## ARMSTRONG WORLD IND /BEAVER FALLS



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

## TITLE V/STATE OPERATING PERMIT

Issue Date: June 24, 2005 Effective Date: June 24, 2005

Expiration Date: June 24, 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: 04-00108

Federal Tax Id - Plant Code: 23-0366390-1

#### Owner Information

Name: ARMSTRONG WORLD IND INC

Mailing Address: 13TH ST & 10TH AVE

BEAVER FALLS, PA 15010

## Plant Information

Plant: ARMSTRONG WORLD IND /BEAVER FALLS

Location: 04 Beaver County 04003 Beaver Falls City

SIC Code: 3299 Manufacturing - Nonmetallic Mineral Products, Nec

#### Responsible Official

Name: ROBERT KNEZOVICH Title: PLANT MANAGER Phone: (724) 847 - 5750

#### Permit Contact Person

Name: JEFFREY EVANS

Title: ENVIRONMENTAL AND FACILIT

Phone: (724) 847 - 5724

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

MARK A WAYNER, SOUTHWEST 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 RequirementsE-III: Monitoring RequirementsE-IV: Recordkeeping RequirementsE-V: Reporting RequirementsE-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





# SECTION A. Site Inventory List

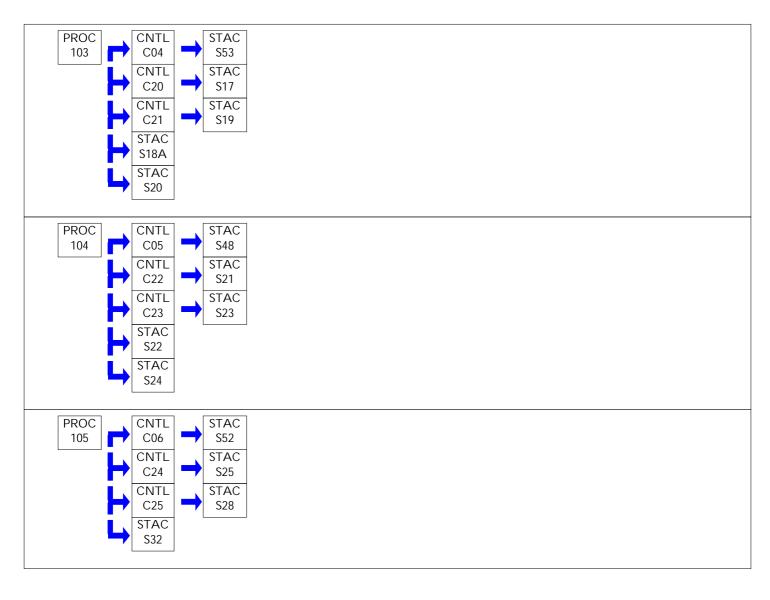
S08	NO. 2 FORMING BACKCOAT PAINT BOOTH FILTER	
S09	NO. 2 FORMING BACKCOAT PAINT DRYER STACK	
S11	TCD BEARING COOLER STACK	
S16	TCD COOLING TALBES STACK	
S17	#1 FAB PRIME PAINT BOOTH STACK	
S18A	#1 FAB PRIME AND FINISH OVEN STACK	
S19	#1 FAB FINISH PAINT BOOTH STACK	
S20	#1 FAB FINISH OVEN STACK	
S21	#2 FAB PRIME PAINT BOOTH	
S22	#2 FAB PRIME OVEN STACK	
S23	#2 FAB FINISH PAINT BOOTH STACK	
S24	#2 FAB FINISH OVEN STACK	
S25	#3 FAB PRIME PAINT BOOTH STACK	
S28	#3 FAB FINISH PAIN BOOTH STACK	
S32	#3 FAB PAINT OVEN STACK	
S33	EMBOSS GENERAL EXHAUST STACK	
S34	EMBOSS PRINT OVEN STACK	
S35	EMBOSS GENERAL EXHAUST STACK	
S36	M BAGHOUSE STACK	
S37	N BAGHOUSE STACK	
S38	EMBOSS PAINT DRYER STACK	
S39	EMBOSS PAINT FILTER STACK	
S42	#1 AND #2 FORMING VACUUM PUMP STACK	
S44	DUST SYSTEM WET SCRUBBER EXHAUST	
S46	Q BAGHOUSE STACK	
S47	R BAGHOUSE STACK	
S48	A BAGHOUSE STACK	
S49	B BAGHOUSE STACK	
S50	C BAGHOUSE STACK	
S51	G BAGHOUSE STACK	
S52	H BAGHOUSE STACK	
S53	J BAGHOUSE STACK	
S55	PERLITE SCRUBBER STACK	
S56	D BAGHOUSE STACK	
S57	K BAGHOUSE STACK	
S58	L BAGHOUSE STACK	
S59	S BAGHOUSE STACK	
S60	NO. 2 FORMING (TCD SCRUBBER VENT)	
S61	NO. 1 FORMING ( PAINT BOOTH)	
S62	NO. 1 FORMING ( DRYING OVEN)	
Z02	EMBOSS FEEDER HEPA FILTER EXHAUST	
Z04	CLAY/BORIC ACID STARCH MIXING DUST COLLEC	
Z05	PAINT MIXING BAGHOUSE EXHAUST INSIDE	
Z06	EMERGENCY GENERATOR EXHAUST	
Z07	PRIMARY WOOL PICKER DUST COLLECTOR EXHA	

# PERMIT MAPS



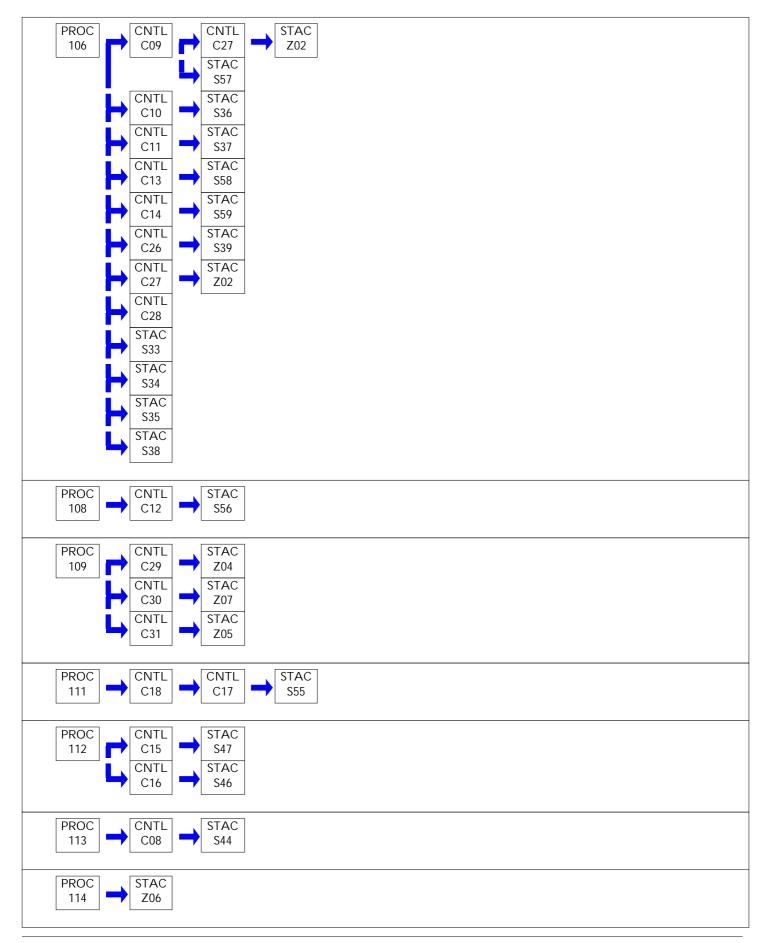
















#001 [25 Pa. Code § 121.1]

**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.





#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





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.



#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.



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 NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air 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 §





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





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.





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





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.





- (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.



#### I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §123.1]

#### Prohibition of certain fugitive emissions

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

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

# 002 [25 Pa. Code §123.2]

#### Fugitive particulate matter

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

# 003 [25 Pa. Code §123.31]

#### Limitations

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in 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 §127.441]

## Operating permit terms and conditions.

In accordance with RACT Operating Permit # 04-000-108, Conditions #4 & #7. total facility wide emissions shall not exceed 164 tons of VOC per consecutive 12 month period. Individual source limitations are specified under each source in Section D of this permit for convenience.

# 005 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

In accordance with RACT Operating Permit #04-000-108, Condition #5, the owner/operator shall not exceed a production limit of 96 million square feet of ceiling board per consecutive 12 month period.

# 006 [25 Pa. Code §127.444]

#### Compliance requirements.

The sources at this facility shall not operate in the event that the associated emissions control equipment is incapable of operation.

#### II. TESTING REQUIREMENTS.

# 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

- (a) At least sixty (60) days prior to the performance of the testing required by this permit, a test plan shall be submitted to the Department for evaluation. The plan shall contain a description of the proposed test methods and dimensioned drawings or sketches showing the test port locations.
- (b) The Department shall be given at least ten (10) days advance notice of the scheduled dates for the performance of the testing required by this permit.
- (c) Within sixty (60) days of the completion of the tests required by this permit, two copies of the test report shall be submitted to the Department. This report shall contain the results of the tests, a description of the testing and analytical procedures actually used in performance of the tests, all process and operating data collected during the tests, a copy of all raw data, and a copy of all calculations generated during data analysis.





#### III. MONITORING REQUIREMENTS.

# 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

# 009 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall conduct daily inspections of this facility, when this source is in operation, to determine the presence of malodorous air emissions detectable beyond the boundaries of this facility.

#### IV. RECORDKEEPING REQUIREMENTS.

# 010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- a) The permittee shall maintain a record of the monitoring observations conducted to determine the presence of fugitive emissions, visible emissions, and odors pursuant to the conditions specified above.
- b) This recordkeeping shall contain a listing or notation of any and all sources of fugitive emissions, visible emissions and odors; the cause of the fugitive emissions, visible emissions, and odors; the duration of the emission; and the corrective action taken to abate the deviation and prevent future occurrences.

# 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit # 04-000-108, Condition #6, the owner/operator shall keep records of coating usage (quantity and VOC content) for 5 years and shall be made available to the Department upon request

# 012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall maintain a log of the ceiling board produced on a weekly basis.

# 013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit #04-000-108, to demonstrate compliance with the annual facility emission limit of 164 tons of VOC per consecutive 12 month period and the individual source limits referenced in other portions of this permit, the production rate shall be monitored and recorded.

# 014 [25 Pa. Code §135.5]

Recordkeeping

The Source owner/operator shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with 135.21 (relating to reporting; and emission statements). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#### V. REPORTING REQUIREMENTS.

# 015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Copies of all request, reports, applications, submittals, and other communicatins shall be forwarded to both EPA and the Department at the addresses listed below unless otherwise noted:

Director, Air Toxics and Radiation U.S. Environmental Protection Agency

Region III

1650 Arch Street

Philadelphia, PA 19103-2029

Pennsylvania Department of Environmental Protection



Office of Air Quality 400 Waterfront Drive Pittsburgh, PA 15222-4745

# 016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 16, owner/operator shall provide two copies of all stack test results within 60 days of the completion of testing. One copy shall be forwarded to each of the following addresses:

Chief, Source Testing Section Bureau of Air Quality PO BOX 8468 RCSOB 400 Market Street Harrisburg, PA 17105-8468

and

Air Quality Program Manager Department of Environmental Protection 400 Waterfront Drive Pittsburgh, PA 15222

# 017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall within 24 hours notify the Department of any malfunction of the plant equipment or associated air cleaning device(s) which results in, or may possible be resulting in the emission of air contaminants in excess of any applicable limitation. Environmental Emergencies require immediate Department notification.

- (a) The owner/operator shall report to the Department each malfunction that occurs at the facility. As defined in 40 CFR §60.2 and incorporated by reference in 25 PA Code Chapter 122, a malfunction means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- (b) When the malfunction poses an imminent and substantial danger to the public health and safety or potential harm to the environment, the notification shall be submitted to the Department no later than one hour after the incident.
- (c) Unless otherwise required by specific reporting requirements, any malfunction that is not subject to the notice requirements of subsection (b) of this permit condition shall be reported to the Department within 24 hours (or the next business day) of discovery of the malfunction.
- (1) The owner/operator shall notify the Regional Air Program Manager within 24 hours (or the next business day) of becoming aware of the occurrence of excess emissions which last for more than 4 hours and which result from a malfunction, a breakdown of process or control equipment or any abnormal condition.

  The report 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;
  - (iv) expected duration of excess emissions; and
  - (v) estimated rate of emissions.
  - (2) The owner/operator shall notify the Department immediately when corrective measures have been accomplished.





- (3) Subsequent to the malfunction, the owner/operator shall submit a full report on the malfunction to the Department within 15 days, if requested.
- (4) The owner/operator shall submit reports on the operation and maintenance of the source to the Regional Air Program 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.

# 018 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 13, a pre-test protocol shall be submitted to the Department at least 60 days in advance of any stack testing review. A copy of this protocol shall be submitted to the each of the addresses below:

Chief, Source Testing Section Bureau of Air Quality PO BOX 8468 RCSOB 400 Market Street Harrisburg, PA 17105-8468

and

Air Quality Program Manager Department of Environmental Protection 400 Waterfront Drive Pittsburgh, PA 15222

# 019 [25 Pa. Code §135.21]

## **Emission statements**

- (a) The permittee shall provide the Department with a statement of each stationary source in a form as prescribed by the Department, showing the actual emissions of oxides of nitrogen and volatile organic compounds (VOCs) from the permitted facility for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based.
- (b) The annual emission statements are due by March 1 for the preceding calendar year and shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate. The Emission Statement shall provide data consistent with requirements and guidance developed by the EPA.
- (c) The Department may require more frequent submittals if the Department determines that one or more of the following applies:
- (1) A more frequent submission is required by the EPA.
- (2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the Air Pollution Control Act.

# 020 [25 Pa. Code §135.3]

#### Reporting

The owner or operator shall submit by March 1 of each year, a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.

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

### VI. WORK PRACTICE REQUIREMENTS.

# 021 [25 Pa. Code §123.1]

## Prohibition of certain fugitive emissions

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





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

#### VII. ADDITIONAL REQUIREMENTS.

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

## VIII. COMPLIANCE CERTIFICATION.

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

#### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

\*\*\* Permit Shield In Effect \*\*





Source ID: 134 Source Name: MISCELLANEOUS AIR HEATERS

Source Capacity/Throughput: MMBTU/HR

#### I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

#### **Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

#### General

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

## IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Fuel usage records shall be kept and maintained on site for 5 years. At a minimum compliance with the SOx, and particulate matter limitations shall be demonstrated through the use of the most current AP-42 emission factors and fuel usage records.

#### 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. \*\*\*



Source ID: 101 Source Name: #1 FORMING LINE AND BACKCOATING

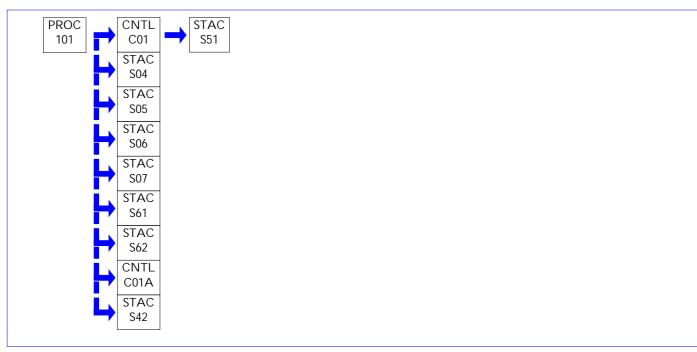
Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2-PAINT BOOTHS

**2A-DRYING OVENS** 

3-PROCESSES WITH BAGHOUSES

GROUP-5



## I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §123.21]

## General

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

#### 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.

# 002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Fuel usage records shall be kept and maintained on site for 5 years. At a minimum compliance with the SOx limitation shall be demonstrated through the use of the most current AP-42 emission factors and fuel usage records.





## 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. \*\*\*



Source ID: 102 Source Name: #2 FORMING & BACKCOATING

Source Capacity/Throughput:

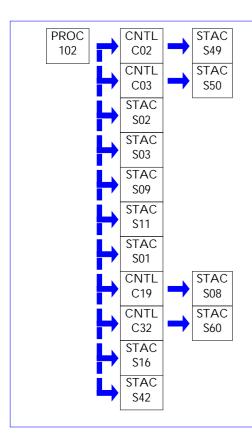
Conditions for this source occur in the following groups: 2-PAINT BOOTHS

**2A-DRYING OVENS** 

3-PROCESSES WITH BAGHOUSES

3A-PROCESSES WITH BAGHOUSES S.B.D

**GROUP-5** 



## 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.

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with PA-04-00108A, Condition #5, for the operation of the TCD scrubber (C-32) the output alarms to the operator panel shall operate with low water, low tank water level, high tank water level, and out of range scrubber system differential pressure or high duct temparture.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with PA- 04-108A, Condition #11, periodic demonstration of compliance shall be determined by measuring the differential pressure across the scrubbing section every five minutes for a two hour period each day. These readings will be averaged and recorded as a single value for the day.

# M Secure

## SECTION D. Source Level Requirements

# 003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Monitoring Type: Indicator #3

I. Indicator: Visible Observations

Measurement Approach: Visible observations performed daily. If visible emissions are observed, inspection and corrective action shall be performed, including Method 22 and Method 9, if necessary.

II. Indicator range: The indicator range is any visible emissions greater than 20% opacity. Excursions trigger an inspection, corrective action, and malfunction reporting, including performing Method 22 and Method 9 observations, if necessary.

III. Performance Criteria:

- A. Data representativeness: Observations are performed at scrubber exhaust when operating.
- B. Verification of Operational Status: Verified by operator or env. maintenance.
- C. QA/QC Practices and Criteria: Operators are trained to identify emission in excess of 20% opacity. Staff is trained to perform Method 22.
- D. Monitoring Frequency: Once per day.

Data Collection Precedure: Operator to record daily visible emissions observations. Records are retained for 5 years.

Averaging Period: NA

# 004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Monitoring Type: Indicator #4

I. Indicator: Inspection and Preventive Maintenance

Measurement approach: Monthly inspections and annual preventative maintenance conducted according to work practice and scheduling; maintenance performed and repaired as needed.

- II. Indicator Range: Maintenance and repairs performed as needed.
- III. Performance Criteria:
- A. Data Representativeness: Monthly inspections are performed at the fans, compartments, hoppers, screws, conveyors and silo.
- B. Verification of Operational Status: Verified by operator or env. maintenance.
- C. QA/QC Practices and Criteria: Qualified maintenance personnel perform monthly inspections. Comprehensive Preventive Maintenance inspection performed annually by contractor.
- D. Monitoring Frequency: Monthly inspections and Annual PM Inspections.

Data Collection Procedure: Records are maintained of monthly and annual PM inspections. Records of actual maintenance kept & retained 5 years.

Averaging Period: Monthly and annually.

# 005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Monitoring Type: Indicator #1

I. Indicator: Pressure Drop

Measurement Approach: Pressure differential is measured and recorded once per shift using static pressure transducer and recorded manually on hard copy forms and in a PLC system.





II. Indicator Range: The indicator is a pressure reading between:7 and 23" H2O (venturi throat);0.5 and 5.5" H20 (Separator Tray); and 0.4 and 5" H20 (demister). Excursions trigger an inspection, corrective action and possibly malfunction reporting.

III. Performance Criteria:

- A. Data Representativeness: Pressure reading is measured across venturi, trays, and mist eliminator. The minimum accuracy of the device is ± 0.5 in. H2O.
- B. Verification of Operational Status: Verified by operator or env. maintenance.
- C. QA/QC Practices and Criteria: Abnormal reading are recorded and investigated.
- D. Monitoring Frequency: Pressure readings taken once per shift.

Data Collection Procedure: Operator manually records the pressure readings every shift. A hard copy of the data is retained for 5 years.

Averaging Period: Daily average.

# 006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Monitoring Type: Indicator #2

I. Indicator: Scrubber Water Flow Rate

Measurement Approach: Read flow meter once per shift

- II. Indicator Range: Water flow rate to scrubber should be greater than: 200 GPM (venturi throat); 98 GPM (Separator tray).
- III. Performance Criteria:
- A.. Data Representativeness: Vendor recommended flow rate ranges are accurate ± 1 gpm.
- B. Verification of Operational Status: NA
- C. QA/QC Practices and Criteria: Maintenance and operations personnel will periodically check meter for proper functionality.
- D. Monitoring Frequency: Once per day.

Data Collection Procedure: Recorded once per day.

Averaging Period: NA

#### IV. RECORDKEEPING REQUIREMENTS.

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with PA- 04-108A, Condition #6, log shall be kept and maintained for five years for all emergency and alarmed events and made available to the Department upon request.

#### V. REPORTING REQUIREMENTS.

# 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with PA- 04-108A, Condition #11, monthly compliance reports of the differential pressure across the scrubber shall be generated from this data and kept on record. All exceedances shall be reported to the Department.

#### VI. WORK PRACTICE REQUIREMENTS.

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with PA- 04-108A, Condition #12, the maintenance schedule/work practice requirements for the air pollution control and process equipment shall be implemented through the plant PM program and shall include the following:





- 1. System externals and its exhaust shall be inspected daily
- 2. All rotating components bearings to be greased, as recommended by the manufacturer.
- 3. Daily leak inspections shall be conducted for piping.
- 4. Quarterly inspection of internal system, venturi throat, and fan wheel.
- 5. Quarterly inspection to determine if clean out of ducts, stacks, and scrubber components are required.
- 6. A log of all inspection, maintenance, and repairs shall be kept and maintained for 5 years and made available upon request.
- 7. Maintenance shall be conducted in accordance with the manufacturers' operating and maintenance recommendations and consistent with good operating practices.

## 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. \*\*\*





Source ID: 103 Source Name: #1 FABRICATION LINE

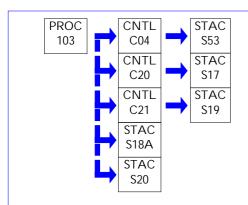
Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2-PAINT BOOTHS

**2A-DRYING OVENS** 

3-PROCESSES WITH BAGHOUSES

GROUP-5



#### 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. \*\*\*





Source ID: 104 Source Name: #2 FABRICATION LINE

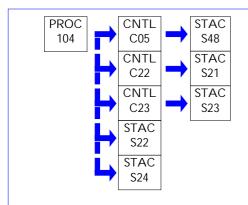
Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2-PAINT BOOTHS

**2A-DRYING OVENS** 

3-PROCESSES WITH BAGHOUSES

GROUP-5



#### 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. \*\*\*





Source ID: 105 Source Name: #3 FABRICATION LINE

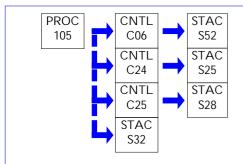
Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2-PAINT BOOTHS

**2A-DRYING OVENS** 

3-PROCESSES WITH BAGHOUSES

GROUP-5



#### 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. \*\*\*



Source ID: 106 Source Name: EMBOSSING OPERATION

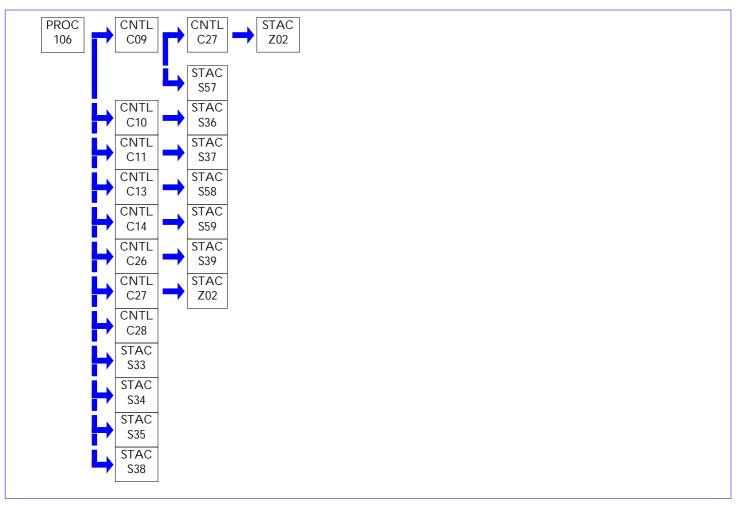
Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2-PAINT BOOTHS

3-PROCESSES WITH BAGHOUSES

3A-PROCESSES WITH BAGHOUSES S.B.D

GROUP-5



#### 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.

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall record time and date that the embossing operation(Source 106) paint filter is changed. These records shall be maintained on site for a period of 5 years and made available for review 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) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall change the Embossing operation(Source 106) paint filter once every eight hour shift.

#### 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).



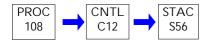


Source ID: 108 Source Name: RIMS OPERATION

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 3-PROCESSES WITH BAGHOUSES

3A-PROCESSES WITH BAGHOUSES S.B.D



#### 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).



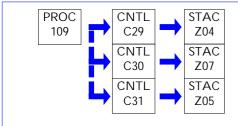


Source ID: 109 Source Name: RAW MATERIAL MIXING

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 3-PROCESSES WITH BAGHOUSES

**GROUP-5** 



#### 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.

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

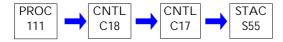
This source is subject to the provision of the Miscellaneous Organic NESHAP(MON) Coating MACT(40 CFR Part 63, Subpart HHHHHH, 63.7980)





Source ID: 111 Source Name: PERLITE EXPANDER

Source Capacity/Throughput:



#### I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition #4, particulate matter emission from the scrubber shall not exceed 0.03 gr/dscf.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 5, visible emissions from the scrubber shall not equal or exceed 10% opacity.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 6, water flow rate to the scrubber shall be at least 50 gpm.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 9, the perlite expansion system may be operated up to 3000 lb/hr (67% of the maximum capacity).

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 7, pressure drop across the scrubber shall be at least 30"w.c.

# 006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.732]

Subpart UUU - Standards of Performance for Calciners and Dryers in Mineral Industries Standards for particulate matter.

Compliance with limit specified in Operating Permit #04-309-035, Condition #4 referenced above in Section D, Condition #001 ensures compliance with the particulate emission standard of .04 gr/dscf.

## II. TESTING REQUIREMENTS.

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Compliance with the particulate emission limit specified in Condition #4 of the Operating Permit # 04-309-035 shall be established through stack testing. This test shall occur within 180 days after permit issuance if a stack test has not been performed on the source in the last 12 months. This stack test shall be performed in accordance with 25 Pa Code Chapter 139, 40 CFR 60.8, and 40 CFR 60.736. If the stack test has occurred within the last 12 months, testing shall be conducted once during the permit term. Visible emission observations shall be performed concurrently with any stack testing.

# 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 14, the owner/operator shall notify the Department of the date and time of any tests at least two weeks prior to any performance testing so that an observer may be present.

# MC SH

## SECTION D. Source Level Requirements

# 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 10, upon achieving 67% of maximum capacity and/or 100% capacity, the owner/operator of the perlite expansion system shall perform stack testing to verify compliance with all applicable emission rates, limitations, conditions, and standards.

# 010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit #04-309-035, Condition #12, all emissions testing shall be performed while the source is being operated at the maximum rated capacity as stated in the application unless otherwise noted. If the source is operated at lower process or production rates, the operating permit will limit the maximum permissible process or production rate to the maximum rate at which compliance has been demonstrated.

#### III. MONITORING REQUIREMENTS.

# 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 17, the owner/operator of the source shall install, calibrate, maintain, and operate monitoring devices that continuously measure and record the pressure loss of the gas stream through the scrubber and liquid flow rate to the scrubber.

# 012 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Monitoring Type: Indicator #2

I. Indicator: Scrubber Liquid Flow Rate

Measurement Approach: Scrubber liquid flowrate is measured and recorded continuously in a PLC system.

- II. Indicator Range: Water flow rate to scrubber should be:greater than 50 gallons per minute.
- III. Performance Criteria:
- A. Data Representiveness: NA
- B. Verification of Operational Status: Verified by operator or Env. Maintenance
- C. QA/QC Practices and Criteria: NA
- D. Monitoring Frequency: Continuous measurement and recording.

Data Collection Procedure: Continuous measurement and recording. A hard copy of the data is retained for 5 years.

Averaging Period: Record one daily average over a 2-hour period for the liquid flowrate.

# 013 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

MonitoringType: Indicator #3

I. Indicator: Visual Observations

Measurement Approach: Opacity is monitored during compliance testing.

- II. Indicator Range: The indicator range is any visible emissions greater than 10 % opacity. Excursions trigger an inspection, corrective action and malfunction reporting, including performing Method 22 and Method 9 observations, if necessary.
- III. Performance Criteria:
- A. Data Representativeness: Observations are performed at scrubber exhaust during compliance testing, and must be equal to or <10%.
- B. Verification of Operational Status: Verified by operator or Env. Maintenance.





C. QA/QC Practices and Criteria: Stack testers trained for Opacity reading.

D. Monitoring Frequency: Once during compliance test.

Data Collection Procedure: NA

Averaging Period: NA

# 014 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Monitoring Type: Indicator #4

I. Indicator: Inspection and Preventive Maintenance

Measurement Approach: Weekly inspections and preventative maintenance conducted according to work practice and scheduling; maintenance performed and repaired as needed.

II. Indicator Range: Weekly inspections and preventative maintenance conducted according to work practice and scheduling; maintenance performed and repaired as needed.

III. Performance Criteria:

- A. Data Representativeness: Weekly inspections are performed on the ductwork ventilating the perlite expanding system and Scrubber, Pressure Drops and Liquid Flow rate.
- B. Verification of Operational Status: Verified by operator or Env. Maintenance.
- C. QA/QC Practices and Criteria: Weekly inspections are performed on the ductwork ventilating the perlite expanding system and Scrubber, Pressure Drops and Liquid Flow rate.
- D. Monitoring Frequency: Weekly Inspections.

Data Collection Procedure: Records are maintained of weekly PM inspections. Records of actual maintenance kept & retained 5 years.

Averaging Period: Weekly

# 015 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Monitoring Type: Indicator #1

I. Indicator: Pressure Drop

Measurement Approach: Pressure differential is measured and recorded continuously in a PLC system.

- II. Indicator Range: The indicator is between: 27 and 56" H2O. Excursions trigger an inspection, corrective action and possibly malfunction reporting.
- III. Performance Criteria:
- A. Data Representativeness: Pressure reading is measured across the scrubber, and must be Certified by the manufacturer to be accurate within 5% of water column gauge at the level of operation.
- B. Verification of Operational Status: Verified by operator or Env. Maintenance.
- C. QA/QC Practices and Criteria: Pressure loss is checked weekly.
- D. Monitoring Frequency: Continuous measurement and recording.

Data Collection Procedure: Continuous measurement and recording. A hard copy of the data is retained for 5 years.

Averaging Period: Record one daily average over a 2-hour period for the pressure.

# 016 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.734] Subpart UUU - Standards of Performance for Calciners and Dryers in Mineral Industries Monitoring of emissions and operations.



# TO ST

## SECTION D. Source Level Requirements

The owner or operator who uses a wet scrubber to comply with the mass emission standard shall install, calibrate, maintain, and operate monitoring devices that continuously measure and record the pressure loss of the gas stream through the scrubber and the scrubbing liquid flow rate to the scrubber. The pressure loss monitoring device must be certified by the manufacturer to be accurate within 5 percent of water column gauge pressure at the level of operation. The liquid flow rate monitoring device must be certified by the manufacturer to be accurate within 5 percent of design scrubbing liquid flow rate.

#### IV. RECORDKEEPING REQUIREMENTS.

# 017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-209-035, Condition 18, 19, 20, 22, & 23, records of all measurements shall be maintained and retained for five years. These records shall be made available to the Department upon request. Copies of requests, reports, applications, submittals and other communications shall be forwarded to boththe EPA and the Department.

# 018 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.735]

Subpart UUU - Standards of Performance for Calciners and Dryers in Mineral Industries

Recordkeeping and reporting requirements.

Each owner or operator who uses a wet scrubber to comply with 60.732 shall determine and record once each day, from the recordings of the monitoring devices in 60.734(d), an arithmetic average over a 2-hour period of both the change in pressure of the gas stream across the scrubber and the flowrate of the scrubbing liquid.

[60.735(b) 58 FR 40591, July 29, 1993]

#### V. REPORTING REQUIREMENTS.

# 019 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.735] Subpart UUU - Standards of Performance for Calciners and Dryers in Mineral Industries Recordkeeping and reporting requirements.

Each owner or operator shall submit written reports semiannually of exceedances of control device operating parameters required to be monitored by 60.734 of this subpart. For the purpose of these reports, exceedances are defined as follows:

- (1) All 6-minute periods during which the average opacity from dry control devices is greater than 10 percent; or
- (2) Any daily 2-hour average of the wet scrubber pressure drop determined as described in 60.735(b) that is less than 90 percent of the average value recorded according to 60.736(c) during the most recent performance test that demonstrated compliance with the particulate matter standard; or [60.735(c)(2) 58 FR 40591, July 29, 1993]
- (3) Each daily wet scrubber liquid flow rate recorded as described in 60.735(b) that is less than 80 percent or greater than 120 percent of the average value recorded according to 60.736(c) during the most recent performance test that demonstrated compliance with the particulate matter standard.

  [60.735(c)(3) 58 FR 40591, July 29, 1993]

#### VI. WORK PRACTICE REQUIREMENTS.

# 020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 19, the pressure loss monitoring device must be certified by the manufacturer to be accurate within 5% of water column gauge pressure at the level of operation.

# 021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-035, Condition # 18, all ductwork ventilating the perlite expansion system and the scrubber shall be regularly inspected and maintained such that the efficiency of the system is not adversely affected and fugitive emissions do not occur.





# 022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Weekly inspection and maintenance shall be conducted on the following:

Ductwork ventilating perlite expanding system & scrubber

Pressure loss - CEM

Liquid Flow rate - CEM

# VII. ADDITIONAL REQUIREMENTS.

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



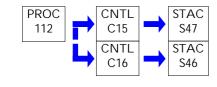


Source ID: 112 Source Name: PNEUMATIC DUST RECYCLING SYSTEM

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 3-PROCESSES WITH BAGHOUSES

**GROUP-5** 



#### 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).





Source ID: 113 Source Name: OVERLAY MATERIAL PREPARATION

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP-5



#### RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

#### **Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain 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) 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.

# 002 [25 Pa. Code §123.13]

**Processes** 

Compliance with the particulate emissions limitation shall be determined at a minimum through the use of coating usage records, transfer efficiency estimates, material balance, fabric filter efficiency rating, or another method approved by the Department.

## 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).

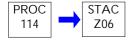




Source ID: 114 Source Name: EMERGENCY GENERATOR

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP-5



#### 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).





Group Name: 2-PAINT BOOTHS
Group Description: Paint Booths
Sources included in this group:

ID	Name
101	#1 FORMING LINE AND BACKCOATING
102	#2 FORMING & BACKCOATING
103	#1 FABRICATION LINE
104	#2 FABRICATION LINE
105	#3 FABRICATION LINE
106	EMBOSSING OPERATION

## I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §129.52]

### Surface coating processes

- (a) This section applies to a surface coating process category, regardless of the size of the facility, which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year since January 1, 1987.
- (b) Not Applicable.
- (c) A facility, regardless of the facility's annual emission rate, which contains surface coating processes shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:
  - (1) The following parameters for each coating, thinner and other component as supplied:
  - (i) The coating, thinner or component name and identification number.
  - (ii) The volume used.
  - (iii) The mix ratio.
  - (iv) The density or specific gravity.
  - (v) The weight percent of total volatiles, water, solids and exempt solvents.
  - (vi) The volume percent of solids for Table I surface coating process categories 1—10.
  - (2) The VOC content of each coating, thinner and other component as supplied.
  - (3) The VOC content of each as applied coating.
- (d) The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this section and § 129.67 (relating to graphic arts systems). A surface coating process which seeks to comply with this section through the use of an exempt solvent may not be included in any alternative standards.
- (e) Not Applicable.
- (f) Not Applicable.
- (g) The records shall be maintained for 2 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.
- (h) Not Applicable.





#### 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 §129.52]

## Surface coating processes

The owner and operator shall maintain records sufficient to demonstrate compliance with this section 25 Pa Code 129.52. At a minimum, a facility shall maintain daily records of the gallons of coating used, the coating density before and after addition of diluents, the gallons of diluents used and the density of the diluents, the gallons of water contained in the coating and the weight percent of the organic volatiles in the coating. The records shall be maintained for 5 years and shall be submitted to the Department on an annual basis.

# 003 [25 Pa. Code §129.91]

## Control of major sources of NOx and VOCs

- (a) This section applies to both the owner and the operator of a major NOx emitting facility or major VOC emitting facility for which no RACT requirement has been established in 129.51 -- 129.72, 129.81 and 129.82 (relating to sources of VOCs; and mobile sources). This section applies to the owner and operator of a major VOC emitting facility for which requirements have been established in 129.52 Table I (11) (relating to surface coating processes).
- (b) The owner and the operator shall, jointly, provide the Department with the following information on or before May 16, 1994.
  - (1) An identification of each facility including individual sources to which this section applies.
  - (2) A determination through emission testing of the following:
    - (i) The total potential to emit and the actual emissions of VOCs for the 1990 calendar year from each source at the facility.
    - (ii) The total potential to emit and actual emissions of NOx for the 1990 calendar year from each source at the facility.
- (c) Alternative methods which accurately characterize the emissions for the 1990 calendar year may be used to determine potential and actual emissions under subsection (b) if emission test data are not available and the Department has approved the alternative method in writing.
- (d) The owner and the operator of a major NOx emitting facility or major VOC emitting facility shall, jointly, on or before July 15, 1994, provide to the Department and the EPA, Chief, Air Programs Branch, United States EPA, Region III, 841 Chestnut Building, Philadelphia, Pennsylvania 19107 a written proposal for RACT for each source of VOCs and NOx at the facility. The RACT proposal shall include, at a minimum, the information contained in 129.92 (relating to RACT proposal requirements).
  - (e) The Department will approve, deny or modify each RACT proposal.
- (f) Upon receipt of notice of the Department's approval of the RACT proposal, the facility shall begin implementation of the measures necessary to comply with the approved or modified RACT proposal. Implementation of the RACT program shall be completed according to the schedule established in the approved RACT program and shall be as expeditious as practicable but no later than May 31, 1995.
- (g) Where the installation of a new source, modification or change in operation of an existing source will result in the source or facility meeting the definition of a major NOx emitting facility or a major VOC emitting facility, the owner and the operator shall jointly submit a RACT proposal to the Department and the EPA that meets the requirements of this section, and complete implementation of the RACT proposal as approved or modified by the Department prior to the installation, modification or change in operation of the existing source.





- (h) Except for sources which elect to comply with the presumptive RACT emission limitations in 129.93 (relating to presumptive RACT emission limitations), the Department will submit each RACT determination to the EPA for approval as a revision to the SIP. A major NOx emitting facility or major VOC emitting facility shall bear the costs of public hearings and notification required for EPA approval.
- (i) Following the implementation of the RACT requirements, the owner and operator of a combustion unit with a rated heat input of 250 million Btus per hour or greater and subject to 123.51 shall, through the use of a Department approved continuous emission monitoring system, determine the rate of emissions of NOx from the combustion unit. Following the implementation of the RACT requirements, the owner and operator of a combustion unit with a rated heat input greater than 100 million Btus per hour and not subject to 123.51, shall, through the use of either a Department approved periodic source testing program or predictive modeling program, determine the rate of emissions of NOx from the combustion unit unless the owner and operator elects to use a Department approved continuous monitoring system.
- (j) Based on the results of the emission monitoring conducted in accordance with subsection (i), the Department will determine the RACT emission limitations for the source and the Department will submit the emission limitations to the EPA as a Federally enforceable permit.

#### 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).





Group Name: 2A-DRYING OVENS

Group Description: Drying Ovens Sources included in this group:

ID	Name
101	#1 FORMING LINE AND BACKCOATING
102	#2 FORMING & BACKCOATING
103	#1 FABRICATION LINE
104	#2 FABRICATION LINE
105	#3 FABRICATION LINE

#### I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

#### **Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from any process in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

#### General

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

## IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §123.13]

#### **Processes**

Fuel usage records shall be kept and maintained on site for five years. At a minimum compliance with the particulate matter limitation shall be demonstrated through the use of fuel usage records and the most current accepted AP-42 emission factors.

# 004 [25 Pa. Code §123.21]

## General

Fuel usage records shall be kept and maintained on site for 5 years. At a minimum compliance with the SOx limitation shall be demonstrated through the use of the most current AP-42 emission factors and fuel usage records.

#### 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).



Group Name: 3-PROCESSES WITH BAGHOUSES

Group Description: Processes with Baghouses

Sources included in this group:

ID	Name
101	#1 FORMING LINE AND BACKCOATING
102	#2 FORMING & BACKCOATING
103	#1 FABRICATION LINE
104	#2 FABRICATION LINE
105	#3 FABRICATION LINE
106	EMBOSSING OPERATION
108	RIMS OPERATION
109	RAW MATERIAL MIXING
112	PNEUMATIC DUST RECYCLING SYSTEM

## I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §123.13]

#### **Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain 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.

# 002 [25 Pa. Code §123.13]

**Processes** 

During operation the owner/operator shall conduct daily visual inspections of the baghouses (external). The inspection shall include observations of the baghouse stack for the presence of visible emissions and pressure readings from the manometers.

## IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §123.13]

**Processes** 

Compliance with the particulate emissions limitation shall be determined at a minimum through the use of coating usage records, transfer efficiency estimates, material balance, fabric filter efficiency rating, or another method approved by the Department.

# 004 [25 Pa. Code §123.13]

**Processes** 

The owner/operator shall keep a log of the daily observations and maintain them on site for five years. At a minimum, the log shall include the date, time, observation, pressure drop reading, name and title of the observer, and any action taken.

## 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.

# 005 [25 Pa. Code §123.13]

#### **Processes**

Operation of any air emissions source is contingent upon proper operation of its associated emissions control system, unless otherwise approved by the Department. Compliance with this work practice standard ensures compliance with 25 Pa Code 127.25.





# 006 [25 Pa. Code §123.13]

**Processes** 

The operation of the sources and their baghouses shall be in accordance with manufacturer's operating and maintenance recommendations consistent with good operating practices.

## VII. ADDITIONAL REQUIREMENTS.

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



Group Name: 3A-PROCESSES WITH BAGHOUSES S.B.D

Group Description: Processes with Baghouses S,B,D

Sources included in this group:

ID	Name
102	#2 FORMING & BACKCOATING
106	EMBOSSING OPERATION
108	RIMS OPERATION

#### I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-008D, Condition #5, particulate matter emission from each of the baghouses S, B, and D are limited to an emission rate of 0.02 grain per dscf.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-008D, Condition #4, visible emission from baghouses S,B,D shall not equal or exceed 10% opacity.

#### 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.

In accordance with Operating Permit # 04-309-008D, Condition #7, manometers shall be installed and maintained to yield accurate measurements on each baghouse.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-008D,Condition #6 & #8, A maintenance protocol has been submitted to the Department and approved by the Department. This protocol provides for daily visual inspections of the baghouse (external) and their visible emissions, a log of pressure readings from the manometers (kept for five years), and operation of the sources and their baghouses in accordance with manufacturer's operating and maintenance recommendations consistent with good operating practices.

## IV. RECORDKEEPING REQUIREMENTS.

# 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Compliance with the particulate emissions limitation shall be determined at a minimum through the use of coating usage records, transfer efficiency estimates, material balance, fabric filter efficiency rating, or another method approved by the Department.

# 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall keep a monthly inventory of spare bags and cartridges kept on site for baghouse maintenance.

## 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.

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with Operating Permit # 04-309-008D, Condition #9, spare bags shall be kept on site for replacement. At a minimum, there should be 20 polyester bags for baghouse "D", 30 polyacrylic bags for baghouse "B" and 3 polyester cartridges for baghouse "S", or similar, or higher quality bags.

## VII. ADDITIONAL REQUIREMENTS.

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





Group Name: GROUP-5

Group Description: Visible Emissions Standard

Sources included in this group:

ID	Name
101	#1 FORMING LINE AND BACKCOATING
102	#2 FORMING & BACKCOATING
103	#1 FABRICATION LINE
104	#2 FABRICATION LINE
105	#3 FABRICATION LINE
106	EMBOSSING OPERATION
109	RAW MATERIAL MIXING
112	PNEUMATIC DUST RECYCLING SYSTEM
113	OVERLAY MATERIAL PREPARATION
114	EMERGENCY GENERATOR

## I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §123.41]

#### Limitations

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

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

## 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.

# 002 [25 Pa. Code §123.41]

## Limitations

During operation of all Source ID#s listed in this group, visible emissions from the stacks will be inspected on a daily basis. If any visible emissions are observed the operators will immediately review the unit's operation and take steps to correct the problem.

## IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §123.41]

## Limitations

A log of the visible emissions shall include at a minimum the date, time, name and title of the observer, and observations and/or occurrences and shall be maintained and kept on site for a minimum of five years.

#### 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).





# 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 is a list of insignificant activities:

#### **Throughout Plant:**

Small Cold Cleaning Shop Degreasers
Janitorial Activities
Plant Maintenance including welding, paving, cleaning
Lube Oil Consoles and Storage in maintenance
Portable landscaping equipment
Battery recharging area in maint. shop
Forklifts
Power washers and power pumps
Building Ventilation Systems
Stretch Wrapping
Portable ( gas and diesel) Maintenance Equipment
Fire Extinguishing Equipment

Millwright Shop Equipment
Electric Ship Equipment
R and D Activities
Hot Water Heates for employees

Hot Water Heates for employee comfort Cafeteria

Mixing Area:

Kraft Mixing Tank Schercoquat Mixing Tanks Slurry Holding Tanks

## **Boiler Activities:**

Boiler water chemicals Water Purification still Water Treatment activities 6.695 MMBTU/hr NG Miura Boiler 2.5 MMBTU/hr NG Miura Boiler

#### Lab Activities:

Laboratory Paint Booth Laboratory Hood and Bunsen Burner Small Lab ovens

#### Office Area:

Ink Jet Labeling Routine Office Equipment

## Miscellaneous:

Bin Vent filter

Paper Trimmers in process areas
Edge Paint Rollers in the Fabrication Lines
Loading/Unloading:
Raw Material Truck Traffic
Weld Shop Activities
Incidental Combustion of Jube oil in the #2 Forming Ovens



TUD ON

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