

CARDINAL HOME PRODUCTS, TEL-O-POST DIVISION



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: December 9, 2002 Effective Date: June 23, 2005

Revision Date: June 23, 2005 Expiration Date: November 30, 2007

Revision Type: Amendment

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

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

State Only Permit No: 20-00175

Federal Tax Id - Plant Code: 34-0713139-1

Owner Information

Name: CARDINAL AMER CORP Mailing Address: 205 N PYMATUNING ST LINESVILLE, PA 16424

Plant Information

Plant: CARDINAL HOME PRODUCTS, TEL-O-POST DIVISION

Location: 20 Crawford County 20922 Linesville Borough

SIC Code: 3499 Manufacturing - Fabricated Metal Products, Nec

Responsible Official

Name: ROBERT KEIL Title: PLANT MANAGER Phone: (814) 683 - 5405

Permit Contact Person

Name: ROBERT KEIL Title: PLANT MANAGER Phone: (814) 683 - 5405

[Signature]	
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JOHN F GUTH, NORTHWEST REGION AIR PROGRAM MANAGER





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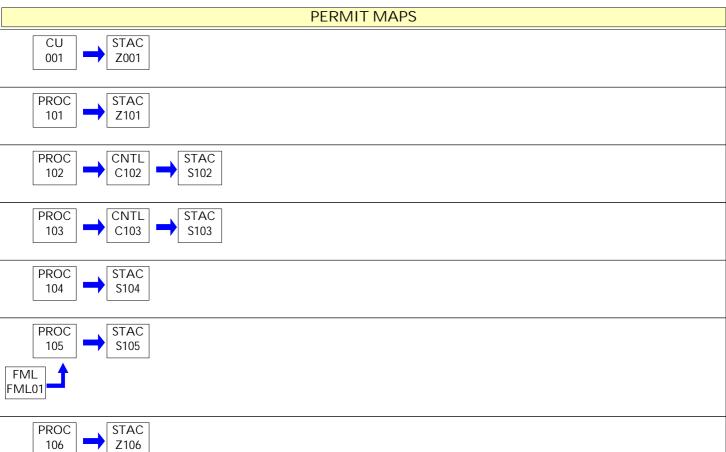
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SECTION A. Site Inventory List

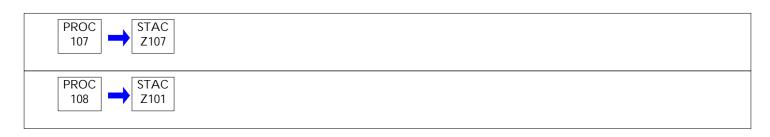
Source I	D Source Name	Capacity/Throughput	Fuel/Material
001	PLANT-WIDE SPACE HEATERS	4.700 MMBTU/HR	
		4.74 MCF/HR	Natural Gas
101	RED PRIMER LINE-FLOW COATER	2.64 Gal/HR	RED PRIMER
102	GRAY PRIMER LINE	6.88 Gal/HR	GRAY PRIMER
103	STAIN LINE	0.55 Lbs/HR	STAIN
104	PYROLYSIS FURNACE	350.00 CF/HR	NATURAL GAS
105	MISCELLANEOUS NATURAL GAS USAGE	10.50 MCF/HR	Natural Gas
106	COLD CLEANING MACHINE	20.00 Gal/HR	
107	LACQUER THINNER USAGE	1.38 Lbs/HR	LACQUER THINNER
108	SECONDARY RED PRIMER FLOW COATING LINE	7.00 Gal/HR	RED PRIMER
C102	GRAY PRIMER LINE DRY FILTERS		
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S104	PYROLYSIS FURNACE STACK		
S105	MISC. NATURAL GAS USAGE STACK		
Z001	PLANT-WIDE SPACE HEATERS FUGITIVES		
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#001 [25 Pa. Code § 121.1]

Definitions.

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

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

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

Permit Renewal.

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

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

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





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

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

Transfer of Operating Permits.

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

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

Inspection and Entry.

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

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

Compliance Requirements.

- (a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:
 - (1) Enforcement action
 - (2) Permit termination, revocation and reissuance or modification





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

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

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

Duty to Provide Information.

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

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

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

Operating Permit Modifications

- (a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:
- (b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.





(d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]

Severability Clause.

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

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
 - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.





- (5) Laboratory equipment used exclusively for chemical or physical analysis.
- (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

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

#015 [25 Pa. Code § 127.11]

Reactivation

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





127.11a(b).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

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

#017 [25 Pa. Code § 121.9]

Circumvention.

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

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

Reporting Requirements.

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

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

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

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

Sampling, Testing and Monitoring Procedures.

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





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

Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
 - (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of the analyses.
 - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

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





I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

- (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:
 - (1) Construction or demolition of buildings or structures.
 - (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
 - (4) Clearing of land.
 - (5) Stockpiling of materials.
 - (6) Open burning operations.
 - (7) Not applicable.
 - (8) Not applicable.
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.
- (b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.
 - (c) See Work Practice Standards
 - (d) Not applicable.

002 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in §123.1(Restrictions) (relating to prohibition of certain fugitive emissions) if such 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 such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.





004 [25 Pa. Code §123.41]

Limitations

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.

005 [25 Pa. Code §123.42]

Exceptions

The limitations of §123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:

- (1) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in §123.1(Restrictions) (relating to prohibition of certain fugitive emissions).
 - (4) Not applicable.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

VOC emissions from this facility shall not exceed 35 tons per year, to be defined as any 12 month rolling period.

[From Section C, Condition #002 of Plan Approval # 20-175B]

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) Daily records shall be maintained of the usage of all coatings, organic cleaners, and diluents used.
- (b) The facility shall maintain monthly totals of VOC emissions and maintain twelve month rolling totals.

[From Section C, Condition #003 of Plan Approval #20-175B]

V. REPORTING REQUIREMENTS.



VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

- (c) A person responsible for any source specified in §123.1 (Restrictions) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:
- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
 - (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

010 [25 Pa. Code §129.14]

Open burning operations

- (a) Air basins. Not applicable.
- (b) Outside of air basins. No person may permit the open burning of material in an area outside of air basins in a manner that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life or property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health.
 - (c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:
- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
 - (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
 - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
 - (4) Not applicable.
 - (5) Not applicable.
 - (6) A fire set solely for recreational or ceremonial purposes.
 - (7) A fire set solely for cooking food.

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





VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

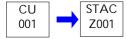




Source ID: 001 Source Name: PLANT-WIDE SPACE HEATERS

Source Capacity/Throughput: 4.700 MMBTU/HR

4.74 MCF/HR Natural Gas



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

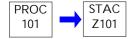
VII. ADDITIONAL REQUIREMENTS.





Source ID: 101 Source Name: RED PRIMER LINE-FLOW COATER

Source Capacity/Throughput: 2.64 Gal/HR RED PRIMER



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §129.52]

Surface coating processes

(a) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from this surface coating process, unless the VOC content of each as applied coating is equal to or less than 6.67 pounds VOC per gallon coating solids.

[Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in applicable requirements of Plan Approval #20-175A, Condition #5]

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

VOC = (Wo)(Dc)/Vn

Where:

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

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

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

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

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

Vn = Volume percent of solids of the as applied coating

- (c) The VOC standards in this condition do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following critieria:
- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

[The Requirements of Paragraph (c), above, originate from 25 Pa Code §129.52(h)]

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.





IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §129.52] Surface coating processes

- (a) 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.
 - (2) The VOC content of each coating, thinner and other component as supplied.
 - (3) The VOC content of each as applied coating.
- (b) The records shall be maintained for 5 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

[The Requirements of Paragraph (b), above, are derived from 25 Pa Code §129.52(g)]

V. REPORTING REQUIREMENTS.

003 [25 Pa. Code §127.12b] Plan approval terms and conditions.

Proposed changes in coatings and formulations shall be indicated to the Department for review at least two weeks prior to implementation.

[From Condition #5 of Plan Approval # 20-175A]

VI. WORK PRACTICE REQUIREMENTS.

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

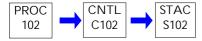
VII. ADDITIONAL REQUIREMENTS.





Source ID: 102 Source Name: GRAY PRIMER LINE

Source Capacity/Throughput: 6.88 Gal/HR GRAY PRIMER



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 this process in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

002 [25 Pa. Code §129.52]

Surface coating processes

(a) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from this surface coating process, unless the VOC content of each as applied coating is equal to or less than 6.67 pounds VOC per gallon coating solids.

[Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in applicable requirements of Plan Approval # 20-0175A, Condition #5.]

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

VOC = (Wo)(Dc)/Vn

Where:

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

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

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

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

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

Vn = Volume percent of solids of the as applied coating

- (c) The VOC standards in this condition do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following critieria:
- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

[The Requirements of Paragraph (c), above, originate from 25 Pa Code §129.52(h)]

II. TESTING REQUIREMENTS.





III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §129.52]

Surface coating processes

- (a) 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.
 - (2) The VOC content of each coating, thinner and other component as supplied.
 - (3) The VOC content of each as applied coating.
- (b) The records shall be maintained for 5 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

[The Requirements of Paragraph (b), above, are derived from 25 Pa Code §129.52(g)]

V. REPORTING REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Proposed changes in coatings and formulations shall be indicated to the Department for review at least two weeks prior to implementation.

[From Condition #5 of Plan Approval # 20-175A]

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The facility shall maintain the following schedule for coating line dry filter changes for the gray line. Filters shall be changed prior to each period of operation.

[From Condition #8 of Plan Approval 20-175A]

VII. ADDITIONAL REQUIREMENTS.





Source ID: 103 Source Name: STAIN LINE

Source Capacity/Throughput: 0.55 Lbs/HR STAIN



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 this source in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

002 [25 Pa. Code §129.52]

Surface coating processes

(a) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from this surface coating process, unless the VOC content of each as applied coating is equal to or less than 1.35 pounds VOC per pound coating solids.

[Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in applicable requirement of Plan Approval #20-175A of Condition #5]

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

VOCB = (Wo)/(Wn)

Where:

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

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

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

Ww = Weight percent of water

Wex = Weight percent of exempt solvents

Wn = Weight percent of solids of the as applied coating

- (c) The VOC standards in this condition do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following critieria:
- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

[The Requirements of Paragraph (c), above, originate from 25 Pa Code §129.52(h)]

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.





IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §129.52] Surface coating processes

- (a) 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) Not applicable.
 - (2) The VOC content of each coating, thinner and other component as supplied.
 - (3) The VOC content of each as applied coating.
- (b) The records shall be maintained for 5 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

[The Requirements of Paragraph (b), above, are derived from 25 Pa Code §129.52(q)]

V. REPORTING REQUIREMENTS.

004 [25 Pa. Code §127.12b] Plan approval terms and conditions.

Proposed changes in coatings and formulations shall be indicated to the Department for review at least two weeks prior to implementation.

[From Condition #5 of Plan Approval # 20-175A]

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The facility shall maintain the following schedule for coating line dry filter changes for the stain line. At a minimum, filters shall be changed when the pressure drop gauge indicates 1" w.g. or more of pressure drop across the filter bank.

[From Condition #8 of Plan Approval 20-175A]

006 [25 Pa. Code §129.52]

Surface coating processes

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

[The Requirements in the above paragraph originated from 25 Pa Code §129.52(f)]





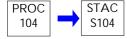
VII. ADDITIONAL REQUIREMENTS.





Source ID: 104 Source Name: PYROLYSIS FURNACE

Source Capacity/Throughput: 350.00 CF/HR NATURAL GAS



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 this source in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

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 (State Only General Requirements).

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The secondary chamber temperature shall be maintained at 1500 degrees Fahrenheit or above. The Company shall install, maintain, and operate a temperature indicator and recorder to record secondary chamber temperature.

[From Condition #2 of Plan Approval # 20-323-001]

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

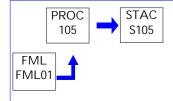
VII. ADDITIONAL REQUIREMENTS.





Source ID: 105 Source Name: MISCELLANEOUS NATURAL GAS USAGE

Source Capacity/Throughput: 10.50 MCF/HR Natural Gas



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 this source in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

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 (State Only General Requirements).

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

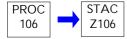
VII. ADDITIONAL REQUIREMENTS.





Source ID: 106 Source Name: COLD CLEANING MACHINE

Source Capacity/Throughput: 20.00 Gal/HR



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §129.63]

Degreasing operations

A person who operates a cold cleaning machine shall maintain for at least 5 years and shall provide to the Department, on request, the information specified in paragraph (5) of the work practice standards for this source. An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

[This requirement originates from 25 Pa Code §129.63(a)(6)]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §129.63]

Degreasing operations

- (a) Cold cleaning machines. Except for those subject to the Federal National emissions standards for hazardous air pollutants (NESHAP) for halogenated solvent cleaners under 40 CFR Part 63 (relating to National emission standards for hazardous air pollutants for source categories), this subsection applies to cold cleaning machines that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.
 - (1) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.
 - (2) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:
- (i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (3). In addition, the label shall include the following discretionary good operating practices:
- (A) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.



- (B) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
 - (C) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.
- (ii) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.
 - (3) Cold cleaning machines shall be operated in accordance with the following procedures:
- (i) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (ii) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
 - (iv) Air agitated solvent baths may not be used.
 - (v) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.
- (4) After December 22, 2002, a person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.
- (5) On and after December 22, 2002, a person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:
 - (i) The name and address of the solvent supplier.
 - (ii) The type of solvent including the product or vendor identification number.
- (iii) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).
 - (6) The conditions of this paragraph are included under the record keeping requirements for this source.
 - (7) Paragraph (4) does not apply:
 - (i) To cold cleaning machines used in extreme cleaning service.
- (ii) If the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with paragraph (4) will result in unsafe operating conditions.
 - (iii) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.
- (b) Not applicable.
- (c) Not applicable.
- (d) Not applicable.
- (e) Not applicable.





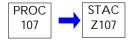
VII. ADDITIONAL REQUIREMENTS.





Source ID: 107 Source Name: LACQUER THINNER USAGE

Source Capacity/Throughput: 1.38 Lbs/HR LACQUER THINNER



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.





Source ID: 108 Source Name: SECONDARY RED PRIMER FLOW COATING LINE

Source Capacity/Throughput: 7.00 Gal/HR RED PRIMER

PROC STAC Z101

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) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from a surface coating process category listed in Table I, [Miscellaneous metal parts and products, air-dried coatings] unless one of the following limitations is met:
 - (1) The VOC content of each as applied coating is equal to or less 6.67 lbs VOC per gallon coating solids.
- (i) The VOC content of the as applied coating, expressed in units of weight of VOC per volume of coating solids, shall be calculated as follows:

VOC = (Wo)(Dc)/Vn

Where:

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

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

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

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

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

Vn = Volume percent of solids of the as applied coating

- (ii) Not applicable.
- (iii) Not applicable.
- (iv) Sampling and testing shall be done in accordance with the procedures and test methods specified in Chapter 139 (relating to sampling and testing).
 - (2) Not applicable.
- (c) [Paragraph (c) is included with the "Recordkeeping Requirements" for this Source]
- (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) [Paragraph (g) is included with the "Recordkeeping Requirements" for this Source]
- (h) The VOC standards in this requirement do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:
- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

[Compliance with the requirements of this streamlined permit condition assures compliance with the applicable provisions from Section D, Condition #006 of Plan Approval # 20-175B.]

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §129.52] Surface coating processes

[Paragraphs (a) - (b) are included with the "Emission Restriction(s)" for this Source.]

- (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.
 - (2) The VOC content of each coating, thinner and other component as supplied.
 - (3) The VOC content of each as applied coating.

[Paragraphs (d) - (f) are included with the "Emission Restriction(s)" for this Source.]





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

[Compliance with the requirements of this streamlined permit condition assures compliance with the applicable provisions from Section D, Conditions #009 and #010 of Plan Approval # 20-175B.]

V. REPORTING REQUIREMENTS.

003 [25 Pa. Code §127.12b] Plan approval terms and conditions.

Proposed changes in coatings and formulations shall be indicated to the Department for review at least two weeks prior to implementation.

[From Section D, Condition # 011 of Plan Approval # 20-175B]

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.12b] Plan approval terms and conditions.

The temperature of the drying oven associated with this source shall be less than 200 degrees F.

[From Section D, Condition #012 of Plan Approval # 20-175B]

VII. ADDITIONAL REQUIREMENTS.





SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





SECTION F. Emission Restriction Summary.

Source Id	Source Description	
102	GRAY PRIMER LINE	
Emission Limit		Pollutant
0.040	gr/DRY FT3	TSP
103	STAIN LINE	
Emission Limit		Pollutant
0.040	gr/DRY FT3	TSP
104	PYROLYSIS FURNACE	
Emission Limit		Pollutant
500.000	PPMV dry basis	SOX
0.040	gr/DRY FT3	TSP
105	MISCELLANEOUS NATURAL GAS USAGE	
Emission Limit		Pollutant
500.000	PPMV	SOX
0.040	gr/DRY FT3	TSP

Site Emission Restriction Summary

Emission Limit		Pollutant	
35.000 Tons/Yr	defined as any 12-month rolling period.	VOC	







SECTION G. Miscellaneous.

- (a) Source 001, Plant-Wide Space Heaters, consists of the following space heaters located throughout the plant:
 - (1) Office Heater rated at 125,000 Btu/hr
 - (2) Reznor Heaters:
 - (a) (1x) each rated at 45,000 Btu/hr.
 - (b) (5x) each rated at 75,000 Btu/hr.
 - (c) (2x) each rated at 125,000 Btu/hr.
 - (d) (4x) each rated at 130,000 Btu/hr.
 - (e) (3x) each rated at 200,000 Btu/hr.
 - (3) Infrared-type Heaters
 - (a) (38x) each rated at 60,000 Btu/hr.
 - (b) (6x) each rated at 90,000 Btu/hr.
- (b) Source 105, Miscellaneous Natural Gas Usage, consists of the following equipment fueled by natural gas.
 - (1) Powder Coating Line Drying and Curing Oven rated at 2.5 MMBtu/hr.
 - (2) Washer Burners (x4) each rated at 2.0 MMBtu/hr.
- (c) The following activities/sources have been determined to be of minor significance with respect to emissions of regulated air pollutants or have no applicable requirements.
- (1) Cutting and Grinding consists of 30 hand and 15 surface grinders. Two grinders are controlled by a baghouse that exhaust inside. There are no outside emissions from these activities.
 - (2) Welding Operations MIG welding is performed as part of the production process of the metal posts.
 - (3) Powder Coating Line particulate emissions from the powder application is controlled by a baghouse that exhausts indoors.
 - (4) Forklift Operations
 - (5) Machine Lubricant Usage
 - (6) Roads and Traffic
- (d) The original Operating Permit No. NM-20-00175 (issued December 9, 2002) has been Administratively Amended on June 23, 2005 to incorporate the applicable requirements of Plan Approval No. 20-175B. The plan approval was for post-construction of a secondary red primer coating line (identified as Source 108 in the permit).



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