

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

### STATE ONLY OPERATING PERMIT

Issue Date: March 13, 2013 Effective Date: April 1, 2013

Expiration Date: March 31, 2018

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: 28-05041

Synthetic Minor

Federal Tax Id - Plant Code: 25-1199382-12

	Owner information	
Name: JLG IND INC		
Mailing Address: 1 J L G DR		
MC CONNELLSBURG, PA 172	233-9502	
	Plant Information	
Plant: JLG IND INC/MOLLY PITCHER PLT		
Location: 28 Franklin County	28905 Antrim Township	
SIC Code: 3531 Manufacturing - Construction Mad	chinery	
	Responsible Official	
Name: ANDREW J TACELOSKY		
Title: VP MFG		
Phone: (301) 745 - 5277		
	Permit Contact Person	
Name: SCOTT_ETTER		
Title: ENV MGR		
Phone: (717) 485 - 6435		
[Signature]		
WILLIAM R. WEAVER. SOUTHCENTRAL REGION AIR PROGRAM MANAGER		



# M South

#### **SECTION A. Table of Contents**

#### Section A. Facility/Source Identification

Table of Contents Site Inventory List

#### Section B. General State Only Requirements

- #001 Definitions.
- #002 Operating Permit Duration.
- #003 Permit Renewal.
- #004 Operating Permit Fees under Subchapter I.
- #005 Transfer of Operating Permits.
- #006 Inspection and Entry.
- #007 Compliance Requirements.
- #008 Need to Halt or Reduce Activity Not a Defense.
- #009 Duty to Provide Information.
- #010 Revising an Operating Permit for Cause.
- #011 Operating Permit Modifications
- #012 Severability Clause.
- #013 De Minimis Emission Increases.
- #014 Operational Flexibility.
- #015 Reactivation
- #016 Health Risk-based Emission Standards and Operating Practice Requirements.
- #017 Circumvention.
- #018 Reporting Requirements.
- #019 Sampling, Testing and Monitoring Procedures.
- #020 Recordkeeping.
- #021 Property Rights.
- #022 Alternative Operating Scenarios.

### Section C. Site Level State Only Requirements

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

#### Section D. Source Level State Only Requirements

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

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

#### Section E. Source Group Restrictions

- E-I: Restrictions
- E-II: Testing Requirements
- E-III: Monitoring Requirements





### **SECTION A. Table of Contents**

E-IV: Recordkeeping Requirements E-V: Reporting Requirements E-VI: Work Practice Standards E-VII: Additional Requirements

### Section F. Alternative Operating Scenario(s)

F-I: Restrictions

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

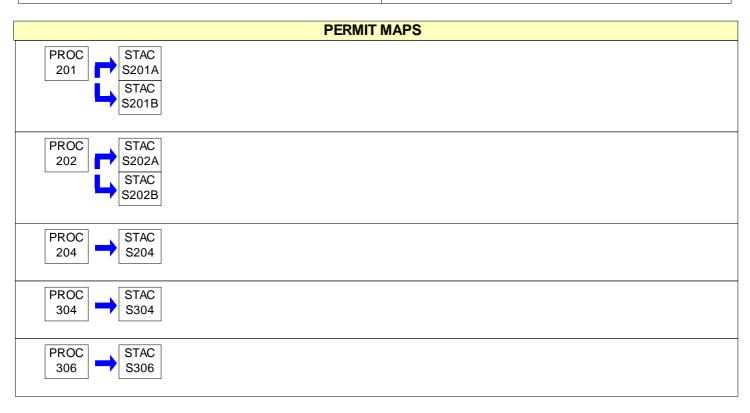
### Section G. Emission Restriction Summary

#### Section H. Miscellaneous



## SECTION A. Site Inventory List

Source	ID Source Name	Capacity/	Throughput	Fuel/Material
201	PRIMER PAINT BOOTH	50.000	Lbs/HR	COATING
202	TOPCOAT BOOTH	50.000	Lbs/HR	COATING
204	DRYING BOOTH	5.000	MCF/HR	NATURAL GAS
304	PRIME PAINT BOOTH	50.000	Lbs/HR	COATING
306	TOP COAT PAINT BOOTH	50.000	Lbs/HR	COATING
S201A	STACK, 201			
S201B	STACK, 201			
S202A	STACK, 202			
S202B	STACK, 202			
S204	STACK, 204			
S304	STACK, 304			
S306	STACK, 306			







### **SECTION B.** General State Only Requirements

#001 [25 Pa. Code § 121.1]

28-05041

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,



### **SECTION B.** General State Only Requirements

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

#### #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



### **SECTION B.** General State Only Requirements

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

DEP Auth ID: 897635 Page 7



### **SECTION B.** General State Only Requirements

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:

DEP Auth ID: 897635 Page 8



### **SECTION B.** General State Only Requirements

- (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)







### **SECTION B.** General State Only Requirements

- (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.
- (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





### **SECTION B.** General State Only Requirements

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.

#### **SECTION C. Site Level Requirements**

#### I. RESTRICTIONS.

#### **Emission Restriction(s).**

#### # 001 [25 Pa. Code §123.1]

#### Prohibition of certain fugitive emissions

The permittee shall not allow the emission into the outdoor atmosphere of any fugitive air contaminant from a source other than the following:

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

#### # 002 [25 Pa. Code §123.2]

#### **Fugitive particulate matter**

The permittee shall not allow the emission of fugitive particulate matter into the outdoor atmosphere from a source specified in Section C. Condition # 001, if the emissions are visible at the point the emissions pass outside the permittee's property.

#### # 003 [25 Pa. Code §123.31]

#### Limitations

The permittee shall not allow 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 permittee's property.

#### # 004 [25 Pa. Code §123.41]

#### Limitations

The permittee shall not allow 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 percent for a period or periods aggregating more than three minutes in any one hour.
- (b) Equal to or greater than 60 percent at any time.

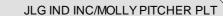
#### # 005 [25 Pa. Code §123.42]

### **Exceptions**

The emission limitations of §123.41 shall not apply when:

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

DEP Auth ID: 897635 Page 12





### **SECTION C.** Site Level Requirements

28-05041

#### # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall limit the facility's total actual emissions below the following limits:

- (a) 100 tons/year of sulfur oxides (SOx)
- (b) 100 tons/year of nitrogen oxides (NOx)
- (c) 100 tons/year of carbon monoxide (CO)
- (d) 100 tons/year of PM-10 /PM-2.5 (particulate matter with an effective aerodynamic diameter of less than or equal to a nominal 10 /2.5 micrometer body as measured by the applicable reference method or an equal method)
- (e) 50 tons/year of volatile organic compounds (VOC)
- (f) 10 tons/year of any individual hazardous air pollutant (HAP)
- (g) 25 tons/year of total combined hazardous air pollutants (HAPs)
- (h) 100,000 tons/year of Carbon Dioxide Equivalent (CO2e) for Green House Gases (GHGs).

#### II. TESTING REQUIREMENTS.

### # 007 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The Department reserves the right to require exhaust stack testing of sources as necessary during the permit term to verify emissions for purposes including permit condition violations, emission fees or malfunctioning.

### # 008 [25 Pa. Code §139.1]

#### Sampling facilities.

Upon request by the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such source. The Department will set forth, in the request, the time period in which the facilities shall be provided as well as the specifications for such facilities.

#### III. MONITORING REQUIREMENTS.

### # 009 [25 Pa. Code §123.43]

#### Measuring techniques

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

- (a) A device approved by the Department and maintained to provide accurate opacity measurements.
- (b) Observers, trained and certified in EPA Method 9 to measure plume opacity with the naked eye or with the aid of any device(s) approved by the Department.

#### # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

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



#### SECTION C. **Site Level Requirements**

c) Presence of malodorous air contaminants beyond the plant property boundaries as stated in Section C, Condition #003.

#### IV. RECORDKEEPING REQUIREMENTS.

#### [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain a logbook for recording the weekly inspection listed above Condition #010 and the exceedances of visible emissions, fugitive visible emissions and malodorous air contaminants. The logbook shall include the name of the company representative, date and time of the monitoring and the wind direction.

#### V. REPORTING REQUIREMENTS.

#### # 012 [25 Pa. Code §127.442]

#### Reporting requirements.

The permittee shall report malfunctions to the Department. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

- (a) Malfunction which poses an imminent danger to the public health, safety, welfare, and environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two (2) hours after the incident. Telephone reports can be made to the Air Quality Program at (814) 946-7290 during normal business hours, or to the Department's Emergency Hotline at (877) 333-1904 at any time. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.
- (b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirement of subsection (a) above, shall be reported to the Department, in writing, within five (5) days of malfunction discovery.

#### # 013 [25 Pa. Code §135.3]

#### Reporting

- (a) The permittee shall submit an annual emissions report to the Department. The report for a given calendar year is due no later than March 1 of the following year, and shall be submitted to the Department's Air Quality District Supervisor unless otherwise specified.
- (b) The permittee may request an extension of time from the Department for filing of the report specified in part (a), above, and the Department may grant the extension for reasonable cause.

### WORK PRACTICE REQUIREMENTS.

#### # 014 [25 Pa. Code §123.1]

#### Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from a source identified in Section C, Condition #001 from becoming airborne, as per §123.1(c). These actions shall include, but are not limited to, the following:

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





### **SECTION C.** Site Level Requirements

#### VII. ADDITIONAL REQUIREMENTS.

#### # 015 [25 Pa. Code §129.14]

#### Open burning operations

- (a) The permittee shall not allow the open burning of material on the permittee's property in a manner such that:
  - (1) The emissions are visible, at any time, at the point such emissions pass outside the permittee's property.
  - (2) Malodorous air contaminants from the open burning are detectable outside the permittee's property.
  - (3) The emissions interfere with the reasonable enjoyment of life or property.
  - (4) The emissions cause damage to vegetation or property.
  - (5) The emissions are or may be deleterious to human or animal health.
- (b) Exceptions. The requirements of (a), above, 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 official.
  - (2) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
  - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
  - (4) A fire set solely for recreational or ceremonial purposes.
  - (5) A fire set solely for cooking food.
- (c) This permit 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.

### 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.





# Mary M

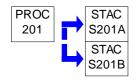
### **SECTION D.** Source Level Requirements

Source ID: 201 Source Name: PRIMER PAINT BOOTH

Source Capacity/Throughput: 50.000 Lbs/HR COATING

Conditions for this source occur in the following groups: 01

02



#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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





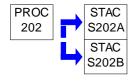
### **SECTION D.** Source Level Requirements

Source ID: 202 Source Name: TOPCOAT BOOTH

Source Capacity/Throughput: 50.000 Lbs/HR COATING

Conditions for this source occur in the following groups: 01

02



#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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







#### SECTION D. **Source Level Requirements**

Source ID: 204 Source Name: DRYING BOOTH

> Source Capacity/Throughput: 5.000 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).

#### TESTING REQUIREMENTS.

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

#### MONITORING REQUIREMENTS. III.

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).

#### REPORTING REQUIREMENTS.

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

#### WORK PRACTICE REQUIREMENTS. VI.

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.

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





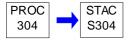
#### SECTION D. **Source Level Requirements**

Source ID: 304 Source Name: PRIME PAINT BOOTH

> Source Capacity/Throughput: 50.000 Lbs/HR **COATING**

Conditions for this source occur in the following groups: 01

02



#### RESTRICTIONS. I.

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

#### **TESTING REQUIREMENTS.**

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

#### MONITORING REQUIREMENTS. III.

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

#### RECORDKEEPING REQUIREMENTS. IV.

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

#### REPORTING REQUIREMENTS.

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

#### **WORK PRACTICE REQUIREMENTS.** VI.

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

#### ADDITIONAL REQUIREMENTS. VII.

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



SECTION D.

#### 28-05041

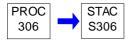
# Source Level Requirements

Source ID: 306 Source Name: TOP COAT PAINT BOOTH

Source Capacity/Throughput: 50.000 Lbs/HR COATING

Conditions for this source occur in the following groups: 01

02



#### I. RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

#### V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

### VII. ADDITIONAL REQUIREMENTS.

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





### **SECTION E.** Source Group Restrictions.

Group Name: 01

Group Description: Paint Booths Sources included in this group

ID	Name
201	PRIMER PAINT BOOTH
202	TOPCOAT BOOTH
304	PRIME PAINT BOOTH
306	TOP COAT PAINT BOOTH

#### I. RESTRICTIONS.

#### **Emission Restriction(s).**

#### # 001 [25 Pa. Code §123.13]

#### **Processes**

The permittee shall not allow the emission into the outdoor atmosphere of particulate matter from the sources listed in Group #001, in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot, as per Section 123.13(c)(1)(i).

#### # 002 [25 Pa. Code §129.52]

### Surface coating processes

- (a) Surface coating process category is subject to 25 Pa. Code Section 129.52, Table I, Item 10(f).
- (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, unless one of the following limitations is met:
- (1) The VOC content of each as applied coating is equal to or less than the standard specified in Table I, expressed in units of weight of VOC per volume of coating solids, shall be equal to or less than 6.67 pounds VOC per gallon coating solids.

[Section 129.52, Table I Item 10(f)]

(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

[Section 129.52(b)(1) (i)]

# 003 [25 Pa. Code §129.52]

Surface coating processes

Exceptions:



- (h) The VOC standards listed in above Condition #002 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.

[Section 129.52(h)]

#### II. TESTING REQUIREMENTS.

### # 004 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall demonstrate the VOC and solids content for each VOC-containing surface coating by one of the following methods:

- (a) For surface coatings applied as they are received from the manufacturer, the permittee may demonstrate compliance with the applicable standard by obtaining EPA Method 24 certification testing from the manufacturer or manufacturer's data including, but not limited to, Material Safety Data Sheets (MSDSs), Certified Product Data Sheets (CPDSs), Product Data Sheets (PDSs), or Environmental Data Sheets (EDSs).
- (b) In the absence of EPA Method 24 certification testing from the manufacturer (or MSDSs, CPDSs, PDSs, or EDSs) allowed under part (a), above, the permittee shall perform EPA Method 24 certification testing on all surface coatings applied as they are received from the manufacturer.
- (c) The permittee shall perform EPA Method 24 certification testing on all surface coatings that are not applied as they are received from the manufacturer, except as otherwise provided in this condition.
- (d) The permittee may use calculated VOC content values in lieu of EPA Method 24 certification testing for customized surface coatings where the permittee maintains a MSDS, CPDS, PDS, or EDS for all surface coating constituents (i.e. coatings, pigments, thinners/cutting solvents). In the event of any inconsistency between the calculated VOC content and data obtained from EPA Method 24 certification testing, the latter shall take precedence. To assist in the calculation of the VOC and solids content, either ASTM Method D2697 of ASTM Method D6093 (or other method approved by the Department) must be performed on each surface coating to determine its solids content, except as otherwise provided in this condition. If a MSDS, CPDS, PDS, or EDS is provided that includes its solids content, then neither of the aforementioned solids content test methods need to be performed on that surface coating.

### III. MONITORING REQUIREMENTS.

#### # 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the daily usage of each coatings, and monthly usage of the coatings and cleanup solvents and the VOC emissions.

### IV. RECORDKEEPING REQUIREMENTS.

#### # 006 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall maintain records of the CPDS, MSDS, PDS, or EDS for each coating used for the most recent 5-year period. The records shall be made available to the Department's representative upon request.

# 007 [25 Pa. Code §129.52]

#### Surface coating processes

(c) The permittee shall maintain daily records sufficient to demonstrate compliance with the coating VOC standard in Condition #002 above. At a minimum, the permittee shall maintain records of:



SECTION E.

28-05041

## Source Group Restrictions.

- (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 solids for Table I surface coating process categories 1 10.
- (2) The VOC content of each coating, thinner and other component as supplied.
- (3) The VOC content of each as applied coating.

[Section 129.52(c)]

#### V. REPORTING REQUIREMENTS.

#### # 008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall report the annual VOC emission from surface coating and cleanup solvents in conjunction with Section C, Condition #013. The report shall include the monthly record of VOC emissions, and shall cover the information in Section E Condition #007.

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall include each new surface coating in the annual report and indicate that it is a new surface coating used during the reporting year.

#### # 010 [25 Pa. Code §127.444]

Compliance requirements.

The sources listed in Section E shall be operated and maintained in accordance with the manufacturer's specifications, or operational instructions, or as specified in Section B, Condition #007(b).

#### VII. ADDITIONAL REQUIREMENTS.

#### # 011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Should credit be desired for those waste coatings or solvents sent off-site for either recycling or incineration at a legally permitted facility, the following information will be required:

- (a) The quantities being disposed of
- (b) VOC content of the waste coatings or solvents being disposed of, and
- (c) Documentation to verify the above.







Group Name: 02

Group Description: MACT, 40 CFR Part 63, Subpart HHHHHHH

Sources included in this group

ID	Name
201	PRIMER PAINT BOOTH
202	TOPCOAT BOOTH
304	PRIME PAINT BOOTH
306	TOP COAT PAINT BOOTH

#### 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 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11177]

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

### What records must I keep?

For surface coating operations, the permittee shall keep the records specified in below paragraphs (a) through (d) and (g) of this section:

- 63.11177(a): Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.
- 63.11177(b): Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).
- 63.11177(c): Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined, by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).
- 63.11177(d): Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.
- 63.11177 (e) and (f): NOT APPLICABLE, THIS IS FOR PAINT STRIPPING MeCI USE.
- 63.11177(g): Records of any deviation from the requirements in §§63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
- 63.11177(h): Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

# 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11178]

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

In what form and for how long must I keep my records?



63.11178(a)

If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

#### V. REPORTING REQUIREMENTS.

#### # 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11175]

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

What notifications must I submit?

Section 63.11175(a), Initial Notification no later than January 11, 2010: NOTE: COMPLIED BY LETTER ON JAN. 7, 2010 TO EPA REGION 3 FOR THE FORMER JERR DAN.

Section 63.11175(b), Notification of Compliance Status: The permittee shall submit the applicable notification on or before March 11, 2011. NOTE: UPON REACTIVATION.

#### # 004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11176]

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

#### What reports must I submit?

63.11176(a): Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

63.11176(a)(1): Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

63.11176(a)(2): The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

63.11176(b): NOT APPLICABLE, NO MeCI USE AT THIS SITE.

### VI. WORK PRACTICE REQUIREMENTS.

#### # 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11173]

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

What are my general requirements for complying with this subpart?

63.11173(a)-(d): NOT APPLICABLE, NO PAINT STRIPPING MeCI USE.

### 63.11173(e), Surface coating operation:

Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in below paragraphs (e)(1) through (e)(5) of this section.

63.11173(e)(1): All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this



paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

63.11173(e)(2): All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

63.11173(e)(2)(i): All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992 (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

63.11173(e)(2)(ii): Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

63.11173(e)(2)(iii): Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

#### 63.11173(e)(2)(iv), Mobile ventilated enclosures:

Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

63.11173(e)(3): All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989 and Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002 (incorporated by reference, see §63.14 of subpart A of this part).

63.11173(e)(4): All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

63.11173(e)(5): As provided in §63.6(g), EPA may choose to grant permission, upon request by the permittee according to §63.6(g)(2), to use an alternative to the emission standards in this section.

#### 63.11173(f):

Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must





include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

- 63.11173(f)(1): A list of all current personnel by name and job description who are required to be trained.
- 63.11173(f)(2): Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in below paragraphs (f)(2)(i) through (f)(2)(iv) of this section.
- 63.11173(f)(2)(i): Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
- 63.11173(f)(2)(ii): Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
  - 63.11173(f)(2)(iii): Routine spray booth and filter maintenance, including filter selection and installation.
  - 63.11173(f)(2)(iv): Environmental compliance with the requirements of this subpart.
- 63.11173(f)(3): A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

#### 63.11173(g):

As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, shall be trained by the dates specified in paragraph (g)(2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

- 63.11173(g): As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.
- 63.11173(g)(1): If your source is a new source [NOTE, SOURCE IDs 304 AND 306], all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
- 63.11173(g)(2): If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
- 63.11173(g)(3): Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

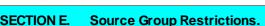
### VII. ADDITIONAL REQUIREMENTS.

#### # 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The facility's auto body painting operations are subject to 40 CFR Part 63, Subpart HHHHHH- National Emission Standards for Hazardous Air Pollutants: Paint stripping and miscellaneous surface coating operations at area sources. The permittee shall comply with all applicable standards, compliance provisions, test methods, monitoring, record keeping, and reporting requirements contained at 40 CFR Sections 63.11169 through 63.11180 and table 1.40 CFR Section 63.13(a)

### JLG IND INC/MOLLY PITCHER PLT



requires submission of copies of all requests, reports, applications, submittals, and other communications to both the U.S. Environmental Protection Agency (U.S. EPA) and the Department. The U.S. EPA copies shall be forwarded to:

Director Air Protection Division, Mail Code 3AP00 U.S. EPA, Region III 1650 Arch Street Philadelphia, PA 19103-2029

(b) In the event that the Federal Subpart that is the subject of this Source Group is revised, the permittee shall comply with the revised version of the subpart, and shall not be required to comply with any provisions in this permit designated as having the subpart as their authority, to the extent that such permit provisions would be inconsistent with the applicable provisions of the revised subpart.

#### [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11169]

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous **Surface Coating Operations at Area Sources** 

What is the purpose of this subpart?

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

- 63.11169(a): NOT APPLICABLE, THIS IS FOR METHYLENE CHLORIDE (MeCI) PAINT STRIPPING.
- 63.11169(b): Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;
- 63.11169(c): Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combination of metal and plastic that are not motor vehicles or mobile equipment.
- 63.11169(d): This subpart does not apply to the any of the activities described in paragraphs (1) through (6) of this section, AS FOLLOWS:
- (1), (2), (3), and (6): NOT APPLICABLE, THESE ARE FOR ARMED FORCES, MUNITIONS, INDIVIDUAL PERSONAL VEHICLE, AND COVERED BY OTHER NESHAP.
- 63.11169(d)(4): Surface coating or paint stripping that meets the definition of "research and laboratory activities" in §63.11180.
- 63.11169(d)(5): Surface coating or paint stripping that meets the definition of "quality control activities" in §63.11180.

#### [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11170]

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous **Surface Coating Operations at Area Sources** 

Am I subject to this subpart?

63.11170(a)

You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

63.11170(a)(1): NOT APPLICABLE, NO MeCI USE AT THIS SITE.

63.11170(a)(2): Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the



Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

63.11170(a)(3): Perform spray application of coatings that contain the target HAP, as defined in 63.11180, to a plastic an/or metal substrat on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in 63.11180.

#### 63.11170(b)

An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

#### [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11171]

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous **Surface Coating Operations at Area Sources** 

How do I know if my source is considered a new source or an existing source?

#### 63.11171(a)

This subpart applies to each new and existing affected area source engaged in the activities listed in §63.11170, with the exception of those activities listed in §63.11169(d) of this subpart.

### 63.11171(b)

The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.

- 63.11171(b)(1): Mixing rooms and equipment;
- 63.11171(b)(2): Spray booths, ventilated prep stations, curing ovens, and associated equipment;
- 63.11171(b)(3): Spray guns and associated equipment;
- 63.11171(b)(4): Spray gun cleaning equipment;
- 63.11171(b)(5): Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and
- 63.11171(b)(6), Paint stripper containing MeCI: Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCI.
- 63.11171(c): An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.
- (c1) You commenced the construction of the source [IDs 304 AND 306] after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCI emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.
- (c)(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.
- 63.11171(d): NOT APPLICABLE, NOT RECONTRUCTED SOURCE.
- 63.11171(e): An affected source is an existing source if it is not a new source or a reconstructed source.

#### # 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11172]

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous **Surface Coating Operations at Area Sources** 





#### SECTION E. **Source Group Restrictions.**

#### When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

63.11172(a)(1): If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

63.11172(a)(2): If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

63.11172(b): For an existing affected source, the compliance date is January 10, 2011.

#### 140 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.111741

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous **Surface Coating Operations at Area Sources** 

What parts of the General Provisions apply to me?

Section 63.11174(a): Table I of this subpart shows which part of the General Provisions in subpart A (40 CFR 63.1 THROUGH 63.16) apply to the permittee.

Section 63.11174(b): If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

#### # 012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11179]

SUBPART HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous **Surface Coating Operations at Area Sources** 

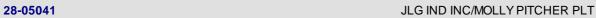
#### Who implements and enforces this subpart?

63.11179(a): This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State. local, or tribal agency.

63.11179(b): In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

63.11179(c): The authority in §63.11173(e)(5) will not be delegated to State, local, or tribal agencies.





## **SECTION F.** Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

DEP Auth ID: 897635 Page 31





# **SECTION G.** Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

DEP Auth ID: 897635 Page 32





SECTION H. Miscellaneous.

28-05041

#001 This operating permit includes the conditions and operating requirements in the operating permit number 28-318-035, incorporated into the Title V permit No. 28-05032, and subsequently included into SMOP 28-05041 and its amendment issued in 2007 and 2008 respectively, and supersedes it.

#002 The following natural gas /propane fired sources (total 15.737 mmbtu/hr) do not require any work practice standards or testing, monitoring, recordkeeping and reporting requirements:

- (a) Wash tank water heater, 3.6 mmbtu/hr.
- (b) Air make up unit, 1.5 mmbtu/hr.
- (c) Infrared unit in Space 59, 4.952 mmbtu/hr.
- (d) Tube heaters in Space 21, 3.675 mmbtu/hr.
- (e) Furnace, 400,000 btu/hr.
- (f) Unit heaters, 60,000 btu/hr.





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