continuous coater reservoir;

(2) Viscosity measurements; and

**SECTION E. Source Group Restrictions.**

(3) Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.

e) The owner or operator of an affected source subject to the work practice standards in 40 CFR 63.803 of this subpart shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

(1) Records demonstrating that the operator training program required by 40 CFR 63.803(b) is in place;

(2) Records collected in accordance with the inspection and maintenance plan required by 40 CFR 63.803(c);

(3) Records associated with the cleaning solvent accounting system required by 40 CFR 63.803(d);

(4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 40 CFR 63.803(h)(5).

(5) Records associated with the formulation assessment plan required by 40 CFR 63.803(l); and

(6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

[Compliance with the requirements in part (e) of this streamlined permit condition assures compliance with the provisions in: Revised RACT OP: 25-316 Condition 12]

f) Not applicable

g) Not applicable

h) The owner or operator of an affected source subject to the emission limits in 40 CFR 63.802 and following the compliance provisions of 40 CFR 63.804(f)(1), (2), (3), (5), (7) and (8) and 40 CFR 63.804(g)(1), (2), (3), (5), (7), and (8) shall maintain records of the compliance certifications submitted in accordance with 40 CFR 63.807(c) for each semiannual period following the compliance date.

i) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by 40 CFR 63.9(h) and 40 CFR 63.807(b) and the semiannual reports required by 40 CFR 63.807(c).

j) The owner or operator of an affected source shall maintain all records in accordance with the requirements of 40 CFR 63.10(b)(1).

V. REPORTING REQUIREMENTS.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.807]

Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations
Reporting requirements

[Source 206 is considered a new affected source, while the other sources are considered existing affected sources]

a) The owner or operator of an affected source subject to this subpart shall fulfill all reporting requirements of 40 CFR 63.7 through 40 CFR 63.10 of subpart A (General Provisions) according to the applicability criteria in 40 CFR 63.800(d) of this subpart.

b) The owner or operator of an affected source demonstrating compliance in accordance with 40 CFR 63.804(f)(1), (2), (3), (5), (7) and (8) shall submit the compliance status report required by 40 CFR 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by 40 CFR 63.804(f)(1), (2), (3), (5), (7), and (8) of this subpart.

c) The owner or operator of an affected source demonstrating compliance in accordance with 40 CFR 63.804(g)(1), (2), (3), (5), (7), and (8) shall submit a report covering the previous 6 months of wood furniture manufacturing operations:

(1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance

**SECTION E. Source Group Restrictions.**

date.

(2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

(3) The semiannual reports shall include the information required by 40 CFR 63.804(g)(1), (2), (3), (5), (7), and (8), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.

(4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

d) Not applicable

e) The owner or operator of an affected source required to provide a written notification under 40 CFR 63.803(l)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

VI. WORK PRACTICE STANDARDS.

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.803]

Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations
Work practice standards

[Source 206 is considered a new affected source, while the other sources are considered existing affected sources]

a) Work practice implementation plan. Each owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of this section. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

b) Operator training course. Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

(1) A list of all current personnel by name and job description that are required to be trained;

(2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

(3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

(4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

c) Inspection and maintenance plan. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

(1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

**SECTION E. Source Group Restrictions.**

- (2) An inspection schedule;
- (3) Methods for documenting the date and results of each inspection and any repairs that were made;
- (4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- d) Cleaning and washoff solvent accounting system. Each owner or operator of an affected source shall develop an organic HAP solvent accounting form to record:
 - (1) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 40 CFR 63.801 of this subpart;
 - (2) The number of pieces washed off, and the reason for the washoff; and
 - (3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- e) Chemical composition of cleaning and washoff solvents. Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this subpart, in concentrations subject to MSDS reporting as required by OSHA.
- f) Spray booth cleaning. Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- g) Storage requirements. Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- h) Application equipment requirements. Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - (1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - (2) For touchup and repair under the following conditions:
 - (i) The touchup and repair occurs after completion of the finishing operation; or
 - (ii) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - (3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
 - (4) When emissions from the finishing application station are directed to a control device;
 - (5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - (6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any

SECTION E. Source Group Restrictions.

other spray application technology.

The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:

(i) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

i) Line cleaning. Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

j) Gun cleaning. Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

k) Washoff operations. Each owner or operator of an affected source shall control emissions from washoff operations by:

(1) Using normally closed tanks for washoff; and

(2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

l) Formulation assessment plan for finishing operations. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

(1) Identifies VHAP from the list presented in Table 5 of this subpart that are being used in finishing operations by the affected source;

(2) Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in 40 CFR 63.805(d) or (e).

(3) Tracks the annual usage of each VHAP identified in (l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.

(4) If, after November 1998, the annual usage of the VHAP identified in paragraph (l)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(i) The exceedance is no more than 15.0 percent above the baseline level;

(ii) Usage of the VHAP is below the de minimis level presented in Table 5 of this subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in 40 CFR 63.805(d) or (e);

(iii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC / kg solids (1.0 lb VOC / lb solids), as applied.

(5) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting

**SECTION E. Source Group Restrictions.**

authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

(6) If after November 1998, an affected source uses a VHAP of potential concern listed in table 6 of this subpart for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in table 6 of this subpart for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv) of this section, the affected source shall follow the procedures in paragraph (l)(5) of this section.

[Compliance with the requirements in parts (b), (c), (d), (f), (g), & (h) of this streamlined permit condition assures compliance with the provisions in: Revised RACT OP: 25-316 Conditions 7(a), (b), (c), 8, 9, & 10]

VII. ADDITIONAL REQUIREMENTS.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.800]

**Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations
Applicability.**

[Source 206 is considered a new affected source, while the other sources are considered existing affected sources]

- a) The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR 63.2. The owner or operator of a source that meets the definition for an incidental furniture manufacturer shall maintain purchase or usage records demonstrating the source meets the definition in 40 CFR 63.801 of this subpart, but the source shall not be subject to any other provisions of this subpart.
- b) Not applicable
- c) Not applicable
- d) Owners or operators of affected sources shall also comply with the requirements of subpart A of this part (General Provisions), according to the applicability of subpart A to such sources, as identified in Table 1 of this subpart.
- e) The compliance date for existing affected sources that emit less than 50 tons per year of HAP in 1996 is December 7, 1998. The compliance date for existing affected sources that emit 50 tons or more of hazardous air pollutants in 1996 is November 21, 1997. The owner or operator of an existing area source that increases its emissions of (or its potential to emit) HAP such that the source becomes a major source that is subject to this subpart shall comply with this subpart one year after becoming a major source.
- f) New affected sources must comply with the provisions of this standard immediately upon startup or by December 7, 1995, whichever is later. New area sources that become major sources shall comply with the provisions of this standard immediately upon becoming a major source.
- g) Reconstructed affected sources are subject to the requirements for new affected sources. The costs associated with the purchase and installation of air pollution control equipment (e.g., incinerators, carbon adsorbers, etc.) are not considered in determining whether the facility has been reconstructed, unless the control equipment is required as part of the process (e.g., product recovery). Additionally, the costs of retrofitting and replacement of equipment that is installed specifically to comply with this subpart are not considered reconstruction costs. For example, an affected source may convert to waterborne coatings to meet the requirements of this subpart. At most facilities, this conversion will require the replacement of existing storage tanks, mix equipment, and transfer lines. The cost of replacing the equipment is not considered in determining whether the facility has been reconstructed.

**SECTION E. Source Group Restrictions.**

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.808]

Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations

Delegation of authority

a) In delegating implementation and enforcement authority to a State under 112(d) of the Clean Air Act, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State.

b) The authority conferred in 40 CFR 63.804(f)(4)(iv)(D) and (E), 40 CFR 63.804(g)(4)(iii)(C), 40 CFR 63.804(g)(4)(vi), 40 CFR 63.804(g)(6)(vi), 40 CFR 63.805(a), 40 CFR 63.805(d)(2)(V), and 40 CFR 63.805(e)(1) shall not be delegated to any State.

*** Permit Shield in Effect. ***

**SECTION E. Source Group Restrictions.**

Group Name: 03

Group Description: RACT Requirements

Sources included in this group:

ID	Name
104	PLT 1 SEALER SPRAY BOOTH
105	PLT 1 LACQUER SPRAY BOOTH NO. 1
107	PLT 1 PADDING STAIN SPRAY BOOTH
108	PLT 1 SEALER SPRAY BOOTH (BENCH)
109	PLT 1 LACQUER SPRAY BOOTH (BENCH)
110	PLT 1 PAINT SPRAY BOOTHS (2)
111	PLT 1 SAP STAIN BOOTH
112	PLT 1 LACQUER SPRAY BOOTH NO. 2
113	PLT 2 UTILITY BOOTH
114	PLT 1 FLOW COATING TANK
115	PLT 1 FLOW COATING TANK
117	PLT 1 STAIN FLOW COATING (BENCH)
118	PLT 1 FLOW COATING TANK
201	PLT 2 SAP STAIN SPRAY BOOTH
202	PLT 2 WIPING STAIN SPRAY BOOTH
203	PLT 2 SEALER SPRAY BOOTH
204	PLT 2 LACQUER SPRAY BOOTH B
205	PLT 2 LACQUER SPRAY BOOTH A

I. RESTRICTIONS.**Emission Restriction(s).**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Authority for this condition is also derived from 25 PA Code 129.93.

a) With the exception of topcoats and sealers, the facility shall use coatings that are in compliance with 25 PA Code 129.52, Table 1 (11), only. Topcoat and sealer VOC contents shall conform to the US EPA issued Control Techniques Guideline (CTG), "Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations", EPA-453/R-96-007 (April 1996), and subsequent revisions. Current CTG defined VOC contents are 1.9 lbs VOC/lb solid and 1.8 lbs VOC/lb solid for sealers and topcoats, respectively. Conformance with the CTG shall be done as expeditiously as practicable, but no later than the following schedule:

1. Product # 1421C10071, 7 Inst. Lacquer, and Product # 420C0149, Inst. Sealer, shall be discontinued from use no later than January 31, 1999.
2. Product #1421C10143, 10 Enviro. Lacquer, Product # 1421C20073, 25 Inst. Lacquer, Product # 1421C20082, 25 Enviro. Lacquer, Product # A-12782-A, Lo HAPs Sealer, and Product # A-12850-A, 55 Lacquer, shall be reformulated to CTG defined VOC limits no later than September 30, 1999.
3. Product # 1421C00173, Precat. Sealer, and Product # 1421C00336, Precat. Lacquer, shall remain in compliance with the CTG.

[Revised RACT OP: 25-316 Condition 5]

b) NGR PRE-STAIN code 111D00608 is not subject to 25 PA Code 129.52 Table 1 part 11. The allowable VOC content for this product is 7.0 pounds per gallon minus water.

[Revised RACT OP: 25-316 Condition 5]

**SECTION E. Source Group Restrictions.****II. TESTING REQUIREMENTS.**

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Authority for this condition is also derived from 25 PA Code 129.95.

a) The facility shall maintain records of all testing performed to determine compliance with the emission limits contained herein shall be performed in accordance with "Standards of Performance for New Stationary Sources", 40 CFR Part 60, Appendix A, Method 24 or other equivalent VOC test methods as approved under Appendix A, and with the provisions of 25 Pa Code Chapter 139. [Revised RACT OP: 25-316 Condition 11(d)]

b) Failure to maintain the records required by RACT OP 25-316 shall constitute a violation of the Operating Permit for each day the records are not maintained. [Revised RACT OP: 25-316 Condition 14]

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.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Authority for this condition is also derived from 25 PA Code 129.93.

The facility shall incorporate the use of waterborne strippable booth coatings.

[Revised RACT OP: 25-316 Condition 6]

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).

*** Permit Shield in Effect. ***

**SECTION E. Source Group Restrictions.**

Group Name: 04

Group Description: State Wood Furniture Requirements

Sources included in this group:

ID	Name
104	PLT 1 SEALER SPRAY BOOTH
105	PLT 1 LACQUER SPRAY BOOTH NO. 1
107	PLT 1 PADDING STAIN SPRAY BOOTH
108	PLT 1 SEALER SPRAY BOOTH (BENCH)
109	PLT 1 LACQUER SPRAY BOOTH (BENCH)
110	PLT 1 PAINT SPRAY BOOTHS (2)
111	PLT 1 SAP STAIN BOOTH
112	PLT 1 LACQUER SPRAY BOOTH NO. 2
113	PLT 2 UTILITY BOOTH
114	PLT 1 FLOW COATING TANK
115	PLT 1 FLOW COATING TANK
117	PLT 1 STAIN FLOW COATING (BENCH)
118	PLT 1 FLOW COATING TANK
201	PLT 2 SAP STAIN SPRAY BOOTH
202	PLT 2 WIPING STAIN SPRAY BOOTH
203	PLT 2 SEALER SPRAY BOOTH
204	PLT 2 LACQUER SPRAY BOOTH B
205	PLT 2 LACQUER SPRAY BOOTH A
206	ROBOTIC SURFACE COATING

I. RESTRICTIONS.**Emission Restriction(s).**

001 [25 Pa. Code §129.102]

Emission Standards

An owner or operator of a facility subject to this section, 25 PA Code 129.101 and 25 PA Code 129.103-129.107 shall limit VOC emissions from wood furniture manufacturing operations by:

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

Table IV

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

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

(2) Using an emissions averaging program which meets the requirements in 25 PA Code 129.107 (relating to special

**SECTION E. Source Group Restrictions.**

provisions for facilities using an emissions averaging approach).

(3) Not applicable

(4) Using a combination of the methods specified in paragraphs (1)-(3).

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.

002 [25 Pa. Code §129.104]

Compliance procedures and monitoring requirements.

a) Compliance methods. An owner or operator of a facility subject to the emission standards in 25 PA Code 129.102 (relating to emission standards) shall demonstrate compliance with those provisions by using one or more of the following methods:

(1) To support that each sealer, topcoat and strippable spray booth coating meets the requirements of 25 PA Code 129.102(1) (relating to emission standards):

(i) Maintain CPDSs for each of the coatings.

(ii) Maintain documentation showing the VOC content of the as applied coating in lbs VOC / lb solids, if solvent or other VOC is added to the coating before application.

(iii) Perform sampling and testing in accordance with the procedures and test methods in Chapter 139 (relating to sampling and testing).

(2) Not applicable

b) Initial compliance.

(1) Compliant coatings. An owner or operator of a facility subject to 25 PA Code 129.102(1) that is complying through the procedures in subsection (a)(1) shall submit an initial compliance status report as required by 25 PA Code 129.106(a) (relating to reporting requirements), stating that compliant sealers, topcoats and strippable spray booth coatings are being used by the facility.

(2) Continuous coaters. An owner or operator of a facility subject to 25 PA Code 129.102(1) that is complying through the procedures in subsection (a)(1) and is applying sealers, topcoats, or both, using continuous coaters shall demonstrate initial compliance by either:

(i) Submitting an initial compliance status report as required by 25 PA Code 129.106(a) stating that compliant sealers, topcoats, or both, as determined by the VOC content of the coating in the reservoir and as calculated from records, are being used.

(ii) Submitting an initial compliance status report as required by 25 PA Code 129.106(a) stating that compliant sealers, topcoats, or both, as determined by the VOC content of the coating in the reservoir, are being used and the viscosity of the coating in the reservoir is being monitored. The facility shall also provide data that demonstrates the correlation between the viscosity and the VOC content of the coating in the reservoir.

(3) Control systems - Not applicable

(4) Work practice implementation plan. An owner or operator of a facility subject to the work practice standards of 25 PA Code 129.103 (relating to work practice standards) shall submit an initial compliance status report as required by 25 PA Code 129.106(a), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

c) Continuous compliance demonstrations. An owner or operator of a facility subject to the requirements of this section and 25 PA Code 129.101-129.103 and 25 PA Code 129.105-129.107 shall submit, in writing, to the Department a compliance

**SECTION E. Source Group Restrictions.**

certification with the semiannual report required by 25 PA Code 129.106(b).

(1) Compliant coatings. An owner or operator of a facility subject to 25 PA Code 129.102 that is complying through the procedures specified in subsection (a)(1) shall demonstrate continuous compliance by the following:

(i) Using compliant coatings.

(ii) Maintaining records that demonstrate the coatings are compliant.

(iii) Submitting a compliance certification which states that compliant sealers, topcoats, or both, and strippable spray booth coatings have been used each day in the semiannual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.

(2) Continuous coaters. An owner or operator of a facility subject to 25 PA Code 129.102 that is complying through the procedures specified in subsection (a)(1) and is applying sealers, topcoats, or both, using continuous coaters shall demonstrate continuous compliance by either:

(i) Using compliant coatings as determined by the VOC content of the coating in the reservoir and as calculated from records, and submitting a compliance certification which states that compliant sealers, topcoats, or both, have been used each day in the semiannual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.

(ii) Using compliant coatings, as determined by the VOC content of the coating in the reservoir, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the viscosity of the coating in the reservoir each time solvent is added, maintaining records of solvent additions and submitting a compliance certification which states that compliant sealers, topcoats, or both, as determined by the VOC content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.

(3) Control systems - Not applicable

(4) Work practice implementation plan. An owner or operator of a facility subject to the work practice standards of 25 PA Code 129.103 shall demonstrate continuous compliance by following the work practice implementation plan and submitting a compliance certification which states that the work practice implementation plan is being followed, or should otherwise identify the periods of noncompliance with the work practice standards and the reasons for noncompliance.

d) Compliance certification requirements. The compliance certification shall be signed by a responsible official of the company that owns or operates the facility. In addition to the certification requirements of this section, the certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §129.105]

Recordkeeping requirements

a) Requirement. The owner or operator of a wood furniture manufacturing operation shall keep records to demonstrate compliance with this section and 25 PA Code 129.101-129.104, 25 PA Code 129.106 and 25 PA Code 129.107. The records shall be maintained for at least 5 years.

b) Compliant coatings. The following records shall be maintained to demonstrate compliance with 25 PA Code 129.102 (relating to emission standards).

(1) A certified product data sheet for each coating and strippable spray booth coating subject to the emission limits of 25 PA Code 129.102.

(2) The VOC content as applied, lbs VOC / lb solids (kg VOC / kg solids), of each coating and strippable spray booth coating

**SECTION E. Source Group Restrictions.**

subject to the emission limits of 25 PA Code 129.102, and copies of data sheets documenting how the as applied values were determined.

c) Continuous coaters. The owner or operator of a facility subject to the emission limits of 25 PA Code 129.102 that is complying through the procedures specified in 25 PA Code 129.104(a)(1) (relating to compliance procedures and monitoring requirements) and is applying sealers, topcoats, or both, using continuous coaters shall maintain the records required by subsections (a) and (b) and records of the following:

- (1) Solvent and coating additions to the continuous coater reservoir.
- (2) Viscosity measurements.

d) Control systems - Not applicable

e) Work practice implementation plan. The owner or operator of a facility subject to the work practice standards of 25 PA Code 129.103 (relating to work practice standards) shall maintain onsite copies of the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including:

- (1) Records demonstrating that the operator training program is in place.
- (2) Records maintained in accordance with the leak inspection and maintenance plan.
- (3) Records associated with the cleaning and washoff solvent accounting system.
- (4) Records associated with the limitation on the use of conventional air spray guns showing total coating usage and the percentage of coatings applied with conventional air spray guns for each semiannual reporting period.
- (5) Records showing the VOC content of compounds used for cleaning booth components, except for solvent used to clean conveyors, continuous coaters and their enclosures or metal filters.
- (6) Copies of logs and other documentation developed to demonstrate that the other provisions of the work practice implementation plan are followed.

f) In addition to the recordkeeping requirements of subsection (a), the owner or operator of a facility that complies with 25 PA Code 129.103 or 25 PA Code 129.104(a)(1) shall maintain a copy of the compliance certifications submitted in accordance with 25 PA Code 129.106(b) (relating to reporting requirements) for each semiannual period following the compliance date.

g) The owner or operator of a facility shall maintain a copy of the other information submitted with the initial status report required by 129.106(a) and the semiannual reports required by 25 PA Code 129.106(b).

V. REPORTING REQUIREMENTS.

004 [25 Pa. Code §129.106]

Reporting requirements

a) Initial compliance report date. The initial compliance report shall be submitted to the Department within 60 days after the compliance date specified in 25 PA Code 129.101(b) and (c) (relating to general provisions and applicability). The report shall include the items required by 25 PA Code 129.104(b) (relating to compliance procedures and monitoring requirements).

b) Semiannual compliance report dates. When demonstrating compliance in accordance with 25 PA Code 129.104(a)(1) or (2), a semiannual report covering the previous 6 months of wood furniture manufacturing operations shall be submitted to the Department according to the following schedule:

- (1) The first report shall be submitted within 30 calendar days after the end of the first 6-month period following the compliance date specified in 25 PA Code 129.101(b) and (c).
- (2) Subsequent reports shall be submitted within 30 calendar days after the end of each 6-month period following the first report.
- (3) Each semiannual report shall include the information required by 25 PA Code 129.104(c) and (d), a statement of

**SECTION E. Source Group Restrictions.**

whether the facility was in compliance or noncompliance and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.

VI. WORK PRACTICE STANDARDS.

005 [25 Pa. Code §129.103]

Work practice standards

a) Work practice implementation plan. Within 60 days after the compliance date specified in 25 PA Code 129.101(b) or (c) (relating to general provisions and applicability), an owner or operator of a facility subject to the requirements in this section and 25 PA Code 129.101, 25 PA Code 129.102 and 25 PA Code 129.104-129.107 shall:

(1) Prepare and maintain a written work practice implementation plan that defines work practices for each wood furniture manufacturing operation and addresses the provisions in subsections (b)-(j). The owner or operator of the facility shall comply with the work practice implementation plan.

(2) Make available the written work practice implementation plan for inspection by the Department upon request. If the Department determines that the work practice implementation plan does not adequately address the criteria specified in subsections (b)-(j), the Department may require that the facility owner or operator modify the plan.

b) Operator training program. New and existing personnel, including contract personnel, who are involved in coating, cleaning or washoff operations or implementation of the requirements of this section, 25 PA Code 129.101, 25 PA Code 129.102 and 25 PA Code 129.104-129.107 shall complete an operator training program.

(1) For a facility subject to 25 PA Code 129.101(b), new personnel hired after June 10, 2000, shall be trained upon hiring. For a facility subject to the requirements of 25 PA Code 129.101(c), new personnel shall be trained upon hiring.

(2) For a facility subject to 25 PA Code 129.101(b), existing personnel hired before June 10, 2000, shall be trained by December 11, 2000. For a facility subject to 25 PA Code 129.101(c), existing personnel shall be trained at least 6 months before the compliance date.

(3) Personnel shall be given refresher training annually.

(4) A copy of the written operator training program shall be maintained with the work practice implementation plan. The operator training program shall include the following:

(i) A list of all current personnel by name and job description that are required to be trained.

(ii) An outline of the subjects to be covered in the initial and annual refresher training sessions for each position or group of personnel.

(iii) Lesson plans for courses to be given at the initial and annual refresher training sessions that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize coating usage and overspray and appropriate management of cleanup wastes.

(iv) A description of the methods to be used at the completion of the initial or annual refresher training sessions to demonstrate and document successful completion.

(v) A record of the date each employee is trained.

c) Leak inspection and maintenance plan. An owner or operator of a facility shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan which shall include the following:

(1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings or solvents.

(2) An inspection schedule.

**SECTION E. Source Group Restrictions.**

(3) The methods for documenting the date and results of each inspection and any repairs that were made.

(4) The time frame between identifying a leak and making the repair, which shall adhere to the following schedule:

(i) A first attempt at repairs, including tightening of packing glands, shall be made within 5 working days after the leak is detected.

(ii) Final repairs shall be made within 15 working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.

d) Cleaning and washoff solvent accounting system. A solvent accounting form shall be developed to account for solvents used in cleaning and washoff operations. The information recorded on the form shall include the following:

(1) The total number of pieces processed through washoff operations each month and the reason for the washoff operations.

(2) The name and total quantity of each solvent used each month for:

(i) Cleaning activities.

(ii) Washoff operations.

(3) The name and total quantity of each solvent evaporated to the atmosphere each month from:

(i) Cleaning activities.

(ii) Washoff operations.

e) Spray booth cleaning. An owner or operator of a facility may not use compounds containing more than 8.0% by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, the facility shall use no more than 1.0 gallon of solvent to prepare the booth prior to applying the booth coating.

f) Storage requirements. An owner or operator of a facility shall use normally closed containers for storing coating, cleaning and washoff materials.

g) Application equipment requirements. An owner or operator of a facility may not use conventional air spray guns to apply coatings except under any of the following circumstances:

(1) To apply coatings that have a VOC content no greater than 1.0 lb VOC / lb solids (1.0 kg VOC / kg solids), as applied.

(2) For touch-up and repair coatings under one of the following circumstances:

(i) The coatings are applied after completion of the wood furniture manufacturing operation.

(ii) The coatings are applied after the stain and before any other type of coating is applied, and the coatings are applied from a container that has a volume of no more than 2.0 gallons.

(3) The spray is automated, that is, the spray gun is aimed and triggered automatically, not manually.

(4) The emissions from the surface coating process are directed to a VOC control system.

(5) The conventional air spray gun is used to apply coatings and the cumulative total usage of those coatings is no more than 5.0% of the total gallons of coating used during each semiannual reporting period.

(6) The conventional air spray gun is used to apply stain on a part for which the Department notifies the operator, in writing, of its determination that it is technically or economically infeasible to use any other spray application technology. To support the facility's claim of technical or economic infeasibility, a videotape, a technical report or other documentation shall

**SECTION E. Source Group Restrictions.**

be submitted to the Department showing either independently or in combination, the following:

- (i) The production speed is too high or the part shape is too complex for one operator to coat the part, and the application station is not large enough to accommodate an additional operator.
- (ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- h) Line cleaning. The solvent used for line cleaning shall be pumped or drained into a normally closed container.
- i) Spray gun cleaning. The solvent used to clean spray guns shall be collected into a normally closed container.
- j) Washoff operations. The emissions from washoff operations shall be controlled by the following:
 - (1) Using normally closed containers for washoff operations.
 - (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

006 [25 Pa. Code §129.107]

Special provisions for facilities using emissions averaging approach

- a) Emissions averaging approach. An owner or operator of a facility subject to the emission limitations in 25 PA Code 129.102 (relating to emission standards) may use an emissions averaging approach which meets the equivalency requirements in 25 PA Code 129.51(a) (relating to general) to achieve compliance with 25 PA Code 129.52 (relating to surface coating processes) or this section and 25 PA Code 129.101-129.106.
- b) Additional requirement. When complying with the requirements of 129.52 or this section and 25 PA Code 129.101-129.106 through emissions averaging, an additional 10% reduction in emissions shall be achieved when compared to a facility using a compliant coatings approach to meet the requirements of this section and 25 PA Code 129.101-129.106.
- c) Program goals and rationale. When using an emissions averaging program, the following shall be submitted to the Department in writing:
 - (1) A summary of the reasons why the facility would like to comply with the emission limitations through an equivalency determination using emissions averaging procedures.
 - (2) A summary of how averaging can be used to meet the emission limitations.
- d) Program scope. A description of the types of coatings that will be included in the facility's emissions averaging program shall also be submitted to the Department in writing:
 - (1) Stains, basecoats, washcoats, sealers and topcoats may all be used in the emissions averaging program.
 - (2) The owner or operator of the facility may choose other coatings for its emissions averaging program, if the program meets the equivalency requirements in 25 PA Code 129.51(a).
 - (3) Coatings that are applied using continuous coaters may only be used in an emissions averaging program if the owner or operator of the facility can determine the amount of coating used each day.
 - (4) A daily averaging period shall be used, except under the following conditions:
 - (i) A longer averaging period may be used if the owner or operator of the facility demonstrates in writing to the satisfaction of the Department that the emissions do not fluctuate significantly on a day-to-day basis.
 - (ii) The owner or operator of the facility requests in writing and the Department approves in writing the longer averaging period.
- e) Program baseline. The baseline for each coating included in the emissions averaging program shall be the lower of the actual or allowable emission rate as of June 10, 2000. The facility baseline emission rate may not be higher than what was presumed in the 1990 emissions inventory for the facility unless the Department has accounted for the increase in emissions as growth.

**SECTION E. Source Group Restrictions.**

f) Quantification procedures. The emissions averaging program shall specify methods and procedures for quantifying emissions. Quantification procedures for VOC content are included in Chapter 139 (relating to sampling and testing). The quantification procedures shall also include methods to determine the usage of each coating and shall be accurate enough to ensure that the facility's actual emissions are less than the allowable emissions.

g) Monitoring, recordkeeping and reporting. A written summary of the monitoring, recordkeeping and reporting procedures that will be used to demonstrate compliance on a daily basis, when using an emissions averaging approach, shall be submitted to the Department.

(1) The monitoring, recordkeeping and reporting procedures shall be structured so that inspectors and facility owners or operators can determine a facility's compliance status for any day.

(2) The monitoring, recordkeeping and reporting procedures shall include methods for determining required data when monitoring, recordkeeping and reporting violations result in missing, inadequate or erroneous monitoring and recordkeeping.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §129.101]

General provisions and applicability

a) Beginning June 10, 2000, this section and 25 PA Code 129.102-129.107 apply to each wood furniture manufacturing facility located in a county included in the northeast ozone transport region or in a county designated as severe, serious, moderate or marginal ozone nonattainment that emits or has the potential to emit 25 tons or more per year of VOCs from wood furniture manufacturing operations.

b) The owner or operator of an existing wood furniture manufacturing facility subject to subsection (a) shall comply with this section and 25 PA Code 129.102-129.107 by June 11, 2001, except for those facilities which have RACT determinations approved by the EPA as revisions to the SIP prior to June 10, 2000.

c) An existing wood furniture manufacturing facility that increases its actual emissions or potential to emit to 25 tons per year or more of VOCs from wood furniture manufacturing operations shall comply with this section and 25 PA Code 129.102-129.107 within 1 year after becoming subject to subsection (a), except for those facilities which have RACT determinations approved by the EPA as revisions to the SIP prior to June 10, 2000.

d) At a minimum, a new source installed at an existing facility that is subject to the requirements of subsection (a) shall comply with the emission standards of 25 PA Code 129.102 (relating to emission standards) upon installation of the new source.

e) The owner or operator of a wood furniture manufacturing facility subject to this section, 25 PA Code 129.52 and 25 PA Code 129.102-129.107 shall comply with the more stringent emissions limitation or applicable requirement for wood furniture manufacturing operations in 25 PA Code 129.52 or this section and 25 PA Code 129.102-129.107.

f) The VOC standards in 25 PA Code 129.102 Table IV do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

(1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.

(2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

*** Permit Shield in Effect. ***



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.



SECTION G. Emission Restriction Summary.

Dep Id	Source Description	
031	WOOD FIRED BOILER	
	Emission Limit	Pollutant
	0.400 Lbs / MMBTU	PM10
	4.000 Lbs / MMBTU over any 1-hour period	SOX
032	GAS FIRED BOILER	
	Emission Limit	Pollutant
	0.400 Lbs / MMBTU	PM10
	4.000 Lbs / MMBTU over any 1-hour period	SOX
101	CHAIR PLANT WOODWORKING AREA	
	Emission Limit	Pollutant
	0.040 gr / DRY FT3	PM10
102	TABLE PLANT WOODWORKING AREA	
	Emission Limit	Pollutant
	0.040 gr / DRY FT3	PM10
104	PLT 1 SEALER SPRAY BOOTH	
	Emission Limit	Pollutant
	0.040 gr / DRY FT3	PM10
105	PLT 1 LACQUER SPRAY BOOTH NO. 1	
	Emission Limit	Pollutant
	0.040 gr / DRY FT3	PM10
107	PLT 1 PADDING STAIN SPRAY BOOTH	
	Emission Limit	Pollutant
	0.040 gr / DRY FT3	PM10
108	PLT 1 SEALER SPRAY BOOTH (BENCH)	
	Emission Limit	Pollutant
	0.040 gr / DRY FT3	PM10
109	PLT 1 LACQUER SPRAY BOOTH (BENCH)	
	Emission Limit	Pollutant
	0.040 gr / DRY FT3	PM10
110	PLT 1 PAINT SPRAY BOOTHS (2)	
	Emission Limit	Pollutant
	0.040 gr / DRY FT3	PM10



SECTION G. Emission Restriction Summary.

Dep Id	Source Description				
111	PLT 1 SAP STAIN BOOTH				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
112	PLT 1 LACQUER SPRAY BOOTH NO. 2				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
113	PLT 2 UTILITY BOOTH				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
114	PLT 1 FLOW COATING TANK				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
115	PLT 1 FLOW COATING TANK				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
117	PLT 1 STAIN FLOW COATING (BENCH)				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
118	PLT 1 FLOW COATING TANK				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
201	PLT 2 SAP STAIN SPRAY BOOTH				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
202	PLT 2 WIPING STAIN SPRAY BOOTH				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
203	PLT 2 SEALER SPRAY BOOTH				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
204	PLT 2 LACQUER SPRAY BOOTH B				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				



SECTION G. Emission Restriction Summary.

Dep Id	Source Description				
205	PLT 2 LACQUER SPRAY BOOTH A				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				
206	ROBOTIC SURFACE COATING				
<table><tr><th>Emission Limit</th><th>Pollutant</th></tr><tr><td>0.040 gr / DRY FT3</td><td>PM10</td></tr></table>		Emission Limit	Pollutant	0.040 gr / DRY FT3	PM10
Emission Limit	Pollutant				
0.040 gr / DRY FT3	PM10				

Site Emission Restriction Summary

Emission Limit		Pollutant
206.000 Tons / Yr	12 month rolling total	VOC

**SECTION H. Miscellaneous.**

a) The Capacity / Throughput numbers listed on Pages 4 & 5 and provided in Section D of this permit for individual sources are for informational purposes only and are not to be considered enforceable limits. Enforceable emission limits are listed in the Restriction section for each source. They are also summarized for informational purposes only in Section F.

b) Source ID: Department assigned ID number for the source
Source Name: Department assigned name for the source
Capacity: The maximum capacity for the source (not a limit)
Fuel / Material: The fuel / material assigned to SCC for the source
Schematics:
FML: Fuel material location
Comb: Combustion source
Proc: Process
CD: Control device
EP: Emission point
Pollutants:
P000: Particulate matter

c) The following previously issued plan approvals and operating permits serve as the basis for certain terms and conditions in this Title V permit:

PA / OP: 25-302-020B
PA / OP: 25-318-100
RACT OP: 25-316
PA: PA-25-316A
PA: PA-25-316B

d) For the purpose of this permit, Source 206 (Robotic Surface Coating) consists of the following:

1. Robotic Spraying System (GS25) with water curtain (C206)
[GS25 --> C206 --> S206A-E]
2. Pre-Stain Booth (GS3) with dry filter bank
[GS3 --> Dry Filter --> Stack]
3. Wiping Stain Booth (GS4) with dry filter bank
[GS4 --> Dry Filter --> Stack]
4. UV Curing Process

e) The following sources have minor emissions and no applicable emission, testing, monitoring, recordkeeping or reporting requirements:

1. Not applicable

f) This Operating Permit No. TV 25-00316 was originally issued on May 21, 1998, effective on May 31, 1998, and expires on May 31, 2003. Revision No. 1, issued on November 10, 1998, was an administrative amendment to correct errors in the permit. Revision No. 2, issued on August 16, 1999, was an administrative amendment to incorporate plan approval PA-25-316A (replacement of existing baghouse with two new baghouses) conditions. Revision No. 3, issued on March 31, 2000, was an administrative amendment to incorporate plan approval PA-25-316B (construction of a robotic coating booth - Source 206) conditions. This Operating Permit was reissued on January 22, 2003, effective on January 22, 2003, and expires on December 31, 2007.



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