



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: December 6, 2013

Effective Date: January 1, 2014

Expiration Date: December 31, 2018

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

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

State Only Permit No: 15-00025

Synthetic Minor

Federal Tax Id - Plant Code: 20-3524714-1

Owner Information

Name: TRANSWALL OFC SYS INC
Mailing Address: 1220 WILSON DR
PO BOX 1930
WEST CHESTER, PA 19380

Plant Information

Plant: TRANSWALL OFFICE SYS INC/WEST CHESTER
Location: 15 Chester County 15963 West Goshen Township
SIC Code: 2522 Manufacturing - Office Furniture, Except Wood

Responsible Official

Name: ARLENE J VOLZ
Title: DIRECTOR OF HR & ADMIN
Phone: (610) 429 - 1400 Ext.136

Permit Contact Person

Name: ARLENE J VOLZ
Title: DIRECTOR OF HR & ADMIN
Phone: (610) 429 - 1400 Ext.136

[Signature] _____
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER

SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General State Only Requirements

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

Section C. Site Level State Only Requirements

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

Section D. Source Level State Only Requirements

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

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

Section E. Alternative Operating Scenario(s)

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



SECTION A. Table of Contents

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

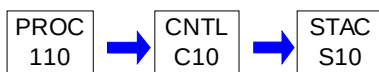
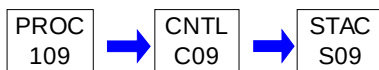
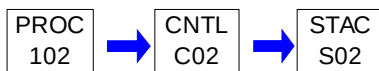
Section F. Emission Restriction Summary

Section G. Miscellaneous

SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	SPRAY BOOTH 1	23.330 Lbs/HR	COATING/SOLVENT
102	SPRAY BOOTH 2	23.330 Lbs/HR	COATING/SOLVENT
103	SPRAY BOOTH 3	23.330 Lbs/HR	COATING/SOLVENT
104	SPRAY BOOTH 4	23.330 Lbs/HR	COATING/SOLVENT
109	GLUE SPRAY BOOTH 1	40.720 Lbs/HR	ADHESIVE/SOLVENT
110	GLUE SPRAY BOOTH 2	40.720 Lbs/HR	ADHESIVE/SOLVENT
C01	SPRAY BOOTH 101-FILTERS		
C02	SPRAY BOOTH 102-FILTERS		
C03	SPRAY BOOTH 103-FILTERS		
C04	SPRAY BOOTH 104-FILTERS		
C05	SPRAY BOOTH 105-FILTERS		
C06	SPRAY BOOTH 106-FILTERS		
C07	GLUE SPRAY BOOTH 109-FILTERS		
C08	GLUE SPRAY BOOTH 110-FILTERS		
C09	GLUE SPRAY BOOTH 109-FILTERS		
C10	GLUE SPRAY BOOTH 110-FILTERS		
S01	SPRAY BOOTH 101		
S02	SPRAY BOOTH 102		
S03	SPRAY BOOTH 103		
S04	SPRAY BOOTH 104		
S09	GLUE SPRAY BOOTH 1		
S10	GLUE SPRAY BOOTH 2		

PERMIT MAPS



SECTION B. General State Only Requirements

#001 [25 Pa. Code § 121.1]

Definitions.

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

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

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

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

Permit Renewal.

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

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

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

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,

SECTION B. General State Only Requirements

modification, revision, renewal, and re-issuance of each operating permit or part thereof.

(b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).

(1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.

(2) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.

(c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund".

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

Transfer of Operating Permits.

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

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

Inspection and Entry.

(a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:

(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

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

Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes

SECTION B. General State Only Requirements

a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

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

Duty to Provide Information.

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

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

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

Operating Permit Modifications

- (a) The permittee is authorized to make administrative amendments, minor operating permit modifications and

SECTION B. General State Only Requirements

significant operating permit modifications, under this permit, as outlined below:

(b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

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

#012 [25 Pa. Code § 127.441]

Severability Clause.

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

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

(c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

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

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

(4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:

SECTION B. General State Only Requirements

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
 - (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
 - (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
 - (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

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

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)

SECTION B. General State Only Requirements

(6) Section 127.462 (relating to minor operating permit modifications)

(7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11]

Reactivation

(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].

(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]

Circumvention.

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

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

Reporting Requirements.

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

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

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

(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

(e) Any records, reports or information submitted to the Department shall be available to the public except for such

SECTION B. General State Only Requirements

records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

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

Sampling, Testing and Monitoring Procedures.

(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.

(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

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

Recordkeeping.

(a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

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

SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit facility-wide VOC emissions to less than 25 tons per year, based on a 12-month rolling sum.

[This condition streamlines the VOC emission limit of 25 Pa. Code § 129.91-95 for each Glue Spray Booths, Source IDs 109 and 110.]

002 **Elective Restriction**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.35 and 40 CFR § 63 Subpart RRRR - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture]

(a) The permittee shall limit Hazardous Air Pollutants (HAPs) emissions of this facility to less than the following:

- (1) 10 tons per year of each HAP on a 12-month rolling period at the facility, and
- (2) 25 tons per year of any combination of HAP on a rolling 12-month period at the facility.

(b) Exceedences of sub-condition (a) of this permit condition will result in the facility being subjected to 40 CFR § 63 Subpart RRRR: National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

003 [25 Pa. Code §121.7]

Prohibition of air pollution.

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

004 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee may not permit the emission into the outdoor atmosphere of a fugitive air contaminant from a source other than the following:

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Open burning operations.
- (g) Sources and classes of sources other than those identified in (a) -- (f) 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:
 - (1) The emissions are not minor significance with respect to causing air pollution.
 - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

005 [25 Pa. Code §123.2]

Fugitive particulate matter

No person may permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a) -- (g) if the emissions are visible at the point the emissions pass outside the person's property.

SECTION C. Site Level Requirements

006 [25 Pa. Code §123.31]

Limitations

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

007 [25 Pa. Code §123.41]

Limitations

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

- (a) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour.
- (b) Equal to or greater than 60% at any time.

008 [25 Pa. Code §123.42]

Exceptions

The emission limitations of 25 Pa. Code § 123.41 shall not apply when:

- (a) The presence of uncombined water is the only reason for failure of the emission to meet the limitations;
- (b) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions;
- (c) The emission results from sources specified in 25 Pa. Code § 123.1(a)(1)-(9).

009 [25 Pa. Code §129.14]

Open burning operations

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

- (a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under supervision of a public officer.
- (b) Any fire set for the purpose of instructing personnel in the fire fighting, when approved by the Department.
- (c) A fire set for the prevention or control of disease or pests, when approved by the Department.
- (d) A fire set solely for cooking food.
- (e) A fire set solely for recreational or ceremonial purposes.

II. TESTING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A or G of this Permit, may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Department reserves the right to require exhaust stack testing of any source(s) as necessary to verify emissions for

SECTION C. Site Level Requirements

purposes for including determining the correct emission fee, malfunctions, or determining compliance with any applicable requirements.

III. MONITORING REQUIREMENTS.**# 012 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

013 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (a) The permittee shall monitor the facility, once per operating day, for the following:
 - (1) Odors, which the Department may determine to be objectionable.
 - (2) Visible Emissions.
 - (3) Fugitive Particulate Matter.
- (b) All detectable fugitive particulate emissions, and/or objectionable odors, that originated on-site and cross the property line as well as visible emissions that originate on site shall:
 - (1) Be investigated.
 - (2) Be reported to the facility management, or individual(s) designated by the permittee.
 - (3) Be recorded in a permanent written log.
- (c) At the end of six months, upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next six month period.
- (d) At the end of the second six month period, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification and the semi-annual report of monitoring and record keeping, complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.**# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain monthly records of facility-wide VOC and HAPs emissions, including 12-month rolling sums.

015 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

- (a) Date, time, and location of the incident(s).
- (b) The cause of the event.
- (c) The corrective action taken, if necessary to abate the situation and prevent future occurrences.

016 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

SECTION C. Site Level Requirements

The permittee shall maintain records of the employee training program for all new and existing personnel involved in coating and cleaning operations. Records shall include the following:

- (a) A list of all personnel by name and job description that are required to be trained;
- (b) An outline of the subjects to be covered in the initial and refresher training for each person or group of personnel;
- (c) Lesson plans for courses to be given at the initial and the annual refresher training that include appropriate application techniques for appropriate management of cleanup waste;
- (d) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

V. REPORTING REQUIREMENTS.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 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 threshold quantity at a 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 40 CFR § 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 this 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 this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If this 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.

SECTION C. Site Level Requirements

(f) When this 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 the permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall report to the Department within 30 days, any exceedances of the facility-wide VOC or HAP emission limitations.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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

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

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

020 [25 Pa. Code §135.3]

Reporting

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

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

VI. WORK PRACTICE REQUIREMENTS.

021 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in 25 Pa. Code § 123.1(a) -- (g) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but are not limited to, the following:

(a) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads or the clearing of land.

(b) Application of asphalt, oil, or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(c) Paving and maintenance of roadways.

(d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee may not modify any air contaminant system identified in Sections A or G, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition #013(g), of Section B, of this permit.

SECTION C. Site Level Requirements

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall implement an employee training program for all new and existing personnel involved in coating and cleaning operations. This training shall address how to reduce VOC usage, the requirements of this operating permit, as well as the requirements of all applicable State and Federal regulations. The training program shall include the following:

- (a) A list of all personnel by name and job description that are required to be trained;
- (b) An outline of the subjects to be covered in the initial and refresher training for each person or group of personnel;
- (c) Lesson plans for courses to be given at the initial and the annual refresher training that include appropriate application techniques for appropriate management of cleanup waste;
- (d) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

025 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that all sources and air cleaning devices are operated and maintained in accordance with manufacturer's specifications and good engineering and air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

SECTION D. Source Level Requirements

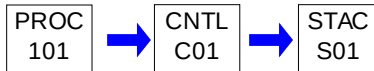
Source ID: 101

Source Name: SPRAY BOOTH 1

Source Capacity/Throughput:

23.330 Lbs/HR

COATING/SOLVENT



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

[Compliance with this regulation is met through the proper operation of the particulate matter filter system in each spray booth.]

002 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

(a) The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the metal furniture surface coating process, unless the VOC content of each as applied coating is equal or less than 3.34 pounds of VOC per gallon coating solids, pursuant to 25 Pa. Code § 129.52a(c)(1)(i) Table II, general, one component, baked coating.

[Compliance with this condition demonstrates compliance with streamlined condition 40 CFR § 60.312 of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

(b) The VOC content of the as applied coating, expressed in units of weight of VOC per volume of coating solids, shall be calculated as follows: $VOC = (Wo)(Dc)/Vn$; where:

VOC = VOC content in lb VOC/gal of coating solids
 Wo = Weight percent of VOC ($Wv - Ww - Wex$)
 Wv = Weight percent of total volatiles (100%-weight percent solids)
 Ww = Weight percent of water
 Wex = Weight percent of exempt solvent(s)
 Dc = Density of coating, lb/gal, at 25° C
 Vn = Volume percent of solids of the as applied coating.

[According to 25 Pa. Code § 129.52a(a)(2) and (b), the requirements of 25 Pa. Code § 129.52a supersede the requirements of 25 Pa. Code § 129.52 and the RACT permit issued to the permittee.]

003 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the application of metal furniture surface coatings, unless the coatings are applied using high volume-low pressure (HVL) spray coating application guns, according to 25 Pa. Code § 129.52a(f)(5).

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall perform sampling and testing for coatings in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 (relating to sampling and testing), according to 25 Pa. Code § 129.52a(c)(1)(iii).

SECTION D. Source Level Requirements

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the hours of operation for this source on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of inspections and maintenance performed on the dry filter associated with this source, including any deficiencies, and any corrective action taken.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-95]

(a) The permittee shall at all times maintain copies of manufacturer's formulation (or composition) data sheets and Material Safety Data Sheets (MSDS) for all finishing materials used at this source within the previous five (5) years.

(b) The data sheets shall contain all of the information needed to determine compliance with the applicable VOC requirements for this source.

[Compliance with this condition demonstrates compliance with streamlined conditions 40 CFR § 60.313(c)(1) and § 60.315(a)(2) and § 60.316 of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of VOC emissions when performing wood furniture surface coating applications.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of the hours of operation for this source.

010 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall at a minimum, maintain daily records of the following, according to 25 Pa. Code § 129.52a(d) and (e):

(a) The following parameters for each coating, thinner, component and cleaning solvent as supplied:

- (1) Name and identification number.
- (2) Volume used.
- (3) Mix ratio.
- (4) Density or specific gravity.
- (5) Weight percent of total volatiles, water, solids and exempt solvents.
- (6) Volume percent of solids for each general, one component coating used in the metal furniture surface coating process.

[Compliance with (a) above demonstrates compliance with streamlined condition 40 CFR § 60.315(d) of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture.]

(b) The VOC content of each coating, thinner, component and cleaning solvent as supplied.

(c) The VOC content of each as applied coating or cleaning solvent.

[Compliance with (b) and (c) above demonstrate compliance with streamlined condition 40 CFR § 60.315(a)(2) of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture.]

SECTION D. Source Level Requirements

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR 60 Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

(a) The permittee shall identify, record, and submit a written report to the Department every calendar quarter of each instance in which the volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids is greater than 0.90 kg of VOC per liter of coating solids applied (for metal furniture surface coating).

(b) If no such instances of (a) above have occurred during during a particular quarter, a report stating this shall be submitted to the Department semiannually.

[Conditions (a) and (b) above are in accordance with 40 CFR § 60.315(b) of 40 CFR 60 Subpart EE]

012 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall submit metal furniture surface coating records to the Department upon receipt of a written request, according to 25 Pa. Code § 129.52a(e)(2).

VI. WORK PRACTICE REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall control particulate matter emissions (overspray) from this spray booth by using dry filters.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall implement an inspection and maintenance program for the dry filter associated with this source, including a daily visual inspection of filters and spray booth filters.

015 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall comply with the following work practices for metal furniture surface coating related activities, according to 25 Pa. Code § 129.52a(h):

(a) Store all VOC-containing coatings, thinners and coating-related waste materials in closed containers.

(b) Ensure that mixing and storage containers used for VOC-containing coatings, thinners and coating-related waste materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC-containing coatings, thinners and coating-related waste materials and clean up spills immediately.

(d) Convey VOC-containing coatings, thinners and coating-related waste materials from one location to another in closed containers or pipes.

016 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee comply with the following work practices for cleaning materials, according to 25 Pa. Code § 129.52a(i):

(a) Store all VOC-containing cleaning materials and used shop towels in closed containers.

(b) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.

SECTION D. Source Level Requirements

(d) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.

(e) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.

VII. ADDITIONAL REQUIREMENTS.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

According to the definition found in 25 Pa. Code § 121.1: High volume-low pressure (HVLP) spray is the application of a coating by means of a gun which operates between 0.1 and 10.0 psig air pressure.

SECTION D. Source Level Requirements

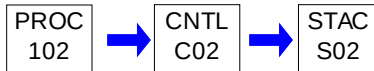
Source ID: 102

Source Name: SPRAY BOOTH 2

Source Capacity/Throughput:

23.330 Lbs/HR

COATING/SOLVENT



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

[Compliance with this regulation is met through the proper operation of the particulate matter filter system in each spray booth.]

002 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

(a) The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the metal furniture surface coating process, unless the VOC content of each as applied coating is equal or less than 3.34 pounds of VOC per gallon coating solids, pursuant to 25 Pa. Code § 129.52a(c)(1)(i) Table II, general, one component, baked coating.

[Compliance with this condition demonstrates compliance with streamlined condition 40 CFR § 60.312 of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

(b) The VOC content of the as applied coating, expressed in units of weight of VOC per volume of coating solids, shall be calculated as follows: $VOC = (Wo)(Dc)/Vn$; where:

VOC = VOC content in lb VOC/gal of coating solids
 Wo = Weight percent of VOC ($Wv - Ww - Wex$)
 Wv = Weight percent of total volatiles (100%-weight percent solids)
 Ww = Weight percent of water
 Wex = Weight percent of exempt solvent(s)
 Dc = Density of coating, lb/gal, at 25° C
 Vn = Volume percent of solids of the as applied coating.

[According to 25 Pa. Code § 129.52a(a)(2) and (b), the requirements of 25 Pa. Code § 129.52a supersede the requirements of 25 Pa. Code § 129.52 and the RACT permit issued to the permittee.]

003 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the application of metal furniture surface coatings, unless the coatings are applied using high volume-low pressure (HVLP) spray coating application guns, according to 25 Pa. Code § 129.52a(f)(5).

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall perform sampling and testing for coatings in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 (relating to sampling and testing), according to 25 Pa. Code § 129.52a(c)(1)(iii).

SECTION D. Source Level Requirements

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the hours of operation for this source on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of inspections and maintenance performed on the dry filter associated with this source, including any deficiencies, and any corrective action taken.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-95]

(a) The permittee shall at all times maintain copies of manufacturer's formulation (or composition) data sheets and Material Safety Data Sheets (MSDS) for all finishing materials used at this source within the previous five (5) years.

(b) The data sheets shall contain all of the information needed to determine compliance with the applicable VOC requirements for this source.

[Compliance with this condition demonstrates compliance with streamlined conditions 40 CFR § 60.313(c)(1) and § 60.315(a)(2) and § 60.316 of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of VOC emissions when performing wood furniture surface coating applications.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of the hours of operation for this source.

010 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall at a minimum, maintain daily records of the following, according to 25 Pa. Code § 129.52a(d) and (e):

(a) The following parameters for each coating, thinner, component and cleaning solvent as supplied:

- (1) Name and identification number.
- (2) Volume used.
- (3) Mix ratio.
- (4) Density or specific gravity.
- (5) Weight percent of total volatiles, water, solids and exempt solvents.
- (6) Volume percent of solids for each general, one component coating used in the metal furniture surface coating process.

[Compliance with (a) above demonstrates compliance with streamlined condition 40 CFR § 60.315(d) of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture.]

(b) The VOC content of each coating, thinner, component and cleaning solvent as supplied.

(c) The VOC content of each as applied coating or cleaning solvent.

[Compliance with (b) and (c) above demonstrate compliance with streamlined condition 40 CFR § 60.315(a)(2) of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture.]

SECTION D. Source Level Requirements

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR 60 Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

(a) The permittee shall identify, record, and submit a written report to the Department every calendar quarter of each instance in which the volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids is greater than 0.90 kg of VOC per liter of coating solids applied (for metal furniture surface coating).

(b) If no such instances of (a) above have occurred during during a particular quarter, a report stating this shall be submitted to the Department semiannually.

[Conditions (a) and (b) above are in accordance with 40 CFR § 60.315(b) of 40 CFR 60 Subpart EE]

012 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall submit metal furniture surface coating records to the Department upon receipt of a written request, according to 25 Pa. Code § 129.52a(e)(2).

VI. WORK PRACTICE REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall control particulate matter emissions (overspray) from this spray booth by using dry filters.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall implement an inspection and maintenance program for the dry filter associated with this source, including a daily visual inspection of filters and spray booth filters.

015 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall comply with the following work practices for metal furniture surface coating related activities, according to 25 Pa. Code § 129.52a(h):

(a) Store all VOC-containing coatings, thinners and coating-related waste materials in closed containers.

(b) Ensure that mixing and storage containers used for VOC-containing coatings, thinners and coating-related waste materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC-containing coatings, thinners and coating-related waste materials and clean up spills immediately.

(d) Convey VOC-containing coatings, thinners and coating-related waste materials from one location to another in closed containers or pipes.

016 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee comply with the following work practices for cleaning materials, according to 25 Pa. Code § 129.52a(i):

(a) Store all VOC-containing cleaning materials and used shop towels in closed containers.

(b) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.

SECTION D. Source Level Requirements

(d) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.

(e) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.

VII. ADDITIONAL REQUIREMENTS.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

According to the definition found in 25 Pa. Code § 121.1: High volume-low pressure (HVLP) spray is the application of a coating by means of a gun which operates between 0.1 and 10.0 psig air pressure.

SECTION D. Source Level Requirements

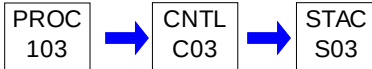
Source ID: 103

Source Name: SPRAY BOOTH 3

Source Capacity/Throughput:

23.330 Lbs/HR

COATING/SOLVENT



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

[Compliance with this regulation is met through the proper operation of the particulate matter filter system in each spray booth.]

002 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

(a) The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the metal furniture surface coating process, unless the VOC content of each as applied coating is equal or less than 3.34 pounds of VOC per gallon coating solids, pursuant to 25 Pa. Code § 129.52a(c)(1)(i) Table II, general, one component, baked coating.

[Compliance with this condition demonstrates compliance with streamlined condition 40 CFR § 60.312 of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

(b) The VOC content of the as applied coating, expressed in units of weight of VOC per volume of coating solids, shall be calculated as follows: $VOC = (Wo)(Dc)/Vn$; where:

VOC = VOC content in lb VOC/gal of coating solids
 Wo = Weight percent of VOC ($Wv - Ww - Wex$)
 Wv = Weight percent of total volatiles (100%-weight percent solids)
 Ww = Weight percent of water
 Wex = Weight percent of exempt solvent(s)
 Dc = Density of coating, lb/gal, at 25° C
 Vn = Volume percent of solids of the as applied coating.

[According to 25 Pa. Code § 129.52a(a)(2) and (b), the requirements of 25 Pa. Code § 129.52a supersede the requirements of 25 Pa. Code § 129.52 and the RACT permit issued to the permittee.]

003 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the application of metal furniture surface coatings, unless the coatings are applied using high volume-low pressure (HVLP) spray coating application guns, according to 25 Pa. Code § 129.52a(f)(5).

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall perform sampling and testing for coatings in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 (relating to sampling and testing), according to 25 Pa. Code § 129.52a(c)(1)(iii).

SECTION D. Source Level Requirements

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the hours of operation for this source on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of inspections and maintenance performed on the dry filter associated with this source, including any deficiencies, and any corrective action taken.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-95]

(a) The permittee shall at all times maintain copies of manufacturer's formulation (or composition) data sheets and Material Safety Data Sheets (MSDS) for all finishing materials used at this source within the previous five (5) years.

(b) The data sheets shall contain all of the information needed to determine compliance with the applicable VOC requirements for this source.

[Compliance with this condition demonstrates compliance with streamlined conditions 40 CFR § 60.313(c)(1) and § 60.315(a)(2) and § 60.316 of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of VOC emissions when performing wood furniture surface coating applications.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of the hours of operation for this source.

010 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall at a minimum, maintain daily records of the following, according to 25 Pa. Code § 129.52a(d) and (e):

(a) The following parameters for each coating, thinner, component and cleaning solvent as supplied:

- (1) Name and identification number.
- (2) Volume used.
- (3) Mix ratio.
- (4) Density or specific gravity.
- (5) Weight percent of total volatiles, water, solids and exempt solvents.
- (6) Volume percent of solids for each general, one component coating used in the metal furniture surface coating process.

[Compliance with (a) above demonstrates compliance with streamlined condition 40 CFR § 60.315(d) of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture.]

(b) The VOC content of each coating, thinner, component and cleaning solvent as supplied.

(c) The VOC content of each as applied coating or cleaning solvent.

[Compliance with (b) and (c) above demonstrate compliance with streamlined condition 40 CFR § 60.315(a)(2) of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture.]

SECTION D. Source Level Requirements

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR 60 Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

(a) The permittee shall identify, record, and submit a written report to the Department every calendar quarter of each instance in which the volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids is greater than 0.90 kg of VOC per liter of coating solids applied (for metal furniture surface coating).

(b) If no such instances of (a) above have occurred during during a particular quarter, a report stating this shall be submitted to the Department semiannually.

[Conditions (a) and (b) above are in accordance with 40 CFR § 60.315(b) of 40 CFR 60 Subpart EE]

012 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall submit metal furniture surface coating records to the Department upon receipt of a written request, according to 25 Pa. Code § 129.52a(e)(2).

VI. WORK PRACTICE REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall control particulate matter emissions (overspray) from this spray booth by using dry filters.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall implement an inspection and maintenance program for the dry filter associated with this source, including a daily visual inspection of filters and spray booth filters.

015 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall comply with the following work practices for metal furniture surface coating related activities, according to 25 Pa. Code § 129.52a(h):

(a) Store all VOC-containing coatings, thinners and coating-related waste materials in closed containers.

(b) Ensure that mixing and storage containers used for VOC-containing coatings, thinners and coating-related waste materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC-containing coatings, thinners and coating-related waste materials and clean up spills immediately.

(d) Convey VOC-containing coatings, thinners and coating-related waste materials from one location to another in closed containers or pipes.

016 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee comply with the following work practices for cleaning materials, according to 25 Pa. Code § 129.52a(i):

(a) Store all VOC-containing cleaning materials and used shop towels in closed containers.

(b) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.

SECTION D. Source Level Requirements

(d) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.

(e) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.

VII. ADDITIONAL REQUIREMENTS.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

According to the definition found in 25 Pa. Code § 121.1: High volume-low pressure (HVLP) spray is the application of a coating by means of a gun which operates between 0.1 and 10.0 psig air pressure.

SECTION D. Source Level Requirements

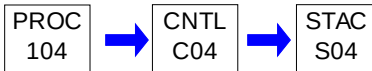
Source ID: 104

Source Name: SPRAY BOOTH 4

Source Capacity/Throughput:

23.330 Lbs/HR

COATING/SOLVENT

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

[Compliance with this regulation is met through the proper operation of the particulate matter filter system in each spray booth.]

002 [25 Pa. Code §129.52a]**Control of VOC emissions from large appliance and metal furniture surface coating processes.**

(a) The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the metal furniture surface coating process, unless the VOC content of each as applied coating is equal or less than 3.34 pounds of VOC per gallon coating solids, pursuant to 25 Pa. Code § 129.52a(c)(1)(i) Table II, general, one component, baked coating.

[Compliance with this condition demonstrates compliance with streamlined condition 40 CFR § 60.312 of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

(b) The VOC content of the as applied coating, expressed in units of weight of VOC per volume of coating solids, shall be calculated as follows: $VOC = (Wo)(Dc)/Vn$; where:

VOC = VOC content in lb VOC/gal of coating solids
 Wo = Weight percent of VOC ($Wv - Ww - Wex$)
 Wv = Weight percent of total volatiles (100%-weight percent solids)
 Ww = Weight percent of water
 Wex = Weight percent of exempt solvent(s)
 Dc = Density of coating, lb/gal, at 25° C
 Vn = Volume percent of solids of the as applied coating.

[According to 25 Pa. Code § 129.52a(a)(2) and (b), the requirements of 25 Pa. Code § 129.52a supersede the requirements of 25 Pa. Code § 129.52 and the RACT permit issued to the permittee.]

003 [25 Pa. Code §129.52a]**Control of VOC emissions from large appliance and metal furniture surface coating processes.**

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the application of metal furniture surface coatings, unless the coatings are applied using high volume-low pressure (HVLP) spray coating application guns, according to 25 Pa. Code § 129.52a(f)(5).

II. TESTING REQUIREMENTS.**# 004 [25 Pa. Code §129.52a]****Control of VOC emissions from large appliance and metal furniture surface coating processes.**

The permittee shall perform sampling and testing for coatings in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 (relating to sampling and testing), according to 25 Pa. Code § 129.52a(c)(1)(iii).

SECTION D. Source Level Requirements

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the hours of operation for this source on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of inspections and maintenance performed on the dry filter associated with this source, including any deficiencies, and any corrective action taken.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-95]

(a) The permittee shall at all times maintain copies of manufacturer's formulation (or composition) data sheets and Material Safety Data Sheets (MSDS) for all finishing materials used at this source within the previous five (5) years.

(b) The data sheets shall contain all of the information needed to determine compliance with the applicable VOC requirements for this source.

[Compliance with this condition demonstrates compliance with streamlined conditions 40 CFR § 60.313(c)(1) and § 60.315(a)(2) and § 60.316 of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of VOC emissions when performing wood furniture surface coating applications.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of the hours of operation for this source.

010 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall at a minimum, maintain daily records of the following, according to 25 Pa. Code § 129.52a(d) and (e):

(a) The following parameters for each coating, thinner, component and cleaning solvent as supplied:

- (1) Name and identification number.
- (2) Volume used.
- (3) Mix ratio.
- (4) Density or specific gravity.
- (5) Weight percent of total volatiles, water, solids and exempt solvents.
- (6) Volume percent of solids for each general, one component coating used in the metal furniture surface coating process.

[Compliance with (a) above demonstrates compliance with streamlined condition 40 CFR § 60.315(d) of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture.]

(b) The VOC content of each coating, thinner, component and cleaning solvent as supplied.

(c) The VOC content of each as applied coating or cleaning solvent.

[Compliance with (b) and (c) above demonstrate compliance with streamlined condition 40 CFR § 60.315(a)(2) of Subpart EE - Standards of Performance for Surface Coating of Metal Furniture.]

SECTION D. Source Level Requirements

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR 60 Subpart EE - Standards of Performance for Surface Coating of Metal Furniture]

(a) The permittee shall identify, record, and submit a written report to the Department every calendar quarter of each instance in which the volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids is greater than 0.90 kg of VOC per liter of coating solids applied (for metal furniture surface coating).

(b) If no such instances of (a) above have occurred during during a particular quarter, a report stating this shall be submitted to the Department semiannually.

[Conditions (a) and (b) above are in accordance with 40 CFR § 60.315(b) of 40 CFR 60 Subpart EE]

012 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall submit metal furniture surface coating records to the Department upon receipt of a written request, according to 25 Pa. Code § 129.52a(e)(2).

VI. WORK PRACTICE REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall control particulate matter emissions (overspray) from this spray booth by using dry filters.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall implement an inspection and maintenance program for the dry filter associated with this source, including a daily visual inspection of filters and spray booth filters.

015 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee shall comply with the following work practices for metal furniture surface coating related activities, according to 25 Pa. Code § 129.52a(h):

(a) Store all VOC-containing coatings, thinners and coating-related waste materials in closed containers.

(b) Ensure that mixing and storage containers used for VOC-containing coatings, thinners and coating-related waste materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC-containing coatings, thinners and coating-related waste materials and clean up spills immediately.

(d) Convey VOC-containing coatings, thinners and coating-related waste materials from one location to another in closed containers or pipes.

016 [25 Pa. Code §129.52a]

Control of VOC emissions from large appliance and metal furniture surface coating processes.

The permittee comply with the following work practices for cleaning materials, according to 25 Pa. Code § 129.52a(i):

(a) Store all VOC-containing cleaning materials and used shop towels in closed containers.

(b) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.

(c) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.

SECTION D. Source Level Requirements

(d) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.

(e) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.

VII. ADDITIONAL REQUIREMENTS.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

According to the definition found in 25 Pa. Code § 121.1: High volume-low pressure (HVLP) spray is the application of a coating by means of a gun which operates between 0.1 and 10.0 psig air pressure.

SECTION D. Source Level Requirements

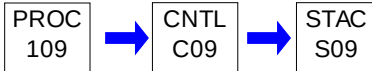
Source ID: 109

Source Name: GLUE SPRAY BOOTH 1

Source Capacity/Throughput:

40.720 Lbs/HR

ADHESIVE/SOLVENT



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

[Compliance with this regulation is met through the proper operation of the particulate matter filter system in each spray booth.]

002 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

The permittee may not use or apply at the facility an adhesive that exceeds 2.1 pounds of VOC per gallon, less water and exempt compounds, as applied, according to 25 Pa. Code § 129.77(b), Table V, for contact bond adhesives.

[Compliance with this condition demonstrates compliance with the VOC content limit for adhesives derived from RACT Operating Permit No. 15-0025, Condition No. 8, as required by 25 Pa. Code §§ 129.91 - 129.95.]

003 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

(a) The permittee shall not use cleanup solvent materials containing VOCs for the removal of adhesives from surfaces, other than from the parts of spray application equipment, unless the composite partial vapor pressure of the solvent is less than or equal to 45 mm mercury at 20°C, according to 25 Pa. Code § 129.77(c) and (e)(3).

(b) The permittee shall perform the removal of an adhesive from the parts of spray application equipment by using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material or 0.6 pound of VOC per gallon of material, according to 25 Pa. Code § 129.77(f)(2).

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

The permittee shall use the following testing procedures, as applicable:

(a) 25 Pa. Code § 129.77(r): Except as otherwise provided in this condition, the VOC and solids content of nonaerosol adhesives (including one-part moisture cure urethane adhesives and silicone adhesives), cleanup solvents shall be determined using one of the following:

(1) EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.

(2) SCAQMD Method 304, Determination of Volatile Organic Compounds (VOC) in Various Materials, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

(b) 25 Pa. Code § 129.77(s): The weight volatile matter content and weight solids content for one-part or multiple part reactive adhesives, except one-part moisture cure urethane adhesives and silicone adhesives, shall be determined using the EPA Reference Method, Determination of Weight Volatile Matter Content and Weight Solids Content of Reactive Adhesives, found at 40 CFR 63, Subpart PPPP, Appendix A, including updates and revisions.

SECTION D. Source Level Requirements

(c) 25 Pa. Code § 129.77(t): The identity and concentration of exempt organic compounds shall be determined using one of the following:

(1) ASTM D4457, Standard Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA including updates and revisions.

(2) SCAQMD Method 303, Determination of Exempt Compounds, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

(d) 25 Pa. Code § 129.77(v): To determine if a diluent is a reactive diluent, the percentage of the reactive organic compound that becomes an integral part of the finished material shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

(e) 25 Pa. Code § 129.77(w): The composite partial vapor pressure of organic compounds in cleaning materials shall be determined by the following procedure:

(1) Quantifying the amount of each compound in the blend using gas chromatographic analysis, using the following methods:

(i) ASTM E260, Standard Practice for Packed Column Gas Chromatography, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, for organic content, including updates and revisions.

(ii) ASTM D3792, Standard Test Method for Water Content of Coatings by Direct Injection Into a Gas Chromatograph, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, for water content, including updates and revisions.

(2) Calculating the composite partial vapor pressure using the equation as found in 25 Pa. Code § 129.77(w); where:

PP_c = VOC composite partial vapor pressure at 20°C, in mm mercury.

W_i = Weight of the "i"th VOC compound, in grams, as determined by ASTM E260.

W_w = Weight of water, in grams, as determined by ASTM D3792.

W_e = Weight of the "e"th exempt compound, in grams, as determined by ASTM E260.

MW_i = Molecular weight of the "i"th VOC compound, in grams per g-mole, as given in chemical reference literature.

MW_w = Molecular weight of water, in grams per g-mole (18 grams per g-mole).

MW_e = Molecular weight of the "e"th exempt compound, in grams per g-mole, as given in chemical reference literature.

VP_i = Vapor pressure of the "i"th VOC compound at 20°C, in mm mercury, as determined by subsection (x) of 25 Pa. Code § 129.77.

(f) 25 Pa. Code § 129.77(x): The vapor pressure of each single component compound shall be determined from one or more of the following:

(1) ASTM D2879, Standard Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, including updates and revisions.

(2) The most recent edition of one or more of the following sources:

(i) Vapour Pressures of Pure Substances, Boublik, Elsevier Scientific Publishing Company, New York.

(ii) Perry's Chemical Engineers' Handbook, Green and Perry, McGraw-Hill Book Company.

(iii) CRC Handbook of Chemistry and Physics, CRC Press.

(iv) Lange's Handbook of Chemistry, McGraw-Hill Book Company.

SECTION D. Source Level Requirements

(v) Additional sources approved by the SCAQMD or other California air districts.

(g) 25 Pa. Code § 129.77(aa): Another test method may be used to determine the VOC or solids content of a product if the request for approval of the test method meets the following requirements:

(1) The request is submitted to the Department in writing.

(2) The request demonstrates that the test method provides results that accurately determine the concentration of VOCs in the product or its emissions.

(3) The Department approves the request in writing.

(h) 25 Pa. Code § 129.77(bb): For adhesive products that do not contain reactive diluents, grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation:

Grams of VOC per liter of product, as applied = $(W_s - W_w - W_e)/(V_m - V_w - V_e)$; where:

W_s = weight of volatile compounds, in grams.

W_w = weight of water, in grams.

W_e = weight of exempt compounds, in grams.

V_m = volume of material, in liters.

V_w = volume of water, in liters.

V_e = volume of exempt compounds, in liters.

(i) 25 Pa. Code § 129.77(cc): For adhesive products that contain reactive diluents, the VOC content of the product is determined after curing. The grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation:

Grams of VOC per liter of product, as applied = $(W_{rs} - W_{rw} - W_{re})/(V_{rm} - V_{rw} - V_{re})$; where:

W_{rs} = weight of volatile compounds not consumed during curing, in grams.

W_{rw} = weight of water not consumed during curing, in grams.

W_{re} = weight of exempt compounds not consumed during curing, in grams.

V_{rm} = volume of material not consumed during curing, in liters.

V_{rw} = volume of water not consumed during curing, in liters.

V_{re} = volume of exempt compounds not consumed during curing, in liters.

(j) 25 Pa. Code § 129.77(dd): For low-solids adhesive products, grams of VOC per liter of product thinned to the manufacturer's recommendation, including the volume of water and exempt compounds, shall be calculated according to the following equation:

Grams of VOC per liter of product, as applied = $(W_s - W_w - W_e)/V_m$; where:

W_s = weight of volatile compounds, in grams.

W_w = weight of water, in grams.

W_e = weight of exempt compounds, in grams.

V_m = volume of material, in liters.

(k) 25 Pa. Code § 129.77(ee): Percent VOC by weight shall be calculated according to the following equation: % VOC by weight = $[(W_v/W)] \times 100$, where: W_v = weight of VOCs, in grams and W = weight of material, in grams.

(l) 25 Pa. Code § 129.77(ff): To convert from grams per liter (g/l) to pounds per gallon (lb/gal), multiply the result (VOC content) by 8.345×10^{-3} (lb/gal/g/l).

SECTION D. Source Level Requirements

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the hours of operation for this source on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of the hours of operation for this source.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of inspections and maintenance performed on the dry filter associated with this source, including any deficiencies, and any corrective action taken.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-95]

(a) The permittee shall at all times maintain copies of manufacturer's formulation (or composition) data sheets and Material Safety Data Sheets (MSDS) for all finishing materials used at this source within the previous five (5) years.

(b) The data sheets shall contain all of the information needed to determine compliance with the applicable VOC requirements for this source, including weight percent solids of adhesives as applied.

009 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

The permittee shall maintain records demonstrating compliance with 25 Pa. Code § 129.77, including the following information, according to 25 Pa. Code § 129.77(o):

(a) A list of each adhesive and cleanup solvent product in use and in storage.

(b) A data sheet or material list which provides the product name, manufacturer identification and use or material application for each adhesive and cleanup solvent.

(c) The VOC content of each adhesive and cleanup solvent, as supplied.

(d) Catalysts, reducers or other components used and the mix ratio, as applicable.

(e) The VOC content or vapor pressure of each adhesive and cleanup solvent, as applied, if solvent or other VOC is added to the product before application.

(f) The volume purchased or produced of each adhesive and cleanup solvent.

(g) The monthly volume used or applied as part of the manufacturing process at the facility of each adhesive and cleanup solvent.

010 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

(a) The permittee shall maintain records to demonstrate compliance with 25 Pa. Code § 129.77 onsite for 5 years from the date the record is created, according to 25 Pa. Code § 129.77(q).

(b) The permittee shall make available to the Department the records used to demonstrate compliance with 25 Pa. Code § 129.77 upon receipt of a written request.

SECTION D. Source Level Requirements**V. REPORTING REQUIREMENTS.**

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

VI. WORK PRACTICE REQUIREMENTS.**# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall control particulate matter emissions (overspray) from this spray booth by using dry filters.

012 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-95]

(a) The permittee shall ensure that all adhesives used at this source shall contain no less than 30% solids.

(b) The permittee shall ensure that all spray guns at the Glue Spray Booths shall be of the HVLP type.

013 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall implement an inspection and maintenance program for the dry filter associated with this source, including a daily visual inspection of filters and spray booth filters.

014 [25 Pa. Code §129.77.]**Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall store or dispose of all absorbent materials, including cloth or paper, which are moistened with adhesives or cleanup solvents, in nonabsorbent containers at the facility that are kept closed except when placing materials in or removing materials from the container, according to 25 Pa. Code § 129.77(h).

015 [25 Pa. Code §129.77.]**Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall not add solvent to the adhesive in an amount in excess of the manufacturer's recommendation for application, if this addition causes the adhesive to exceed the applicable VOC content limit, unless the emissions are controlled through the use of add-on air pollution control equipment, according to 25 Pa. Code § 129.77(j).

VII. ADDITIONAL REQUIREMENTS.**# 016 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

According to the definition found in 25 Pa. Code § 121.1: High volume-low pressure (HVLP) spray is the application of a coating by means of a gun which operates between 0.1 and 10.0 psig air pressure.

SECTION D. Source Level Requirements

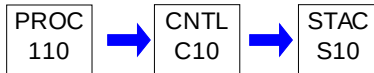
Source ID: 110

Source Name: GLUE SPRAY BOOTH 2

Source Capacity/Throughput:

40.720 Lbs/HR

ADHESIVE/SOLVENT



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

[Compliance with this regulation is met through the proper operation of the particulate matter filter system in each spray booth.]

002 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

The permittee may not use or apply at the facility an adhesive that exceeds 2.1 pounds of VOC per gallon, less water and exempt compounds, as applied, according to 25 Pa. Code § 129.77(b), Table V, for contact bond adhesives.

[Compliance with this condition demonstrates compliance with the VOC content limit for adhesives derived from RACT Operating Permit No. 15-0025, Condition No. 8, as required by 25 Pa. Code §§ 129.91 - 129.95.]

003 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

(a) The permittee shall not use cleanup solvent materials containing VOCs for the removal of adhesives from surfaces, other than from the parts of spray application equipment, unless the composite partial vapor pressure of the solvent is less than or equal to 45 mm mercury at 20°C, according to 25 Pa. Code § 129.77(c) and (e)(3).

(b) The permittee shall perform the removal of an adhesive from the parts of spray application equipment by using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material or 0.6 pound of VOC per gallon of material, according to 25 Pa. Code § 129.77(f)(2).

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

The permittee shall use the following testing procedures, as applicable:

(a) 25 Pa. Code § 129.77(r): Except as otherwise provided in this condition, the VOC and solids content of nonaerosol adhesives (including one-part moisture cure urethane adhesives and silicone adhesives), cleanup solvents shall be determined using one of the following:

(1) EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.

(2) SCAQMD Method 304, Determination of Volatile Organic Compounds (VOC) in Various Materials, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

(b) 25 Pa. Code § 129.77(s): The weight volatile matter content and weight solids content for one-part or multiple part reactive adhesives, except one-part moisture cure urethane adhesives and silicone adhesives, shall be determined using the EPA Reference Method, Determination of Weight Volatile Matter Content and Weight Solids Content of Reactive Adhesives, found at 40 CFR 63, Subpart PPPP, Appendix A, including updates and revisions.

SECTION D. Source Level Requirements

(c) 25 Pa. Code § 129.77(t): The identity and concentration of exempt organic compounds shall be determined using one of the following:

(1) ASTM D4457, Standard Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA including updates and revisions.

(2) SCAQMD Method 303, Determination of Exempt Compounds, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

(d) 25 Pa. Code § 129.77(v): To determine if a diluent is a reactive diluent, the percentage of the reactive organic compound that becomes an integral part of the finished material shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

(e) 25 Pa. Code § 129.77(w): The composite partial vapor pressure of organic compounds in cleaning materials shall be determined by the following procedure:

(1) Quantifying the amount of each compound in the blend using gas chromatographic analysis, using the following methods:

(i) ASTM E260, Standard Practice for Packed Column Gas Chromatography, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, for organic content, including updates and revisions.

(ii) ASTM D3792, Standard Test Method for Water Content of Coatings by Direct Injection Into a Gas Chromatograph, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, for water content, including updates and revisions.

(2) Calculating the composite partial vapor pressure using the equation as found in 25 Pa. Code § 129.77(w); where:

PPc = VOC composite partial vapor pressure at 20°C, in mm mercury.

Wi = Weight of the "i"th VOC compound, in grams, as determined by ASTM E260.

Ww = Weight of water, in grams, as determined by ASTM D3792.

We = Weight of the "e"th exempt compound, in grams, as determined by ASTM E260.

MWi = Molecular weight of the "i"th VOC compound, in grams per g-mole, as given in chemical reference literature.

MWw = Molecular weight of water, in grams per g-mole (18 grams per g-mole).

MWe = Molecular weight of the "e"th exempt compound, in grams per g-mole, as given in chemical reference literature.

VPi = Vapor pressure of the "i"th VOC compound at 20°C, in mm mercury, as determined by subsection (x) of 25 Pa. Code § 129.77.

(f) 25 Pa. Code § 129.77(x): The vapor pressure of each single component compound shall be determined from one or more of the following:

(1) ASTM D2879, Standard Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, including updates and revisions.

(2) The most recent edition of one or more of the following sources:

(i) Vapour Pressures of Pure Substances, Boublik, Elsevier Scientific Publishing Company, New York.

(ii) Perry's Chemical Engineers' Handbook, Green and Perry, McGraw-Hill Book Company.

(iii) CRC Handbook of Chemistry and Physics, CRC Press.

(iv) Lange's Handbook of Chemistry, McGraw-Hill Book Company.

SECTION D. Source Level Requirements

(v) Additional sources approved by the SCAQMD or other California air districts.

(g) 25 Pa. Code § 129.77(aa): Another test method may be used to determine the VOC or solids content of a product if the request for approval of the test method meets the following requirements:

(1) The request is submitted to the Department in writing.

(2) The request demonstrates that the test method provides results that accurately determine the concentration of VOCs in the product or its emissions.

(3) The Department approves the request in writing.

(h) 25 Pa. Code § 129.77(bb): For adhesive products that do not contain reactive diluents, grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation:

Grams of VOC per liter of product, as applied = $(W_s - W_w - W_e)/(V_m - V_w - V_e)$; where:

W_s = weight of volatile compounds, in grams.

W_w = weight of water, in grams.

W_e = weight of exempt compounds, in grams.

V_m = volume of material, in liters.

V_w = volume of water, in liters.

V_e = volume of exempt compounds, in liters.

(i) 25 Pa. Code § 129.77(cc): For adhesive products that contain reactive diluents, the VOC content of the product is determined after curing. The grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation:

Grams of VOC per liter of product, as applied = $(W_{rs} - W_{rw} - W_{re})/(V_{rm} - V_{rw} - V_{re})$; where:

W_{rs} = weight of volatile compounds not consumed during curing, in grams.

W_{rw} = weight of water not consumed during curing, in grams.

W_{re} = weight of exempt compounds not consumed during curing, in grams.

V_{rm} = volume of material not consumed during curing, in liters.

V_{rw} = volume of water not consumed during curing, in liters.

V_{re} = volume of exempt compounds not consumed during curing, in liters.

(j) 25 Pa. Code § 129.77(dd): For low-solids adhesive products, grams of VOC per liter of product thinned to the manufacturer's recommendation, including the volume of water and exempt compounds, shall be calculated according to the following equation:

Grams of VOC per liter of product, as applied = $(W_s - W_w - W_e)/V_m$; where:

W_s = weight of volatile compounds, in grams.

W_w = weight of water, in grams.

W_e = weight of exempt compounds, in grams.

V_m = volume of material, in liters.

(k) 25 Pa. Code § 129.77(ee): Percent VOC by weight shall be calculated according to the following equation: % VOC by weight = $[(W_v/W)] \times 100$, where: W_v = weight of VOCs, in grams and W = weight of material, in grams.

(l) 25 Pa. Code § 129.77(ff): To convert from grams per liter (g/l) to pounds per gallon (lb/gal), multiply the result (VOC content) by 8.345×10^{-3} (lb/gal/g/l).

SECTION D. Source Level Requirements

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the hours of operation for this source on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of the hours of operation for this source.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of inspections and maintenance performed on the dry filter associated with this source, including any deficiencies, and any corrective action taken.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-95]

(a) The permittee shall at all times maintain copies of manufacturer's formulation (or composition) data sheets and Material Safety Data Sheets (MSDS) for all finishing materials used at this source within the previous five (5) years.

(b) The data sheets shall contain all of the information needed to determine compliance with the applicable VOC requirements for this source, including weight percent solids of adhesives as applied.

009 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

The permittee shall maintain records demonstrating compliance with 25 Pa. Code § 129.77, including the following information, according to 25 Pa. Code § 129.77(o):

(a) A list of each adhesive and cleanup solvent product in use and in storage.

(b) A data sheet or material list which provides the product name, manufacturer identification and use or material application for each adhesive and cleanup solvent.

(c) The VOC content of each adhesive and cleanup solvent, as supplied.

(d) Catalysts, reducers or other components used and the mix ratio, as applicable.

(e) The VOC content or vapor pressure of each adhesive and cleanup solvent, as applied, if solvent or other VOC is added to the product before application.

(f) The volume purchased or produced of each adhesive and cleanup solvent.

(g) The monthly volume used or applied as part of the manufacturing process at the facility of each adhesive and cleanup solvent.

010 [25 Pa. Code §129.77.]

Control of emissions from the use or application of adhesives, sealants, primers and solvents.

(a) The permittee shall maintain records to demonstrate compliance with 25 Pa. Code § 129.77 onsite for 5 years from the date the record is created, according to 25 Pa. Code § 129.77(q).

(b) The permittee shall make available to the Department the records used to demonstrate compliance with 25 Pa. Code § 129.77 upon receipt of a written request.

SECTION D. Source Level Requirements**V. REPORTING REQUIREMENTS.**

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

VI. WORK PRACTICE REQUIREMENTS.**# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall control particulate matter emissions (overspray) from this spray booth by using dry filters.

012 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91-95]

(a) The permittee shall ensure that all adhesives used at this source shall contain no less than 30% solids.

(b) The permittee shall ensure that all spray guns at the Glue Spray Booths shall be of the HVLP type.

013 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall implement an inspection and maintenance program for the dry filter associated with this source, including a daily visual inspection of filters and spray booth filters.

014 [25 Pa. Code §129.77.]**Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall store or dispose of all absorbent materials, including cloth or paper, which are moistened with adhesives or cleanup solvents, in nonabsorbent containers at the facility that are kept closed except when placing materials in or removing materials from the container, according to 25 Pa. Code § 129.77(h).

015 [25 Pa. Code §129.77.]**Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall not add solvent to the adhesive in an amount in excess of the manufacturer's recommendation for application, if this addition causes the adhesive to exceed the applicable VOC content limit, unless the emissions are controlled through the use of add-on air pollution control equipment, according to 25 Pa. Code § 129.77(j).

VII. ADDITIONAL REQUIREMENTS.**# 016 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

According to the definition found in 25 Pa. Code § 121.1: High volume-low pressure (HVLP) spray is the application of a coating by means of a gun which operates between 0.1 and 10.0 psig air pressure.



SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

SECTION F. Emission Restriction Summary.

Source Id	Source Description								
101	SPRAY BOOTH 1								
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr/DRY FT3</td><td>PM10</td></tr> <tr> <td>3.340 Lbs/Gal</td><td>lb VOC/gal coating solids (coatings) VOC</td></tr> </table>		Emission Limit	Pollutant	0.040 gr/DRY FT3	PM10	3.340 Lbs/Gal	lb VOC/gal coating solids (coatings) VOC		
Emission Limit	Pollutant								
0.040 gr/DRY FT3	PM10								
3.340 Lbs/Gal	lb VOC/gal coating solids (coatings) VOC								
102	SPRAY BOOTH 2								
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr/DRY FT3</td><td>PM10</td></tr> <tr> <td>3.340 Lbs/Gal</td><td>lb VOC/gal coating solids (coatings) VOC</td></tr> </table>		Emission Limit	Pollutant	0.040 gr/DRY FT3	PM10	3.340 Lbs/Gal	lb VOC/gal coating solids (coatings) VOC		
Emission Limit	Pollutant								
0.040 gr/DRY FT3	PM10								
3.340 Lbs/Gal	lb VOC/gal coating solids (coatings) VOC								
103	SPRAY BOOTH 3								
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr/DRY FT3</td><td>PM10</td></tr> <tr> <td>3.340 Lbs/Gal</td><td>lb VOC/gal coating solids (coatings) VOC</td></tr> </table>		Emission Limit	Pollutant	0.040 gr/DRY FT3	PM10	3.340 Lbs/Gal	lb VOC/gal coating solids (coatings) VOC		
Emission Limit	Pollutant								
0.040 gr/DRY FT3	PM10								
3.340 Lbs/Gal	lb VOC/gal coating solids (coatings) VOC								
104	SPRAY BOOTH 4								
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr/DRY FT3</td><td>PM10</td></tr> <tr> <td>3.340 Lbs/Gal</td><td>lb VOC/gal coating solids (coatings) VOC</td></tr> </table>		Emission Limit	Pollutant	0.040 gr/DRY FT3	PM10	3.340 Lbs/Gal	lb VOC/gal coating solids (coatings) VOC		
Emission Limit	Pollutant								
0.040 gr/DRY FT3	PM10								
3.340 Lbs/Gal	lb VOC/gal coating solids (coatings) VOC								
109	GLUE SPRAY BOOTH 1								
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr/DRY FT3</td><td>PM10</td></tr> <tr> <td>0.600 Lbs/Gal</td><td>cleanup solvent VOC</td></tr> <tr> <td>2.100 Lbs/Gal</td><td>less water and exempt compounds (adhesives, as applied) VOC</td></tr> </table>		Emission Limit	Pollutant	0.040 gr/DRY FT3	PM10	0.600 Lbs/Gal	cleanup solvent VOC	2.100 Lbs/Gal	less water and exempt compounds (adhesives, as applied) VOC
Emission Limit	Pollutant								
0.040 gr/DRY FT3	PM10								
0.600 Lbs/Gal	cleanup solvent VOC								
2.100 Lbs/Gal	less water and exempt compounds (adhesives, as applied) VOC								
110	GLUE SPRAY BOOTH 2								
<table> <tr> <th>Emission Limit</th><th>Pollutant</th></tr> <tr> <td>0.040 gr/DRY FT3</td><td>PM10</td></tr> <tr> <td>0.600 Lbs/Gal</td><td>cleanup solvent VOC</td></tr> <tr> <td>2.100 Lbs/Gal</td><td>less water and exempt compounds (adhesives, as applied) VOC</td></tr> </table>		Emission Limit	Pollutant	0.040 gr/DRY FT3	PM10	0.600 Lbs/Gal	cleanup solvent VOC	2.100 Lbs/Gal	less water and exempt compounds (adhesives, as applied) VOC
Emission Limit	Pollutant								
0.040 gr/DRY FT3	PM10								
0.600 Lbs/Gal	cleanup solvent VOC								
2.100 Lbs/Gal	less water and exempt compounds (adhesives, as applied) VOC								

Site Emission Restriction Summary

Emission Limit	Pollutant
24.900 Tons/Yr	Combination of HAPs Hazardous Air Pollutants
9.900 Tons/Yr	Individual HAP Hazardous Air Pollutants
24.900 Tons/Yr	VOC



SECTION F. Emission Restriction Summary.

SECTION G. Miscellaneous.

(a) Certain terms and conditions of this State Only Permit have been derived from the previously issued RACT Operating Permit OP-46-0024.

(b) This State Only Operating Permit replaces the previously issued Title V Permit TVOP-15-00025 AUTH ID 355353.

(c) The Department has determined that the emissions from the following activities, excluding those indicated as site level requirements, in Section C, of this permit, do not require additional limitations, monitoring, or recordkeeping:

(1) Source ID 011 Non-Process Heating (gas fired) Units: one (1) at 0.62 MMBtu/hr; two (2) at 0.82 MMBtu/hr; two (2) at 1.09 MMBtu/hr; ten (10) at 1.60 MMBtu/hr and two (2) at 2.40 MMBtu/hr using natural gas from FML001.

(2) Source ID 075 Make-up Air: one (1) Titan TA-227 NG NRH at 3.33 MMBtu/hr and one (1) New York Boiler M# P55-70 at 4.235 MMBtu/hr using natural gas from FML001.

(3) Source ID 090 Power Wash: maximum capacity is 8.139 MMBtu/hr using natural gas from FML001.

(4) The activities associated with welding, grinding, shearing, cutting, bending, drilling, and molding of metal sheets and bars.

(5) Source ID 107 Dry Off Oven: maximum capacity approximately 1.6 MMBtu/hr using natural gas from FML001.

(6) Source ID 108 Baking Oven: maximum capacity approximately 2.1 MMBtu/hr using natural gas from FML001.

(7) Natural gas fired burn-off oven rated at 0.5 MMBtu/hr RFD No. 15-A01-1131.

(d) Sources 107 and 108 in (c)(5) and (c)(6) above shall be maintained and operated in accordance with manufacturers specifications and good air pollution control practices, according to 25 Pa. Code § 129.93(c).

(e) The mapping diagrams and the source capacities listed in Section A and D of this operating permit are for information purposes only; they do not represent permit limits or restrictions unless explicitly stated under item I - Restrictions - of Section D - Source Level Requirements.

(f) The facility has requested de minimis increases on November 17, 2003 for the addition of minimal wood surface coating operations to be performed at spray booths Source IDs 101 - 106. VOC increases 0.44 tons per year, and PM increases 0.01 tons per year for the facility.

(g) This permit has been amended (Administrative Amendment Application received 11/15/2005) to address the change of ownership from the previous owner Kimball International Marketing, Inc dba Transwall (APS 346547; AUTH 374119) to the current owner Transwall Office Systems, Inc. (APS 568619; AUTH 612823).

(h) This permit is the State Only Renewal Permit (APS 568619; AUTH 712203). There are no changes at the facility. Updates to the permit are as follows.

(1) Insignificant activity (e)(7) above has been added to this Section G (natural gas fired burn-off oven).

(2) The compliance milestone has been met and has been removed from Section C of this permit. The facility has submitted reports demonstrating that Transwall will remain an area source for HAPs in order to escape the requirements of 40 CFR 63 Subpart RRRR - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.

(3) The reporting requirements for a Risk Management Plan have been added to Section C of this permit.

(4) For each spray booth (101-106) and glue spray booth (109-110), the surface coating monitoring requirement under citation 25 Pa. Code § 129.52 has been removed. The surface coating recordkeeping requirement under citation 25 Pa. Code § 129.52 remains for each spray booth and glue spray booth as previously issued.

(i) This permit is the State Only Renewal Permit (APS 568619; AUTH 981651). There are no new sources at the facility. Updates to the permit are as follows:

(1) Source ID 101 – 104: The surface coating requirements of 25 Pa. Code § 129.52a supersede the requirements of 25 Pa. Code § 129.52; the VOC content of paint applied to surfaces is revised from 5.06 lb VOC/gal coating solids (Item No. 7 of Table 1 of

SECTION G. Miscellaneous.

25 Pa. Code § 129.52) to 3.34 lb VOC/gal coating solids (for baked, general, one component coatings of Table II of 25 Pa. Code § 129.52a).

(2) Source ID 105 and 106: Two (2) manual paint spray booths, Source ID 105 and 106, were last operated in 2005 (according to AIMS reporting). The sources are completely dismantled and decommissioned. Transwall plans to permanently remove the booths when a new powder coating operation is installed in its place (RFD No. 3928).

(3) Source ID 109 – 110: The requirements of 25 Pa. Code § 129.77 supersede the requirements of 25 Pa. Code § 129.91 – 129.95; VOC content of adhesives applied is revised from 4.3 lb VOC/gal adhesive to 2.1 lb VOC/gallon, less water and exempt compounds (Table V for contact bond). Incorrect references to 25 Pa. Code § 129.52, including the VOC content limit of adhesives applied as 5.06 pounds of VOC per gallon of solids, have been removed from glue spray booth sources. The weight percent of solids limit (30% or more) derived from RACT Operating Permit No. 15-0025, Condition No. 8 remains applicable to adhesives applied according to 25 Pa. Code § 129.91 – 129.95; the specific solids information has been added to the MSDS recordkeeping condition (as derived from RACT Condition No. 14(c)(4th bullet)).

(4) Dry panel filters (Control Device C01 – C10) have been added to the Site Inventory and the source maps as control devices associated with all paint spray booths (Source ID 101 – 104) and glue spray booths (Source ID 109 and 110).



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