#### WOODS QUALITY CABINE/EIGHTY-FOUR



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

#### STATE ONLY OPERATING PERMIT

Issue Date: May 24, 2006 Effective Date: May 24, 2006

Expiration Date: May 24, 2011

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

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

State Only Permit No: 63-00633

Federal Tax Id - Plant Code: 25-1674461-1

#### **Owner Information**

Name: WOODS QUALITY CABINETRY CO

Mailing Address: 42 84 DR

EIGHTY FOUR, PA 15330-2470

#### Plant Information

Plant: WOODS QUALITY CABINE/EIGHTY-FOUR

Location: 63 Washington County 63954 Somerset Township

SIC Code: 2511 Manufacturing - Wood Household Furniture

## Responsible Official

Name: DAVIS WALKER

Title: OWNER

Phone: (724) 228 - 3040

## Permit Contact Person

Name: CHARLES A BROADWATER

Title: PLANT MANAGER Phone: (724) 228 - 3040

[Signature] \_\_\_\_\_

Mark A WAYNER, SOUTHWEST REGION AIR PROGRAM MANAGER





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

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# PERMIT MAPS



## SECTION B. General State Only 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 in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)]

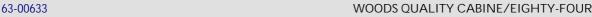
Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).
  - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
  - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):
  - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.



(2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension, modification, revision, renewal, and re-issuance of each operating permit or part thereof.

- (b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).
  - (1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.
  - (2) Three hundred dollars for applications filed during the 2000-2004 calendar years.
  - (3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.
- (c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund".

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

Transfer of Operating Permits.

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this

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

Inspection and Entry.

- (a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
  - (2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.



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

Compliance Requirements.

- (a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:
  - (1) Enforcement action
  - (2) Permit termination, revocation and reissuance or modification
  - (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

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

Duty to Provide Information.

- (a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.
- (b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.





- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

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

#### **Operating Permit Modifications**

- (a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:
- (b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]

Severability Clause.

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

#013 [25 Pa. Code § 127.449]

#### De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
  - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air

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# SECTION B. General State Only Requirements

Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
  - (4) Space heaters which heat by direct heat transfer.
  - (5) Laboratory equipment used exclusively for chemical or physical analysis.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined



## SECTION B. General State Only Requirements

in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit modifications)
- (7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11]

#### Reactivation

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

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

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

#017 [25 Pa. Code § 121.9]

#### Circumvention.

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

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

#### Reporting Requirements.

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.



- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

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

- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

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

Sampling, Testing and Monitoring Procedures.

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

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

#### Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
  - (1) The date, place (as defined in the permit) and time of sampling or measurements.
  - (2) The dates the analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of the analyses.
  - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized



records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

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



#### SECTION C. Site Level Requirements

#### I. RESTRICTIONS.

#### Emission Restriction(s).

# 001 [25 Pa. Code §123.1]

#### Prohibition of certain fugitive emissions

- (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:
  - (1) Construction or demolition of buildings or structures.
  - (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
  - (4) Clearing of land.
  - (5) Stockpiling of materials.
  - (6) Open burning operations.
  - (7) Not applicable.
  - (8) Not applicable.
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
  - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

# 002 [25 Pa. Code §123.11]

#### Combustion units

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

# 003 [25 Pa. Code §123.13]

#### **Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

# 004 [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 §123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

# 005 [25 Pa. Code §123.21]

#### General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.



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# 006 [25 Pa. Code §123.22]

#### Combustion units

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

# 007 [25 Pa. Code §123.31]

#### Limitations

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

# 008 [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.

# 009 [25 Pa. Code §123.42]

#### Exceptions

The limitations of §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 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).
- (4) When arising from the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

# 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall only use dry wood as fuel for any wood burning boilers or furnaces at this facility.

# 011 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Emission of hazardous air pollutants (HAPs) shall not exceed 9.0 tons of any single HAP and shall not exceed 24.0 tons in aggregate of all HAPs in any consecutive 12-month period. This may include but is not necessarily limited to all HAP containing adhesives, coatings, diluents, degreasing agents, clean-up materials, etc. used at this facility.

# 012 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Emission of volatile organic compounds (VOCs) shall not exceed 49.0 tons in any consecutive 12-month period. This may include but is not necessarily limited to all VOC containing adhesives, coatings, diluents, degreasing agents, clean-up materials, etc. used at this facility.

# 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Emissions from this facility shall not exceed the following in any consecutive 12-month period:



## SECTION C. Site Level Requirements

99.0 tons of PM-10 (PARTICULATE MATTER < 10 MICRONS)

99.0 tons of NOx (NITROGEN OXIDES)

99.0 tons of CO (CARBON MONOXIDE)

## 99.0 tons of SOx (SULFUR OXIDES)

# 014 [25 Pa. Code §129.101]

#### General provisions and applicability

- (a) This section and §§ 129.102-129.107 apply to each wood furniture manufacturing facility that emits or has the potential to emit 25 tons or more per year of VOCs from wood furniture manufacturing operations.
- (b) Not applicable.
- (c) An existing wood furniture manufacturing facility that increases its actual emissions or potential to emit to 25 tons per year or more of VOCs from wood furniture manufacturing operations shall comply with this section and §§ 129.102-129.107 within 1 year of issuance of this permit.
- (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 § 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, § 129.52 and §§ 129.102-129.107 shall comply with the more stringent emissions limitation or applicable requirement for wood furniture manufacturing operations in § 129.52 or this section and §§ 129.102-129.107.
- (f) The VOC standards in § 129.102 Table IV do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:
- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

# 015 [25 Pa. Code §129.102]

#### **Emission Standards**

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

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

#### Table IV

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





# The state of the

# SECTION C. Site Level Requirements

Topcoat  3. Acid-cured alkyd amino systems	1.8
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	
Other topcoat	1.8
4. Waterborne strippable spray booth coating	8.0

- (2) Using an emissions averaging program which meets the requirements in § 129.107 (relating to special provisions for facilities using an emissions averaging approach).
- (3) Using a control system that will achieve a reduction in emissions equivalent to 0.8 lb VOC/lb solids for topcoats or 1.8 lbs VOC/lb solids for topcoats and 1.9 lbs VOC/lb solids for sealers.
- (4) Using a combination of the methods specified in paragraphs (1)-(3).

# 016 [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) Not applicable.
  - (5) Not applicable.
  - (6) A fire set solely for recreational or ceremonial purposes.

#### SECTION C. Site Level Requirements

- (7) A fire set solely for cooking food.
- (d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:
  - (1) As used in this subsection the following terms shall have the following meanings:

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

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

- (2) Not applicable.
- (3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:
- (i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.
- (ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.
- (4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

[25 Pa. Code §129.52] # 017

#### Surface coating processes

- (a) This section applies to a surface coating process category, regardless of the size of the facility, which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year since January 1, 1987.
- (b) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from a surface coating process category listed in Table I, unless one of the following limitations is met:
- (1) The VOC content of each as applied coating is equal to or less than the standard specified in Table I.
- (i) The VOC content of the as applied coating, expressed in units of weight of VOC per volume of coating solids, shall be calculated as follows:

VOC = (Wo)(Dc)/Vn

Where:

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

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

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

# SECTION C. Site Level Requirements

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

Dc = Density of coating, lb/gal, at 25°C

Vn = Volume percent of solids of the as applied coating

(ii) The VOC content of a dip coating, expressed in units of weight of VOC per volume of coating solids, shall be calculated on a 30-day rolling average basis using the following equation:

Where:

VOCA = VOC content in lb VOC/gal of coating solids for a dip coating, calculated on a 30-day rolling average basis

Woi = Percent VOC by weight of each as supplied coating (i) added to the dip coating process, expressed as a decimal fraction (that is 55% = 0.55)

Dci = Density of each as supplied coating (i) added to the dip coating process, in pounds per gallon

Qi = Quantity of each as supplied coating (i) added to the dip coating process, in gallons

Vni = Percent solids by volume of each as supplied coating (i) added to the dip coating process, expressed as a decimal fraction

WoJ = Percent VOC by weight of each thinner (J) added to the dip coating process, expressed as a decimal fraction

DdJ = Density of each thinner (J) added to the dip coating process, in pounds per gallon

QJ = Quantity of each thinner (J) added to the dip coating process, in gallons

(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:

$$VOCB = (Wo)/(Wn)$$

Where:

VOCB = VOC content in Ib VOC/Ib 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



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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) The overall weight of VOCs emitted to the atmosphere is reduced through the use of vapor recovery or incineration or another method which is acceptable under § 129.51(a) (relating to general). The overall efficiency of a control system, as determined by the test methods and procedures specified in Chapter 139 shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = (1 - E/V) \times 100$$

Where:

- V = The VOC content of the as applied coating, in lb VOC/gal of coating solids or lb VOC/lb of coating solids.
- E = Table I limit in lb VOC/gal of coating solids or lb VOC/lb of coating solids.
- O = Overall control efficiency.
- (c) Not applicable.
- (d) The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this section and § 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) If more than one emission limitation under miscellaneous metal parts and products applies to a specific coating, the least stringent emission limitation applies.
- (f) Not applicable.
- (g) Not applicable.
- (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:
- (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

Emission Limits of VOCs in Surface Coatings by Process Category Weight of VOC per Volume of Coating Solids

Surface Coating

Ibs VOC

kg VOC



SECTION C.

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rocess Category	per gal coating solids	per liter coating solids	
I. Can coating	3049 301143	554g 5511 <b>4</b> 5	
a) sheet basecoat	4.62	0.55	
b) can exterior	4.62	0.55	
c) interior body spray	10.05	1.20	
d) two piece can end exterior	10.05	1.20	
e) side-seam spray	21.92	2.63	
f) end sealing compound	7.32	0.88	
2. Coil coating	4.02	0.48	
3. Fabric coating	4.84	0.58	
I. Vinyl coating	7.69	0.92	
5. Paper coating	4.84	0.58	
<ul><li>b. Automobile and light duty truck (</li></ul>		5.55	
a) prime coat	2.60	0.31	
b) top coat	4.62	0.55	
c) repair	14.14	1.69	
7. Metal furniture coating	5.06	0.61	
3. Magnet wire coating	2.16	0.26	
9. Large appliance coating	4.62	0.20	
Categories 1-9 were adopted on Apr		0.55	
0. Miscellaneous metal parts & proc			
·	iucis		
a) top coats for locomotives and	4.47	0.00	
neavy-duty trucks	6.67	0.80	
b) hopper car and tank car nteriors	4.47	0.00	
	6.67	0.80	
c) pail and drum interiors	10.34	1.24	
d) clear coatings	10.34	1.24	
e) air-dried coatings	6.67	0.80	
f) extreme performance coatings	6.67	0.80	
g) all other coatings	5.06	0.61	
Category 10 was adopted on April 2	1, 1981		
Veight of VOC per Weight of Coatin	g Solids		
	lbs VOC	kg VOC	
	per Ib	per kg	
	coating solids	coating solids	
1. Wood furniture manufacturing o	nerations		
a) Topcoats and enamels	3.0	3.0	
b) Washcoat	14.3	14.3	
c) Final repair coat	3.3	3.3	
d) Basecoats	3.3 2.2	2.2	
e) Cosmetic specialty coatings		14.3	
f) Sealers	14.3		
r) Sealers Category 11 was adopted on May 7, 1	3.9	3.9	

# II. TESTING REQUIREMENTS.

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





#### SECTION C. Site Level Requirements

#### HI. MONITORING REQUIREMENTS

# 018 [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.

# 019 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

Compliance with mass emission limits established in this operating permit may be demonstrated using engineering calculations based on fuel and raw material purchase records, manufacturer's specifications, manufacturer's analysis, AP-42 emission factors, source test results, operating records, material balance methods, and/or other applicable methods with written Departmental approval.

# 020 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- (a) The permittee shall conduct weekly stack emission observations, fugitive emission and malodor surveys around the perimeter of the facility property to ensure compliance with 25 Pa. Code § 123.1, 123.2, and 123.31.
- (b) If any stack emission, fugitive emissions or malodor are apparent, the permittee shall take immediate corrective action to eliminate them.

#### RECORDKEEPING REQUIREMENTS.

# 021 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain a record of all stack, malodor, and fugitive emission surveys performed. The records shall include the date, time, name and title of the observer, whether stack emissions, fugitive emissions, or malodors were observed, and any corrective action. Records shall be kept on site for a minimum of 5 years and made available to the Department upon request.

# 022 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

Records to establish compliance with mass emission limits shall be maintained on a monthly basis, retained for 5 years, and made available to the Department upon request.

# 023 [25 Pa. Code §129.105]

#### Recordkeeping requirements

- (a) The owner or operator of a wood furniture manufacturing operation shall keep records to demonstrate compliance with this section and §§129.101-129.104, §129.106 and §129.107. The records shall be maintained for at least 5 years.
- (b) Compliant coatings. The following records shall be maintained to demonstrate compliance with §129.102 (relating to emission standards).
- (1) A certified product data sheet for each coating and strippable spray booth coating subject to the emission limits of §129.102.
- (2) The VOC content as applied, lbs VOC/lb solids (kg VOC/kg solids), of each coating and strippable spray booth coating subject to the emission limits of §129.102, and copies of data sheets documenting how the as applied values were determined.
- (c) Continuous coaters. The owner or operator of a facility subject to the emission limits of §129.102 that is complying





#### SECTION C. Site Level Requirements

through the procedures specified in §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. The owner or operator of a facility complying through the procedures in 129.104(a)(2) by using a control system shall maintain the following records:
- (1) Copies of the calculations to support the equivalency of using a control system, as well as the data that are necessary to support the calculation of C and E in §129.104(a)(2)(i) and O in §129.104(a)(2)(iii).
- (2) Records of the daily average value of each continuously monitored parameter for each operating day. If all recorded values for a monitored parameter are within the range established during the initial performance test, the owner or operator may record that all values were within the range rather than calculating and recording an average for that day.
- (e) Work practice implementation plan. The owner or operator of a facility subject to the work practice standards of §129.103 (relating to work practice standards) shall maintain onsite copies of the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including:
  - (1) Records demonstrating that the operator training program is in place.
  - (2) Records maintained in accordance with the leak inspection and maintenance plan.
  - (3) Records associated with the cleaning and washoff solvent accounting system.
- (4) Records associated with the limitation on the use of conventional air spray guns showing total coating usage and the percentage of coatings applied with conventional air spray guns for each semiannual reporting period.
- (5) Records showing the VOC content of compounds used for cleaning booth components, except for solvent used to clean conveyors, continuous coaters and their enclosures or metal filters.
- (6) Copies of logs and other documentation developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (f) In addition to the recordkeeping requirements of subsection (a), the owner or operator of a facility that complies with §129.103 or §129.104(a)(1) shall maintain a copy of the compliance certifications submitted in accordance with §129.106(b) (relating to reporting requirements) for each semiannual period following the compliance date.
- (g) The owner or operator of a facility shall maintain a copy of the other information submitted with the initial status report required by \$129.106(a) and the semiannual reports required by \$129.106(b).

# 024 [25 Pa. Code §129.52]

Surface coating processes

A facility, regardless of the facility's annual emission rate, which contains surface coating processes shall maintain records sufficient to demonstrate compliance. 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.





# SECTION C. Site Level Requirements



- (ii) The volume used.
- (iii) The mix ratio.
- (iv) The density or specific gravity.
- (v) The weight percent of total volatiles, water, solids and exempt solvents.
- (vi) The volume percent of solids for 25 PA Code Section 129.52 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.

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

#### V. REPORTING REQUIREMENTS.

# 025 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

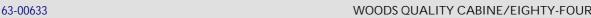
- (a) The permittee shall report each malfunction that may result in an emissions increase to the Department. For purposes of this condition a malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of an air pollution control or process equipments; or, operating in a non-permitted manner.
- (b) When the malfunction poses an imminent and substantial danger to the public's health and safety, or potential harm to the environment, the permittee shall report the incident to the Department within one hour.
- (1) The report shall describe the:
  - (i) name and location of the facility
  - (ii) nature and cause of the malfunction;
  - (iii) time when the malfunction was first observed;
  - (iv) expected duration of excess emissions; and
  - (v) estimated rate of emissions.
  - (2) The owner or operator shall notify the Department immediately when corrective measures have been accomplished.
- (c) Unless otherwise required by specific reporting requirements, any malfunction that is not subject to the notice requirements of paragraph (b) of this permit condition, shall be reported to the Department within 24 hours (or the next business day) by telephone, and within five days by mail of discovery. The report shall contain the same information required by subsection (b)(1).
- (d) Malfunctions shall be reported to the Department at the following address:

PA DEP Office of Air Quality 400 Waterfront Drive Pittsburgh, PA 15222-4745 (412) 442-4000

# 026 [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 §129.101(c) (relating to general provisions and applicability). The report shall include the items required by §129.104(b) (relating to compliance procedures and monitoring requirements).



#### SECTION C. Site Level Requirements

- (b) Semiannual compliance report dates. When demonstrating compliance in accordance with §129.104(a)(1) or (2), a semiannual report covering the previous 6 months of wood furniture manufacturing operations shall be submitted to the Department according to the following schedule:
- (1) 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 §129.101(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 §129.104(c) and (d), a statement of whether the facility was in compliance or noncompliance and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.

# 027 [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.

# WORK PRACTICE REQUIREMENTS.

# 028 [25 Pa. Code §123.1]

#### Prohibition of certain fugitive emissions

A person responsible for any source specified in §123.1(a)(1) -- (7) or (9) 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.

# 029 [25 Pa. Code §129.103]

# Work practice standards

- (a) Work practice implementation plan. Within 60 days after the compliance date specified in §129.101(b) or (c) (relating to general provisions and applicability), an owner or operator of a facility subject to the requirements in this section and §129.101, §129.102 and §§129.104-129.107 shall:
  - (1) Prepare and maintain a written work practice implementation plan that defines work practices for each wood



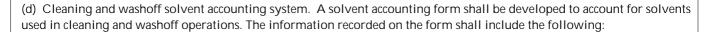
# SECTION C. Site Level Requirements

furniture manufacturing operation and addresses the provisions in subsections (b)-(j). The owner or operator of the facility shall comply with the work practice implementation plan.

- (2) Make available the written work practice implementation plan for inspection by the Department upon request. If the Department determines that the work practice implementation plan does not adequately address the criteria specified in subsections (b)-(j), the Department may require that the facility owner or operator modify the plan.
- (b) Operator training program. New and existing personnel, including contract personnel, who are involved in coating, cleaning or washoff operations or implementation of the requirements of this section, §129.101, §129.102 and §§129.104-129.107 shall complete an operator training program.
  - (1) New personnel shall be trained upon hiring.
  - (2) 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.
  - (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.

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- (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 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

WOODS QUALITY CABINE/EIC



# SECTION C. Site Level Requirements

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.

# 030 [25 Pa. Code §129.52]

#### Surface coating processes

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, roller coating, hand roller, hand brush, flow coating, dip coating or high volume-low pressure application equipment. Air atomized sprays may be used to apply cosmetic specialty coatings if the volume of the cosmetic specialty coatings is less than 5% by volume of the total coating used at the facility or to apply final repair coatings.

# VII. ADDITIONAL REQUIREMENTS.

# 031 [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 §129.102 (relating to emission standards) shall demonstrate compliance with those provisions by using one or more of the following methods:
- (1) To support that each sealer, topcoat and strippable spray booth coating meets the requirements of §129.102(1) (relating to emission standards):
  - (i) Maintain certified product data sheets (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) To comply through the use of a control system as described in §129.102(3):
  - (i) Calculate the required overall control efficiency needed to demonstrate compliance using the following equation:

$$O = (1 - E/C) \times 100$$

Where:

C = the VOC content of the as applied coating, lbs VOC/lb solids

E = the Table IV emission limit which shall be achieved by the affected emission point(s), lbs VOC/lb solids

O = the overall control efficiency of the control system, expressed as a percentage



#### SECTION C. Site Level Requirements

- (ii) Document that the value of C in the equation in subparagraph (i) is obtained from the VOC and solids content of the as applied coating.
- (iii) Determine the overall control efficiency of the control system using the procedures and test methods in Chapter 139 and demonstrate that the value of O calculated by the following equation is equal to or greater than the value of O calculated by the equation in subparagraph (i):

$$O = (F \times N) (100)$$

Where:

F = the control device efficiency, expressed as a fraction

N = the capture device efficiency, expressed as a fraction

- (b) Initial compliance.
- (1) Compliant coatings. An owner or operator of a facility subject to §129.102(1) that is complying through the procedures in subsection (a)(1) shall submit an initial compliance status report as required by \$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 §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 §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 §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. An owner or operator of a facility using a control system to comply with this section and §§ 129.101-129.103 and 129.105-129.107 shall demonstrate initial compliance by submitting a report to the Department that:
- (i) Identifies the operating parameter value to be monitored for the capture device and discusses why the parameter is appropriate for demonstrating ongoing compliance.
- (ii) Includes the results of the initial performance testing using the procedures and test methods specified in Chapter 139.
  - (iii) Includes calculations of the overall control efficiency (O) using the equation in subsection (a)(2)(iii).
- (iv) Defines those operating conditions of the control system critical to determining compliance and establishes operating parameter values that will ensure compliance with the standard:
- (A) For compliance with a thermal incinerator, minimum combustion temperature shall be the operating parameter value.
  - (B) For compliance with another control system, the operating parameter value shall be established using the

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# Site Level Requirements



procedures identified in subsection (c)(3)(iv).

- (v) An owner or operator of a facility complying with this paragraph shall calculate the site-specific operating parameter value as the arithmetic average of the maximum or minimum operating parameter values, as appropriate, that demonstrate compliance with the standards, using the procedures in Chapter 139.
- (4) Work practice implementation plan. An owner or operator of a facility subject to the work practice standards of §129.103 (relating to work practice standards) shall submit an initial compliance status report as required by §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 §§ 129.101-129.103 and 129.105-129.107 shall submit, in writing, to the Department a compliance certification with the semiannual report required by §129.106(b).
- (1) Compliant coatings. An owner or operator of a facility subject to §129.102 that is complying through the procedures specified in subsection (a)(1) shall demonstrate continuous compliance by the following:
  - (i) Using compliant coatings.
  - (ii) Maintaining records that demonstrate the coatings are compliant.
- (iii) Submitting a compliance certification which states that compliant sealers, topcoats, or both, and strippable spray booth coatings have been used each day in the semiannual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.
- (2) Continuous coaters. An owner or operator of a facility subject to §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. An owner or operator of a facility subject to §129.102 that is complying through the use of a control system shall demonstrate continuous compliance by the following:
  - (i) Installing, calibrating, maintaining and operating monitoring equipment approved, in writing, by the Department.
- (ii) Using a device to monitor the site-specific operating parameter value established in accordance with subsection (b)(3)(i).



# SECTION C. Site Level Requirements

- (iii) When a thermal incinerator is used, a temperature monitoring device equipped with a continuous recorder is required and shall be installed in the firebox or in the ductwork immediately downstream of the firebox at a location before any substantial heat exchange occurs.
- (iv) An owner or operator using a control system not listed in this section shall submit, in writing, to the Department a description of the system, test data verifying the performance of the system, the appropriate operating parameter values that will be monitored and the monitoring device that will be used to demonstrate continuous compliance with the standard and receive, in writing, the Department's approval prior to use.
- (v) An owner or operator of a facility may not operate the control system at a daily average value greater than or less than (as appropriate) the operating parameter value. The daily average value shall be calculated as the average of all values for a monitored parameter recorded during the operating day.
- (vi) Submitting a compliance certification which states that the control system has not been operated at a daily average value greater than or less than (as appropriate) the operating parameter value for each day in the semiannual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.
- (4) Work practice implementation plan. An owner or operator of a facility subject to the work practice standards of \$129.103 shall demonstrate continuous compliance by following the work practice implementation plan and submitting a compliance certification which states that the work practice implementation plan is being followed, or should otherwise identify the periods of noncompliance with the work practice standards and the reasons for noncompliance.
- (d) Compliance certification requirements. The compliance certification shall be signed by a responsible official of the company that owns or operates the facility. In addition to the certification requirements of this section, the certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- # 032 [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 §129.102 (relating to emission standards) may use an emissions averaging approach which meets the equivalency requirements in §129.51(a) (relating to general) to achieve compliance with §129.52 (relating to surface coating processes) or this section and §§129.101-129.106.
- (b) Additional requirement. When complying with the requirements of §129.52 or this section and §§129.101-129.106 through emissions averaging, an additional 10% reduction in emissions shall be achieved when compared to a facility using a compliant coatings approach to meet the requirements of this section and §§129.101-129.106.
- (c) Program goals and rationale. When using an emissions averaging program, the following shall be submitted to the Department in writing:
- (1) A summary of the reasons why the facility would like to comply with the emission limitations through an equivalency determination using emissions averaging procedures.
  - (2) A summary of how averaging can be used to meet the emission limitations.
- (d) Program scope. A description of the types of coatings that will be included in the facility's emissions averaging program shall also be submitted to the Department in writing:
  - (1) Stains, basecoats, washcoats, sealers and topcoats may all be used in the emissions averaging program.
  - (2) The owner or operator of the facility may choose other coatings for its emissions averaging program, if the program





# SECTION C. Site Level Requirements

meets the equivalency requirements in §129.51(a).

- (3) Coatings that are applied using continuous coaters may only be used in an emissions averaging program if the owner or operator of the facility can determine the amount of coating used each day.
  - (4) A daily averaging period shall be used, except under the following conditions:
- (i) A longer averaging period may be used if the owner or operator of the facility demonstrates in writing to the satisfaction of the Department that the emissions do not fluctuate significantly on a day-to-day basis.
- (ii) The owner or operator of the facility requests in writing and the Department approves in writing the longer averaging period.
- (e) Program baseline. The baseline for each coating included in the emissions averaging program shall be the lower of the actual or allowable emission rate as of June 10, 2000. The facility baseline emission rate may not be higher than what was presumed in the 1990 emissions inventory for the facility unless the Department has accounted for the increase in emissions as growth.
- (f) Quantification procedures. The emissions averaging program shall specify methods and procedures for quantifying emissions. Quantification procedures for VOC content are included in Chapter 139 (relating to sampling and testing). The quantification procedures shall also include methods to determine the usage of each coating and shall be accurate enough to ensure that the facility's actual emissions are less than the allowable emissions.
- (g) Monitoring, recordkeeping and reporting. A written summary of the monitoring, recordkeeping and reporting procedures 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.

#### VIII. COMPLIANCE CERTIFICATION.

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

#### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.



# SECTION D. Source Level Requirements

Source ID: 031 Source Name: FUEL COMBUSTION SOURCES

Source Capacity/Throughput:

#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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



# SECTION D. Source Level Requirements

Source ID: 101 Source Name: VOC/HAP SOURCES

Source Capacity/Throughput:

#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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



# SECTION D. Source Level Requirements

Source ID: 102 Source Name: FABRICATION SOURCES

Source Capacity/Throughput:

#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

## VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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





# SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.



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# SECTION F. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.



SECTION G. Miscellaneous.

# 031 FUEL COMBUSTION SOURCES

Source 031 consists of 100,000 BTU natural gas heaters, and four 500,000 BTU wood burning boilers.

## 101 VOC SOURCES

Source 101 consists of five paint booths. These may be added to or rearranged by permitee at will as long as mass emission limits are not exceeded.

#### 102 FABRICATION SOURCES

Source 102 consist of various woodworking equipment. These may be added to or rearranged by permitee at will as long as mass emission limits are not exceeded.

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