



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: March 10, 2003 Effective Date: September 1, 2005
Revision Date: September 1, 2005 Expiration Date: March 31, 2008
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: 46-00227

Synthetic Minor

Federal Tax Id - Plant Code: 20-2717167-1

Owner Information

Name: SCHMIDT STRUCTURAL PROD INC
Mailing Address: 38 SOUDERTON PIKE
SOUDERTON, PA 18964-1912

Plant Information

Plant: SCHMIDT STRUCTURAL PROD INC/SOUDERTON
Location: 46 Montgomery County 46927 Franconia Township
SIC Code: 3446 Manufacturing - Architectural Metal Work

Responsible Official

Name: ERIC BROWN
Title: VICE PRES/GEN MGR
Phone: (215) 721 - 8300

Permit Contact Person

Name: ERIC BROWN
Title: VICE PRES/GEN MGR
Phone: (215) 721 - 8300

[Signature] _____
FRANCINE B CARLINI, SOUTHEAST REGION AIR PROGRAM MANAGER



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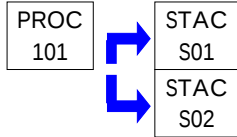
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	SURFACE COATING LINE (PAINT SPRAY BOOTHS 1 & 2)		
S01	PAINT SPRAY BOOTH 1 STACK		
S02	PAINT SPRAY BOOTH 2 STACK		

PERMIT MAPS

SECTION B. General State Only Requirements

#001 [25 Pa. Code § 121.1]

Definitions.

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

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(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.

**SECTION B. General State Only Requirements**

#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.

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(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 NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air

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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

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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 satisfies 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.

SECTION B. General State Only Requirements

(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

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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.



SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

002 [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:

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving, and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Sources and classes of sources other than those identified in (a) - (e), above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1(b), that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution.
 - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [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 Condition # 002, Section C, of this permit, if such emissions are visible at the point the emissions pass outside the person's property.

004 [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.

005 [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:

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

006 [25 Pa. Code §123.42]

Exceptions

The emission limitations of Condition # 005, Section C, of this permit, shall not apply to a visible emission in either of the following instances:



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(a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.

(b) When the emission results from sources specified in Condition # 002, Section C, of this permit.

007 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material except the following:

(a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.

(b) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(c) A fire set for the prevention and control of disease or pests, when approved by the Department.

(d) A fire set solely for cooking food.

(e) A fire set solely for recreational or ceremonial purposes.

II. TESTING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) If at any time the Department has cause to believe that air contaminant emissions from any source listed in Section A, of this permit, may be in excess of the limitations specified in this permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.

009 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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

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

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall monitor the facility, once per operating day, for the following:

(1) Odors, which the Department may determine to be objectionable.

(2) Visible emissions.

(3) Fugitive particulate emissions.

SECTION C. Site Level Requirements

(b) All detectable objectionable odors that originate on-site and cross the property line, as well as visible emissions and/or fugitive particulate emissions that originate on-site, shall:

- (1) Be investigated.
- (2) Be reported to the facility management, or individual(s) designated by the permittee.
- (3) Be recorded in a permanent written log.

(c) At the end of six (6) months, upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next 6 month period.

(d) After 6 months of weekly monitoring, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

(e) The Department reserves the right to change the above monitoring requirements at any time, based on, but not limited to, the review of complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain a record of all monitoring required in Condition # 010(a)(1) - (3), Section C, of this permit, including deviations from the conditions found in Section C, of this permit. The record of deviations shall contain, at a minimum, the following items for each incident:

- (1) The date(s) and time(s).
- (2) The source(s) and location(s).
- (3) The cause(s).
- (4) The corrective action(s) taken, if necessary to abate the situation and prevent future occurrences.

(b) The monitoring shall be recorded and maintained in a Department-approved format and time frame.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All records, reports, and analysis results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with Condition # 020(b), Section B, of this permit, and shall be made available to the Department upon written or verbal request within a reasonable time.

013 [25 Pa. Code §135.5]

Recordkeeping

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with Condition # 017, Section C, of this permit, and 25 Pa. Code § 135.21 (relating to 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.

SECTION C. Site Level Requirements

V. REPORTING REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. Part 68.]

(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 C.F.R. 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 C.F.R. Part 68, and the Federal Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act when a regulated substance listed in 40 C.F.R. § 68.130 is present in a process in more than the threshold quantity at a major facility. The permittee shall submit the RMP to the EPA 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 in 40 C.F.R. § 68.130.

(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 C.F.R. § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 C.F.R. 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 C.F.R. § 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 this facility is subject to 40 C.F.R. Part 68, as part of the certification required under this permit, the permittee shall perform the following:

(1) Submit a compliance schedule for satisfying the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. § 68.10(a).

(2) Certify that this facility is in compliance with all requirements of 40 C.F.R. Part 68 including the registration and submission of the RMP.

(e) If this facility is subject to 40 C.F.R. Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 C.F.R. § 68.200.

(f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 C.F.R. Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to perform either of the following:

(1) Register and submit the RMP or a revised plan pursuant to 40 C.F.R. Part 68.

(2) Submit a compliance schedule or include a statement in an annual compliance certification for the previous year indicating compliance with the requirements of the terms and conditions of this permit and the requirements of Section

SECTION C. Site Level Requirements

112(r) of the Clean Air Act, 40 C.F.R. Part 68, and 25 Pa. Code § 127.512(i).

(i) The compliance certification shall include the following:

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

(ii) The compliance certification should be postmarked or hand-delivered within 30 days of each anniversary date of the date of issuance of this permit.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall, within two (2) hours of discovery of any occurrence, notify the Department, at (484) 250-5920, of any malfunction(s) of the sources or associated air pollution control devices listed in Section A, of this permit, which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit, or of a regulation contained in 25 Pa. Code Article III.

(b) Any malfunction(s) which occurs at this facility, and poses an imminent danger to public health, safety, welfare, and the environment, and would violate permit conditions if the source(s) were to continue to operate after the malfunction(s), shall immediately be reported to the Department by telephone at the above number.

(c) A written report shall be submitted to the Department within 2 working days following the notification of the incident, and shall describe, at a minimum, the following:

- (1) The malfunction(s).
- (2) The emission(s).
- (3) The duration.
- (4) Any corrective action taken.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Within thirty (30) days after permit issuance, the permittee shall submit, to the Department for approval, the proposed recordkeeping formats required in this permit.

017 [25 Pa. Code §135.3]

Reporting

The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year. The permittee 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.

018 [25 Pa. Code §135.4]

Report format

Source reports shall contain sufficient information to enable the Department to complete its emission inventory. Source reports shall be made by the source owner or operator in a format specified by the Department.

SECTION C. Site Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

019 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in Condition # 002, Section C, of this permit, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

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

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee may not modify any air contaminant system identified in Section A, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition # 013(g), Section B, of this permit.
- (b) If an unauthorized modification of any source(s) occurs at this facility, the permittee shall immediately notify the Department. If so directed by the Department, then this permit, as it pertains to the modified source(s), shall be suspended and the source(s) shall not be operated until the modification is authorized by the Department.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall immediately, upon discovery, implement measures, which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A, of this permit, is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to, 25 Pa. Code Article III or any other applicable rule promulgated under the Clean Air Act.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the source(s) and air pollution control device(s) listed in Section A, of this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturer's specifications.

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Maintenance on the monitoring and recordkeeping equipment shall be performed in accordance with manufacturer's recommendations. All monitoring and recording equipment shall be calibrated on an annual basis.

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.



SECTION C. Site Level Requirements

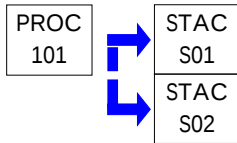
No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: SURFACE COATING LINE (PAINT SPRAY BOOTHS 1 & 2)

Source Capacity / Throughput:

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

001 [25 Pa. Code §123.13]

Processes

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

The permittee shall ensure that emission into the outdoor atmosphere of particulate matter from the surface coating line occurs in such a manner that the concentration of particulate matter in the exhaust air does not exceed 0.04 gr / dscf.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

The permittee shall ensure that emission into the outdoor atmosphere of volatile organic compounds (VOCs) from the surface coating line and clean-up operations occurs in such a manner that the rate of the emission does not exceed 22 tons/yr, calculated monthly as a twelve (12)-month rolling sum.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) To assist in documenting the VOC emissions and to demonstrate compliance with VOC emission and/or content limits, the permittee shall certify the composition of all coatings and/or inks and/or solvents used on the surface coating line, through Certified Product Data Sheets (CPDS), Material Safety Data Sheets (MSDS), and/or testing in accordance with EPA Method 24/24A, as specified in 40 C.F.R. Part 60, Appendix A, and as specified below; or through an alternative method which has been approved by the Department.

(b) The method(s) used to certify the VOC, Hazardous Air Pollutants (HAPs), solids, and water composition shall adhere to the following parameters:

(1) CPDS. When a CPDS is supplied, there is no need to replicate testing to verify the accuracy of the CPDS, if the supplier used EPA Method 24/24A as a basis for the CPDS.

(2) MSDS. When the actual VOC and HAP emissions are less than 11 tons of VOCs and 5 tons of an individual HAP or 12.5 tons of aggregate HAPs, whichever is more restrictive, as calculated based on the upper bounds reported on the MSDS, no additional testing is required. Solvents used to dilute coatings and for cleanup must be included in the calculation.

(c) Testing of individual coatings and/or inks and/or solvents is required when any of the following conditions are met:

(1) The facility is unable to comply with the requirements specified in (b)(1) and (b)(2), above.

(2) A CPDS is not supplied and, the actual VOC and HAP emissions from individual materials exceed 11 tons for VOCs, 1 ton for an individual HAP and 2.5 tons for aggregate HAPs.

SECTION D. Source Level Requirements

(3) Results from the MSDS (when calculated to actual emissions) indicate VOCs greater than 11 tons.

(d) Whenever the levels in (c)(2), above, are exceeded in any on-going calendar year, and no CPDS is supplied, the material(s) must be tested during that year. From that point on, testing shall be conducted quarterly on at least 25% of the affected coatings and solvents, and all materials shall be tested at least once per calendar year.

(e) All testing shall be done on an as-applied state.

(f) When the Department takes samples of inks, U.S. EPA Method 24 testing may be used to test the ink.

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

To sufficiently demonstrate compliance with Conditions # 002, 017, and 019, Section D, of this permit, the permittee shall monitor the following, at a minimum, for each month of operation:

- (a) The type and monthly consumption of all materials, in pounds or gallons.
- (b) The total VOC content in all materials consumed.
- (c) The name and content of any HAP in the materials.
- (d) The quantity and type of all VOC-containing solvents used for clean-up operations.
- (e) An estimate of the VOC and HAP emissions, calculated monthly as a twelve (12)-month rolling sum.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.52(c).]

To sufficiently demonstrate compliance with Conditions # 002, 017, and 019, Section D, of this permit, the permittee shall monitor the following, at a minimum, on a daily basis:

- (a) The following parameters for each coating, thinner, and additive used in the spray paint booths:
 - (1) The coating, thinner, or additive name and identification number.
 - (2) The volume used.
 - (3) The mix ratio.
 - (4) The density or specific gravity.
 - (5) The weight percent of total volatiles, water, solids, and exempt solvents.
 - (6) The volume or weight percent of solids for the coatings used.
- (b) The VOC content of each as supplied coating, where applicable.
- (c) The VOC content of each as applied coating, in pounds per gallon of coating solids.

**SECTION D. Source Level Requirements**

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Once per operating day, the permittee shall monitor the static pressure differential across the exhaust filters for both spray paint booths.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443 and 129.52(c).]

The permittee shall maintain records sufficient to demonstrate compliance with Conditions # 002, 017, and 019, Section D, of this permit. At a minimum, the permittee shall maintain daily records of:

(a) The following parameters for each coating, thinner, and additive used in the spray paint booths:

- (1) The coating, thinner, or additive name and identification number.
- (2) The volume used.
- (3) The mix ratio.
- (4) The density or specific gravity.
- (5) The weight percent of total volatiles, water, solids, and exempt solvents.
- (6) The volume or weight percent of solids for the coatings used.

(b) The VOC content of each as supplied coating, where applicable.

(c) The VOC content of each as applied coating, in pounds per gallon of coating solids.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Once per operating day, the permittee shall record the static pressure differential across the exhaust filters for both spray paint booths.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

The permittee shall maintain records sufficient to demonstrate compliance with Conditions # 002, 017, and 019, Section D, of this permit. At a minimum, the permittee shall maintain records of the following, for each month of operation:

- (a) The type and monthly consumption of all materials, in pounds or gallons.
- (b) The total VOC content in all materials consumed.
- (c) The name and content of any HAP in the materials.
- (d) The quantity and type of all VOC-containing solvents used for clean-up operations.

**SECTION D. Source Level Requirements**

(e) An estimate of the VOC and HAP emissions, calculated monthly as a twelve (12)-month rolling sum.

010 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

The permittee shall maintain the records required in Conditions # 007 and 010, Section D, of this permit, for a period of 5 years. These records shall be made available to the Department upon written or verbal request within a reasonable time.

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.

011 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.1 and 127.443.]

Except as indicated in Condition # 019, Section D, of this permit, the permittee shall maintain the VOC content of each as applied coating at or below 4.52 lb VOC / gal coating solids.

[Compliance with this permit condition assures compliance with 25 Pa. Code § 129.52(b)(1).]

012 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

The permittee shall operate and maintain the surface coating line in a manner consistent with good air pollution control practices. The practices shall include, but not be limited to, the following:

- (a) Good housekeeping procedures for the storage, use, and disposal of solvents.
- (b) Employee training detailing good work practices and complete and accurate recordkeeping.
- (c) Keeping solvent and paint containers closed when not in use.
- (d) Keeping all solvent-laden shop towels in closed containers when not in use.

013 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

The permittee shall ensure that spray painting is performed exclusively in the spray paint booths, and is applied with a transfer efficiency of 80% or higher.

014 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

SECTION D. Source Level Requirements

The permittee shall not operate the spray paint booths unless all exhaust air passes through the filtering system.

015 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

The permittee shall ensure that the filtering system reduces particulate matter emissions from the spray paint booths by a minimum of 99.7%.

016 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

The permittee shall ensure that filters are inspected daily for gaps and/or holes and are replaced every month, or as needed. Spare filters shall be kept on hand for replacement.

017 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

The permittee shall operate and maintain pressure gauges to indicate the static pressure differential across the exhaust filters of both spray paint booths. Both spray paint booths shall operate within the differential pressure range of 0.2 to 0.5 inches of water.

018 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Compliance with Conditions # 017 and/or 019 (whichever is applicable), Section D, of this permit, may be demonstrated through certification from the supplier showing that Method 24, as specified in 40 C.F.R. Part 60, Appendix A, was used to test the coating(s). In the event that proper documentation is not obtained, the permittee shall perform testing in accordance with Condition # 003, Section D, of this permit, for the surface coating line. If the proper testing has been demonstrated, and the coating(s) is altered prior to use with a VOC-containing thinner, the permittee shall perform calculations to demonstrate that compliance is still maintained with Conditions # 017 and/or 019 (whichever is applicable), Section D, of this permit, or shall retest the coating in accordance with Condition # 003, Section D, of this permit, for the surface coating line.

019 [25 Pa. Code §129.52]

[Surface coating processes](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443.]

The permittee shall maintain the VOC content of each Yellow Coating, as applied to the substrate, at or below 6.67 lb VOC/gal coating solids.

VII. ADDITIONAL REQUIREMENTS.

020 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

This source consists of a surface coating line, and is comprised of the following equipment:

(a) An overhead conveyor, rated at 12 ft/min.

(b) Two opposing dry-filter paint spray booths, Model No. 10B-88-S, manufactured by JBI. Each booth exhausts through a dedicated stack.



SECTION D. Source Level Requirements

(c) An airless spray paint application system.



SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

**SECTION F. Emission Restriction Summary.**

Source Id	Source Description
101	SURFACE COATING LINE (PAINT SPRAY BOOTHS 1 & 2)
Emission Limit	
0.040	gr / DRY FT3
22.000	Tons / Yr
	12-Month Rolling Sum, Calculated Monthly
	VOC

Site Emission Restriction Summary

Emission Limit	Pollutant
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SECTION G. Miscellaneous.

- (a) Previously issued Plan Approval No. PA-46-0227 serves as the basis for certain terms and conditions set forth in this permit.
- (b) This permit is an Administrative Amendment to State Only (Synthetic Minor) Operating Permit No. SOOP-46-00227, originally issued on March 10, 2003 (APS No. 468273, Auth ID 484393). This Administrative Amendment (APS No. 560164, Auth ID 602014) incorporates the change of ownership of this facility. The following is a summary of the changes to this permit:
- (1) The owner and plant names have been changed to Schmidt Structural Products, Inc.
 - (2) The responsible official and permit contact person have been changed to Mr. Eric Brown, Vice President and General Manager, 215-721-8300.
 - (3) Source ID 101, S01, and S02 have been renamed to provide clarification.
 - (4) The reference to compliance certifications has been removed from Condition # 018(d), Section B, of this permit.
 - (5) The numbering format for Condition # 002, Section C, of this permit, has been changed to be consistent with the rest of the permit.
 - (6) The wording of Condition # 010(b), Section C, of this permit, has been revised to specify that any fugitive particulate emissions that originate on-site are required to comply with Condition # 010(b)(1) - (3), Section C, of this permit, not only those that originate on-site and cross the property line.
 - (7) The references to compliance certifications and semi-annual monitoring reports have been removed from Condition # 010(e), Section C, of this permit.
 - (8) The wording of Condition # 011, Section C, of this permit, has been revised to specify that the source(s) where any deviations are observed is required to be recorded.
 - (9) Condition # 012, Section C, of the original permit, has been moved to Condition # 011(b), Section C, of this permit.
 - (10) An accidental release program /RMP requirement has been added to Condition # 014, Section C, of this permit.
 - (11) The Department telephone number at which to report any malfunction(s), as specified in Condition # 015(a), Section C, of this permit, has been changed to 484-250-5920.
 - (12) Additional authority citations to 25 Pa. Code § 127.443 have been added to Conditions # 001 - 002, 007 - 008, 010 - 017, and 019, Section D, of the permit.



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