## STONEHOUSE ACQUISITION CO LLC/CHAMBERSBURG



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

## TITLE V/STATE OPERATING PERMIT

Issue Date: October 12, 2010 Effective Date: January 3, 2012
Revision Date: January 3, 2012 Expiration Date: October 31, 2015

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 applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

## TITLE V Permit No: 28-05036

Federal Tax Id - Plant Code: 45-3450515-1

## Owner Information

Name: STONEHOUSE ACQUISITION COMPANY, LLC

Mailing Address: 8025 BLUEGRASS DR

FLORENCE, KY 41042-2901

## Plant Information

Plant: STONEHOUSE ACQUISITION CO LLC/CHAMBERSBURG

Location: 28 Franklin County 28907 Greene Township

SIC Code: 3089 Manufacturing - Plastics Products, Nec

## Responsible Official

Name: PAUL AVIDON
Title: PRESIDENT/CEO
Phone: (717) 381 - 1276

## Permit Contact Person

Name: SCOTT BOWMAN Title: OPERATIONS MGR Phone: (859) 980 - 1513

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

WILLIAM R. WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER





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





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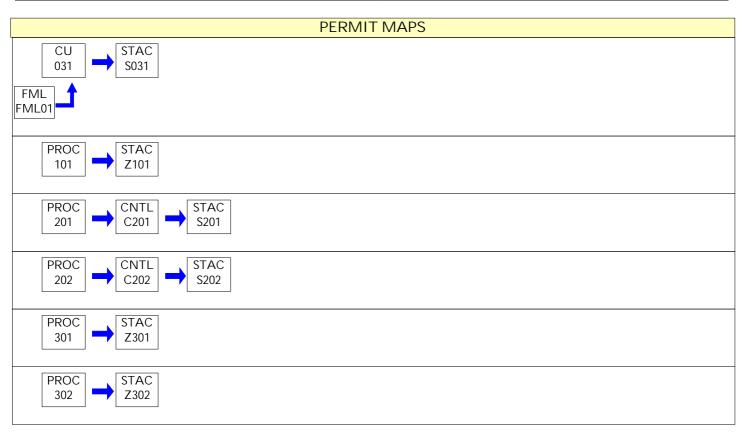
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## SECTION A. Site Inventory List

| Source I | D Source Name                              | Capacity/ | Throughput | Fuel/Material          |
|----------|--|-----------|------------|------------------------|
| 031      | 4 LP GAS COMFORT HEATERS                   | 2.600     | MMBTU/HR   |                        |
|          |  | 28.190    | Gal/HR     | LPG                    |
| 101      | COUNTER TOP ADHESIVE APPLICATION           | 5.000     | Lbs/HR     | ADHESIVE               |
| 201      | GEL COAT BOOTH 1                           | 23.000    | Lbs/HR     | GEL COAT               |
| 202      | GEL COAT BOOTH 2                           | 23.000    | Lbs/HR     | GEL COAT               |
| 301      | CONTINOUS MIXING MACHINE                   | 1,121.000 | Lbs/HR     | RESIN, FILLER, CATALYS |
| 302      | HAND POUR                                  | 100.000   | Lbs/HR     | RESIN, FILLER, CATALYS |
| 900      | PARTS WASHER                               |           |            |                        |
| C201     | SPRAY BOOTH 1 PARTICULATE FILTER           |           |            |                        |
| C202     | SPRAY BOOTH 2 PARTICULATE FILTER           |           |            |                        |
| FML01    | LIQUID PROPANE GAS                         |           |            |                        |
| S031     | 3 STACKS FOR COMFORT HEATERS (010,011,012) |           |            |                        |
| S201     | SPRAY BOOTH 1 STACK                        |           |            |                        |
| S202     | SPRAY BOOTH 2 STACK                        |           |            |                        |
| Z101     | FUGITIVE ADHESIVE EMISSIONS, COUNTER TOP   |           |            |                        |
| Z301     | FUGITIVE EMISSIONS MIXING MACHINE          |           |            |                        |
| Z302     | FUGITIVE EMISSIONS BATCH MIXER             |           |            |                        |









#001 [25 Pa. Code § 121.1]

**Definitions** 

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

#002

[25 Pa. Code § 127.512(c)(4)]

**Property Rights** 

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

#003

[25 Pa. Code § 127.446(a) and (c)]

Permit Expiration

This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#004 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]

#### Permit Renewal

- (a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.
- (b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.
- (c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).
- (d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

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

### Transfer of Ownership or Operational Control

- (a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:
  - (1) The Department determines that no other change in the permit is necessary:
- (2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.





#006 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

Inspection and Entry

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

#007 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

Compliance Requirements

- (a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:
  - (1) Enforcement action
  - (2) Permit termination, revocation and reissuance or modification
  - (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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

#009 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

**Duty to Provide Information** 

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request





in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#010 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

- (a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.
- (b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:
- (1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.
- (2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.
- (3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- (4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.
- (d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#011 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

#012 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541.

#013 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

- (a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (b) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code §





127.516 (relating to permit shield) shall extend to an operational flexibility change authorized by 25 Pa. Code § 127.462.

#014 [25 Pa. Code § 127.450]

## Administrative Operating Permit Amendments

- (a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations thereunder from being processed as an administrative amendment.
- (b) Upon taking final action granting a request for an administrative permit amendment in accordance with § 127.450(c), the Department will allow coverage under 25 Pa. Code § 127.516 (relating to permit shield) for administrative permit amendments which meet the relevant requirements of 25 Pa. Code Article III, unless precluded by the Clean Air Act or the regulations thereunder.

#015 [25 Pa. Code § 127.512(b)]

## Severability Clause

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

#016 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

## Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.
- (f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

#017 [25 Pa. Code §§ 127.14(b) & 127.449]

## Authorization for De Minimis Emission Increases

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:





- (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

The Department may disapprove or condition de minimis emission increases at any time.

- (b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
  - (4) Space heaters which heat by direct heat transfer.
  - (5) Laboratory equipment used exclusively for chemical or physical analysis.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.







- (4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.
- (e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#018 [25 Pa. Code §§ 127.11a & 127.215]

### Reactivation of Sources

- (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#019 [25 Pa. Code §§ 121.9 & 127.216]

### Circumvention

- (a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#020 [25 Pa. Code §§ 127.402(d) & 127.513(1)]

#### Submissions

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

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

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Office of Air Enforcement and Compliance Assistance (3AP20) United States Environmental Protection Agency Region 3





1650 Arch Street Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#021 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

## Sampling, Testing and Monitoring Procedures

- (a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#022 [25 Pa. Code §§ 127.511 & Chapter 135]

## Recordkeeping Requirements

- (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:
  - (1) The date, place (as defined in the permit) and time of sampling or measurements.
  - (2) The dates the analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of the analyses.
  - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#023 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

## Reporting Requirements

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.



- (b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.
- (c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #020(c) of this permit.
- (d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#024 [25 Pa. Code § 127.513]

## Compliance Certification

- (a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:
  - (1) The identification of each term or condition of the permit that is the basis of the certification.
  - (2) The compliance status.
  - (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
  - (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance or, of the submittal date specified elsewhere in the permit, to the Department and EPA in accordance with the submission requirements specified in condition #020 of this section.

#025 [25 Pa. Code § 127.3]

## Operational Flexibility

- (a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:
  - (1) Section 127.14 (relating to exemptions)
  - (2) Section 127.447 (relating to alternative operating scenarios)
  - (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
  - (4) Section 127.449 (relating to de minimis emission increases)
  - (5) Section 127.450 (relating to administrative operating permit amendments)
  - (6) Section 127.462 (relating to minor operating permit amendments)
  - (7) Subchapter H (relating to general plan approvals and operating permits)
- (b) Unless precluded by the Clean Air Act or the regulations adopted thereunder, the permit shield authorized under 25 Pa. Code § 127.516 shall extend to operational flexibility changes made at this Title V facility pursuant to this permit





condition and other applicable operational flexibility terms and conditions of this permit.

#026 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

## Risk Management

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:
  - (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
  - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
  - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
  - (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.
- (2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #24 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#027 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs





No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#028 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(q)]

#### Permit Shield

- (a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:
  - (1) The applicable requirements are included and are specifically identified in this permit.
- (2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.
- (b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.
  - (2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.
  - (4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.
- (c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department on minor or significant permit modifications, and operational flexibility changes shall be covered by the permit shield. Upon taking final action granting a request for an administrative permit amendment, the Department will allow coverage of the amendment by the permit shield in § 127.516 for administrative amendments which meet the relevant requirements of 25 Pa. Code Article III.
- (d) The permit shield authorized under § 127.516 is in effect for the permit terms and conditions in this Title V permit, including administrative operating permit amendments and minor operating permit modifications.







## 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 a fugitive air contaminant from a source other than the following:

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

# 002 [25 Pa. Code §123.2]

## Fugitive particulate matter

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 §127.441]

## Operating permit terms and conditions.

- a.) The permittee shall limit the annual VOC emissions below 50 tons per any consecutive 12 month period.
- b.) The permittee shall limit the annual HAPs emissions below 100 tons per any consecutive 12 month period.

# 005 [25 Pa. Code §129.14]

#### Open burning operations

- (a) The permittee shall not allow the open burning of materials in such a manner 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 and 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 Subsection (a) do not apply where the open burning operations result from:



## SECTION C. Site Level Requirements

- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) 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 PS Section 6018.610 (3) or any other provision of the Solid Waste Management Act.

#### II. TESTING REQUIREMENTS.

# 006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The Department reserves the right to require exhaust stack testing of the sources referenced in this permit to measure emissions for purposes including verification of permit condition compliance and estimation of annual air emissions.

# 007 [25 Pa. Code §139.1]

Sampling facilities.

Upon the request of 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.

# 008 [25 Pa. Code §139.11]

## General requirements.

- (a) As specified in 25 Pa. Code Section 139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.
- (b) As specified in 25 Pa. Code Section 139.11(2), the Department will consider test results for approval where sufficient information is provided to verify the source conditions existing at the time of the test and where adequate data is available to show the manner in which the test was conducted. Information submitted to the Department shall include, at a minimum, all of the following:
- (1) A thorough source description, including a description of any air cleaning devices and the flue.
- (2) Process conditions, for example, production rate, and other conditions which may affect emissions from the process.
- (3) The location of the sampling ports.
- (4) Effluent characteristics, including velocity, temperature, moisture content, gas density (percentage CO, CO2, O2, and N2), static and barometric pressures.
- (5) Sample collection techniques employed, including procedures used, equipment descriptions, and data to verify that isokinetic sampling for particulate matter collection occurred and that acceptable test conditions were met.
- (6) Laboratory procedures and results.
- (7) Calculated results.







#### SECTION C. Site Level Requirements

#### MONITORING REQUIREMENTS.

# 009 [25 Pa. Code §123.43]

## Measuring techniques

Visible emissions may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements (e.g. Continuous Opacity Monitor).
- (2) Observers trained and certified in EPA Reference Method 9 to measure plume opacity with the naked eye or with the aid of any device(s) approved by the Department.

[25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall conduct a daily inspection around the plant periphery during daylight hours when one or more of the sources are operating to detect visible emissions, fugitive emissions, and malodorous air contaminants. These inspections are necessary to determine:

- (a) The presence of visible emissions. Visible emissions may be measured according to the methods specified in Section C, Condition #009. Alternately, plant personnel who observe visible emissions may report the incidence of visible emissions to the Department within two (2) hours of the incident and make arrangements for a certified observer to measure the visible emissions.
- (b) The presence of fugitive emissions beyond the plant property boundaries, as stated in Section C, Condition #002.
- (c) The presence of malodorous air contaminants beyond the plant property boundaries, as stated in Section C, Condition #003.

# 011 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall calculate monthly air emissions from the facility using EPA AP-42 emission factors, manufacturersupplied emission factors, stack test results, or other method(s) approved by the Department to determine compliance with Section C, Condition #004. Also, the emissions should be included in the annual facility emission report referenced in Section C, Condition #015.

### IV. RECORDKEEPING REQUIREMENTS.

# 012 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records of the monthly air emissions referenced in Section C, Condition #011.

The permittee shall retain these records for a minimum of five (5) years. The records shall be made available to the Department upon its request.

[25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records of the daily inspections referenced in Section C, Condition #010. The records shall include, at a minimum, the following information:

- (1) The name of the company representative monitoring these instances.
- (2) A description of the emissions and/or malodors observed, and actions taken to mitigate them.
- (3) The date and time of the observation.
- (4) The wind direction during each observation.

The permittee shall retain these records for a minimum of five (5) years. The records shall be made available to the Department upon request.







#### SECTION C. Site Level Requirements

#### REPORTING REQUIREMENTS.

# 014 [25 Pa. Code §127.442]

## Reporting requirements.

The permittee shall report malfunctions to the Department. As defined in 40 CFR Section 60.2 and incorporated by reference in 25 Pa. Code Chapter 122, 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) Malfunctions which occur at the facility and which pose an imminent danger to public health, safety, welfare and the environment shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two 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 (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 requirements of part (a), above, shall be reported to the Department, in writing, within five (5) days of malfunction discovery.

# 015 [25 Pa. Code §135.3]

## Reporting

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

#### VI. WORK PRACTICE REQUIREMENTS.

# 016 [25 Pa. Code §123.1]

## Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne from any source specified in Section C, Condition #001(1)-(7). These actions shall include, but not be limited to, the following:

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

# 017 [25 Pa. Code §127.444]

## Compliance requirements.

The permittee shall operate and maintain all sources and any air cleaning devices identified in this operating permit in accordance with the manufacturer's recommendations/specifications, as well as in a manner consistent with good operating and good air pollution control practices.

#### ADDITIONAL REQUIREMENTS.

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

## VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit within thirty days of 01/01/2011 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and annually thereafter.

## IX. COMPLIANCE SCHEDULE.







## SECTION C. Site Level Requirements

No compliance milestones exist.

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

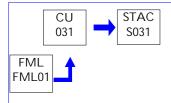




Source ID: 031 Source Name: 4 LP GAS COMFORT HEATERS

Source Capacity/Throughput: 2.600 MMBTU/HR

28.190 Gal/HR LPG



#### RESTRICTIONS.

## Emission Restriction(s).

# 001 [25 Pa. Code §123.21]

General

The permittee may not allow the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

## IV. RECORDKEEPING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly totals of the following:

- a.) total gas usage for all equipment included in Source ID 031
- b.) air emissions of NOx, SOx, CO, PM10, VOC and/or HAPs associated with the burning of the fuel. Table 1.5-1. EMISSION FACTORS FOR LPG COMBUSTION from the EPA AP--42 emission factors or other approved factors may be used.

## V. REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

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

## VII. ADDITIONAL REQUIREMENTS.

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





\*\*\* Permit Shield in Effect. \*\*\*





Source ID: 101 Source Name: COUNTER TOP ADHESIVE APPLICATION

Source Capacity/Throughput: 5.000 Lbs/HR ADHESIVE



#### RESTRICTIONS.

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

#### II. TESTING REQUIREMENTS.

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

#### III. MONITORING REQUIREMENTS.

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

## IV. RECORDKEEPING REQUIREMENTS.

# 001 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain monthly records of the following information:

- a.) name of adhesives used.
- b.) amount of adhesives used in gallons or pounds.
- c.) amount of VOC and HAP emissions resulting from adhesive usage in pounds of tons.
- d.) 12-month total of VOC and HAP emissions resulting from the counter top adhesive usage.

The records shall remain on site for the most recent 5-year period and be made available to the Department upon request.

### V. REPORTING REQUIREMENTS.

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

## VI. WORK PRACTICE REQUIREMENTS.

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

#### VII. ADDITIONAL REQUIREMENTS.

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

\*\*\* Permit Shield in Effect. \*\*\*





Source ID: 201 Source Name: GEL COAT BOOTH 1

Source Capacity/Throughput: 23.000 Lbs/HR GEL COAT

Conditions for this source occur in the following groups: 1



## I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart WWWW Table 3]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 T

The permittee shall comply with the limits of Table 3 below.

Excerpt from Table 3 to Subpart WWWW

| Operation type  | Using gel coat             | Organic HAP    |
|-----------------|----------------------------|----------------|
|                 |                            | emission limit |
| 6. Open Molding | a. tooling                 | 440 lb/ton     |
| gel coat        | b. white/off white pigment | 267 lb/ton     |
|                 | c. all other pigments      | 377 lb/ton     |
|                 | d. CR/HS or high perform   | 605 lb/ton     |
|                 | e. fire retardant          | 854 lb/ton     |
|                 | f. clear production        | 522 lb/ton     |

If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

#### II. TESTING REQUIREMENTS.

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

## III. MONITORING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain instrumentation on each spray booth that measures and displays the pressure drop across the filters.

#### IV. RECORDKEEPING REQUIREMENTS.

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







#### REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Operation of any air emissions source is contingent upon proper operation of its associated emissions control system, unless otherwise approved by the Department.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart WWWW Table 4]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production Work Practice Standards

The permittee shall comply with the limits of Table 4 below.

Excerpt Table 4 to Subpart WWWW -- Work Practice Standards

| FOr | You must |
|-----|----------|
|     |          |

2. A new or existing cleaning operation

Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

3. A new or existing materials HAPcontaining materials storage operation.

Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

## VII. ADDITIONAL REQUIREMENTS.

# 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart WWWW Table 1] Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

The permittee shall use the following factors to calculate emissions from the atomized spray gel coat booths, unless otherwise approved by the Department:

- a.) materials with less than 33% organic HAP:
  - $EF = 0.445 \times \text{%HAP} \times 2000$
- b.) materials with more than 33% organic HAP  $EF = ((1.03646 \times \%HAP) - 0.195) \times 2000.$

## \*\*\* Permit Shield in Effect. \*\*\*





Source ID: 202 Source Name: GEL COAT BOOTH 2

Source Capacity/Throughput: 23.000 Lbs/HR GEL COAT

Conditions for this source occur in the following groups: 1



## I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart WWWW Table 3]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 T

The permittee shall comply with the limits of Table 3 below.

Excerpt from Table 3 to Subpart WWWW

| Operation type  | Using gel coat                               | Organic HAP    |
|-----------------|--|----------------|
|                 |  | emission limit |
| 6. Open Molding | a. tooling                                   | 440 lb/ton     |
| gel coat        | <ul><li>b. white/off white pigment</li></ul> | 267 lb/ton     |
|                 | c. all other pigments                        | 377 lb/ton     |
|                 | d. CR/HS or high perform                     | 605 lb/ton     |
|                 | e. fire retardant                            | 854 lb/ton     |
|                 | f. clear production                          | 522 lb/ton     |

If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

#### II. TESTING REQUIREMENTS.

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

## III. MONITORING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain instrumentation on each spray booth that measures and displays the pressure drop across the filters.

#### IV. RECORDKEEPING REQUIREMENTS.

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







#### REPORTING REQUIREMENTS.

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

#### VI. WORK PRACTICE REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Operation of any air emissions source is contingent upon proper operation of its associated emissions control system, unless otherwise approved by the Department.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart WWWW Table 4]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production Work Practice Standards

The permittee shall comply with the limits of Table 4 below.

Excerpt Table 4 to Subpart WWWW -- Work Practice Standards

| For | You must |
|-----|----------|
|     |          |

2. A new or existing cleaning operation

Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

3. A new or existing materials HAPcontaining materials storage operation.

Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

## VII. ADDITIONAL REQUIREMENTS.

# 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart WWWW Table 1] Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

The permittee shall use the following factors to calculate emissions from the atomized spray gel coat booths, unless otherwise approved by the Department:

- a.) materials with less than 33% organic HAP:
  - $EF = 0.445 \times \text{%HAP} \times 2000$
- b.) materials with more than 33% organic HAP  $EF = ((1.03646 \times \%HAP) - 0.195) \times 2000.$

## \*\*\* Permit Shield in Effect. \*\*\*

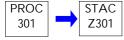




Source ID: 301 Source Name: CONTINOUS MIXING MACHINE

> Source Capacity/Throughput: 1,121.000 Lbs/HR RESIN, FILLER, CATALYST, PIGN

Conditions for this source occur in the following groups: 1



## RESTRICTIONS.

## Emission Restriction(s).

# 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart WWWW Table 3]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 T

The permittee shall comply with the limits of Table 3 below:

| Excerpt from Table 3 to   | Subpart WWWW  |                            |  |
|---|---|----------------------------|--|
| Operation type  | Using   | Organic HAP emission limit |  |
| 1. Open molding-<br>corrosion-resistant<br>and/or high strength | <ul><li>a. Mechanical resin<br/>application.</li></ul>                        | 113 lb/ton                 |  |
| (CR/HS).  | b. Filament application   | 171 lb/ton                 |  |
|   | c. Manual resin application   | 123 lb/ton                 |  |
| 2. Open molding-<br>non-CR/HS.                                  | a. Mechanical resin application.  | 88 lb/ton                  |  |
|   | <ul><li>b. Filament application</li><li>c. Manual resin application</li></ul> | 188 lb/ton<br>87 lb/ton    |  |
| 3. Open molding-<br>tooling                                     | a. Mechanical resin application.  | 254 lb/ton                 |  |
|   | b. Manual resin application   | 157 lb/ton                 |  |
| 4. Open molding-<br>low-flame spread.<br>/low- smoke products   | a. Mechanical resin application.  | 497 lb/ton                 |  |
| , rew smere preducts  | b. Filament application   | 270 lb/ton                 |  |
|   | c. Manual resin application   | 238 lb/ton                 |  |
| 5. Open molding-<br>shrinkage controlled<br>resins.             | a. Mechanical resin application.  | 354 lb/ton                 |  |
| . 6515.   | b. Filament application   | 215 lb/ton                 |  |
|   | c. Manual resin application.  | 180 lb/ton                 |  |



#### II. TESTING REQUIREMENTS.

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

## III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

## V. REPORTING REQUIREMENTS.

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

## VI. WORK PRACTICE REQUIREMENTS.

| WORK PRACTICE RE  | QUIREMENTS.   |
|---|---|
|   | 63 NESHAPS for Source Categories §40 CFR 63 Subpart WWWW Table 4] nal Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production  |
| The permittee shall comp                                    | oly with the limits of Table 4 below.   |
| Excerpt Table 4 to Subpar                                   | rt WWWW Work Practice Standards   |
| For   | You must  |
| 1. not applicable   |   |
| 2. A new or existing cleaning operation                     | Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. |
| 3. A new or existing materials HAP-containing materials     | Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.   |
| storage operation.  | Bulk HAP-containing materials storage tanks may be vented as necessary for safety.  |
| 4. not applicable<br>5. not applicable                      |   |
| 6. An existing or new mixing or BMC manufacturing operation | Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.   |
| 7. An existing mixing or BMC manufacturing operation        | Close any mixer vents when actual mixing is occuring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.   |
| 8. A new or existing mixing or BMC                          | Keep the mixer covers closed while actual mixing is occuring except when adding materials or changing covers to the mixing vessels.   |



SECTION D.



## Source Level Requirements



| manu | ıfactu | ıring | operation. |
|------|--------|-------|------------|
|      |        |       |            |

## VII. ADDITIONAL REQUIREMENTS.

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

\*\*\* Permit Shield in Effect. \*\*\*

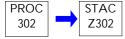




Source ID: 302 Source Name: HAND POUR

Source Capacity/Throughput: 100.000 Lbs/HR RESIN, FILLER, CATALYST, PIGN

Conditions for this source occur in the following groups: 1



## I. RESTRICTIONS.

## Emission Restriction(s).

# 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart WWWW Table 3]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 T

The permittee shall comply with the limits of Table 3 below:

| Excerpt from Table 3 to   | Subpart WWWW  |                               |
|---|---|-------------------------------|
| Operation type  | Using   | Organic HAP<br>emission limit |
| 1. Open molding-<br>corrosion-resistant<br>and/or high strength | <ul><li>a. Mechanical resin<br/>application.</li></ul>                        | 113 lb/ton                    |
| (CR/HS).  | b. Filament application   | 171 lb/ton                    |
|   | c. Manual resin application   | 123 lb/ton                    |
| 2. Open molding-<br>non-CR/HS.                                  | a. Mechanical resin application.  | 88 lb/ton                     |
|   | <ul><li>b. Filament application</li><li>c. Manual resin application</li></ul> | 188 lb/ton<br>87 lb/ton       |
| 3. Open molding-<br>tooling                                     | a. Mechanical resin application.  | 254 lb/ton                    |
|   | b. Manual resin application   | 157 lb/ton                    |
| 4. Open molding-<br>low-flame spread.<br>/low- smoke products   | a. Mechanical resin application.  | 497 lb/ton                    |
| 7 low smoke products  | b. Filament application   | 270 lb/ton                    |
|   | c. Manual resin application   | 238 lb/ton                    |
| 5. Open molding-<br>shrinkage controlled<br>resins.             | a. Mechanical resin application.  | 354 lb/ton                    |
|   | b. Filament application   | 215 lb/ton                    |
|   | c. Manual resin application.  | 180 lb/ton                    |





#### II. TESTING REQUIREMENTS.

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

## III. MONITORING REQUIREMENTS.

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

#### IV. RECORDKEEPING REQUIREMENTS.

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

## V. REPORTING REQUIREMENTS.

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

## VI. WORK PRACTICE REQUIREMENTS.

| Subpart WWWW-Nation   | # 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart WWWW Table 4] Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production Work Practice Standards   |  |  |  |
|---|---|--|--|--|
| Excerpt Table 4 to Subpar                                   | rt WWWW Work Practice Standards   |  |  |  |
| For   | You must  |  |  |  |
| 1. not applicable   |   |  |  |  |
| 2. A new or existing cleaning operation                     | Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. |  |  |  |
| 3. A new or existing materials HAP-containing materials     | Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.   |  |  |  |
| storage operation.  | Bulk HAP-containing materials storage tanks may be vented as necessary for safety.  |  |  |  |
| 4. not applicable 5. not applicable                         |   |  |  |  |
| 6. An existing or new mixing or BMC manufacturing operation | Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.   |  |  |  |
| 7. An existing mixing or BMC manufacturing operation        | Close any mixer vents when actual mixing is occuring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.   |  |  |  |
| 8. A new or existing mixing or BMC manufacturing operation  | Keep the mixer covers closed while actual mixing is occuring except when adding materials or changing covers to the mixing vessels.   |  |  |  |





## VII. ADDITIONAL REQUIREMENTS.

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

\*\*\* Permit Shield in Effect. \*\*\*



28-05036



#### SECTION D. Source Level Requirements

Source ID: 900 Source Name: PARTS WASHER

Source Capacity/Throughput:

#### RESTRICTIONS.

### Emission Restriction(s).

# 001 [25 Pa. Code §129.63]

#### Degreasing operations

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

The above requirement does not apply:

- To cold cleaning machines used in extreme cleaning service.
- If the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with this condition will result in unsafe operating conditions.
- (iii) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

## Throughput Restriction(s).

# 002 [25 Pa. Code §129.63]

Degreasing operations

Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.

#### TESTING REQUIREMENTS.

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

#### MONITORING REQUIREMENTS. III.

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

#### IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall maintain for at least two (2) years and shall provide to the Department, on request, the following information:

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

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

## REPORTING REQUIREMENTS.

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

#### WORK PRACTICE REQUIREMENTS.

# 004 [25 Pa. Code §129.63]

Degreasing operations

1. Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:





- (i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph 2. In addition, the label shall include the following discretionary good operating practices:
- (A) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.
- (B) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
  - (C) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.
- (ii) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.
- 2. Cold cleaning machines shall be operated in accordance with the following procedures:
- (i) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (ii) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
  - (iv) Air agitated solvent baths may not be used.
  - (v) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

### VII. ADDITIONAL REQUIREMENTS.

# 005 [25 Pa. Code §129.63]

Degreasing operations

The permittee that operates a parts washer or cold cleaning machines that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts shall comply with the requirements listed in this section.

\*\*\* Permit Shield in Effect. \*\*\*





Group Name:

1

Group Description: MACT Regulations

Sources included in this group:

| ID  | Name                     |
|-----|--------------------------|
| 201 | GEL COAT BOOTH 1         |
| 202 | GEL COAT BOOTH 2         |
| 301 | CONTINOUS MIXING MACHINE |
| 302 | HAND POUR                |

## RESTRICTIONS.

## Emission Restriction(s).

# 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5805]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production What standards must I meet to comply with this subpart?

You must meet the requirements of paragraphs (a) through (h) of this section that apply to you. You may elect to comply using any options to meet the standards described in §§63.5810 through 63.5830. Use the procedures in §63.5799 to determine if you meet or exceed the 100 tpy threshold.

- (a) NOT APPLICABLE NO CENTRIFUGAL CASTING OR CONTINUOUS CASTING/LAMINATION OPERATIONS
- (b) All operations at existing facilities not listed in paragraph (a) of this section must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply, regardless of the quantity of HAP emitted.
- (c) (g) NOT APPLICABLE NOT A NEW FACILITY
- (h) NOT APPLICABLE NO ADD-ON CONTROL DEVICE

### II. TESTING REQUIREMENTS.

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

## III. MONITORING REQUIREMENTS.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5895] Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production How do I monitor and collect data to demonstrate continuous compliance?

- (a) (b) NOT APPLICABLE CONTROL DEVICE NOT USED
- (c) You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to this subpart. You must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP content limits in Table 7 to this subpart if you are averaging organic HAP contents. Resin use records may be based on purchase records if you can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.
- (d) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports. If after you have initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or you change the application method or controls, then you again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 or 5 of this subpart, you must begin collecting resin and gel coat use records and calculate compliance using one of the







averaging options on a 12-month rolling average.

## (e) NOT APPLICABLE - NO PULTRUSION OPERATIONS

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5900]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production How do I demonstrate continuous compliance with the standards?

- (a) You must demonstrate continuous compliance with each standard in §63.5805 that applies to you according to the methods specified in paragraphs (a)(1) through (3) of this section.
- (1) NOT APPLICABLE NO ADD-ON CONTROL DEVICES
- (2) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 or 5 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d).
- (3) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to this subpart, as discussed in §63.5895(d).
- (4) Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for your operation.
- (b) You must report each deviation from each standard in §63.5805 that applies to you. The deviations must be reported according to the requirements in §63.5910.
- (c) Except as provided in paragraph (d) of this section, during periods of startup, shutdown or malfunction, you must meet the organic HAP emissions limits and work practice standards that apply to you.
- (d) NOT APPLICABLE NO ADD-ON CONTROL DEVICES
- (e) NOT APPLICABLE NO ADD-ON CONTROL DEVICES

#### IV. RECORDKEEPING REQUIREMENTS.

# 004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain the following records for each gel coat, resin, colorant, filler, initiator, or adhesive material used:

- a. MSDS or CPDS sheets for each coating,
- b. the monthly amount used of each coating,
- c. the weight % of VOC and HAP for each coating,
- d. the emission factor used for each coating, and
- e. calculated monthly emissions of VOC and HAP for each coating.

These records shall be maintained on site for the most recent five year period and made available to the Department upon request.

# 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5810]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards for open molding or centrifugal casting operations in Table 3 or 5 to this subpart. You may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of your emissions to an add-on control. You may use different compliance options for the different operations listed in Table 3 or 5 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a)





through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are changing to, unless you were previously using an option that did not require you to maintain records of resin and gel coat use. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

- (a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart. (1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If you are using vapor suppressants to reduce HAP emissions, you must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63. If you are using an add-on control device to reduce HAP emissions, you must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in §63.5850. The organic HAP emissions factor calculated from the equations in Table 1 to this subpart, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of this section to calculate the add-on control factor used in the organic HAP emissions factor equations.
- (2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.
- (b) Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type. Demonstrate that on average you meet the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to you.
- (1)(i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.
- (ii) You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.
- (2) Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 or 5 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.
- (c) Demonstrate compliance with a weighted average emission limit. Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.
- (1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits





in Table 3 or 5 to this subpart for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of this section.

- (2) Each month calculate your weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of this section.
- (3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.
- (d) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.
- (1) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.
- (2) You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.
- (3) You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.
- (4) You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.

# 006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5915]
Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production What records must I keep?

- (a) You must keep the records listed in paragraphs (a)(1) through (3) of this section.
- (1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).
- (2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
- (3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).
- (b) NOT APPLICABLE ADD-ON CONTROL DEVICE NOT USED
- (c) You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in tables 3, 5, and 7 to this subpart.



- (d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.
- (e) NOT APPLICABLE NO CONTINUOUS LAMINATION/ CASTING OPERATION
- # 007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5920]
- Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production In what form and how long must I keep my records?
- (a) You must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).
- (b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.
- (d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.
- V. REPORTING REQUIREMENTS.
  - # 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5910] Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
  - (a) You must submit each report in Table 14 to this subpart that applies to you. [TABLE 14 PROVISIONS LISTED AT THE END OF THIS CONDITION]
  - (b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.
  - (1) N/A THIS SUBSECTION CONCERNS THE INTIAL COMPLIANCE REPORT
  - (2) N/A THIS SUBSECTION CONCERNS THE INTIAL COMPLIANCE REPORT
  - (3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
  - (4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
  - (5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.
  - (c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:
  - (1) Company name and address.
  - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - (3) Date of the report and beginning and ending dates of the reporting period.
  - (4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
  - (5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to





you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

- (6) NOT APPLICABLE CMS AND CEMS NOT REQUIRED
- (d) For each deviation from an organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.
- (1) The total operating time of each affected source during the reporting period.
- (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (e) NOT APPLICABLE CMS NOT REQUIRED
- (f) You must report if you have exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make your facility subject to §63.5805(a)(1) or (d). Include with this report any request for an exemption under §63.5805(e). If you receive an exemption under §63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, you must report this exceedance as required in §63.5805(f).
- (g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- (h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in table 14 to this subpart, and not based on the requirements in §63.999.
- (i) Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

## TABLE 14

- I. You must submit a compliance report semiannually according to the requirements in §63.5910(b). The report shall contain:
- a. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in §63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period
- b. The information in §63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in §63.8(c)(7), the report must contain the information in §63.5910(e)
- c. The information in  $\S 63.10(d)(5)(i)$  if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan
- II. You must submit an immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan.



- a. You must submit the following information by fax or telephone within 2 working days after starting actions inconsistent with the plan. The report must state the actions taken for the event.
- b. You must submit the following information by letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. The report must contain the information required in §63.10(d)(5)(ii).

## VI. WORK PRACTICE REQUIREMENTS.

# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5835] Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production What are my general requirements for complying with this subpart?

- (a) You must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3.
- (b) NOT APPLICABLE CONTROL DEVICE NOT USED
- (c) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).
- (d) NOT APPLICABLE CONTROL DEVICE NOT USED

### VII. ADDITIONAL REQUIREMENTS.

# 010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5780]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production What is the purpose of this subpart?

Calculating Organic HAP Emissions Factors for Open Molding and Centrifugal Casting

§ 63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?

Emissions factors are used in this subpart to determine compliance with certain organic HAP emissions limits in Tables 3 and 5 to this subpart. You may use the equations in Table 1 to this subpart to calculate your emissions factors. Equations are available for each open molding operation and centrifugal casting operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. You may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate your organic HAP emissions.

§ 63.5797 How do I determine the organic HAP content of my resins and gel coats?

In order to determine the organic HAP content of resins and gel coats, you may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c) of this section, as applicable.

- (a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.
- (b) If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.
- (c) If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate





measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.

§ 63.5798 What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?

If you wish to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 to this subpart, you may use the procedures in paragraphs (a) or (b) of this section to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in this subpart, and to calculate facility organic HAP emissions.

- (a) Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in §63.5850.
- (b) Submit a petition to the Administrator for administrative review of this subpart. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in Table 1 to this subpart.
- # 011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5785]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production Am I subject to this subpart?

Sources included in Source Group 1 are subject to the National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, Subpart WWWW, and shall comply with all applicable sections of the regulation.

# 012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5925]

Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production What parts of the General Provisions apply to me?

Table 15 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

\*\*\* Permit Shield in Effect. \*\*\*





## SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

DEP Auth ID: 907733



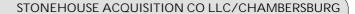


## SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

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## 28-05036





## SECTION H. Miscellaneous.

Source ID 031, 4 LP GAS COMFORT HEATERS contains: (010), a 400,000 Btu/hr ADP heater in building 8; (011), a 290,000 Btu/hr ADP heater in building 9; (012), a 230,000 Btu/hr ADP heater in building 9; and (013), a 1,739,000 Btu/hr Absolute Air heater in building 8, which does not vent through a stack.

The following activities are not required any emission restrictions, testing, monitoring requirements, reporting requirements, and work practice standards:

- Internally venting dust collectors supporting the grinding and polishing of molded vanity tops including, but not limited to: JCT DC 1200, JCT DC 1900, 2-Coral 500, JCT DC 1100, JCT DC 1100A, Dustek 750d, Delta 50-852, Gruber Bag House, and Delta Drum Collector.

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Revision No. 1 of this Title V Operating Permit was issued due to the change of ownership from LamTech, Inc. to Stonehouse Acquisition Company, LLC that occurred on November 14, 2011. This administrative amendment is issued pursuant to 25 Pa. Code Section 127.450(a)(4). Changes have also been made to the Responsible Official (name, title and phone number) and Permit Contact Person (name, title and phone number), as well as the owner mailing address, pursuant to 25 Pa. Code Section 127.450(a)(2).



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