



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: January 5, 2006

Effective Date: January 5, 2006

Expiration Date: December 31, 2010

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: 06-05049](#)

Federal Tax Id - Plant Code: 23-1897530-1

Owner Information

Name: FLEETWOOD INDUSTRIES, INC.

Mailing Address: 225 PEACH ST
LEESPORT, PA 19533-8644

Plant Information

Plant: FLEETWOOD IND/READING FACILITY

Location: 06 Berks County

06962 Saint Lawrence Borough

SIC Code: 2599 Manufacturing - Furniture And Fixtures, Nec

Responsible Official

Name: ROBERT MERVINE

Title: GEN MGR

Phone: (610) 916 - 9999

Permit Contact Person

Name: MIKKI KYACK

Title: HUMAN RES MGR

Phone: (610) 916 - 9999

[Signature] _____

LEIF ERICSON, SOUTHCENTRAL REGION AIR PROGRAM MANAGER



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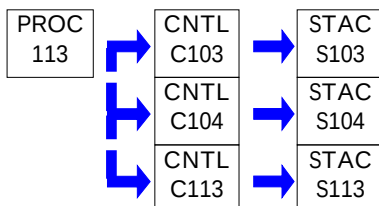
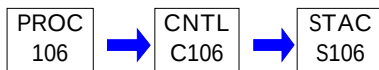
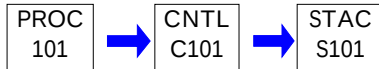
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SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	NO. 1 SPRAY BOOTH		
102	NO. 2 SPRAY BOOTH		
105	ADHESIVE STATION(S)		
106	CEPHLA SPRAY LINE		
113	RHOADS COATING LINE		
C101	DRY FILTERS: SPRAY BOOTH #1		
C102	DRY FILTERS: SPRAY BOOTH #2		
C103	DRY FILTERS: RHOADS LINE #1		
C104	DRY FILTERS: RHOADS LINE #2		
C105	DRY FILTERS: ADHESIVE BOOTH		
C106	DRY FILTER: CEPHLA LINE		
C113	DRY FILTERS: RHOADS LINE #3		
S101	STACK: SPRAY BOOTH #1		
S102	STACK: SPRAY BOOTH NO. 2		
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S106	STACK: CEPHLA LINE		
S113	STACK: RHOADS LINE #3		

PERMIT MAPS



**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, liquefied 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 §



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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:

Air Enforcement Branch (3AP12)
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

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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.

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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 or, of the submittal date specified elsewhere in the permit, 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 fugitive air contaminants from a source other than the following:

- a. Construction or demolition of buildings or structures.
- b. Grading, paving and maintenance of roads and streets.
- c. Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- d. Clearing of land.
- e. Stockpiling of materials.

Sources and classes of sources other than those identified in paragraphs (a) - (e), for which the operator has obtained a determination from the Department in accordance with 25 Pa. Code Section 123.1(b) that fugitive emissions from the source, after appropriate control, meet the following requirements:

- a. The emissions are of minor significance with respect to causing air pollution; and
- b. The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

002 [25 Pa. Code §123.2]

Fugitive particulate matter

No person shall permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in the preceding permit Condition #001, Section C, if such emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

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

004 [25 Pa. Code §123.41]

Limitations

No person shall emit visible air contaminants into the outdoor atmosphere in such a manner that the opacity of the emission is either of the following unless specifically stated otherwise in this permit:

- a. Equal to or greater than 20 percent for a period or periods aggregating more than three minutes in any one hour.
- b. Equal to or greater than 60 percent at any time.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- a. Hazardous Air Pollutants (single) - 10 tons
- b. Hazardous Air Pollutants (total) - 25 tons

SECTION C. Site Level Requirements**II. TESTING REQUIREMENTS.**

006 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured by using either of the following:

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

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

At least 60 days prior to the test, the permittee shall submit to the Department for approval, the procedures for the testing and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

At least 30 days prior to the testing, the Regional Air Quality Program Manager or a representative shall be informed of the date and time of the testing.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Within 60 days after the source testing, three copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Program Manager or a representative for approval.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

011 [25 Pa. Code §139.1]

Sampling facilities.

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

III. MONITORING REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall conduct a weekly inspection of the sources covered by this approval during the daylight hours when the facility is in production to detect visible emissions, fugitive emissions and malodors as follows:

- a. Visible emissions in excess of the limits specifically stated in this permit in Section D and Section E. Visible emissions may be measured according to the methods specified in Condition #004, Section C. As an alternative, facility personnel who observe such visible emissions shall report each incident to the Department within two hours of each occurrence and make arrangements for a certified observer to read the visible emissions.

SECTION C. Site Level Requirements

b. Presence of visible fugitive emissions and fugitive particulate matter beyond the plant property boundaries, as stated in Condition #002, Section C.

c. Presence of odors beyond the facility property boundaries that have the potential to be malodorous as stated in Condition #003, Section C.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a logbook for recording the results of the weekly inspections around the facility. The records shall include the name of the company representative, date and time of the monitoring and the wind direction.

V. REPORTING REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall report malfunctions, which occur at the facility to the Department. As defined in 40 CFR Section 60.2 and incorporated by reference in 25 Pa. Code Chapter 122, a malfunction is any sudden, infrequent and not reasonably preventable failure of the air pollution control equipment, process equipment, or process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

Malfunctions, which occur at the facility, which pose an imminent danger to public health, safety, welfare and environment, shall be reported immediately to the Department by telephone. The telephone report of such malfunctions shall occur no later than two (2) hours after the incident. The permittee shall submit a written report of such malfunctions to the Department within three (3) days of the telephone report.

Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirements above, shall be reported to the Department, in writing, within five (5) days of the discovery of the malfunction.

VI. WORK PRACTICE REQUIREMENTS.

015 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

a. Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads or the clearing of land.

b. Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

c. Paving and maintenance of roadways.

d. Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water or other means.

VII. ADDITIONAL REQUIREMENTS.

016 [25 Pa. Code §123.42]

Exceptions

SECTION C. Site Level Requirements

The opacity limitations do not apply to a visible emission in any of the following instances:

- a. When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- b. When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- c. When the emission results from sources specified in Condition #001, Section C (relating to prohibition of certain fugitive emissions).

017 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material in the air basin except where the open burning operations result from the following:

- a. A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- b. Any fire set for the propose of instructing personnel in fire fighting, when approved by the Department.
- c. A fire set for the prevention and control of disease or pests, when approved by the Department.
- d. A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- e. A fire set solely for recreational or ceremonial purposes.
- f. A fire set solely for cooking food.

This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 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 **

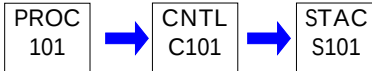
**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: NO. 1 SPRAY BOOTH

Source Capacity / Throughput:

Conditions for this source occur in the following groups: SG01 WOOD SURFACE COATING

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: NO. 2 SPRAY BOOTH

Source Capacity / Throughput:

Conditions for this source occur in the following groups: SG01 WOOD SURFACE COATING

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

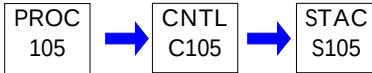
*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 105

Source Name: ADHESIVE STATION(S)

Source Capacity / Throughput:

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the emissions of VOCs from the adhesive operation to less than 2.7 tons during any consecutive 12-month period.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the source in a manner that results in no visible emissions.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record the following items for this operation:

- a. Monthly amounts of VOC containing adhesives used,
- b. 12-month rolling total of VOC containing adhesives used,
- c. Monthly emissions of VOCs, and
- d. 12-month rolling total emissions of VOCs.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Manufacturer supplied Certified Product Data Sheets (CPDS) and /or Material Safety Data Sheets (MSDS) for all VOC containing adhesives applied within the most recent five (5) years shall be maintained at the above location and be made available to the Department at any time.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

**SECTION D. Source Level Requirements**

The permittee shall daily record the quantity and identity of all VOC solvents used for clean-up purposes.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the VOC emissions from the cleanup of equipment in the following manner:

- a. All solvents shall be stored in plunger cans.
- b. All rags containing solvent shall be placed into storage containers (triangular red cans or others approved by the Department) for storage.
- c. All rags containing solvent shall be placed into sealed Haz-Waste drums and removed from the facility as part of disposal.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

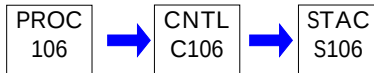
**SECTION D. Source Level Requirements**

Source ID: 106

Source Name: CEPHLA SPRAY LINE

Source Capacity / Throughput:

Conditions for this source occur in the following groups: SG01 WOOD SURFACE COATING

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

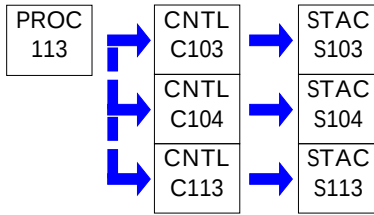
SECTION D. Source Level Requirements

Source ID: 113

Source Name: RHOADS COATING LINE

Source Capacity / Throughput:

Conditions for this source occur in the following groups: SG01 WOOD SURFACE COATING



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION E. Source Group Restrictions.**

Group Name: SG01 WOOD SURFACE COATING

Group Description: Wooden Furniture Surface Coating Operations

Sources included in this group:

ID	Name
101	NO. 1 SPRAY BOOTH
102	NO. 2 SPRAY BOOTH
106	CEPHLA SPRAY LINE
113	RHOADS COATING LINE

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the sources in a manner that results in no visible emissions.

002 [25 Pa. Code §129.102]

Emission Standards

The permittee shall additionally limit the VOC content of coatings, as applied, used to the following:

- a. Waterborne Topcoats - 0.8 pounds per pound of solids
- b. High Solids Coatings:
 1. Sealers - 1.9 pounds per pound of solids
 2. Topcoats - 1.8 pounds per pound of solids
- c. Acid-cured Alkyd Amino Coatings:
 1. Acid-cured Alkyd Amino Sealers - 2.3 pounds per pound of solids
Acid-cured Alkyd Amino Conversion Varnish Topcoats - 2.0 pounds per pound of solids
 2. Other Sealers - 1.9 pounds per pound of solids
Acid-cured Alkyd Amino Conversion Varnish Topcoats - 2.0 pounds per pound of solids
 3. Acid-cured Alkyd Amino Sealers - 2.3 pounds per pound of solids
Other Topcoats - 1.8 pounds per pound of solids
- d. Waterborne strippable Spray Booth Coatings - 0.8 pounds per pound of solids

003 [25 Pa. Code §129.52]

Surface coating processes

The permittee shall limit the VOC content in the as applied wood furniture coating to the following:

- a. Top coats and enamels - 3.0 pounds per pound of solids
- b. Wash coats - 14.3 pounds per pound of solids
- c. Final repair coats - 3.3 pounds per pound of solids
- d. Base coats - 2.2 pounds per pound of solids
- e. Cosmetic Specialty coatings - 14.3 pounds per pound of solids
- f. Sealers - 3.9 pounds per pound of solids
- g. Stains - 14.3 pounds per pound of solids
- h. Primers - 14.3 pounds per pound of solids



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 (Title V General Requirements).

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §129.104]

Compliance procedures and monitoring requirements.

a. Compliance Methods:

The permittee shall demonstrate compliance with the restriction of Condition #002 by using one or more of the following methods:

To support that each sealer, topcoat and strippable spray booth coating meets the limits:

1. Maintain CPDSs for each of the coatings.
2. 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.
3. Perform sampling and testing in accordance with the procedures and test methods in Chapter 139 (relating to sampling and testing).

b. Initial Compliance:

1. Compliant coatings: The permittee shall submit an initial compliance status report as required by Condition #012 (relating to reporting requirements), stating that compliant sealers, topcoats and strippable spray booth coatings are being used by the facility.

2. Continuous Coaters: The permittee shall demonstrate initial compliance by either:

A. Submitting an initial compliance status report as required by Condition #012 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.

B. Submitting an initial compliance status report as required by Condition #012 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 permittee shall also provide data that demonstrates the correlation between the viscosity and the VOC content of the coating in the reservoir.

4. Work Practice Implementation Plan: The permittee shall submit an initial compliance status report as required by Condition #012, 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:

The permittee shall submit, in writing, to the Department a compliance certification with the semiannual report required by Condition #012.

1. Compliant coatings: The permittee that is complying through the procedures specified in subsection (a)(1) shall demonstrate continuous compliance by the following:

A. Using compliant coatings.

B. Maintaining records that demonstrate the coatings are compliant.

C. 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.

SECTION E. Source Group Restrictions.

2. Continuous Coaters: The permittee 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:

A. 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.

B. 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. Work Practice Implementation Plan: The permittee 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.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record the following information for waste coatings, solvents or mixtures sent off-site for recycling or disposal:

- a. Pounds and gallons per month of waste coating, solvents or mixtures shipped from the facility,
- b. Waste profile or sampling data for each shipment, and
- c. Identification of the waste disposal company for each shipment.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Manufacturer supplied Certified Product Data Sheets (CPDS) and /or Material Safety Data Sheets (MSDS) for all coatings applied within the most recent five (5) years shall be maintained at the above location and be made available to the Department at any time.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record the quantity and identity of all VOC solvents used for cleanup purposes on the source on a daily basis. These records shall be maintained and shall be made part of the permittee's annual "AIMS" report to the Department.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

**SECTION E. Source Group Restrictions.**

The permittee shall maintain a continuous 12-month rolling total of VOC emissions from the source.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep daily records for each coating for the source. These records shall be compiled on a monthly basis and submitted on an annual basis to the Reading District Office along with the facilities "AIMS" report.

a. The following parameters for each coating, thinner and other component as supplied:

1. The coating, thinner or component name and identification,
2. The volume used,
3. The mix used,
4. VOC content in pounds per gallon of coating solids,
5. The coating density or specific gravity at 25°C,
6. The weight percent of total volatiles, including water and exempt solvents,
7. The weight percent of water,
8. The weight percent of exempt solvents,
9. The weight percent VOC (volatiles minus water and exempt solvents), and
10. The volume percent of solids of the as applied coating.

b. Pounds of VOC emitted.

010 [25 Pa. Code §129.105]

Recordkeeping requirements

a. Requirement:

The permittee shall keep records to demonstrate compliance with Conditions #002, 004, 012 and 017.

b. Compliant Coatings:

The following records shall be maintained to demonstrate compliance with Condition #002 (relating to emission standards):

1. A certified product data sheet for each coating and strippable spray booth coating subject to the emission limits of Condition #002.
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 Condition #002, and copies of data sheets documenting how the as applied values were determined.

c. Continuous Coaters:

The permittee that is complying through the procedures specified in Condition #004 (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. Work Practice Implementation Plan:

The permittee subject to the work practice standards of Condition #017 (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:

**SECTION E. Source Group Restrictions.**

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.
- e. In addition to the record keeping requirements of subsection (a), the permittee shall maintain a copy of the compliance certifications submitted in accordance with Condition #012 (relating to reporting requirements) for each semiannual period following the compliance date.
- f. The permittee shall maintain a copy of the other information submitted with the initial status report required by Condition #012 and the semiannual reports required by Condition #012.

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Any new coating or any compositional change in an existing coating shall be reported to the Reading District Office prior to its use. Information to be reported shall include: (a)(1) through (a)(4) of the above Condition #009.

012 [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 start-up of the sources. The report shall include the items required by Condition #004 (relating to compliance procedures and monitoring requirements).

b. Semiannual Compliance Report Dates:

When demonstrating compliance in accordance with Condition #004, 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 start-up of the sources.
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 Condition #004, 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.

VI. WORK PRACTICE REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

SECTION E. Source Group Restrictions.

Equipment (a differential manometer or equivalent, as approved by the Department), shall be provided and maintained so that at any time the pressure drop across the dry filters of each spray booth can be measured.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the VOC emissions from the cleanup of equipment in the following manner:

- a. All solvents shall be stored in plunger cans.
- b. All rags containing solvent shall be placed into storage containers (triangular red cans or others approved by the Department) for storage.
- c. All rags containing solvent shall be placed into sealed Haz-Waste drums and removed from the facility as part of disposal.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain provisions so the Department can obtain samples of the coatings being used at each booth.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall demonstrate compliance with Condition #003 for each VOC-containing surface coating by one of the following methods:

- a. For surface coatings applied as they are received from the manufacturer, the permittee may demonstrate compliance with the applicable standard by obtaining EPA Method 24 certification testing from the manufacturer (or Certified Product Data Sheets (CPDSs)).
- b. In the absence of EPA Method 24 certification testing from the manufacturer (or CPDSs) allowed under (a), above, the permittee shall perform EPA Method 24 certification testing on all surface coatings applied as received from the manufacturer.
- c. The permittee shall perform EPA Method 24 certification testing on all surface coatings that are not applied as they are received from the manufacturer.
- d. The permittee may use calculated VOC content values in lieu of EPA Method 24 certification testing for customized surface coatings where the permittee maintains a CPDS for all surface coating constituents (i.e. coatings, pigments, thinners/cutting solvents). This option is available in those cases where both the base coating and the final customized coating comply with Condition #003, above. In the event of any inconsistency between the calculated VOC content and data obtained from EPA Method 24 certification testing, the latter shall take precedence.

To assist in the compliance demonstration with Condition #003, above, either ASTM Method D2697 or ASTM Method D6093 (or other method approved by the Department) must be performed on each surface coating to determine its solids content. If a CPDS is provided that includes its solids content, then neither of the aforementioned solids content test methods need to be performed on that surface coating.

017 [25 Pa. Code §129.103]

Work practice standards

The permittee shall follow the work practices below:

a. Work Practice Plan:

The permittee shall develop a work practice implementation plan prior to the start-up of any of the sources within this Group Source. The permittee 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) through (j). The permittee shall comply with the

SECTION E. Source Group Restrictions.

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) through (j), the Department may require that the permittee 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 permit, shall complete an operator training program.

1. New personnel hired after the start of the sources shall be trained upon hiring.

2. Personnel that were employed at the existing facility shall be trained before the start-up of the sources.

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:

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

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

C. 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.

D. 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.

E. A record of the date each employee is trained.

c. Leak Inspection and Maintenance Plan:

The permittee 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:

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

B. 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:

SECTION E. Source Group Restrictions.

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:
 - A. Cleaning activities.
 - B. Washoff operations.
3. The name and total quantity of each solvent evaporated to the atmosphere each month from:
 - A. Cleaning activities.
 - B. Washoff operations.

e. Spray Booth Cleaning:

The permittee 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:

The permittee shall use normally closed containers for storing coating, cleaning and washoff materials.

g. Application Equipment Requirements:

The permittee 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:
 - A. The coatings are applied after completion of the wood furniture manufacturing operation.
 - B. 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 permittee, 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:
 - A. 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.
 - B. 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.

SECTION E. Source Group Restrictions.**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.

VII. ADDITIONAL REQUIREMENTS.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The VOC content standards stated above 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:

- a. 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.
- b. The permittee requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

019 [25 Pa. Code §129.52]

Surface coating processes

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:

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

Where:

VOC = VOC content in pound VOC / pound 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 solvent(s)

Wn = Weight percent of solids of the as applied coating

*** Permit Shield in Effect. ***



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.



SECTION H. Miscellaneous.



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