



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: August 16, 2005

Effective Date: September 1, 2005

Expiration Date: August 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: 67-05018](#)

Federal Tax Id - Plant Code: 36-3899269-3

Owner Information

Name: YORKTOWNE INC
Mailing Address: 100 REDCO AVE
RED LION, PA 17356-0231

Plant Information

Plant: YORKTOWNE INC / NO 6 RED LION
Location: 67 York County 67805 Red Lion Borough
SIC Code: 2434 Manufacturing - Wood Kitchen Cabinets

Responsible Official

Name: JOSEPH STENGLEIN
Title: VICE PRESIDENT OF MANUFAC
Phone: (717) 244 - 4011

Permit Contact Person

Name: PAUL BLANNARD
Title: SAFETY & ENVIRON. MGR.
Phone: (717) 246 - 5270

[Signature] _____
LEIF ERICSON, SOUTHCENTRAL REGION AIR PROGRAM MANAGER



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General Title V Requirements

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

Section C. Site Level Title V Requirements

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

Section D. Source Level Title V Requirements

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

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



SECTION A. Table of Contents

Section E. Source Group Restrictions

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

Section F. Alternative Operating Scenario(s)

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

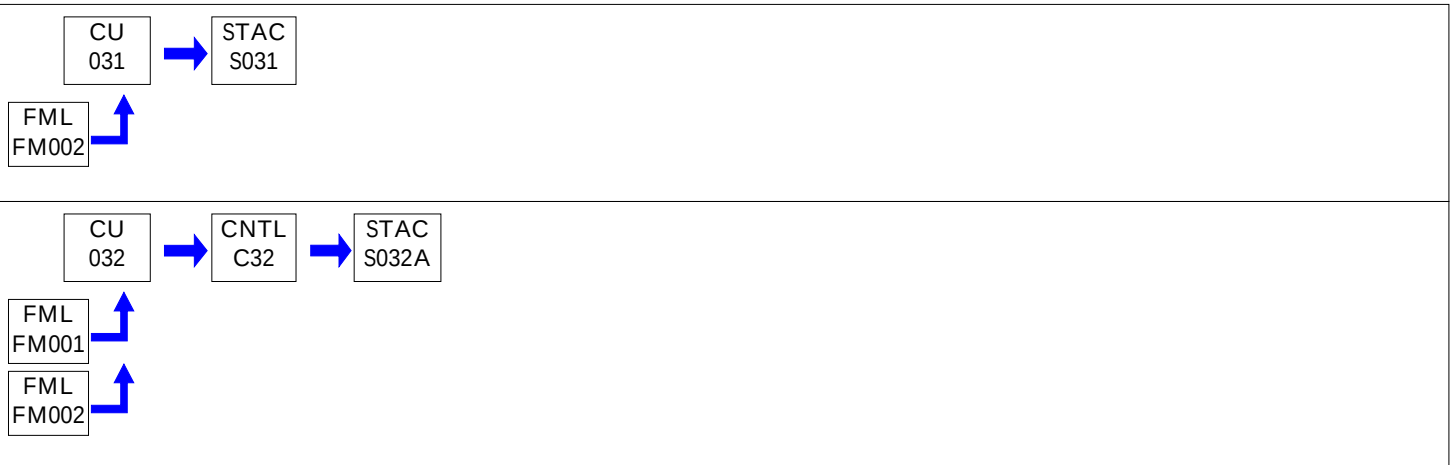
Section G. Emission Restriction Summary

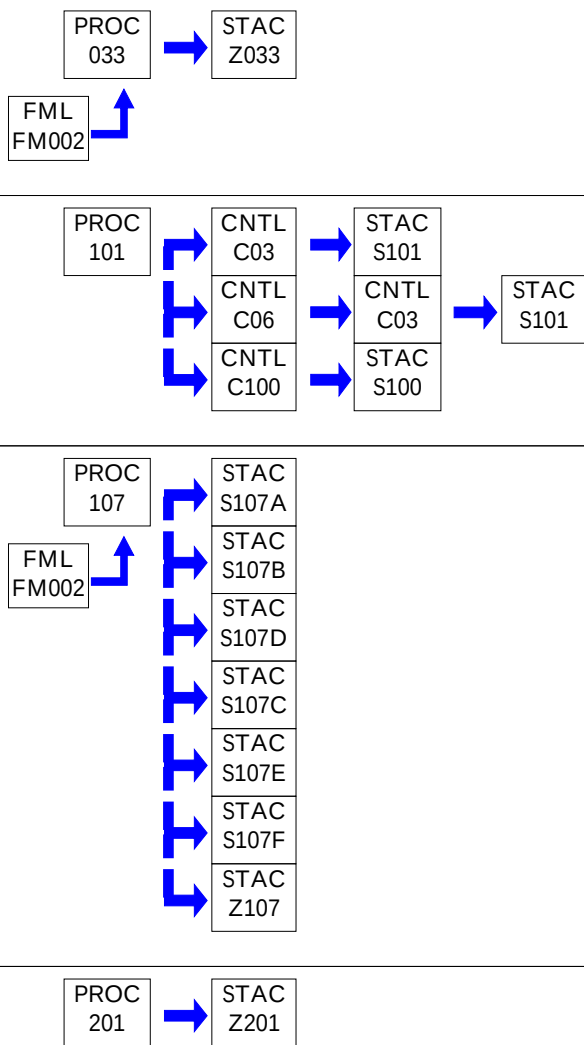
Section H. Miscellaneous

SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	"BACK-UP" BOILER	10.000 MMBTU / HR	
		10.00 MCF / HR	NATURAL GAS
032	NORTHFAB SYSTEMS BOILER	12.300 MMBTU / HR	
		1,620.00 Lbs / HR	WASTE WOOD
		12.30 MCF / HR	NATURAL GAS
033	SPACE HTRS & AIR MU UNITS (9)	10.50 MCF / HR	NATURAL GAS
		6.40 Gal / HR	NO. 2 OIL
101	WOODWORKING AREA	12.00 Tons / HR	WOOD / PRODUCTS
107	FINISHING OPS W/ 5 SPRAY BOOTHS	100.00 Lbs / HR	SOLVENT
201	PARTS WASHER		
C03	MOLDOW FABRIC COLLECTOR		
C06	LOW DRAFT LOSS CYCLONE		
C100	STEELCRAFT FABRIC COLLECTOR		
C32	ZURN MULTICLONE		
FM001	FUEL - WOOD & WOOD PRODUCTS		
FM002	FUEL - NATURAL GAS		
S031	STACK - "BACK-UP" BOILER		
S032A	STACK - DECOM'D BOILER		
S100	STACK - STLCFT COLLECTOR		
S101	STACK - WOODWORKING AREA		
S107A	STACK - FINISH OPRS (BBL)		
S107B	STACK - FINISH OPRS (BBL)		
S107C	STACK - FINISH OPRS (BTH)		
S107D	STACK - FINISH OPRS (BTH)		
S107E	STACK - FINISH OPR (OVEN)		
S107F	STACK - FINISH OPRS		
Z033	FUGITIVES - HTRS/ MU UNITS		
Z107	FUGITIVES - FINISH OPRS		
Z201	FUGITIVES -PARTS WASHER		

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 §

SECTION B. General Title V Requirements

127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.

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

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

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

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

Reactivation of Sources

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

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

#019 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

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

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

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

Submissions

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

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

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

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

SECTION B. General Title V Requirements

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

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

Sampling, Testing and Monitoring Procedures

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

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

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

Recordkeeping Requirements

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

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.

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

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

#023 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

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

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source.

SECTION B. General Title V Requirements

The required reports shall be certified by a responsible official.

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

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#024 [25 Pa. Code § 127.513]

Compliance Certification

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance 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 contaminant from a source other than the following:

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

002 [25 Pa. Code §123.2]

Fugitive particulate matter

No person shall emit particulate matter into the atmosphere from a source specified in Section C, Condition #001 if the emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

No person shall 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.

004 [25 Pa. Code §123.41]

Limitations

No person shall permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

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

005 [25 Pa. Code §123.42]

Exceptions

The emission limitations of Pa. Code §123.41 shall not apply when:

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

SECTION C. Site Level Requirements

006 [25 Pa. Code §129.14]

Open burning operations

(a) No person may permit the open burning of material 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.

(b) The requirements of subsection (a) do not apply where the open burning operations result from:

- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) A fire set solely for recreational or ceremonial purposes.
- (5) A fire set solely for cooking food.

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

II. TESTING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Department reserves the right to require exhaust performance testing of any source and Method 24 testing of any coating as necessary during the permit term to verify emissions for purposes including emission fees, malfunctions or permit condition violations.

008 [25 Pa. Code §139.1]

Sampling facilities.

Upon the request of the Department, the person responsible for a source 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.

009 [25 Pa. Code §123.43]

Measuring techniques

Visible air contaminants may be measured using either of the following:

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

SECTION C. Site Level Requirements

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall conduct a weekly inspection during regular business workdays around the plant periphery during the daylight hours when the plant is in production to detect visible emissions, fugitive visible emissions and malodorous emissions as follows:

- (1) Visible emissions in excess of the limits stated in Section C, Condition #004. Visible emissions may be measured according to the methods specified in Section C, Condition #009. As an alternative, plant personnel who observe such visible emissions shall report each incident to the Department within four hours of the occurrence and arrange for a certified observer to read the visible emissions.
- (2) Presence of fugitive visible emissions beyond the plant property boundaries, as stated in Section C, Condition #002.
- (3) Presence of malodorous air contaminants beyond the plant property boundaries as stated in Section C, Condition #003.

IV. RECORDKEEPING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a logbook to record the results of all observations of visible, fugitive and malodorous air emissions, along with the name of the company observer, date, time and wind direction during the observance.

V. REPORTING REQUIREMENTS.

012 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code §127.511 (c)(1).]

Reporting of Malfunctions - The permittee shall report malfunctions which occur at the Title V facility to the Department. As defined in 40 CFR §60.2 and incorporated by reference in 25 Pa Code §122, a malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a 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:

- (a) Malfunctions which occur at the Title V facility which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two hours after the incident. The permittee shall submit a written report of instances of such malfunctions to the Department within three days of the telephone report.
- (b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirements of Paragraph (a) above, shall be reported to the Department, in writing, within five days of discovery of the malfunction.

VI. WORK PRACTICE REQUIREMENTS.

013 [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 the Site Level Requirements, Condition #001, 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.

SECTION C. Site Level Requirements

014 [25 Pa. Code §127.444]

Compliance requirements.

The permittee shall maintain and operate the sources and the air cleaning devices consistent with good operating and maintenance practices and operate in a manner as not to cause air pollution.

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Effect **

**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: "BACK-UP" BOILER

Source Capacity / Throughput:

10.000 MMBTU / HR

10.00 MCF / HR

NATURAL GAS

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

001 [25 Pa. Code §123.11]

Combustion units

No person shall permit the emission into the outdoor atmosphere of particulate matter from the "back-up" boiler in excess of 0.4 pound per million Btu of heat input.

002 [25 Pa. Code §123.22]

Combustion units

No person shall permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from the "back-up" boiler in excess of 4 pounds per million Btu of heat input over any 1-hour period.

[Compliance with the requirement(s) specified in this streamlined permit condition assures compliance with the SIP-approved sulfur dioxide emission limit specified in 40 CFR §52.2020(c)(1).]

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the "back-up" boiler solely on natural gas.

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.

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

V. REPORTING REQUIREMENTS.

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



SECTION D. Source Level Requirements

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).

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: 032

Source Name: NORTHFAB SYSTEMS BOILER

Source Capacity / Throughput:

12.300 MMBTU / HR

1,620.00 Lbs / HR

12.30 MCF / HR

WASTE WOOD

NATURAL GAS

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

001 [25 Pa. Code §123.11]

Combustion units

No person shall permit the emission into the outdoor atmosphere of particulate matter from the Northfab boiler in excess of 0.4 pound per million Btu of heat input.

002 [25 Pa. Code §123.22]

Combustion units

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

[Compliance with the requirement(s) specified in this streamlined permit condition assures compliance with the SIP-approved sulfur dioxide emission limit specified in 40 CFR §52.2020(c)(1).]

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the Northfab boiler solely on either wood or natural gas.

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.

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

V. REPORTING REQUIREMENTS.

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



SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The cyclone shall be operated at all times when the Northfab Systems boiler is in operation.

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: 033

Source Name: SPACE HTRS & AIR MU UNITS (9)

Source Capacity / Throughput:

10.50 MCF / HR

NATURAL GAS

6.40 Gal / HR

NO. 2 OIL

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

001 [25 Pa. Code §123.13]

Processes

No person shall permit the emission into the outdoor atmosphere of particulate matter from the natural gas-fired space heaters and air make-up units in such a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

002 [25 Pa. Code §123.21]

General

No person shall permit the emission into the outdoor atmosphere of sulfur oxides from the natural gas-fired space heaters and air make-up units in such a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 ppm, by volume, dry basis.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate the natural gas-fired space heaters and air make-up units solely on natural gas.

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.

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

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.

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



SECTION D. Source Level Requirements

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

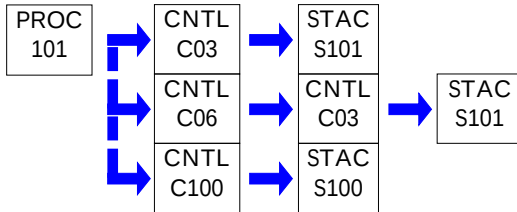
Source ID: 101

Source Name: WOODWORKING AREA

Source Capacity / Throughput:

12.00 Tons / HR

WOOD / PRODUCTS



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person shall permit the emission into the outdoor atmosphere of particulate matter from the woodworking operations in a manner that the concentration of the particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

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.

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

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.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The fabric collectors/cyclones shall be operated at all times when the woodworking sources are in operation.

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: 107

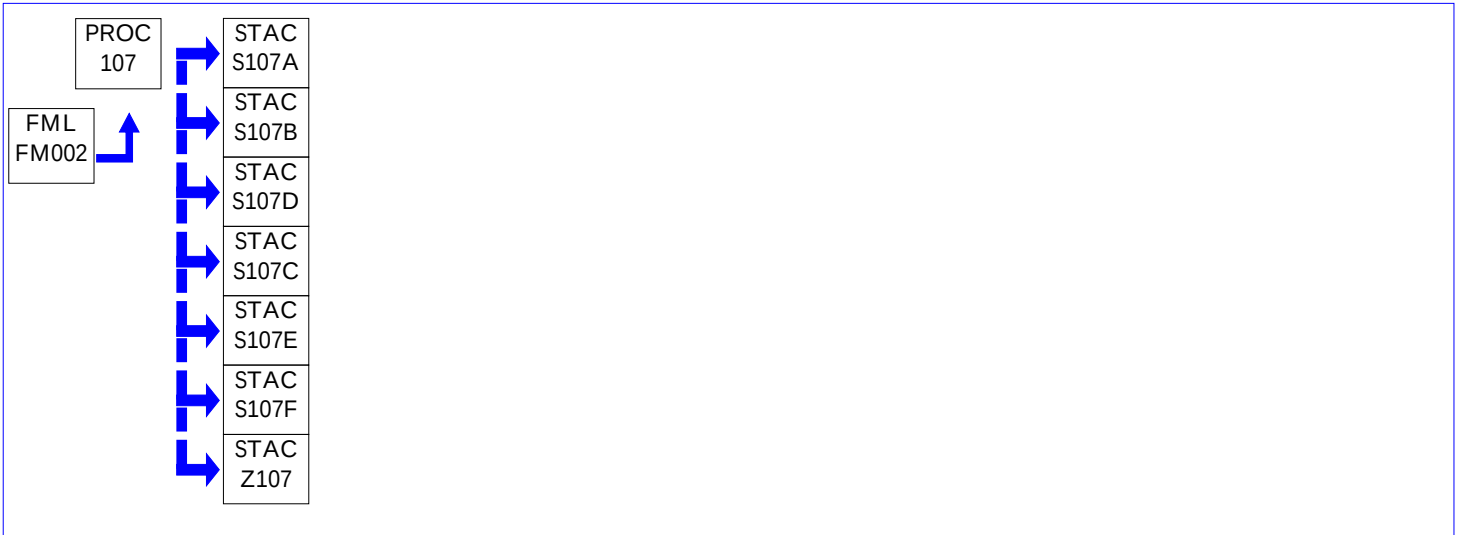
Source Name: FINISHING OPS W / 5 SPRAY BOOTHS

Source Capacity / Throughput:

100.00 Lbs / HR

SOLVENT

Conditions for this source occur in the following groups: 01

**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).



SECTION D. Source Level Requirements

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).

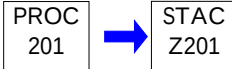
*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 201

Source Name: PARTS WASHER

Source Capacity / Throughput:

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

001 [25 Pa. Code §129.63]

Degreasing operations

Parts washing activities shall be conducted in accordance with the applicable requirements of 25 Pa. Code Section 129.63 to include the following:

(a) After December 22, 2002, parts washing units shall not employ any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.

(b) This permit condition does not apply when:

(1) Parts washing units are used in extreme cleaning service. Extreme cleaning service is defined as the use of a parts washing machine to clean parts used in the manufacture of the following gases or to clean parts exposed to these gases in manufacturing, production, research and development, analytical work, or other similar operations:

- (A) Oxygen in concentrations greater than 23%
- (B) Ozone
- (C) Nitrous oxide
- (D) Fluorine
- (E) Chlorine
- (F) Bromine
- (G) Halogenated compounds

(2) The permittee demonstrates, and the Department approves in writing, that compliance with this permit condition will result in unsafe operating conditions.

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.

002 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall maintain the following records on and after December 22, 2002:

- (a) The name and address of the solvent supplier.
- (b) The type of solvent including the product or vendor identification number.
- (c) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

An invoice, bill of sale, or certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other

**SECTION D. Source Level Requirements**

appropriate documentation acceptable to the Department may be used to comply with this section.

The permittee shall retain these records for a minimum of five (5) years and shall make them available to the Department upon its request.

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.

003 [25 Pa. Code §129.63]

Degreasing operations

Each parts washing unit shall be equipped with one of the following:

- (a) A cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent.
- (b) A perforated drain with a diameter of not more than six (6) inches, if the unit drains directly into the solvent storage reservoir.

004 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall operate each parts washing unit in accordance with the following procedures:

- (a) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (b) Flushing of parts using a flexible hose or other flushing device shall be performed only within the unit. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (c) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in any parts washing unit.
- (d) Air-agitated solvent baths may not be used.
- (e) Spills during solvent transfer and use of each parts washing unit shall be cleaned up immediately.

005 [25 Pa. Code §129.63]

Degreasing operations

Each parts washing unit shall have a permanent, conspicuous label summarizing the operating requirements in Condition #004. In addition, the label shall include the following discretionary good operating practices:

- (a) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the unit.
- (b) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
- (c) Work area fans should be located and positioned so that they do not blow across the opening of the parts cleaning unit.

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.**

006 [25 Pa. Code §129.63]

Degreasing operations

Conditions Nos. 3, 4, and 5 apply to each parts washing unit so long as the unit uses 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.

*** Permit Shield in Effect. ***

**SECTION E. Source Group Restrictions.**

Group Name: 01

Group Description: NESHAP Subpart JJ (40 CFR 63.800 thru 63.808)

Sources included in this group:

ID	Name
107	FINISHING OPS W/ 5 SPRAY BOOTHS

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Effective June 10, 2001

(a) The permittee shall apply either waterborne topcoats or a combination of sealers and topcoats and strippable spray booth coatings, as applied, in pounds of VOC per pound of coating solids (kg VOC / kg of coating solids) with a VOC content equal to or less than the standards specified below:

(1) waterborne topcoats 0.8

(2) high solids coating systems

sealer 1.9

topcoat 1.8

(3) acid-cured alkyd amino systems

acid-cured alkyd amino sealer 2.3

acid-cured alkyd amino conversion varnish topcoat 2.0

other sealer 1.9

acid-cured alkyd amino conversion varnish topcoat 2.0

acid-cured alkyd amino sealer 2.3

other topcoat 1.8

(4) waterborne strippable spray booth coating 0.8

(b) The above VOC emission standards do not apply to a coating that is used exclusively for determining product quality and commercial acceptance, touch-up and repair, and other small quantity coatings until the State Implementation Plan (SIP) is approved by the EPA if the coating meets the following criteria:

(1) The quantity of the coating that is 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.

[25 Pa. Code Section 129.102(1) and 129.101(f)(1) and (2)]

002 [25 Pa. Code §129.52]

Surface coating processes

(a) The volatile organic compound (VOC) content of all coatings applied by the individual Group 001 sources shall not exceed the allowable levels specified in 25 Pa. Code Section 129.52 as follows:

(1) Topcoats and enamels 3.0 lbs VOC / lb coating solids

(2) Washcoat 14.3 lbs VOC / lb coating solids

SECTION E. Source Group Restrictions.

- (3) Final repair coat 3.3 lbs VOC / lb coating solids
- (4) Basecoats 2.2 lbs VOC / lb coating solids
- (5) Cosmetic specialty coatings 14.3 lbs VOC / lb coating solids
- (6) Sealers 3.9 lbs VOC / lb coating solids

(b) The VOC limits in (a), above, do not apply to coatings used exclusively for determining product quality and commercial acceptance, touch-up and repair, and other small quantity coatings that meet the following criteria after EPA approves the State Implementation Plan (SIP) submitted by the Department:

- (1) The quantity of coatings 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 permittee requests, in writing, and the Department approves, in writing, the exemption prior to use of the coatings.

(c) 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:

$$\text{VOC} = (\text{Wo})(\text{Dc}) / \text{Vn}$$

where

VOC = VOC content in pounds of VOC / gallon 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)
Dc = density of coating in pounds / gallon at 25 degrees C.
Vn = volume percent of solids of the as applied coating

(d) 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 according to the equation found in 25 Pa. Code Section 129.52(b)(ii)

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

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

where

VOCB = VOC content in pounds of 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 solvents
Wn = weight percent of solids of the as applied coating

[25 Pa. Code Section 129.52(b)(1)(i), (ii) and (iii), 129.52(d), Table I Category 11, 129.52(h)(1) and (2)]

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.802]

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

[40 CFR § 63.802]

SECTION E. Source Group Restrictions.

(a) The emission of volatile hazardous air pollutants (VHAPS) from the existing conventional line sources which are identified in 40 CFR Part 63 Subpart JJ, Table 2 (relating to the list of volatile hazardous air pollutants) may not exceed 1.0 lb VHAP per lb solids, as applied, as specified in 40 CFR Part 63 Subpart JJ Table 3 (relating to summary of emission limits).

(b) The emission of VHAPs from wood finishing operations except for conventional line sources which are identified in 40 CFR Part 63 Subpart JJ Table 2 (relating to the list of volatile hazardous air pollutants) may not exceed 1.0 lb VHAP per lb solids, as applied, as specified in 40 CFR Part 63 Subpart JJ Table 3 (relating to summary of emission limits).

(c) The permittee shall limit the emission of VOCs (identified in 40 CFR Part 63 Subpart JJ Table 2) from strippable booth coating operations by complying with the VOC emission limitation of 0.8 lb VOC per lb solids as specified in 40 CFR Part 63 Subpart JJ Table 3.

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §129.52]

Surface coating processes

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

[25 Pa. Code Section 129.52(b)(1)(iv)]

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.805]

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

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

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee may demonstrate compliance with the VHAP/VOC content limitations of 40 CFR Part 61, Subpart JJ by one of the following:

(a) EPA Reference Test Methods 24 and 311.

(b) Calculated VHAP/VOC content values may be used in lieu of Test Methods 24 and 311 for customized coatings where the permittee maintains a Certified Product Data Sheet (CPDS) for all coating constituents (i.e., coatings, pigments, thinners, etc.); this option is available in those cases where both the base coating and the final customized coating meet the VHAP/VOC content limitations of 40 CFR Part 61, Subpart JJ.

In the event of any inconsistency between the calculated VHAP/VOC content and data obtained from a Method 24 or 311 analysis, the analytical data shall take precedence.

INITIAL COMPLIANCE

(a) The permittee shall submit an initial compliance status report as required by 25 Pa. Code Section 129.106(a) stating that

SECTION E. Source Group Restrictions.

compliant sealers, topcoats, and strippable spray booth coatings are being used by the facility.

(b) The permittee in the use of continuous coaters that are applying sealers, topcoats, or both, shall demonstrate initial compliance by either:

- (1) Submitting an initial compliance status report as required by 25 Pa. Code Section 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.
- (2) Submitting an initial compliance status report 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 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.

(c) The permittee shall submit an initial compliance status report stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

CONTINUOUS COMPLIANCE DEMONSTRATIONS

(a) The permittee shall submit, in writing, to the Department a compliance certification with the semi-annual report.

(1) The permittee in the use of compliant coatings 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 semi-annual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.

(b) The permittee in the use of continuous coaters and in applying sealers, topcoats, or both, shall demonstrate continuous compliance by either:

- (1) 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 semi-annual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.
- (2) 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 sealer, topcoat, or both, as determined by the VOC content of the coating in the reservoir, have been used each day in the semi-annual

SECTION E. Source Group Restrictions.

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 semi-annual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.

(c) 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 is being followed, or should otherwise identify the periods of noncompliance with the plan and the reasons for noncompliance.

(d) 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, the certification shall state that, based on the information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

[25 Pa. Code Section 129.104(a)(1), (b)(1), (b)(2), (b)(4), (c)(1), (c)(2), (c)(4) and (d)]

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Effective June 10, 2001

(a) The permittee shall keep records to demonstrate compliance with the presumptive RACT requirements of 25 Pa. Code Sections 129.101 through 129.107. The records shall be maintained at the facility for a period of 5 years.

COMPLIANT COATINGS

(b) The following records shall be maintained to document the use of compliant coatings in relation to the required emission standards:

- (1) A certified product data sheet for each coating and strippable spray booth coating subject to the emission limits of 25 Pa. Code Section 129.102.
- (2) The VOC content as applied, lbs VOC / lb solids (kg VOC / kg of solids), of each coating and strippable spray booth coating and copies of data sheets documenting how the as applied values were determined.

CONTINUOUS COATERS

(c) The permittee in the use of continuous coaters applying sealers, topcoats, or both, shall maintain the records required by subsections (a) and (b) above, and records of the following:

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

WORK PRACTICE IMPLEMENTATION PLAN

(d) The owner or operator 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.

**SECTION E. Source Group Restrictions.**

- (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 semi-annual 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 recordkeeping requirements of subsection (a) above, the permittee shall maintain a copy of the compliance certifications submitted for each semi-annual period following the compliance date.
- (f) The permittee shall maintain a copy of the other information submitted with the initial status report and the semi-annual reports.

[25 Pa. Code Section 129.105]

008 [25 Pa. Code §129.52]

Surface coating processes

(a) The permittee shall maintain records sufficient to demonstrate compliance with this section. At a minimum, the facility shall maintain daily records of the following parameters for each coating, thinner, and other component as supplied:

- (1) The coating, thinner or component name and identification number.
- (2) The volume used.
- (3) The mixing ratio.
- (4) The density or specific gravity.
- (5) The weight percent of total volatiles, water, solids and exempt solvents.
- (6) The VOC content of each coating, thinner and other component as applied.
- (7) The VOC content of each as applied coating.

(b) The records shall be maintained for a period of 5 years and be made available upon request.

[25 Pa. Code Section 129.52(c)]

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.806]

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

[40 CFR § 63.806]

(a) The permittee shall keep comprehensive and accurate records to demonstrate that the training of new and existing employees meets the requirements of 40 CFR § 63.803(b). These records shall contain the names of employees receiving annual refresher training along with the dates the training was received. [40 CFR § 63.806 (e)]

SECTION E. Source Group Restrictions.

(b) The permittee shall develop and maintain a leak inspection and maintenance plan for all equipment used to store, transfer, or apply coatings, adhesives, or organic solvents. The plan shall contain a schedule for visually inspecting affected equipment with the minimum frequency of once per month. Date of inspection, inspection results, and necessary repairs shall be documented in accordance with 40 CFR § 63.803 (c).

(c) (1) The permittee shall keep comprehensive and accurate records of organic solvent usage. At a minimum, the records shall include:

- (a) the quantity and type of organic solvents used during each monthly period for cleaning and washoff;
- (b) the number of pieces washed off and the reason for washoff;
- (c) the quantity of spent solvent generated from each cleaning or washoff operation on a monthly basis;
- (d) the disposition of the spent solvent, either recycled on-site or disposed of off-site.

(2) The records shall be retained for a period of five years and submitted to the Department upon request.

(d) (1) The permittee shall keep comprehensive and accurate records of all solvents used for cleaning spray booth components other than conveyors, continuous coaters/enclosures, or metal filters.

(2) The permittee shall retain the MSDS to demonstrate compliance with 40 CFR § 63.803 (e) for a period of five years. The MSDS shall be submitted to the Department upon request.

(e) The permittee shall keep comprehensive and accurate records of the use of all conventional air spray guns. At a minimum, the records shall include:

- (1) the VOC content of the material applied;
- (2) if the application was for touchup and repair;
- (3) if the gun was aimed and triggered automatically;
- (4) if the amount of finishing material applied represents no more than 5% of the total amount of the material used during the semiannual period;
- (5) if the material applied was a stain for which it is infeasible to use any other spraying technology.

(f) The permittee shall keep comprehensive and accurate records to demonstrate that the Formulation Assessment Plan meets the requirements of 40 CFR § 63.803(l). The records shall include the quantity of each "VHAP of Potential Concern" specified in Tables 5 and 6 in 40 CFR Part 63 Subpart JJ".

(g) The permittee shall keep comprehensive and accurate records of all Certified Product Data Sheets for each finishing material, thinner, contact adhesive, and strippable booth coating, including the VHAP content, lb. VHAP/lb. Solids, for all finishing material and contact adhesives as applied, the VOC content, lb. VOC/lb. Solids, of each strippable coating as applied, and the HAP content, weight %, of each thinner used as applied.

(h) The permittee shall keep comprehensive and accurate records to demonstrate compliance with the methods described in 40 CFR § 63.804(a)(1) or (d)(1). The record shall include copies of the averaging calculation for each month following the compliance date, as well as quantity of each coating and thinner used that is necessary to support the calculation of E in Equation 1 specified in 40 CFR § 63.804(a)(1).

(i) (1) If the permittee is subject to the emission limits in 40 CFR § 63.802, the permittee shall keep comprehensive and accurate records to demonstrate compliance with the provisions described in 40 CFR §§ 63.804(f)(1),(2),(5),(7) and (8).

(2) The permittee shall maintain records of the compliance certifications submitted in accordance with 40 CFR § 63.807(c) for each semiannual period following the compliance date.

(j) (1) The permittee shall keep comprehensive and accurate records of all other information submitted to the Department with the compliance status report required by 40 CFR §§ 63.9(h) and 63.807(b).

(2) The records shall include the semiannual reports required by 40 CFR § 63.807(c).

(k) The permittee shall maintain all records in accordance with the requirements of 40 CFR § 63.10(b)(1).

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

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall provide the following information to obtain credit for surface coating wastes sent off-site for recycling or incineration at a legally-permitted afcility:

- (a) amount per month of surface coating wastes shipped from the facility
- (b) waste profile for each shipment, and
- (c) identification of the waste disposal company for each shipment

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Effective June 10, 2001

INITIAL COMPLIANCE REPORT DATE

The permittee shall submit the initial compliance report to the Department within 60 days after the effective date of this operating permit. The report shall include all of the items required by this section.

SEMI-ANNUAL COMPLIANCE REPORT DATE

The permittee shall submit a semi-annual report covering the previous 6 months of operations in accordance with the following schedule:

(1) The first report shall be submitted wihin 30 calendar days after the end of the first 6-month period following the effective date of the operating permit.

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

(3) Each semi-annual report shall include the information required by this section, 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.

[25 Pa. Code Section 129.106]

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.807]

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

[40 CFR § 63.807]

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

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

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

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

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

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

SECTION E. Source Group Restrictions.

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

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

VI. WORK PRACTICE REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.**WORK PRACTICE IMPLEMENTATION PLAN**

(a) Within 60 days after the effective date of June 11, 2001, the permittee shall prepare and maintain a written work practice implementation plan that defines work practices for each wood furniture manufacturing operation and addresses the provisions of subsections (b) through (j), below. The owner or operator of the facility shall comply with the work practice implementation plan and make the document available to the Department upon request.

OPERATOR TRAINING PLAN

(b) New and existing personnel, including contract personnel, who are involved in coating, cleaning or washoff operations or implementation of the requirements of Sections 129.101, 129.102 and 129.104 through 129.107 shall complete an operator training program.

- (1) All new personnel shall be trained upon hiring.
- (2) All personnel shall be given refresher training annually.
- (3) 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 clean-up 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

LEAK INSPECTION AND MAINTENANCE PLAN

(c) 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

SECTION E. Source Group Restrictions.

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.

CLEANING AND WASHOFF SOLVENT ACCOUNTING SYSTEM

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

- (1) The total number of pieces processed through washoff operations each month and the reason for the washoff operations.
- (2) The name and total quantity of each solvent used each month for cleaning activities and washoff operations.
- (3) The name and total quantity of each solvent evaporated to the atmosphere each month from cleaning activities and washoff operations.

SPRAY BOOTH CLEANING

(e) The permittee shall 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.

STORAGE REQUIREMENTS

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

APPLICATION EQUIPMENT REQUIREMENTS

(g) 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 / 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

SECTION E. Source Group Restrictions.

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 cumulative total usage of those coatings is no more than 5.0% of the total gallons of coating used during each semi-annual 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 with the following:
 - (i) The product speed is too high or the part shape is too complex for one operator to coat the part, and the application station is not large enough to accommodate an additional operator.
 - (ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

LINE CLEANING

- (h) The solvent used for line cleaning shall be pumped or drained into a normally closed container.

SPRAY GUN CLEANING

- (i) The solvent used to clean spray guns shall be collected into a normally closed container.

WASHOFF OPERATIONS

- (j) 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.

[25 Pa. Code Section 129.103]

SECTION E. Source Group Restrictions.

014 [25 Pa. Code §129.52]

Surface coating processes

A person may not cause or permit the emission into the outdoor atmosphere of VOC 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.

[25 Pa. Code Section 129.52(f)]

015 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.803]

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

Work practice standards

[40 CFR § 63.803]

(a) (1) The permittee shall prepare a written work practice implementation plan pursuant to the requirements of 40 CFR § 63.803 (a).

(2) The permittee shall develop the work practice implementation plan no more than 60 days after the compliance dates specified in 40 CFR § 63.800(e). The work practice implementation plan shall be available for inspection upon the request of EPA or DEP personnel.

Operator Training Course

(b) (1) The permittee shall train all new and existing personnel, including contract personnel who are involved in finishing, gluing, cleaning and washoff operations, use of manufacturing equipment or the implementation of 40 CFR Part 63, Subpart JJ.

(2) The permittee shall provide operator training courses according the following schedule:

(a) All new personnel, those starting after the compliance date, shall be trained upon hiring.

(b) All existing personnel hired before the compliance date shall be trained within 6 months of the compliance date of the standard that limits HAPs from wood furniture manufacturing operations.

(3) The permittee shall provide refresher training annually for all personnel specified above and shall maintain a copy of the training program with the work practice implementation plan.

(4) Pursuant to 40 CFR § 63.802(b), the training program shall include the following:

(a) Name and job description of all current affected personnel.

(b) An outline of subjects covered in training and retraining for each unique job description.

(c) Lesson plans for both initial and annual refresher courses that explain application techniques, cleaning and washoff procedures, equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate methods of cleaning up the wastes.

(d) A method used to demonstrate and document successful completion of the course.

Inspection and Maintenance Planning

(c) (1) The permittee shall develop and maintain a written leak inspection and maintenance plan that meets the requirements of 40 CFR § 60.803(c).

(2) The written leak inspection and maintenance plan shall be maintained along with the work practice implementation plan. The leak inspection and maintenance plan shall specify the following:

(a) A minimum visual inspection frequency of once a month for all equipment used to transfer or apply coatings, adhesives, and organic solvents.

(b) An inspection schedule.

(c) Methods for documenting the date and results of each inspection and any repairs that were made.

(d) The timeframe for identifying the leak and making the repairs according to the following schedule:

SECTION E. Source Group Restrictions.

- (1) A first attempt at repair (e.g. tightening of packing glands) shall be made no later than five (5) calendar days after identifying the leak.
- (2) Complete repair within 15 days, unless the repair requires purchase of new equipment.
- (3) Complete repair requiring purchase of new equipment within 3 months.

Cleaning and Washoff Solvent Accounting System

(d) The permittee shall develop an organic solvent accounting form to record the following:

- (1) The quantity and type of organic solvents used for cleaning and washoff during each month.
- (2) The number of pieces washed off and the reason for the washoff.
- (3) The quantity of spent solvent generated from each cleaning or washoff operation each month and whether it was recycled on site or disposed offsite.

Chemical Composition of Cleaning and Washoff Solvent

(e) The permittee may not use cleaning or washoff solvents that contain any of the pollutants listed in 40 CFR Part 63 Subpart JJ Table 4, at a concentration subject to MSDS reporting as required by OSHA.

Spray Booth Cleaning

(f) The permittee may not use compounds containing more than 8.0 % by weight of VOCs for the cleaning of 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 protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.

Storage Requirements

- (g) (1) The permittee shall use normally closed containers for storing all finishing, gluing, organic solvents for line cleaning, organic solvents for gun cleaning, and washoff materials at all times.
- (2) The permittee shall pump, drain, or collect all organic solvent used for line cleaning and gun cleaning into normally closed containers.

Application Equipment Requirements

(h) The permittee shall only use conventional air spray guns for any of the following applications:

- (1) To apply finishing materials with a VOC content no greater than 1.0 lbs VOCs/lb solids, as applied.
- (2) For touch up and repair spraying after completion of finishing operation.
- (3) For touch up and spraying between spraying and finishing, if finishing container volume is no more than 2.0 gallons.
- (4) When the spray gun is aimed and triggered automatically, not manually.
- (5) When emissions from the finishing application station are directed to a control device.
- (6) When the amount of finishing materials used by the conventional air atomized spray gun are less than 5% of the total amount used during that semiannual period.
- (7) To apply stain on a part for which it is technically or economically infeasible to use any other spraying technology. The permittee must demonstrate technical or economical infeasibility by the procedures described in 40 CFR §63.803(h)(6).

Washoff Operations

SECTION E. Source Group Restrictions.

(i) The permittee shall control emissions from washoff operations by using normally closed tanks and minimize dripping by tilting or rotating all parts removed from the washoff operation to drain as much solvent as possible into the washoff tank.

Formulation Assessment Plan (FAP) of Chemicals used in Finishing Operations

(j) (1) The permittee shall prepare and maintain a formulation assessment plan (FAP) with the work practice implementation plan. The FAP shall:

(a) Identify all the VHAPs used in the finishing operation from the list presented in 40 CFR Part 63 Subpart JJ Table 5.

(b) Establish a baseline level of usage for each VHAP used in the finishing operation. The baseline usage shall be the highest annual usage from 1994, 1995 or 1996 for each of these VHAPs. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material as it is applied. For styrene, calculate the baseline level of usage by multiplying finishing material as applied styrene monomer content by 0.16.

(2) The facility shall report the annual usage (by the affected source) of each VHAP that is present in amounts subject to MSDS reporting as required by OSHA.

(3) If after November, 1998, the annual usage of the listed VHAPS from 40 CFR Part 63 Subpart JJ Table 5, exceeds the established baseline, the facility shall notify the Department in writing to explain the amount and the reasons for the exceedance from the established baseline. Any one of the following explanations will relieve the permittee from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(a) The facility did not exceed the baseline by more than 15%.

(b) The amount of VHAP used is below the de minimus level specified in 40 CFR Part 63 Subpart JJ Table 5.

(c) The affected source is in compliance with the States air toxic regulations for VHAPS.

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

(4) If the explanation for the exceedance is other than described above in paragraph (3), the permittee shall:

(a) Confer with the Department concerning practical and reasonable technology-based solutions for reducing the usage.

(b) Develop a plan and a timetable to reduce the usage of VHAPS whenever practical and reasonable.

(c) Prepare a schedule and submit to the Department indicating the reduction progress.

(5) If after November 1998, the affected source uses a VHAP of potential concern for which no limit has been established, then the baseline shall be determined based on the 70 year exposure level and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP of potential concern is provided in 40 CFR Part 63 Subpart JJ Table 6. If usage of the VHAP of potential concern exceeds the de minimus level, then the affected source shall provide an explanation to the Department. If the explanation provided by the permittee is other than those listed under paragraph(3), the affected source shall follow procedures established above in paragraph (4).

VII. ADDITIONAL REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner or operator of a wood furniture manufacturing facility that is subject to both 25 Pa. Code Section 129.52 and Sections 129.102 through 129.107, shall comply with the more stringent emissions limitation or applicable requirement.

[25 Pa. Code Section 129.101(e)]

*** 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 *****
