



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: July 18, 2005

Effective Date: August 1, 2005

Expiration Date: July 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: 01-05002](#)

Federal Tax Id - Plant Code: 13-3346717-1

Owner Information

Name: MASTERBRAND CABINETS INC

Mailing Address: PO BOX 5

LITTLESTOWN, PA 17340-0005

Plant Information

Plant: MASTERBRAND CABINETS/LITTLESTOWN FKA ARISTOKRAFT

Location: 01 Adams County

01802 Littlestown Borough

SIC Code: 2434 Manufacturing - Wood Kitchen Cabinets

Responsible Official

Name: RICKY CREEDMORE

Title: GEN MGR OF PA OPS

Phone: (717) 359 - 4131

Permit Contact Person

Name: HENRY UNGER

Title: ENVIRO MGR

Phone: (717) 359 - 4131

[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

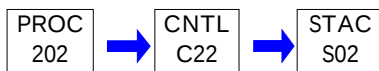
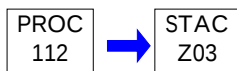
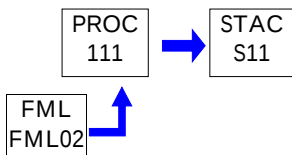
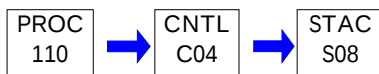
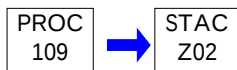
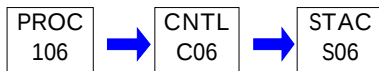
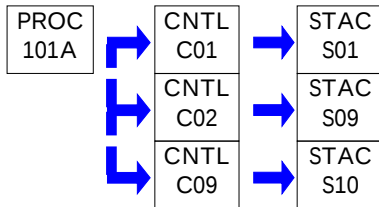
Source ID	Source Name	Capacity/Throughput	Fuel/Material
101A	WOODWORKING OPERATION	600.00 Lbs/HR	SAWDUST
105	CONVENTIONAL STAIN BOOTHS	40.00 Lbs/HR	VOC IN COATING
106	CONVENTIONAL SEALER BOOTHS	26.40 Lbs/HR	VOC IN COATING
107	CONVENTIONAL TOPCOAT BOOTHS	35.00 Lbs/HR	VOC IN COATING
109	CONVENTIONAL EQUIPMENT CLEANUP	100.00 Lbs/HR	VOC IN COATING
110	BASECOAT AND SPARE PARTS BOOTHS	1.00 Lbs/HR	VOC IN COATING
111	OVENS, HVACS AND WATER HEATERS	63.00 MCF/HR	NATURAL GAS
112	DEGREASING OPERATIONS		
202	ELECTROSTATIC BELL STAIN BOOTHS	6.13 Lbs/HR	VOC IN COATING
202A	ELECTROSTATIC BELL TONER BOOTH	6.14 Lbs/HR	VOC IN COATING
203	(2) ELECTROSTATIC BELL SEALER BOOTHS	32.50 Lbs/HR	VOC IN COATING
204	ELECTROSTATIC BELL TOPCOAT BOOTH	24.10 Lbs/HR	VOC IN COATING
205	ELECTROSTATIC BELL PRESEALER BOOTH	16.20 Lbs/HR	VOC IN COATING
208	ELECTROSTATIC BELL CLEANUP SOLVENTS	1.00 Lbs/HR	SOLVENT
209	ELECTROSTATIC LINE CURING OVEN		
210	ELECTROSTATIC LINE IR OVEN		
301	END GRAIN BOOTH	24.12 Lbs/HR	VOC IN COATING
302	UV STICK LINE	0.02 Lbs/HR	VOC IN COATING
303	UV FLAT LINE	0.06 Lbs/HR	VOC IN COATING
304	UV VACUUM LINE	0.00 Lbs/HR	VOC IN COATING
C01	CARTER-DAY BAGHOUSE		
C02	PNEUMAFIL BAGHOUSE		
C03	SPRAY BOOTH FABRIC FILTER		
C04	SPRAY BOOTH FABRIC FILTER		
C05	SPRAY BOOTH FABRIC FILTER		
C06	SPRAY BOOTH FABRIC FILTER		
C07	SPRAY BOOTH FABRIC FILTER		
C08	SPRAY BOOTH FABRIC FILTER		
C09	PNEUMAFIL BAGHOUSE		
C10	REGENERATIVE THERMAL OXIDIZER (RTO)		
C16	SPRAY BOOTH FABRIC FILTER		
C22	SPRAY BOOTH FABRIC FILTER		
C23	SPRAY BOOTH FABRIC FILTER		
FML02	NATURAL GAS PIPELINE		
S01	SOURCE 101A STACK		
S02	SOURCE 202 STACK		
S05	SOURCE 105 STACK		
S06	SOURCE 106 STACK		
S07	SOURCE 107 STACK		
S08	SOURCE 110 STACK		
S09	SOURCE 101A STACK		
S10	SOURCE 101A STACK		
S11	SOURCE 111 STACK		
S12	SOURCE 302 STACK		
S13	SOURCE 303 STACKS		
S14	SOURCE 304 STACKS		
S17	SOURCE 301 STACK		
S18	RTO STACK		

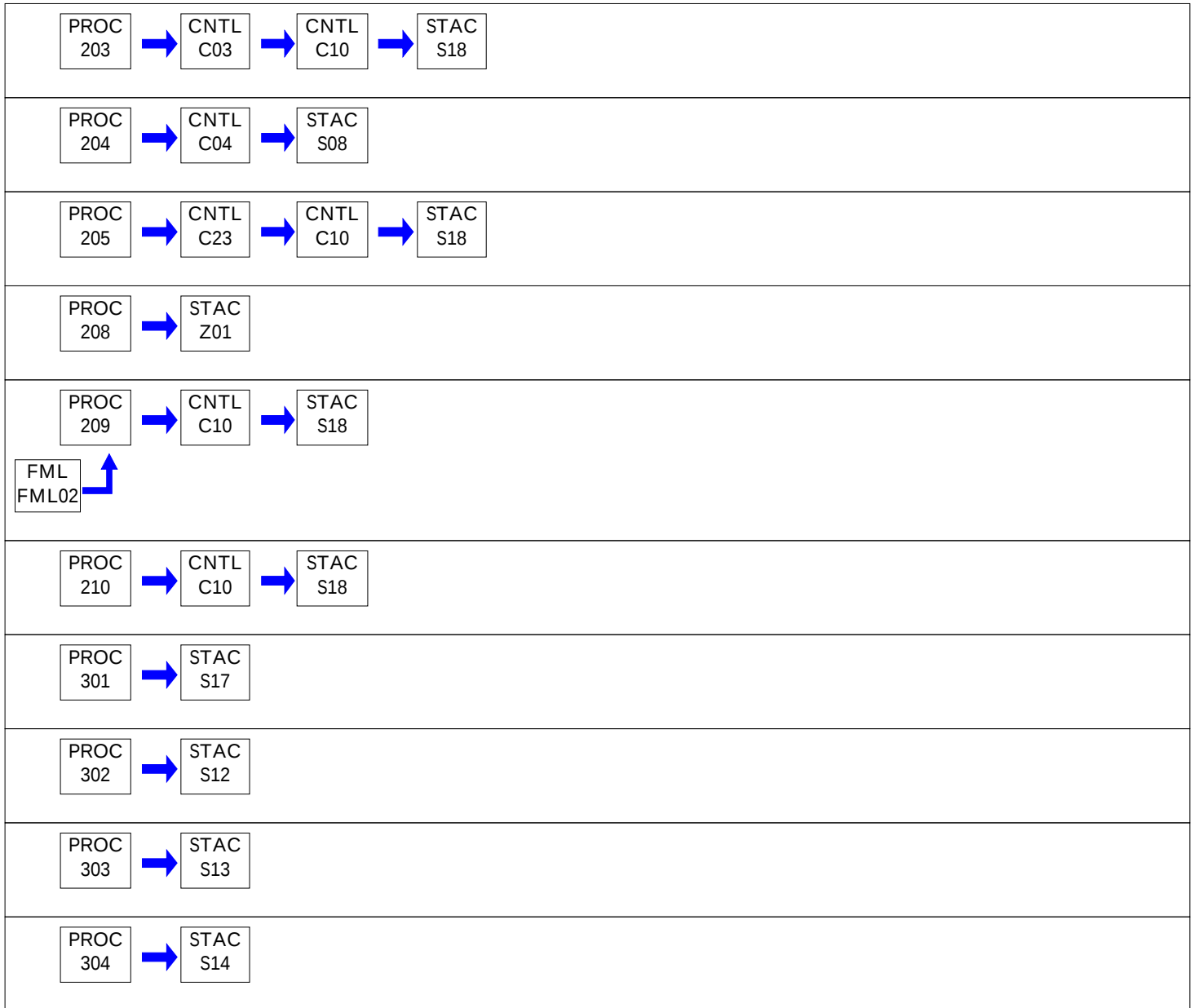


SECTION A. Site Inventory List

Z01	SOURCE 208 FUGITIVES	
Z02	SOURCE 109 FUGITIVES	
Z03	FUGITIVE EMISSIONS	

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 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:

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations.

(7) Sources and classes of sources other than those identified in paragraphs (1)-(6), for which the operator has obtained a determination from the Department in accordance with 25 Pa. Code Section 123.1(b) that fugitive emissions from the source, after appropriate control, meet the following requirements:

(i) the emissions are of minor significance with respect to causing air pollution; and

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

002 [25 Pa. Code §123.2]

Fugitive particulate matter

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

003 [25 Pa. Code §123.31]

Limitations

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

004 [25 Pa. Code §123.41]

Limitations

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

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

(2) Equal to or greater than 60% at any time.

**SECTION C. Site Level Requirements**

005 [25 Pa. Code §123.42]

Exceptions

The limitations of 25 Pa. Code Section 123.41 (relating to limitations) do not apply to a visible emission in any of the following instances:

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

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following conditions are derived from Plan Approval No. 01-318-009D]

- (a) The total VOC emissions from the facility shall not exceed a Plantwide Applicability Limit (PAL) of 107.7 tons per year based on any consecutive 12-month rolling period, with emissions calculated on a monthly basis.
- (b) The construction of a new source or the modification of an existing air contaminant source shall require the source to meet Best Available Technology (BAT) requirements in accordance with 25 Pa. Code Section 127.1 and 127.12(a). The construction, modification, reactivation or the installation of an air cleaning device shall require prior approval from the Department in accordance with 25 Pa. Code Sections 127.11 and / or 127.14(c).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following condition is derived from operating permit number 01-318-009C]

- (a) High Volume Low Pressure (HVLP) Spray guns shall be operated at atomizing air pressure as recommended by the manufacturer. Manufacturer air pressure recommendations shall be kept on-site and available upon Department request.

008 [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.

**SECTION C. Site Level Requirements**

(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.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Department reserves the right to require exhaust stack testing of any source and Methods 24/311 testing of any coating as necessary during the permit term to verify emissions for purposes including emission fees, malfunctions or permit condition violations.

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §123.43]

Measuring techniques

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

(1) A device approved by the Department and maintained to provide accurate opacity measurements.

(2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall conduct a weekly inspection around the plant periphery during the daylight hours when the plant is in production to detect visible emissions, fugitive visible emissions and odorous 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 #010. As an alternative, (uncertified) plant personnel who observe such visible emissions shall report each incident to the Department within two (2) hours of each occurrence and make arrangements 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 odorous air contaminants beyond the plant property boundaries as stated in Section C, Condition #003.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor and record the pressure drop across each of the fabric filters or other particulate matter control device. At a minimum, these readings shall be taken once per week while the sources and control devices are in operation. These records shall be maintained on-site for the most recent five-year period and be made available to Department representatives upon request.

**SECTION C. Site Level Requirements****IV. RECORDKEEPING REQUIREMENTS.**

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a VOC emission tracking system to document compliance with the VOC PAL for the facility as specified in site condition # 006(a). The system shall track a daily record of coating usage, and quantify the monthly records of coating usage and total monthly VOC emissions from all VOC generating sources at the facility. The report shall include as a minimum, the coating, thinner or component name and identification number, the volume used, the mix ratio, the density of specific gravity, the weight percent of total volatiles, water, solids and exempt solvents, the VOC content of each coating, thinner, and other component as supplied, and the VOC content of each, as applied coating.

014 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

(a) The company shall maintain an organic solvent accounting form to record quantity and type of solvent used, quantity of spent organic solvent generated, disposed off-site and recycled on-site, etc.

(b) In accordance with Site Level Condition #011, the permittee shall maintain a logbook for recording the status of any fugitive, visible, or odorous emission encountered during the inspection. A log entry is required for each inspection whether or not a detection has occurred. As a minimum, the logbook shall include the name of the company representative, the date and time the monitoring was conducted, wind direction, and the actions taken to correct any exceedances.

(c) Manufacturer supplied VOC Certified Product Data Sheets for all coatings applied at this facility within the most recent five years shall be maintained at the above location and be made available to the Department at any time.

(d) All records shall be maintained for each calendar year (January 1 through December 31) and retained for at least five years.

V. REPORTING REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following condition is derived from Plan Approval No. 01-318-009D]

(a) The permittee shall generate a summary of the actual VOC emissions to determine compliance with the PAL. The emissions summary shall be generated within 30 days of the end of each month and be calculated based upon the prior 12 months of operation. The annual report of VOC emissions for each month shall be submitted to the York District Supervisor.

(b) The permittee shall provide an annual report of the data recorded in condition #013 to the York District Supervisor. The report (January 1 through December 31) of the previous calendar year is due no later than March 1.

016 [25 Pa. Code §127.442]

Reporting requirements.

[Additional authority for the following conditions are derived from 25 Pa. Code Section 127.511]

(a) The owner or operator shall report each malfunction that poses an imminent and substantial danger to the public health and safety or the environment or which it should reasonably believe may result in citizens complaints to the Department that occurs at this Title V facility. For purposes of this condition a malfunction is defined as 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 that may result in an increase in the emissions of air contaminants.

(b) When the malfunction poses an imminent and substantial danger to the public health and safety or harm to the environment, the notification shall be submitted to the Department no later than one hour after the incident.

(1) The notice shall describe the:

(i) name and location of the facility;

(ii) nature and cause of the malfunction or breakdown;

(iii) time when the malfunction or breakdown was first observed;

SECTION C. Site Level Requirements

(iv) expected duration of excess emissions; and

(v) estimated rate of emissions.

(2) The owner or operator shall notify the Department immediately when corrective measures have been accomplished.

(3) Subsequent to the malfunction, the owner or operator shall submit a full report on the malfunction to the Department within 15 days, if requested.

(4) The owner or operator shall submit reports on the operation and maintenance of the source to the Air Quality Regional Manager at such intervals and in such form and detail as may be required by the Department. Information required in the reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and maintenance schedules.

(c) Malfunctions shall be reported to the Department at the following address:

PA Department of Environmental Protection
909 Elmerton Avenue
Harrisburg, PA 17110-8200

VI. WORK PRACTICE REQUIREMENTS.

017 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from becoming air borne for any source specified in Section C, Condition #001. These actions shall include, but not be limited to the following:

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

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

(3) Paving and maintenance of roadways.

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

VII. ADDITIONAL REQUIREMENTS.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Any changes in operations at the facility that result in an actual emission increase greater than the established PAL will subject the facility to major New Source Review (NSR) requirements of 25 Pa. Code Chapter 127, Subchapter E.

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**

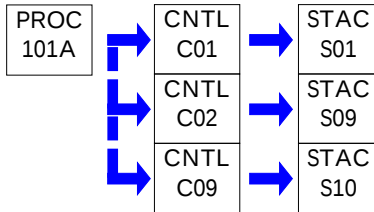
Source ID: 101A

Source Name: WOODWORKING OPERATION

Source Capacity / Throughput:

600.00 Lbs/HR

SAWDUST

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

001 [25 Pa. Code §123.13]

Processes

No person may permit into the outdoor atmosphere of particulate matter from each of the above sources, at any time, in a manner that the concentration of 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.

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: 105

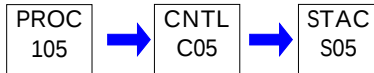
Source Name: CONVENTIONAL STAIN BOOTHS

Source Capacity / Throughput:

40.00 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 106

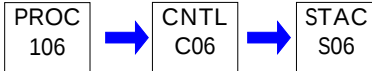
Source Name: CONVENTIONAL SEALER BOOTHS

Source Capacity / Throughput:

26.40 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 107

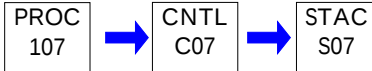
Source Name: CONVENTIONAL TOPCOAT BOOTHS

Source Capacity / Throughput:

35.00 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 109

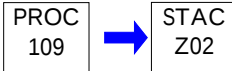
Source Name: CONVENTIONAL EQUIPMENT CLEANUP

Source Capacity / Throughput:

100.00 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 110

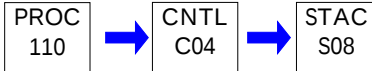
Source Name: BASECOAT AND SPARE PARTS BOOTHS

Source Capacity / Throughput:

1.00 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 111

Source Name: OVENS, HVACS AND WATER HEATERS

Source Capacity / Throughput:

63.00 MCF / HR

NATURAL GAS

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

001 [25 Pa. Code §123.13]

Processes

No person may permit into the outdoor atmosphere of particulate matter from each of the above sources, at any time, in 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 emissions into the outdoor atmosphere of sulfur oxides from each of the above sources in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

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.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate each of the above sources on natural gas only.

004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall monitor the fuel usage for the facility and submit the information to the Department in the annual AIMS report due by March 1 for the previous calendar year (January 1 through December 31).

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).

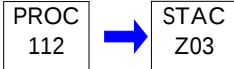
*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 112

Source Name: DEGREASING OPERATIONS

Source Capacity / Throughput:

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

001 [25 Pa. Code §129.63]

Degreasing operations

The permittee may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs. This condition does not apply to the following Cold Cleaning Machines:

- (1) Machines used in extreme cleaning service.
- (2) Machines, in which the Department approves in writing, that compliance with this 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 for at least two (2) years and shall provide to the Department, on request, the following information:

- (1) The name and address of the solvent supplier.
- (2) The type of solvent including the product or vendor identification number.
- (3) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).

An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

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.**

003 [25 Pa. Code §129.63]

Degreasing operations

(a) The cold cleaning machines shall have a permanent, conspicuous label summarizing the operating requirements in Section D, Condition #004. In addition, the label shall include the following discretionary good operating practices:

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

(2) 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.

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

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

004 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall operate the cold cleaning machines in accordance with the following procedures:

(1) 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.

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

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

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

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

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: 202

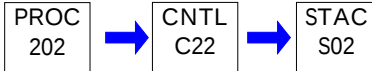
Source Name: ELECTROSTATIC BELL STAIN BOOTHS

Source Capacity / Throughput:

6.13 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 202A

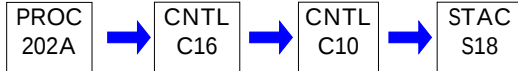
Source Name: ELECTROSTATIC BELL TONER BOOTH

Source Capacity / Throughput:

6.14 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01
G02

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 203

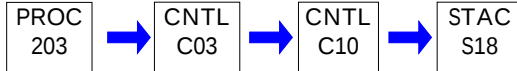
Source Name: (2) ELECTROSTATIC BELL SEALER BOOTHS

Source Capacity / Throughput:

32.50 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01
G02

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 204

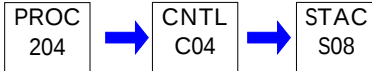
Source Name: ELECTROSTATIC BELL TOPCOAT BOOTH

Source Capacity / Throughput:

24.10 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 205

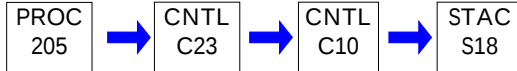
Source Name: ELECTROSTATIC BELL PRESEALER BOOTH

Source Capacity / Throughput:

16.20 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01
G02

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 208

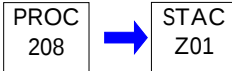
Source Name: ELECTROSTATIC BELL CLEANUP SOLVENTS

Source Capacity / Throughput:

1.00 Lbs/HR

SOLVENT

Conditions for this source occur in the following groups: G01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 209

Source Name: ELECTROSTATIC LINE CURING OVEN

Source Capacity / Throughput:

Conditions for this source occur in the following groups: G02

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

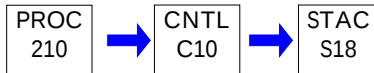
**SECTION D. Source Level Requirements**

Source ID: 210

Source Name: ELECTROSTATIC LINE IR OVEN

Source Capacity / Throughput:

Conditions for this source occur in the following groups: G02

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 301

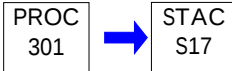
Source Name: END GRAIN BOOTH

Source Capacity / Throughput:

24.12 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 302

Source Name: UV STICK LINE

Source Capacity / Throughput:

0.02 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

PROC
302STAC
S12**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 303

Source Name: UV FLAT LINE

Source Capacity / Throughput:

0.06 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

PROC
303STAC
S13**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 304

Source Name: UV VACUUM LINE

Source Capacity / Throughput:

0.00 Lbs/HR

VOC IN COATING

Conditions for this source occur in the following groups: G01

PROC
304STAC
S14**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION E. Source Group Restrictions.**

Group Name: G01

Group Description: 40 CFR Part 63, Subpart JJ

Sources included in this group:

ID	Name
105	CONVENTIONAL STAIN BOOTHS
106	CONVENTIONAL SEALER BOOTHS
107	CONVENTIONAL TOPCOAT BOOTHS
109	CONVENTIONAL EQUIPMENT CLEANUP
110	BASECOAT AND SPARE PARTS BOOTHS
202	ELECTROSTATIC BELL STAIN BOOTHS
202A	ELECTROSTATIC BELL TONER BOOTH
203	(2) ELECTROSTATIC BELL SEALER BOOTHS
204	ELECTROSTATIC BELL TOPCOAT BOOTH
205	ELECTROSTATIC BELL PRESEALER BOOTH
208	ELECTROSTATIC BELL CLEANUP SOLVENTS
301	END GRAIN BOOTH
302	UV STICK LINE
303	UV FLAT LINE
304	UV VACUUM LINE

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following conditions are derived from 25 Pa. Code Section 129.102]

(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	
(i) Sealer	1.9
(ii) Topcoat	1.8
(3) Acid-cured alkyd amino systems	
(i) Acid-cured alkyd amino sealer	2.3
Acid-cured alkyd amino conversion varnish topcoat	2.0
(ii) Other sealer	1.9
Acid cured alkyd amino conversion varnish topcoat	2.0
(iii) Acid-cured alkyd amino sealer	2.3
Other topcoat	1.8
(4) Waterborne strippable spray booth coating	0.8

(b) The above VOC emission standards do not apply to a coating that is used exclusively for determining product quality and



SECTION E. Source Group Restrictions.

commercial acceptance, touch-up and repair and other small quantity coatings 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.

002 [25 Pa. Code §129.52]

Surface coating processes

a) All coatings, associated with the wood furniture manufacturing operations, as applied, shall comply with the following requirements below:

- | | |
|---------------------------------|----------------------------------|
| (1) Topcoats and enamels | 3.0 lbs VOC / lb coating solids |
| (2) Washcoats | 14.3 lbs VOC / lb coating solids |
| (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 standards of subsection (a) above, do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

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

(2) The permittee requests in writing, and the Department approves, in writing, the exemption prior to use of the coating.

(c) 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:

$$\text{VOC(A)} = [W(1) / W(2)]$$

Where:

VOC(A) = VOC content in lb VOC / lb of coating solids.

W(1) = Weight percent of VOC [W(3)-W(4)-W(5)]

W(2) = Weight percent of solids of the as applied coating

W(3) = Weight percent of total volatiles (100% - weight percent solids)

W(4) = Weight percent of water

W(5) = Weight percent of exempt solvents

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 permittee, shall limit emission of volatile hazardous air pollutants (VHAPS, as identified in Appendix A, Table 2 of Subpart JJ) from each of the existing wood finishing sources identified above, by meeting the VHAP emission limitations specified in Appendix A, Table 3 of Subpart JJ (relating to summary of emission limits).
- (b) The permittee shall limit the emission of VHAPs (identified in Appendix A, Table 2 of Subpart JJ) from existing adhesive operations associated with the above sources by complying with the VHAP emission limitations in Appendix A, Table 3 of Subpart JJ.
- (c) The permittee in determining VHAP emissions from finishing materials containing formaldehyde or styrene, the permittee shall use the methods presented in Appendix A, Table 2 of Subpart JJ for determining styrene and formaldehyde usage.
- (d) The permittee shall limit the emission of VHAPs (identified in Appendix A, Table 2 of Subpart JJ) from existing strippable booth coating operations associated with the above sources to a maximum VOC content of 0.8 kg VOC / kg solids [0.8 lb VOC / lb solids].

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 139.14(a)(1).

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

[40 CFR § 63.805]

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 HAPs 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 24A.

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following conditions are derived from 25 Pa. Code Section 129.104]

Compliance Methods

(a) The permittee in demonstrating compliance through the use of compliant coatings shall use either of the following methods:

- (1) To support that each sealer, topcoat and strippable spray booth coating meets the requirements of the emission

SECTION E. Source Group Restrictions.

standards.

- (i) Maintain CPDSs for each of the coatings.
- (ii) Maintain documentation showing the VOC content of the as applied coatings in lbs VOC / lb solids, if solvent or other VOC is added to the coating before application.
- (iii) Perform sampling and testing in accordance with the procedures and test methods in Chapter 139.

Initial Compliance

- (b) The permittee shall submit an initial compliance status report stating that compliant sealers, topcoats, and strippable spray booth coatings are being used by the facility.
- (c) 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 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.
- (d) 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

- (e) 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.
- (f) The permittee in the use of continuous coaters and is 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 sealers, topcoats, or both, as determined by the VOC content of the coating in the reservoir, have been used each day in the semi-annual 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

SECTION E. Source Group Restrictions.

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

(g) 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.

(h) 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.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.804]

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

[40 CFR § 63.804]

(a) The permittee shall demonstrate continuous compliance by using compliant coatings, thinners, contact and /or foam adhesives, and strippable spray booth coatings, maintaining records that demonstrate the coatings, adhesives, and thinners are compliant, and submitting a compliance certification with the semiannual report required by § 63.807(c).

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

(2) The compliance certification shall be signed by a responsible official of the company.

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

(1) The compliance certification shall be signed by a responsible official of the company.

(c) In the event that the permittee is applying coatings through the use of continuous coaters, the permittee shall demonstrate continuous compliance by one of the following:

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

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

(3) The permittee may demonstrate compliance with the VHAP / VOC content limitations of 40 CFR Part 63, Subpart JJ by one of the following:

(i) EPA Reference Test Methods 24 and 311.

(ii) Calculate 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 63, Subpart JJ.

**SECTION E. Source Group Restrictions.**

Note: 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.

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following conditions are derived from 25 Pa. Code Section 129.105]

(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.

(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.

(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.

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

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

(2) Viscosity measurements.

(d) 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.

(e) The permittee shall maintain a copy of the other information submitted with the initial status report and the semi-annual reports.

009 [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 components 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 to the Department upon request.

010 [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]

**SECTION E. Source Group Restrictions.**

- (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)]
- (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, result of inspection, and repairs if necessary shall be detailed including the date of first attempt at repair, the date of repair completion, along with any new equipment purchased to complete repair as required in 40 CFR § 63.803 (c).
- (c) The permittee shall keep comprehensive and accurate records of organic solvent usage. At a minimum, the records shall include:
- (1) the quantity and type of organic solvents used during each monthly period for cleaning and washoff;
 - (2) the number of pieces washed off and the reason for washoff;
 - (3) the quantity of spent solvent generated from each cleaning or washoff operation on a monthly basis;
 - (4) 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) 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.
- (e) 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.
- (f) 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.
- (g) 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 Appendix A, Tables 5 and 6 of Subpart JJ.
- (h) 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.
- (i) The permittee shall keep comprehensive and accurate records to demonstrate compliance with the procedures described in 40 CFR § 63.804(f)(3)(ii) and (g)(3)(ii). The permittee shall also maintained the records required by 40 CFR § 63.806(b), and the following records required under 40 CFR § 63.806 (d):
- (1) Solvent and coating additions to the continuous coater reservoir;
 - (2) Viscosity measurements; and
 - (3) Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.
- (j) The permittee shall keep comprehensive and accurate records to demonstrate compliance with the provisions described in 40 CFR §§ 63.804(f)(1),(2),(3),(5),(7),and (8).
- (k) 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.

**SECTION E. Source Group Restrictions.**

(l) 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).

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

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

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for the following conditions are derived from 25 Pa. Code Section 129.106]

(a) The permittee shall submit the initial compliance report to the Department within 60 days after the effective date of this Title V operating permit. The report shall include the items required by Group Level (G01) Condition # 006(b),(c), and (d) above.

(b) 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 within 30 calendar days after the end of the first 6-month period following the effective date of this Title V 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 Group Level (G01) Condition #006(e) through (h), 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.

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 permittee shall fulfill all reporting requirements of 40 CFR Part 63, Subpart A, Sections 63.7 through 63.10 according to the applicability criteria of 40 CFR Section 63.800(d).

(b) In the event that the permittee is required to provide a written notification under 40 CFR Section 63.803(l)(4), the notification shall include 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.

(c) The permittee shall submit semi-annual compliance certifications within 30 days after the end of each six-month period.

(d) The frequency of the Continuous Compliance Demonstration Report for Wood Furniture (Form B, Appendix C) may not be reduced from semiannually regardless of the history of the owners or operators compliance status.

VI. WORK PRACTICE REQUIREMENTS.

013 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for the following conditions are derived from 25 Pa. Code Section 129.103]

(a) Within 60 days after the effective date of this Title V operating permit, 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). The permittee of the facility shall comply with the work practice implementation plan and make the document available to the Department upon request.

**SECTION E. Source Group Restrictions.**

(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 hired after June 10, 2000 shall be trained upon hiring. All other personnel shall be trained by no later than December 11, 2000.

(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.

(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 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.

(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.

(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.



SECTION E. Source Group Restrictions.

- (f) The permittee shall use normally closed containers for storing coating, cleaning and washoff materials.
- (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 VOC / kg solids), as applied.
 - (2) For touch-up and repair coatings under one of the following circumstances:
 - (i) The coatings are applied after completion of the wood furniture manufacturing operation.
 - (ii) The coatings are applied after the stain and before any other type of coating is applied, and the coatings are applied from a container that has a volume of no more than 2.0 gallons.
 - (3) The spray is automated, that is, the spray gun is aimed and triggered automatically, not manually.
 - (4) The emissions from the surface coating process are directed to a VOC control system.
 - (5) The conventional air spray gun is used to apply coatings and cumulative total usage of those coatings is no more than 5.0% of the total gallons of coating used during each semiannual reporting period.
 - (6) The conventional air spray gun is used to apply stain on a part for which the Department notifies the operator, in writing, of its determination that it is technically or economically infeasible to use any other spray application technology. To support the facility's claim of technical or economic infeasibility, a videotape, a technical report or other documentation shall be submitted to the Department showing either independently or in combination the following:
 - (i) The 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.
- (h) The solvent used for line cleaning shall be pumped or drained into a normally closed container.
- (i) The solvent used to clean spray guns shall be collected into a normally closed container.
- (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.

014 [25 Pa. Code §129.52]

[Surface coating processes](#)

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

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

(b) 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.

**SECTION E. Source Group Restrictions.****Operator Training**

(c) 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.

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

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

(2) 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:

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

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

(iii) 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.

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

Inspection and Maintenance Planning

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

(f) 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:

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

(2) An inspection schedule.

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

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

(i) First attempt to repair shall be no later than 5 days after identifying the leak.

(ii) Complete repair within 15 days after detection, unless the repair requires the purchase of new equipment.

(iii) If purchase of new equipment is required, the repair shall be completed 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.

SECTION E. Source Group Restrictions.

(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

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

(h) 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.

Spray Booth Cleaning

(i) The permittee may not use solvents containing more than 8.0 % by weight of VOCs for the cleaning of spray booth components others than conveyors, continuous coaters and their enclosures, or metal filters unless the spray booth is being replaced. If the spray booth is being refurbished, no more than 1.0 gallon of organic solvent per booth can be used for preparing the booths surface prior to applying the coating.

Storage Requirements

(j) 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.

(k) The permittee shall pump, drain, or collect all organic solvent used for line cleaning and gun cleaning into normally closed containers.

Application Equipment Requirements

(l) 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.

(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 less than 2.0 gallons.

(4) When aimed and triggered automatically.

(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 infeasible to use any other spraying technology.

Washoff Operations

(m) 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

(n) The permittee shall prepare and maintain a formulation assessment plan (FAP) with the work practice implementation

**SECTION E. Source Group Restrictions.**

plan. The FAP shall:

(1) Identify all the VHAPs used in the finishing operation from the list presented in Appendix A, Table 5 of Subpart JJ.

(2) 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.

(3) When a control device is used to reduce emissions, the permittee may adjust usage based on the overall efficiency of the control system, which is determined using the equation in 40 CFR § 63.805(d) or (e).

(o) The permittee shall track and report to the Department upon request the annual usage (by the affected source) of each VHAP that is present in amounts subject to MSDS reporting as required by OSHA.

(p) If annual usage of the listed VHAPS in Appendix A, Table 5 of Subpart JJ 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 will relieve the permittee from further action, unless the effected source is not in compliance with the Department's regulations or requirements for that VHAP:

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

(2) The amount of VHAP used is below the de minimus level specified in Appendix A, Table 5 of Subpart JJ.

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

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

(q) If the explanation for the exceedance is other than described in the previous condition (p), the permittee shall:

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

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

(3) Prepare a schedule and submit to the permitting authorities indicating the reduction progress.

(r) In accordance with 40 CFR Section 63.803(h)(6), if 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 Appendix A, Table 6 of Subpart JJ.

Note: 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 in condition (p) above, the affected source shall follow procedures established above in condition (q).

VII. ADDITIONAL REQUIREMENTS.

016 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for the following condition is derived from 25 Pa. Code Section 129.101]

(a) 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.

017 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.802]

[Subpart JJ--National Emission Standards for Wood Furniture Manufacturing Operations](#)
[Emission limits](#)

**SECTION E. Source Group Restrictions.**

All provisions of 40 CFR Part 63, Subpart JJ that are applicable to the operations of the facility are incorporated by reference even if not specifically mentioned in these conditions.

*** Permit Shield in Effect. ***

**SECTION E. Source Group Restrictions.**

Group Name: G02

Group Description: Sources controlled by the RTO

Sources included in this group:

ID	Name
202A	ELECTROSTATIC BELL TONER BOOTH
203	(2) ELECTROSTATIC BELL SEALER BOOTHS
205	ELECTROSTATIC BELL PRESEALER BOOTH
209	ELECTROSTATIC LINE CURING OVEN
210	ELECTROSTATIC LINE IR OVEN

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

001 [25 Pa. Code §123.12]

Incinerators

No person shall permit the emission to the outdoor atmosphere of particulate matter from the above RTO, at any time, in such a manner that the particulate matter concentration in the effluent gas exceeds 0.1 gr / dscf, corrected to 12% carbon dioxide.

002 [25 Pa. Code §123.21]

General

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

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following conditions is derived from plan approval number 01-05002A]

(a) All VOC emissions captured from the above toner booth, presealer booth, the two sealer booths, cure oven, and the infra-red (IR) oven, shall be reduced at a minimum destruction efficiency of 95%, or a maximum of 10 ppm_{dv}, as propane, whichever is more stringent.

(b) All VOC emissions sent to the RTO shall be incinerated at a minimum combustion chamber temperature of 1400 degrees Fahrenheit for at least 0.3 seconds prior to the emissions into the outdoor atmosphere.

(c) The RTO shall achieve and maintain the above temperature before any process gases are allowed to enter the combustion chamber.

(d) The permittee shall not alter or change the exhaust and / or RTO control configuration without receiving prior approval from the Department.

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following conditions is derived from plan approval number 01-05002A]

(a) In accordance with the EPA's revised capture efficiency protocol of January 9, 1994 entitled "Guidelines for Determining Capture Efficiency", the Department has authorized the permittee to assume a capture efficiency of 95% for each of the above booths. This capture efficiency is based on a face velocity, at each booth, of no less than 200 feet per minute.

(b) The permittee shall be required to do a performance test for destruction efficiency testing of the RTO within 30-months of the issuance of this permit. The testing shall be performed in accordance with the latest revision of the Department's Source Testing Manual and 25 Pa. Code Chapter 139. The permittee shall also measure the face velocities at each of the booths with a vane anemometer, hot wire anemometer, or other device(s) approved by the Department. Readings shall be taken during each of the test runs.

(c) The permittee shall submit a proposed emission test protocol to the Department's Air Quality Regional Manager for

**SECTION E. Source Group Restrictions.**

approval at least sixty (60) days prior to the test.

(d) The permittee shall notify the Department at least two (2) weeks in advance of the date and time of the proposed emissions tests so that an observer may be present.

(e) Two copies of the performance test results along with the face velocity readings of the booths shall be submitted to the Department's Air Quality Regional Manager for review within sixty (60) days of completion of testing.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following conditions is derived from plan approval number 01-05002A]

(a) The permittee, shall operate and maintain a device to continuously monitor and record the combustion chamber temperature of the RTO

(b) The permittee shall operate and maintain a device to measure the pressure drop across each of the booth filters, and the RTO pre-filter.

(c) The permittee, on a weekly basis, shall monitor and record the pressure drop across each of the booth filters, and RTO pre-filter. The readings shall be documented in a log book and compared with the operating pressure drop range as specified by the manufacturer. Any deviation from the manufacturer's specifications shall be documented and corrective actions shall be taken to return the operations of the filters to within the required range.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

At a minimum, the permittee shall measure the face velocities at each of the above booths on a monthly basis. The measurements shall be made with a vane anemometer, hot wire anemometer, or other device(s) approved by the Department. The measurements shall be entered into a log at the facility and be made available to the Department upon request.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following conditions is derived from plan approval number 01-05002A]

(a) The permittee shall keep a log of the weekly pressure drop readings including the date and time of the readings and the name of the company representative taking the readings. The information shall be kept for a period of five years and be made available to the Department upon request.

(b) The recorded monitoring data for the combustion chamber temperature of the RTO shall be kept for a period of five years and be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(1) The RTO shall be operated and maintained in accordance with the manufacturer's specifications.

(2) The permittee shall maintain and implement an inspection and maintenance (I & M) plan for the RTO. The I & M plan and associated records shall be kept onsite and be made available to the Department upon request.

**SECTION E. Source Group Restrictions.****VII. ADDITIONAL REQUIREMENTS.**

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

*** 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.

The following miscellaneous source does not require any work practice standards, testing, reporting, monitoring or recordkeeping requirements:

Fire Pump (210 hp capacity, diesel fuel)
3-station UV roll coater and UV oven
Emergency Generator (17 HP natural gas fired)

The capacities listed under Section A, Site Inventory List, and in Section D for the individual sources, are for informational purposes only and are not intended to be enforceable restrictions.

This Title V operating permit contains information from the following permits:

01-318-009D (Plan Approval)
01-318-009C (Operating Permit)
01-02002 (RACT Operating Permit)
01-05002A (Plan Approval)

Revisions:

Revision No.1 incorporates the requirements from plan approval number 01-05002A into Group #G02. Under this amendment, the facility constructed a new presealer booth, modified two sealer booths and a toner booth, and installed a Regenerative Thermal Oxidizer (RTO) controlling the above booths, a curing oven, and an IR oven.



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