



**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM**

**STATE ONLY SYNTHETIC MINOR OPERATING PERMIT**

Issue Date: March 24, 2022

Effective Date: March 24, 2022

Expiration Date: March 23, 2027

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: 09-00022**

Synthetic Minor

Federal Tax Id - Plant Code: 34-0934564-1

**Owner Information**

Name: CLEVELAND STEEL CONTAINER CORP

Mailing Address: 350 E MILL ST  
QUAKERTOWN, PA 18951-1325

**Plant Information**

Plant: CLEVELAND STEEL CONTAINER/QUAKERTOWN

Location: 09 Bucks County 09811 Quakertown Borough

SIC Code: 3411 Manufacturing - Metal Cans

**Responsible Official**

Name: JOE KELLY

Title: GENERAL MGR

Phone: (215) 536 - 4492 Ext.12

Email: jkelly@cscpails.com

**Permit Contact Person**

Name: JOE KELLY

Title: GENERAL MGR

Phone: (215) 536 - 4492 Ext.12

Email: jkelly@cscpails.com

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

JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER



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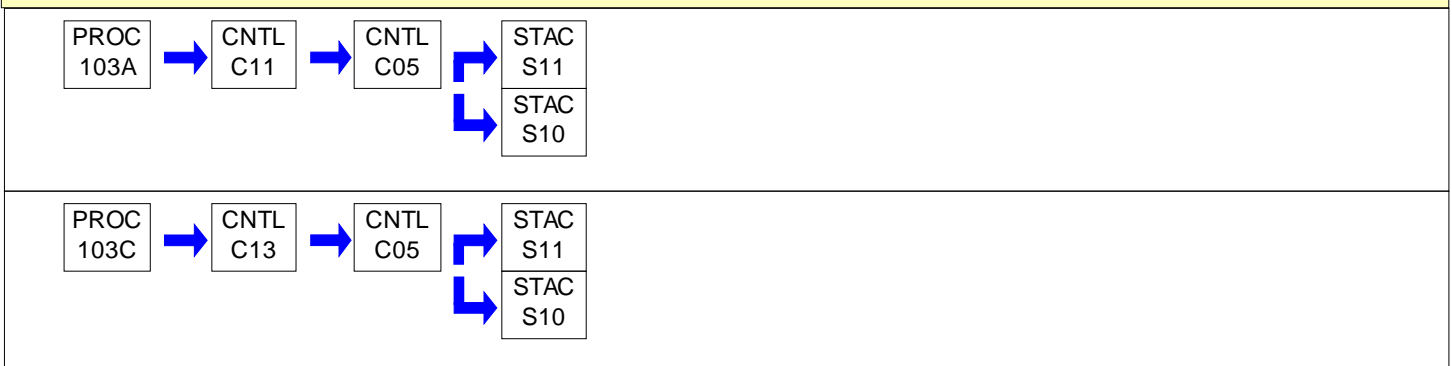
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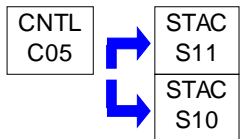
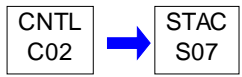
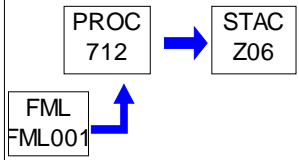
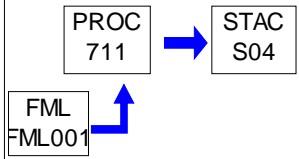
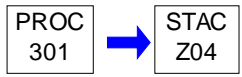
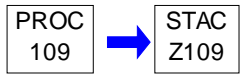
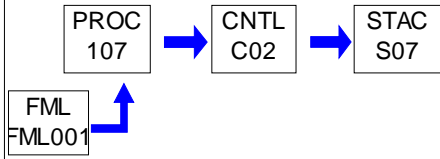
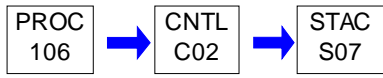
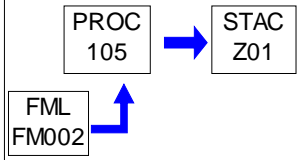
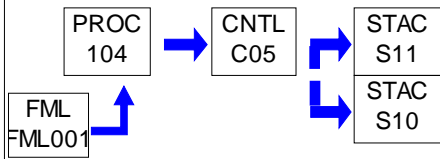
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
103A	PAIL LINE PAINT BOOTH	200.000 Lbs/HR	SOLVENT/COATING
103C	PAIL LINE BOTTOM SPRAY BOOTH	0.600 Lbs/HR	SOLVENT/COATING
104	PAIL LINE OVEN	6.300 Lbs/HR	SOLVENT/COATING
		6.670 MCF/HR	Natural Gas
105	PAIL LINE-METAL FORMING	285.700 CF/HR	Propane
106	ROLLER COATER W/ SMELL HOOD	4.990 Lbs/HR	SOLVENT/COATING
107	ROLLER COATER LINE OVEN	0.560 Lbs/HR	SOLVENT/COATING
		2.381 MCF/HR	Natural Gas
109	ADHESIVES	N/A	ADHESIVES
110	HOE LITHOGRAPHIC PRESS W COATER		
301	MAINTENANCE PARTS WASHER	0.130 Lbs/HR	SOLVENT
711	COMFORT HEATERS	1.887 MCF/HR	Natural Gas
712	MAKE-UP AIR UNITS	3.050 MCF/HR	Natural Gas
C02	ROLLER COATER PILLAR SYSTEM, INCINERATOR	3.600 MCF/HR	
C05	REGENERATIVE THERMAL OXIDIZER	2.476 MCF/HR	Natural Gas
C11	PAIL LINE PAINT BOOTH FILTERS		
C12	PAIL LINE FLANGE BOOTH FILTERS		
C13	PAIL LINE-BOTTOM SPRAY FILTERS		
FM002	PAIL LINE-PROPANE TANKS		
FML001	NATURAL GAS PIPELINE		
S04	COMFORT HEAT STACKS		
S07	ROLLER COATER STACK		
S10	TELLKAMP OXIDIZER STACK		
S11	TELLKAMP OXIDIZER SAFETY STACK		
Z01	PROCESS 105 FUGITIVE		
Z04	PROCESS 301 FUGITIVE		
Z06	MAKE-UP AIR FUGITIVE		
Z109	FUGITIVES		

**PERMIT MAPS**



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)]****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 as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.

(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 the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.

(1) For a synthetic minor facility, a fee equal to:

(i) Four thousand dollars (\$4,000) for calendar years 2021—2025.

(ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.

(iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.

**SECTION B. General State Only Requirements**

(2) For a facility that is not a synthetic minor, a fee equal to:

- (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
- (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
- (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.

(b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

**#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]****Transfer of Operating Permits.**

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

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

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

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

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

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

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

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

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

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

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

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

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:

**SECTION B. General State Only Requirements**

- (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, 127.465 & 127.703]****Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:



**SECTION B. General State Only Requirements**

(b) Administrative Amendments. The permittee shall submit the application for 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 submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.

(e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

**#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<sub>x</sub> from a single source during the term of the permit and 5 tons of NO<sub>x</sub> 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 PM<sub>10</sub> from a single source during the term of the permit and 3.0 tons of PM<sub>10</sub> 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 B. General State Only Requirements****#023 [25 Pa. Code §135.3]****Reporting**

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

**#024 [25 Pa. Code §135.4]****Report Format**

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

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

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

**# 002 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

(a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations, as specified in 25 Pa. Code § 129.14.
- (7) N/A
- (8) N/A

(9) Sources and classes of sources other than those identified in (1)-(8) above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

- (i) The emissions are of minor significance with respect to causing air pollution; and
- (ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

**# 003 [25 Pa. Code §123.2]****Fugitive particulate matter**

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

**# 004 [25 Pa. Code §123.31]****Limitations**

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

**# 005 [25 Pa. Code §123.41]****Limitations**

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

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

**# 006 [25 Pa. Code §123.42]****Exceptions**

The limitations of 25 Pa. Code § 123.41 (relating to opacity limitations) shall not apply to a visible emission in any of the following instances:

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

**SECTION C. Site Level Requirements**

emissions).

**# 007 [25 Pa. Code §129.14]****Open burning operations**

No person may permit the open burning of material in the Southeast Air Basin except where the open burning operations result from:

- (a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (c) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (d) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.
- (f) A fire set solely for recreational or ceremonial purposes.
- (g) A fire set solely for cooking food.

**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit facility-wide emissions to the following:

- (a) less than 25 tons per year VOC, based on a 12-month rolling sum,
- (b) less than 25 tons per year any combination HAP, based on a 12-month rolling sum, and
- (c) less than 10 tons per year individual HAP, based on a 12-month rolling sum.

**II. TESTING REQUIREMENTS.****# 009 [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 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 and the most current version of the DEP Source Testing Manual, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

**III. MONITORING REQUIREMENTS.****# 010 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

**SECTION C. Site Level Requirements**

the Department.

**# 011 [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 may be objectionable (as per 25 Pa. Code § 123.31);
- (2) Visible Emissions (as per 25 Pa. Code §§ 123.41 and 123.42); and
- (3) Fugitive Particulate Matter (as per 25 Pa. Code §§ 123.1 and 123.2).

(b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:

- (1) Be investigated;
- (2) Be reported to the facility management, or individual(s) designated by the permittee;
- (3) Have appropriate corrective action taken (for emissions that originate on-site); and
- (4) Be recorded in a permanent written log.

(c) After six (6) months of daily monitoring, and 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) After six (6) months of weekly monitoring, and 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, complaints, monitoring results, and/or Department findings.

**IV. RECORDKEEPING REQUIREMENTS.****# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain records of the monitoring data and supporting information required by this Operating Permit for a minimum of five (5) years.

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

(a) The permittee shall maintain the following facility-wide records, as per the Rule Effectiveness program:

- (1) The composition and amount of coatings and cleanup solutions used.
- (2) The type and amount of training provided to each operator.
- (3) The Operation and Maintenance Instructions (O&M) and/or checklists and sign off log.

(b) The records shall be maintained on a monthly and 12-month rolling basis, shall be kept for a minimum of five (5) years, and shall be made available to the Department upon request.

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

(a) The permittee shall record total VOC emissions from the facility on a monthly basis, including 12-month rolling sums.

(b) The permittee shall record total combination and individual HAP emissions from the facility on a monthly basis, 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



**SECTION C. Site Level Requirements**

items:

- (a) date, time, and location of the incident(s);
- (b) the cause of the event; and
- (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.**

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

- (a) De minimis increases without notification to the Department.
- (b) De minimis increases with notification to the Department, via letter.
- (c) Increases resulting from a Request for Determination (RFD) to the Department.
- (d) Increases resulting from the issuance of a plan approval and subsequent operating permit.

**V. REPORTING REQUIREMENTS.****# 017 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- (b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.
- (c) The report shall describe the following:
  - (1) Name, permit or authorization number, and location of the facility;
  - (2) Nature and cause of the malfunction, emergency or incident;
  - (3) Date and time when the malfunction, emergency or incident was first observed;
  - (4) Expected duration of excess emissions;
  - (5) Estimated rate of emissions; and
  - (6) Corrective actions or preventative measures taken.
- (d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.
- (e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.
- (f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.
- (g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

**SECTION C. Site Level Requirements****# 018 [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.
- (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.

**VI. WORK PRACTICE REQUIREMENTS.****# 019 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

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

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



## SECTION C. Site Level Requirements

(b) Application of asphalt, water, or other 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 by other means.

### # 020 [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 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.

### # 021 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

### # 022 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

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

### # 023 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall implement the following work practice standards for facility-wide cleanup operations:

(a) All containers of cleaning materials containing VOC and/or HAP shall be kept closed at all times except when transferring material in or out of the containers.

(b) All used rags/applicators containing VOC and/or HAP shall be stored in closed containers.

### # 024 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

The permittee shall implement the following work practice standards, as per the Rule Effectiveness Program:

(a) Provide at least 41 hours of introductory training to new employees (that operate and maintain the sources and control devices listed in this Permit) and 25 hours per year of refresher training on the proper operation and maintenance of the sources' control devices.

(b) Operate and maintain the control devices in a manner consistent with the Operation and Maintenance Instructions (O&M) submitted to the Department. Operators shall follow the O&M instruction and/or checklist and sign off daily.

## VII. ADDITIONAL REQUIREMENTS.

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

## VIII. COMPLIANCE CERTIFICATION.

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

## IX. COMPLIANCE SCHEDULE.



**SECTION C. Site Level Requirements**

No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 103A

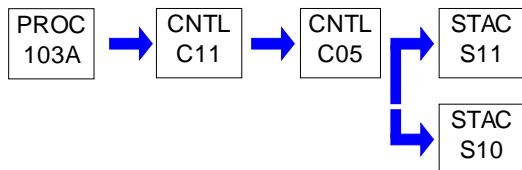
Source Name: PAIL LINE PAINT BOOTH

Source Capacity/Throughput:

200.000 Lbs/HR

SOLVENT/COATING

Conditions for this source occur in the following groups: 02

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain a pressure drop range across the filters associated with this source between of 0.15 to 0.45 inches water gauge.

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

Source ID: 103C

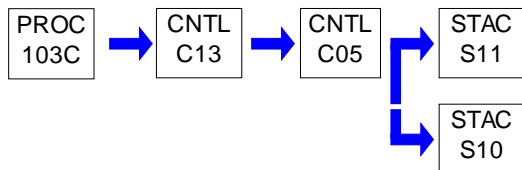
Source Name: PAIL LINE BOTTOM SPRAY BOOTH

Source Capacity/Throughput:

0.600 Lbs/HR

SOLVENT/COATING

Conditions for this source occur in the following groups: 02

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain a pressure drop range across the filters associated with this source between 0.03 to 0.15 inches water gauge.

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

Source ID: 104

Source Name: PAIL LINE OVEN

Source Capacity/Throughput:

6.300 Lbs/HR

SOLVENT/COATING

6.670 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 01

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall vent all emissions from the Pail Line Oven directly to the Tellkamp Thermal Oxidizer (RTO Source ID C05).

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

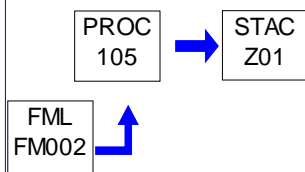
Source ID: 105

Source Name: PAIL LINE-METAL FORMING

Source Capacity/Throughput:

285.700 CF/HR

Propane

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

# 001 [25 Pa. Code §123.13]

**Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from this Source (ID:105) in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this Source (ID:105) in a manner that the concentration of the sulfur oxides, expressed as sulfur dioxide, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

[The method of compliance for this requirement is the use of propane in this source.]

**Fuel Restriction(s).**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall only use propane as a fuel for this source.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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



**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

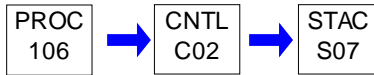
Source ID: 106

Source Name: ROLLER COATER W/ SMELL HOOD

Source Capacity/Throughput:

4.990 Lbs/HR

SOLVENT/COATING

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [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.]

The total Volatile Organic Compound (VOC) emissions from the Roller Coater Line Cleanup Operation shall not exceed 1.99 pounds per hour and 2.18 tons per year in any twelve (12) consecutive month period.

**II. TESTING REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall use data from Certified Product Data Sheets (CPDS) and Safety Data Sheets (SDS) to determine VOC content of coatings and to calculate VOC emissions from this source.

(b) The permittee, as an alternative to the CPDS and SDS, may use USEPA Test Method 24 to determine the VOC content of the coatings.

**III. MONITORING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the operational start and end times, for this source, on a daily basis.

**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92.]

The permittee shall maintain a differential manometer, as approved by the Department, to continuously monitor the pressure drop between the inside and the outside of the total enclosure.

**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92.]

The permittee shall monitor the following information, on a monthly basis, to demonstrate compliance with the Roller Coater Cleanup Operation emissions limit:

- (a) Quantity and identity of the cleanup solvents used.
- (b) VOC content of the cleanup solvents.
- (c) Cleanup solvent density.

**# 006 [25 Pa. Code §129.52]****Surface coating processes**

(a) The permittee shall monitor the following for each coating, thinner and other component as supplied on a daily basis:

- (1) The coating, thinner or component name and identification number.

**SECTION D. Source Level Requirements**

- (2) The volume used.
- (3) The mix ratio.
- (4) The density or specific gravity.
- (5) The weight percent of total volatiles, water, solids and exempt solvents.
- (6) The volume percent of solids.

(b) The permittee shall monitor the VOC content of each coating, thinner, and other component as supplied on a daily basis.

(c) The permittee shall monitor the VOC content of each as applied coating on a daily basis.

**IV. RECORDKEEPING REQUIREMENTS.****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain daily records of the operational start and end times for this source.

**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92.]

The permittee shall record daily when in use, the pressure drop between the inside and the outside of the total enclosure using a differential manometer, as approved by the Department.

**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92.]

(a) The permittee shall record the following information on a monthly basis, to demonstrate compliance with the Roller Coater Cleanup Operation emissions limit:

- (1) Quantity and identity of the cleanup solvents used.
- (2) VOC content of the cleanup solvents.
- (3) Cleanup solvent density.

(b) The total VOC emissions from the Roller Coater Cleanup Operations shall be recorded monthly, including a twelve (12) month rolling total.

**# 010 [25 Pa. Code §129.52]****Surface coating processes**

(a) The permittee shall maintain daily records of the following for each coating, thinner and other component as supplied:

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

(b) The permittee shall maintain daily records of the VOC content of each coating, thinner, and other component as supplied.

(c) The permittee shall maintain daily records of the VOC content of each as applied coating.

**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.**

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

The total enclosure shall be maintained at a negative pressure drop of at least 0.3 inches w.g. at any time the source is operated.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92.]

The permittee shall maintain and operate a differential manometer, as approved by the Department, to measure the pressure drop between the inside and outside of the total enclosure.

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

(a) The permittee shall operate this source in a total enclosure. The VOC emissions from this total enclosure shall be directly ducted to the Pillar System Incinerator (C02).

(b) The permittee shall perform all Roller Coater Line Cleanup Operations within the total enclosure while actively ventilating to the operating Pillar System Incinerator (C02).

(c) The permittee shall not bypass the Pillar Incinerator at any time when coatings or solvents are being applied on the Roller Coater Line.

(d) The permittee shall ensure air passing through all natural draft openings are continuously flowing into the total enclosure whenever the roller coater line is operating.

(e) The permittee shall ensure the total enclosure and the Pillar Incinerator are operated every time that this source is operated.

(f) The permittee shall ensure the total enclosure meets the requirements specified in USEPA Test Method 204.

**# 014 [25 Pa. Code §129.52]****Surface coating processes**

The permittee shall reduce the overall weight of VOCs emitted to the atmosphere through the use of the Roller Coater Pillar System Incinerator (C02) when this source is in operation, according to 25 Pa. Code § 129.52(b)(2).

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: ROLLER COATER LINE OVEN

Source Capacity/Throughput:

0.560 Lbs/HR

SOLVENT/COATING

2.381 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 01

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall direct all emissions from the Roller Coater Line Oven to the Roller Coater Pillar System Incinerator (C02).

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

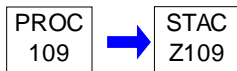
Source ID: 109

Source Name: ADHESIVES

Source Capacity/Throughput:

N/A

ADHESIVES

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall not use or apply at the facility an adhesive that exceeds the VOC content limit applicable to rubber substrate as listed in Table VI, in accordance with 25 Pa. Code § 129.77(b).

The VOC content limit in Table VI applicable to this source is 2.1 pounds of VOC per gallon, less water and exempt compounds or 250 grams of VOC per liter, less water and exempt compounds (for rubber substrate).

**II. TESTING REQUIREMENTS.****# 002 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall determine the VOC and solids content of nonaerosol adhesives by using one of the following:

(a) 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.

(b) 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.

**# 003 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall determine 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, by 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.

**# 004 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall determine the identity and concentration of exempt organic compounds using one of the following:

(a) 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.

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

**# 005 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall request for approval another test method to determine the VOC or solids content of a product if the request for approval of the test method meets the following requirements:

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

(b) The request demonstrates that the test method provides results that accurately determine the concentration of VOCs in

**SECTION D. Source Level Requirements**

the product or its emissions.

(c) The Department approves the request in writing.

**# 006 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall calculate grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds for adhesives that do not contain reactive diluents according to the following equation:

$$\text{Grams of VOC per liter of product, as applied} = (W_s - W_w - W_e) / (V_m - V_w - V_e)$$

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.

**# 007 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall calculate grams of VOC per liter of product thinned to the manufacturer's recommendation, including the volume of water and exempt compounds, for low-solids adhesives according to the following equation:

$$\text{Grams of VOC per liter of product, as applied} = (W_s - W_w - W_e) / V_m$$

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.

**# 008 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall calculate the percent VOC by weight according to the following equation:

$$\% \text{ VOC by weight} = [(W_v/W)] \times 100$$

Where:

$W_v$  = weight of VOCs, in grams.

$W$  = weight of material, in grams.

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.****# 009 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

(a) The permittee shall maintain the following records to demonstrate compliance with 25 Pa. Code § 129.77:

**SECTION D. Source Level Requirements**

- (1) A list of each adhesive in use and in storage.
  - (2) A data sheet or material list which provides the product name, manufacturer identification and use or material application for each product included on the list required under paragraph (a) above.
  - (3) The VOC content of each product on the list required under paragraph (a) above, as supplied.
  - (4) Catalysts, reducers or other components used and the mix ratio, as applicable.
  - (5) The VOC content or vapor pressure of each product on the list required by paragraph (a) above, as applied, if solvent or other VOC is added to the product before application.
  - (6) The volume purchased or produced of each product on the list required under paragraph (a) above.
  - (7) The monthly volume used or applied as part of a manufacturing process at the facility of each product on the list required under paragraph (a) above.
- (b) The permittee shall maintain records onsite for 5 years from the date the record is created.
- (c) The permittee shall make records available to the Department upon receipt of a written request.

**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.****# 010 [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, in nonabsorbent containers at the facility that are kept closed except when placing materials in or removing materials from the container, as per 25 Pa. Code § 129.77(h).

**# 011 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall not solicit, require or specify the use or application of an adhesive if the use or application would result in a violation of 25 Pa. Code § 129.77, unless the emissions are controlled through the use of add-on air pollution control equipment. The prohibition of this subsection applies to all written or oral contracts created on or after January 1, 2012, under which an adhesive subject 25 Pa. Code § 129.77 is to be used or applied at a facility in this Commonwealth.

**# 012 [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 listed in Table V or VI, unless the emissions are controlled through the use of add-on air pollution control equipment, in accordance with 25 Pa. Code § 129.77(j).

**VII. ADDITIONAL REQUIREMENTS.****# 013 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

To convert from grams per liter (g/l) to pounds per gallon (lb/gal), multiply the result (VOC content) by  $8.345 \times 10^{-3}$  (lb/gal/g/l).



**SECTION D. Source Level Requirements**

Source ID: 110

Source Name: HOE LITHOGRAPHIC PRESS W COATER

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall only use UV inks on this sheet-fed Lithographic press.

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

The VOC content of the as applied coating shall be equal to or less than 4.62 lbs. VOC per gallon of coating solids

**# 003 [25 Pa. Code §129.67b]****Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from cleaning solutions used in or on an offset lithographic printing press or a letterpress printing press unless the following conditions are met:

(i) The cleaning solutions used must meet one or both of the following VOC limits:

(A) A VOC composite partial vapor pressure less than 10 millimeters of mercury at 68°F (20°C).

(B) A VOC content less than 70% by weight.

(ii) The use of one or more cleaning solutions with a higher VOC composite partial vapor pressure or higher VOC content, or both, than is listed in subparagraph (i) is limited to 110 gallons per year, combined, of all cleaning solutions that exceed the limits in subparagraph (i).

**# 004 [25 Pa. Code §129.67b]****Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from a fountain solution used in an offset lithographic printing press unless the fountain solution meets one or more of the following VOC limits.

For each sheet-fed offset lithographic printing press, the press-ready (as applied) fountain solution must meet one of the following limits:

(A) A VOC content of 5% or less by weight.

(B) A VOC content of 8.5% or less by weight if the fountain solution is refrigerated below 60°F (15.5°C).

(C) A VOC content of 5% or less by weight and no alcohol in the fountain solution.

(D) Another method that achieves a level of control of VOC emissions from the press-ready (as applied) fountain solution equal to or better than the methods listed in clauses (A)—(C).

**II. TESTING REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall determine the VOC content of fountain solution by one of the following procedures:

a. Use USEPA Method 24 to determine the VOC content of a fountain solution sample, or

b. Calculate the VOC content of the fountain solution using data from Certified Product Data Sheet (CPDS) from suppliers

**SECTION D. Source Level Requirements**

of  
the materials used to prepare the press ready solution and Safety Data Sheet (SDS).

The calculations shall only be performed once for each press ready fountain solution and kept in the form of a batch log.

**# 006 [25 Pa. Code §129.67b]****Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

The Permittee shall determine the VOC content of fountain solution by one of the following:

- i. Use of Method 24 to analyze a sample of fountain solution
- ii. Calculation for each press ready solution

The Facility currently uses SDS Sheets to verify the VOC content of fountain solution

**III. MONITORING REQUIREMENTS.****# 007 [25 Pa. Code §129.52]****Surface coating processes**

A facility, regardless of the facility's annual emission rate, which contains surface coating processes shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:

- (1) The following parameters for each coating, thinner and other component as supplied:
  - (i) The coating, thinner or component name and identification number.
  - (ii) The volume used.
  - (iii) The mix ratio.
  - (iv) The density or specific gravity.
  - (v) The weight percent of total volatiles, water, solids and exempt solvents.
  - (vi) The volume percent of solids for Table I surface coating process category 1 (can coating)
- (2) The VOC content of each coating, thinner and other component as supplied.
- (3) The VOC content of each as applied coating.

**# 008 [25 Pa. Code §129.67b]****Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

The Facility currently uses SDS Sheets to verify the VOC content of fountain solution

**IV. RECORDKEEPING REQUIREMENTS.****# 009 [25 Pa. Code §129.67b]****Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

The permittee shall record VOC and HAP emissions from press on a monthly and 12 month rolling sum

- (a) The permittee shall maintain the following records on a monthly basis for each offset lithographic press:
  - (1) Consumption of each ink, coating, fountain solution and cleaning solvent in pounds or gallons.
  - (2) Percent by weight VOC and HAP content as applied.
  - (3) VOC and HAP emissions.
  - (4) Alternately, for inks and coatings, the ink and coating with the highest VOC and HAP content may be used to represent all inks and coatings used by all web offset lithographic printing presses.

**V. REPORTING REQUIREMENTS.**

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

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 010 [25 Pa. Code §129.67b]****Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

The Permittee shall keep all solvent containers closed at all times unless filling, draining, or performing cleanup operations.

(a) The permittee shall comply with the following work practices for cleaning activities at the facility:

- (1) Store all VOC-containing cleaning solutions, waste cleaning solutions and used shop towels in closed containers.
- (2) Ensure that mixing vessels and storage containers used for VOC-containing cleaning solutions, waste cleaning solutions and used shop towels are kept closed, except when depositing or removing these solutions or shop towels.
- (3) Minimize spills of VOC-containing cleaning solutions and waste cleaning solutions and clean up spills immediately.

The requirements in paragraph (a) do not apply to the following activities:

The use of parts washers or cold cleaners at an offset lithographic printing or a letterpress printing facility. The use of parts washers and cold cleaners is regulated under § 129.63 (relating to degreasing operations)

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

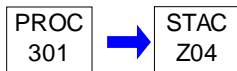
Source ID: 301

Source Name: MAINTENANCE PARTS WASHER

Source Capacity/Throughput:

0.130 Lbs/HR

SOLVENT

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.****# 001 [25 Pa. Code §129.63]****Degreasing operations**

(a) The permittee shall maintain records and shall provide to the Department on request, the following information, in accordance with 25 Pa. Code § 129.63(a)(5):

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

(b) An invoice, bill of sale, certificate that corresponds to a number of sales, Safety Data Sheet (SDS), or other appropriate documentation acceptable to the Department may be used to comply with (a) above, according to 25 Pa. Code § 129.63(a)(6).

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 002 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall maintain the following work practice standards:

- (a) The immersion cold cleaning machine shall have a freeboard ratio of 0.50 or greater.
- (b) The immersion cold cleaning machine shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent.
- (c) The immersion cold cleaning machine shall have a permanent, conspicuous label summarizing the operating requirements of 25 Pa. Code § 129.63(a)(3). In addition, the label shall include the following discretionary good operating

**SECTION D. Source Level Requirements**

practices:

(1) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.

(2) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.

(3) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.

**# 003 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs, according to 25 Pa. Code § 129.63(a)(4).

**# 004 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall operate the cold cleaning machine in accordance with the following procedures:

(a) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

(b) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.

(c) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.

(d) Air agitated solvent baths may not be used.

(e) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

Source ID: 711

Source Name: COMFORT HEATERS

Source Capacity/Throughput:

1.887 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 01

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

Source ID: 712

Source Name: MAKE-UP AIR UNITS

Source Capacity/Throughput:

3.050 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 01

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

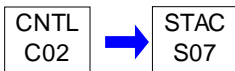
**SECTION D. Source Level Requirements**

Source ID: C02

Source Name: ROLLER COATER PILLAR SYSTEM, INCINERATOR

Source Capacity/Throughput:

3.600 MCF/HR

**I. RESTRICTIONS.****Control Device Efficiency Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92.]

The permittee shall maintain a control equipment overall efficiency, as determined by the test methods and procedures specified in Chapter 139 as follows, which ever is more stringent:

(a) No less than the equivalent calculated by the following equation for the Pillar Incinerator (Source ID: C02), according to 25 Pa. Code § 129.52(b)(2):

$$O = (1 - E/V) \times 100$$

Where:

V = The highest VOC content of the as applied coating, in lb VOC/gal of coating solids

E = 4.62 lb VOC/gal coating solids (Table 1 Surface Coating Process Category 1: Can Coating)

O = Overall control efficiency

(b) 90% overall control device efficiency.

**II. TESTING REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall perform a stack test for the Roller Coater Pillar System Incinerator (Source ID No.C02) using the Department-approved procedures once every five (5) calendar years, where five (5) calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five (5) years later. The source test shall be performed while all sources which are ducted to the Incinerator are operating at normal routine operating conditions or under other such conditions, within the capacity of the equipment, as may be requested by the Department. When determining the VOC destruction efficiency of the incinerator, the sources shall be operated within normal parametric ranges and the incinerator shall be maintained at the minimum temperature that it will ever be operated.

(b) The source test shall, at a minimum, determine the following:

- (1) mass destruction efficiency for VOC emissions;
- (2) capture efficiency or verification of permanent total enclosure;
- (3) overall control efficiency for VOC emissions;
- (4) actual VOC emissions from the Incinerator;

Tests shall be conducted in accordance with the provisions of in accordance with 25 Pa. Code Chapter 139, 40 CFR Part 51 Appendix M, and the most recent DEP Source Testing Manual.

(c) At least sixty (90) days prior to the test, the company shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the



**SECTION D. Source Level Requirements**

test.

(e) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region  
RA-EPSEstacktesting@pa.gov

Central Office  
RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.

## 1. Test Date(s)

- a. For protocols, provide the proposed date on which testing will commence or "TBD"
- b. For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but

"Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

## 4. Testing Requirements (all that apply)

- a. Operating permit number
- b. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- c. Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

**III. MONITORING REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall continuously monitor the burner temperature of the incinerator.

(b) The permittee shall monitor the pressure drop gauge located at the suction side of the fan on a daily basis for this control device.

**SECTION D. Source Level Requirements****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the operational start and end times, for this source, on a daily basis.

**IV. RECORDKEEPING REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall continuously record the burner temperature of the incinerator.

(b) The permittee shall record the pressure drop gauge located at the suction side of the fan on a daily basis for this control device.

**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain daily records of this control device operational start and end times, and any unplanned shutdown, its reason and duration.

**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.****# 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.]

The permittee shall ensure the incinerator is operational at any time when the roller coater process (Source ID 106 and/or Source ID 107) is operating.

**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall maintain and operate a pressure drop gauge at the suction side of the fan for this control device.

(b) The permittee shall maintain a pressure drop range of 6.0 - 12.0 inches w.g across this control device.

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

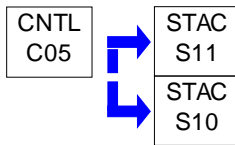
Source ID: C05

Source Name: REGENERATIVE THERMAL OXIDIZER

Source Capacity/Throughput:

2.476 MCF/HR

Natural Gas

**I. RESTRICTIONS.****Control Device Efficiency Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain a control equipment overall efficiency, as determined by the test methods and procedures specified in Chapter 139 as follows, which ever is more stringent:

(a) No less than the equivalent calculated by the following equation for the Regenerative Thermal Oxidizer (Source ID: C05), according to 25 Pa. Code § 129.52(b)(2):

$$O = (1 - E/V) \times 100$$

Where:

V = The highest VOC content of the as applied coating, in lb VOC/gal of coating solids

E = 4.62 lb VOC/gal coating solids (Table 1 Surface Coating Process Category 1: Can Coating)

O = Overall control efficiency

(b) 85% overall control device efficiency.

**II. TESTING REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall perform a stack test for the Regenerative Thermal Oxidizer (Source ID: C05) using the Department-approved procedures once every five (5) calendar years, where five (5) calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five (5) years later. The source test shall be performed while all sources which are ducted to the oxidizer are operating at normal routine operating conditions or under other such conditions, within the capacity of the equipment, as may be requested by the Department. When determining the VOC destruction efficiency of a thermal oxidizer, the sources shall be operated within normal parametric ranges and the oxidizer shall be maintained at the minimum temperature that it will ever be operated.

(b) The source test shall, at a minimum, determine the following:

- (1) mass destruction efficiency for VOC emissions;
- (2) capture efficiency or verification of permanent total enclosure;
- (3) overall control efficiency for VOC emissions;
- (4) actual VOC emissions from the RTO;

Tests shall be conducted in accordance with the provisions of in accordance with 25 Pa. Code Chapter 139, 40 CFR Part 51 Appendix M, and the most recent DEP Source Testing Manual.

(c) At least sixty (90) days prior to the test, the company shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the

**SECTION D. Source Level Requirements**

test.

(e) Within sixty (60) days after the source test, an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(f) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

**# 003 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

(a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

(b) The following pertinent information shall be listed on the title page.

1. Test Date(s)

- a. For protocols, provide the proposed date on which testing will commence or "TBD"
- b. For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

4. Testing Requirements (all that apply)

- a. Operating permit number
- b. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- c. Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

Email all electronic submissions to both the PSIMS Administrator in Central Office and the Air Quality Program Manager for the pertinent regional office. Email address are provided below.

Southeast Region: RA-EPSEstacktesting@pa.gov

Central Office: RA-EPstacktesting@pa.gov

**III. MONITORING REQUIREMENTS.**

**# 004 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall calculate the post-control VOC emissions from all sources routed to this control device on a monthly basis.

**# 005 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall monitor the pressure drop gauge located on the suction side of the fan on a daily basis.

**# 006 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall monitor the operational start and end times, for this source, on a daily basis.

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall continuously record the temperature of the combustion chamber gas of the regenerative thermal oxidizer.

**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain monthly records of post-control VOC emissions from all sources routed to this control device, including 12-month rolling sums.

**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain daily records of the pressure drop as measured on the suction side of the fan.

**# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain daily records of this control device operational start and end times, and any unplanned shutdown, its reason and duration.

**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 thermal oxidizer shall be operated in accordance with the manufacturer's specifications and good air pollution control practices.

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

The thermal oxidizer shall not be bypassed, at any time, when coatings and/or solvents are being applied at any source vented to the oxidizer, except in the event of an unplanned shutdown to the oxidizer.

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

(a) The permittee shall maintain and operate a pressure drop gauge at the suction side of the fan for this control device.

(b) The permittee shall maintain a pressure drop range of 0.5 to 3.0 inches water gauge across this control device.

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

(a) The permittee shall not start applying coatings and/or solvents in the sources controlled by this RTO before the thermal oxidizer combustion chamber gas temperature reaches 1400°F.

(b) The permittee shall ensure the burners associated with the thermal oxidizer maintain the combustion chamber gas temperature of at least 1400°F, at any time, when coatings and/or solvents are applied.

(c) The permittee shall maintain the thermal oxidizer combustion chamber gas temperature at 1400°F for at least 30 minutes after the spray booths have operated and/or clean-up operations have ended.

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

The permittee shall maintain and operate a monitoring and recording device that continuously indicates and records the combustion chamber gas temperature of this thermal oxidizer.

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION E. Source Group Restrictions.**

Group Name: 01

Group Description: Natural Gas Fired Sources

Sources included in this group

ID	Name
104	PAIL LINE OVEN
107	ROLLER COATER LINE OVEN
711	COMFORT HEATERS
712	MAKE-UP AIR UNITS

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

# 001 [25 Pa. Code §123.13]

**Processes**

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

# 002 [25 Pa. Code §123.21]

**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from each source of this group in a manner that the concentration of the sulfur oxides, expressed as sulfur dioxide, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

[The method of compliance for this requirement is the use of natural gas.]

**Fuel Restriction(s).**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall only use natural gas as a fuel for this source.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

# 004 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall monitor the amount of natural gas consumed by this source using a Department-approved method.

**IV. RECORDKEEPING REQUIREMENTS.**

# 005 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall record the amount of natural gas consumed by this source on a monthly basis using a Department-approved method.

**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.**

# 006 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall maintain and operate this source in accordance with manufacturer's specifications and good air

**SECTION E. Source Group Restrictions.**

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).



**SECTION E. Source Group Restrictions.**

Group Name: 02

Group Description: Paint Booths

Sources included in this group

ID	Name
103A	PAIL LINE PAINT BOOTH
103C	PAIL LINE BOTTOM SPRAY BOOTH

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

No person may permit the emission into the outdoor atmosphere of particulate matter from each spray booth in this group at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

**# 002 [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.]

The total Volatile Organic Compound (VOC) emissions from the Pail Line Cleanup Operation shall not exceed 11.90 pounds per hour or 13.03 tons per year in any twelve (12) consecutive month period.

**II. TESTING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall use data from Certified Product Data Sheets (CPDS) and Safety Data Sheets (SDS) to determine VOC content of coatings and to calculate VOC emissions from these sources.

(b) The permittee, as an alternative to the CPDS and SDS, may use USEPA Test Method 24 to determine the VOC content of the coatings.

**III. MONITORING REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the pressure drop across the filtering system associated with each spray booth in this group on a daily basis.

**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the operational start and end times of each spray booth in this group, including clean-up operation time, on a daily basis.

**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92.]

The permittee shall monitor the following information, on a monthly basis, to demonstrate compliance with the Pail line Cleanup Operation emissions limit:

- (a) Quantity and identity of the cleanup solvents used.
- (b) VOC content of the cleanup solvents.
- (c) Cleanup solvent density.

**# 007 [25 Pa. Code §129.52]****Surface coating processes**

(a) The permittee shall monitor the following for each coating, thinner and other component as supplied on a daily basis:

**SECTION E. Source Group Restrictions.**

- (1) The coating, thinner or component name and identification number.
  - (2) The volume used.
  - (3) The mix ratio.
  - (4) The density or specific gravity.
  - (5) The weight percent of total volatiles, water, solids and exempt solvents.
  - (6) The volume percent of solids.
- (b) The permittee shall monitor the VOC content of each coating, thinner, and other component as supplied on a daily basis.
- (c) The permittee shall monitor the VOC content of each as applied coating on a daily basis.

**IV. RECORDKEEPING REQUIREMENTS.****# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall record the following on a weekly basis:

- (a) the pressure drop reading across the filtering system associated with each spray booth in this group,
- (b) the date the pressure drop reading is being recorded.

**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep weekly records of the following for the filtering system associated with each spray booth in this group:

- (a) inspections performed,
- (b) maintenance performed (including when filters are replaced),
- (c) any deficiencies, and
- (d) any corrective actions taken.

**# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain daily records of the operational start and end times for each spray booth in this group, including clean up operations time.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

(a) The permittee shall record the following information, on a monthly basis, to demonstrate compliance with the Pail line Cleanup Operation emissions limit:

- (1) Quantity and identity of the cleanup solvents used.
- (2) VOC content of the cleanup solvents.
- (3) Cleanup solvent density.

(b) The total VOC emissions from the Pail Line Cleanup Operations shall be recorded monthly, using a Department-approved method. The twelve (12) month rolling total shall be calculated and recorded monthly.

**# 012 [25 Pa. Code §129.52]****Surface coating processes**

(a) The permittee shall maintain daily records of the following for each coating, thinner and other component as supplied:

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

**SECTION E. Source Group Restrictions.**

- (b) The permittee shall maintain daily records of the VOC content of each coating, thinner, and other component as supplied.
- (c) The permittee shall maintain daily records of the VOC content of each as applied coating.
- (d) The permittee shall maintain monthly totals of the volume used for each coating, including 12-month rolling sums.

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

- (a) The permittee shall perform and maintain good housekeeping procedures for storage, use and disposal of coatings used in these spray booths.
- (b) The permittee shall keep all containers and vessels containing coatings or solvent-containing materials closed or covered when not in use.

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

- (a) The permittee shall operate each spray booth in this group in a total enclosure. The VOC emissions from each total enclosure shall be directly ducted to the thermal oxidizer.
- (b) The permittee shall perform all Pail Line Cleanup Operations within the total enclosures while actively ventilating to the operating regenerative thermal oxidizer (C05).
- (c) The permittee shall not bypass the regenerative thermal oxidizer at any time when applying coatings or solvents or when performing clean up operations in any spray booth in this group.
- (d) The permittee shall ensure air passing through all natural draft openings are continuously flowing into the total enclosures whenever any spray booth in this group is operating or during clean up operations.
- (e) The permittee shall ensure total enclosures and the thermal oxidizer are operated every time a spray booth in this group is operated or during clean up operations.
- (f) The permittee shall ensure the total enclosure meets the requirements as specified in USEPA Test Method 204.

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

- (a) The permittee shall keep at the facility a sufficient quantity of spare paper filters for each spray booth in this group, to replace any paper filters requiring replacement due to deterioration resulting from routine operation of the booths and filters.
- (b) The permittee shall replace filters with gaps, tears, and holes immediately upon discovery.

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

The permittee shall operate each spray booth in this group equipped with paper filters to control particulate matter emissions.

**# 017 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall not apply coatings and/or solvents in a spray booth in this group unless the thermal oxidizer combustion chamber gas temperature is operating at or above 1400°F.

**# 018 [25 Pa. Code §129.52]****Surface coating processes**

**SECTION E. Source Group Restrictions.**

The permittee shall reduce the overall weight of VOCs emitted to the atmosphere through the use of the regenerative thermal oxidizer (C05) when each spray booth in this group is in operation, according to 25 Pa. Code § 129.52(b)(2).

**VII. ADDITIONAL REQUIREMENTS.**

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



**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Descriptor			
103A	PAIL LINE PAINT BOOTH			
<b>Emission Limit</b>				<b>Pollutant</b>
0.040	gr/DRY FT3			PM10
11.900	Lbs/Hr	clean-up operations		VOC
13.030	Tons/Yr	clean-up operations		VOC
103C	PAIL LINE BOTTOM SPRAY BOOTH			
<b>Emission Limit</b>				<b>Pollutant</b>
0.040	gr/DRY FT3			PM10
11.900	Lbs/Hr	clean-up operations		VOC
13.030	Tons/Yr	clean-up operations		VOC
104	PAIL LINE OVEN			
<b>Emission Limit</b>				<b>Pollutant</b>
500.000	PPMV			SOX
0.040	gr/DRY FT3	Total Particulate		TSP
105	PAIL LINE-METAL FORMING			
<b>Emission Limit</b>				<b>Pollutant</b>
500.000	PPMV			SOX
0.040	gr/DRY FT3	Total Particulates		TSP
106	ROLLER COATER W/ SMELL HOOD			
<b>Emission Limit</b>				<b>Pollutant</b>
1.990	Lbs/Hr	Clean-Up Op.		VOC
2.180	Tons/Yr	Clean-Up Op.		VOC
107	ROLLER COATER LINE OVEN			
<b>Emission Limit</b>				<b>Pollutant</b>
500.000	PPMV			SOX
0.040	gr/DRY FT3	Total Particulates		TSP
109	ADHESIVES			
<b>Emission Limit</b>				<b>Pollutant</b>
2.100	Lbs/Gal	less water and exempt compounds		VOC
250.000	GRAMS/L	less water and exempt compounds		VOC
711	COMFORT HEATERS			
<b>Emission Limit</b>				<b>Pollutant</b>
500.000	PPMV			SOX
0.040	gr/DRY FT3	Total Particulates		TSP
712	MAKE-UP AIR UNITS			
<b>Emission Limit</b>				<b>Pollutant</b>
500.000	PPMV			SOX
0.040	gr/DRY FT3	Total Particulates		TSP

**SECTION G. Emission Restriction Summary.****Site Emission Restriction Summary**

Emission Limit		Pollutant
24.900 Tons/Yr	12-month rolling sum	VOC
9.900 Tons/Yr	Individual HAP	Hazardous Air Pollutants
24.900 Tons/Yr	Combination HAP	Hazardous Air Pollutants



**SECTION H. Miscellaneous.**

(a) 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 limitations, monitoring, or recordkeeping:

- (1) Welding.
  - (2) Forklifts and Tow Motors.
  - (3) Mixing Operation at Finishing Lines.
  - (4) Maintenance Activities.
- 

(b) This operating permit is a compilation of applicable requirements including those addressed in the previously issued RACT permit OP-09-0022.

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(c) This permit is a minor modification of Title V Permit TVOP-09-00022, previously issued on August 17, 2000. Source ID: C05 Regenerative Thermal Oxidizer has been modified to add the installation of a safety damper; a fan and associated stack to exhaust fume trapped in the oven in the event of emergency shutdown of the oxidizer. C05 is associated with Sources 103A, 103B, 103C, and 104. Language has been added to Source ID: C05, Section D, to monitor and report any unplanned shutdowns, resulting in the use of the safety stack, S11 Tellkamp Oxidizer Safety Stack.

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(d) The following items have been revised in the renewal permit:

- (1) The pressure drop for Source Id 103A - Pail Spray Booth has been changed to be in the range of 0.15 to 0.45
  - (2) The pressure drop for Source Id 103B - Flange Spray Booth has been changed to be in the range of 0.03 to 0.15
  - (3) The pressure drop for Source Id 103C - Bottom Spray Booth has been changed to be in the range of 0.03 to 0.15
  - (4) Monitoring and Recordkeeping for Clean-up usage has been changed to monthly
  - (5) Monitoring and Recordkeeping for Litho Press has been changed to weekly
  - (6) The maintenance parts washer has updated 25 Pa Code §129.63 regulations.
- 

(e) This permit is an administrative amendment (AUTH ID 645939; APS 345738) which incorporates terms and conditions of Plan Approval PA-09-0022B (AUTH ID 598518; APS 557696). Revisions include Hazardous Air Pollutant (HAP) emission limit less than 10 tons per year and any combination HAP emissions less than 25 tons per year, in order to exempt the facility from requirements of 40 CFR Part 63 Subpart M - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, according to 40 CFR § 63.3881(b). Revisions also include an increase in the Volatile Organic Compound (VOC) content of inks applied to steel sheets at Lithographic Press No. 1 (Source ID 108) from 10% to 15% by weight.

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(f) This permit is an administrative amendment (AUTH 664604; APS 345738) which corrects the term used to describe the regenerative thermal oxidizer chamber temperatures. Previously, the permit required monitoring and recordkeeping of the thermal oxidizer combustion chamber exit gas. This administrative amendment deletes the term "exit" from conditions for Source ID C05 and Work Practice Conditions #020 for Source IDs 103A, 103B, and 103C.

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(g) This permit is an administrative amendment (AUTH 686205; APS 345738) to add a compliance schedule to establish pressure drop ranges for C02 (Roller Coater Pillar System Incinerator) and C05 (Regenerative Thermal Oxidizer). Source Level Conditions for monitoring and recordkeeping pressure drop has also been revised for Source IDs C02 and C05. Monitoring and recordkeeping references to fan amperage and airflow have been deleted for both C02 and C05. Also, a work practice standard condition has been added to indicate pressure gauges will be located at the suction side of the fan for each C02 and C05.

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(h) This permit is an administrative amendment (AUTH ID 736279; APS 345738) in order to address revisions to monitoring,



**SECTION H. Miscellaneous.**

recordkeeping, and work practice conditions associated with pressure drop readings at Source ID 103A and 103C. In addition, Source ID 103B has been permanently shutdown and no longer appears in the permit.

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(i) This permit is an administrative amendment (AUTH 759831; APS 345738) in order to include a pressure drop range for the Roller Coater Pillar System Incinerator (C02) and the Regenerative Thermal Oxidizer (C05). This amendment is in correlation with the previous administrative amendment AUTH ID 686205, in paragraph (g) above. The pressure drops now appear as a work practice standard for each source (C02 and C05).

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(j) This permit is the renewal (AUTH 841100): There are no changes to existing sources and there are no new sources at the facility. There are changes to the permit due to facility status changing from a major Title V to a minor Synthetic Minor; all Compliance Assurance Monitoring (CAM - reference 40 CFR Section 64) monitoring, recordkeeping, reporting, work practice standards, and additional requirements are no longer applicable and have been removed from the permit. All references to Chapter 127, Subchapter G (127.500-127.543) have been removed because they apply only to Title V Operating Permits. The remaining revisions, as outlined below, are for clarification, correction of errors, or enforceability of conditions.

Responsible Official and Permit Contact have been updated from Donald Dulin (VP of Technical Services) to Robert Harding (General Manager).

**Section C - Site Level Requirements**

1. The facility has elected to cap VOC emissions to less than 25 tons per year; therefore this emissions restriction now appears in Section C of the permit and supersedes the previous emission limit of 100 tons per year. Associated monitoring and recordkeeping requirements apply. According to AIMS reports, facility wide VOC emissions have been: 11.79 tpy (2009), 11.92 tpy (2008), 11.75 tpy (2007), 11.92 tpy (2006), 14.11 tpy (2005), 15.78 tpy (2004), 13.70 tpy (2003), 16.32 tpy (2002), 13.81 tpy (2001), 10.96 tpy (2000), 8.86 tpy (1999). The facility is a minor source for NOx emissions. See potential to emit calculations in Addendum 1 of this review memo.
2. The Stack Testing requirement for the control devices C02 and C05 have been removed from Site Level requirements and now appear as Source Level requirements (Section D), per control device source, as applicable.
3. The recordkeeping requirement to record fugitive emissions, visible emissions, and odors has been revised for consistency with Southeast Region permitting.
4. The Risk Management Plan Reporting requirement has been added to Section C.
5. The requirements of 25 Pa. Code § 135.21 Emission statements and 25 Pa. Code § 135.3 Reporting have been clarified in Section C. Both requirements are applicable to this facility.
6. Compliance Certification reporting requirement has been removed from Section C because the facility is no longer a Title V facility.
7. All permit conditions regarding the Rule Effectiveness Program are applicable and remain as part of this permit.
8. The Compliance Schedule has been met and has been removed from the Section C of the permit.

**Section D - Source Level Requirements**

Source ID 103A - Pail Line Paint Booth / Source ID 103C - Pail Line Bottom Spray Booth

1. The overall control efficiency equation in emission restrictions has been moved to the RTO control device (C05) requirements. Instead, a work practice requirement to vent emissions to a control device has been added for Source ID 103A and Source ID 103C.
2. Testing of coatings, inks, etc. requirement has been revised for consistency with Southeast Region permits.
3. The requirement to monitor the pressure drop between the thermal oxidizer exhaust and the total enclosure is vague,

**SECTION H. Miscellaneous.**

ambiguous, and unenforceable. The Department's original intention was to demonstrate a negative air flow from each spray booth to the control device (RTO). The condition has been replaced with pressure drop requirements at the control device. In addition, a requirement to monitor pressure drop across the filtering system associated with spray booth has been added to each spray booth.

4. Surface coating monitoring and recordkeeping requirements from 25 Pa. Code § 129.52 have been revised for consistency with the regulation.
5. A recordkeeping requirement to record inspections performed on the filtering system has been added to each spray booth as part of an O&M plan.
6. The requirement to report coating and solvent usage has been deleted per source but remains a site level requirement.
7. Work Practice Standards regarding permanent total enclosure have been consolidated for clarity, enforceability and consistency.

**Source ID 104 - Pail Line Oven**

Based on information provided in Addendum 1 of the review memo, the combined potential to emit NO<sub>x</sub> emissions from Source ID 104 and Source ID C05 will not exceed the Title V emission limit of 1.2 lb/hr and 5.3 tons per year (combined PTE NO<sub>x</sub> = 0.85 lb/hr and 3.71 tons per year). Therefore, NO<sub>x</sub> emission restriction and associated monitoring and recordkeeping have been removed from this source.

**Source ID 106 - Roller Coater w/ Smell Hood**

1. The overall control efficiency restriction of 90% and the equation from 25 Pa. Code § 129.52 have been moved to the incinerator control device (C02) requirements. Instead, a work practice requirement to vent emissions to a control device has been added to this source.
2. Testing of coatings, inks, etc. requirement has been revised for consistency with Southeast Region permits.
3. Surface coating monitoring and recordkeeping requirements from 25 Pa. Code § 129.52 have been revised for consistency with the regulation.
4. The requirement to report coating and solvent usage has been deleted per source but remains a site level requirement.
5. Work Practice Standards regarding permanent total enclosure have been consolidated for clarity, enforceability and consistency.

**Source ID 107 - Roller Coater Line Oven**

The overall control efficiency restriction of 90% has been moved to the incinerator control device (C02) requirements. Instead, a work practice requirement to vent emissions to a control device has been added.

**Source ID 108 - Litho Press No. 1 (2 Color)**

1. The conditions with VOC emission limits while using fountain solution, ink, and clean-up solvents have been combined into one condition for uniformity.
2. The testing of inks condition has been revised for consistency throughout the permit.
3. Monitoring and recordkeeping of ink usage and composition have been revised for consistency and the frequency has been reduced from weekly to monthly as requested.
4. The requirement to report coating and solvent usage has been deleted per source but remains a site level requirement.
5. The as-applied VOC content limit for fountain solution as been corrected to fifteen (15) VOC % by weight.

**Source ID 301 - Maintenance Parts Washer**

Source Level conditions for this source have been revised to be consistent with immersion cold cleaning machine requirements of 25 Pa. Code § 129.63(a)(1)-(6).

**Source ID C02 - Roller Coater Pillar System, Incinerator**

1. The overall control device efficiency restriction has been revised for clarification.



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- 2. The stack testing requirement has been moved from Section C to the source level.
- 3. The maximum capacity of the burners of the incinerator is 3.78 MMBtu/hr. The burners are fired by natural gas. See Addendum No. 1 of this review memo for potential emission calculations from natural gas consumption for this source. Fuel monitoring and recordkeeping requirements have been removed from this source.
- 4. The monitoring and recordkeeping requirements for inlet and outlet temperature have been revised to the "burner" temperature of the incinerator.
- 5. CAM monitoring, recordkeeping, reporting, WPS and additional requirements have been removed from this source because the facility is no longer a Title V facility.
- 6. Pressure drop range has been revised from 8.0-9.3 to 6.0-12.0 inches water gauge, as requested.

Source ID C05 - Regenerative Thermal Oxidizer

- 1. Based on information provided in Addendum 1 of the review memo, the combined potential to emit NOx emissions from Source ID 104 and Source ID C05 will not exceed the Title V emission limit of 1.2 lb/hr and 5.3 tons per year (combined PTE NOx = 0.85 lb/hr and 3.71 tons per year). Therefore, NOx emission restriction and associated monitoring and recordkeeping have been removed from this source.
- 2. The overall control device efficiency restriction has been revised for clarification.
- 3. The stack testing requirement has been moved from Section C to the source level.
- 4. CAM monitoring, recordkeeping, reporting, WPS and additional requirements have been removed from this source because the facility is no longer a Title V facility.
- 5. Pressure drop ranges for the filtering system associated with each spray booth were inadvertently added to the RTO during the 2005 permit renewal (AUTH 588145). These pressure drop ranges have been removed from the oxidizer and now appear at each spray booth, as applicable.
- 6. The reporting requirement for facility wide VOC and NOx emissions have been removed from this source but it does remain as a site level requirement according to 25 Pa. Code § 135.21 in Section C.
- 7. Work Practice Standards for the control device have been revised for clarification into a single WPS condition, and removed from efficiency restriction.

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(k) This permit is an Administrative Amendment (AUTH ID 960375; APS 724602) to address the following:

- (1) Incorporate terms and conditions of Plan Approval No. 09-0022C, which allows for the reactivation of Source ID 103B (Pail Line Flange Booth), and associated control devices Source ID C05 (Regenerative Thermal Oxidizer) and Source ID C12 (Pail Line Filtering System).
- (2) Revise pressure drop range across the RTO (Source ID C05).
- (3) Revise the capture efficiency of the RTO (Source ID C05) for the Pail Line to 98.66%.

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(l) This permit is the Synthetic Minor Renewal Permit (AUTH ID 1089017; APS No. 724602). The following items have been addressed with issuance of the renewal permit:

- (1) The Responsible Official and Permit Contact have been updated to replace Mr. Robert Harding with Mr. Joe Kelly, General Manager.
- (2) The maximum rated capacities of some of the fuel-consuming sources have been corrected with updated information (minor typographical errors).

**SECTION H. Miscellaneous.**

(3) The reporting requirements of 25 Pa. Code § 135.21 no longer apply to the facility and have been removed from Section C with this renewal permit. The emission statement required under 25 Pa. Code § 135.21 applies to major sources of VOC and/or NOx emissions; CSCC is no longer a Title V facility.

(4) The requirement to monitor the amount of natural gas used while each fuel-consuming source is operating has been revised to require monitoring fuel usage using a Department-approved method (i.e. monthly natural gas supplier bills).

(5) The source testing requirements for each VOC control device listed in the permit (C02 – Roller Coater Pillar System, Incinerator, and C05 – Regenerative Thermal Oxidizer) have been clarified to specifically indicate that in addition to measuring mass destruction efficiency, capture efficiency shall also be measured or PTE be verified during each source test performed once every five (5) years.

(6) Source ID 109 has been added to the permit to address the regulatory requirements applicable to adhesives used at the plant. The process and equipment are existing, only the requirements of 25 Pa. Code § 129.77 have been added with this renewal permit.

(7) A compliance schedule has been added to Section C (Condition IX.) of the permit in order to address compliance with the requirements of 25 Pa. Code § 129.77.

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(M) 01/14/2022

This permit is the Synthetic Minor Renewal Permit (AUTH ID 1323679 APS No. 724602). Changes to the permit are indicated below.

(1) Section E now contains Source Group Restrictions, Alternative Operating Scenarios have been moved to Section F, Emissions Restriction Summary have been moved to Section G and Section H, Miscellaneous have been added.

(2) Source ID Nos 108 and 103B have been removed from the permit.

(3) Source ID No. 110 have been added to the permit to incorporate GP7-09-0066.

(4) Sources with similar conditions have been grouped. Conditions for these sources have been moved to Section E. Conditions for 104, 107, 711 and 712 are included Group 01 of Section E. Conditions for 103A and 103C are now included in Group 02 of Section E.

(5) New Conditions #023 (Reporting) and #024 (Report Format) have been added to Section B.

(6) The language of Section B, Condition #021 was updated for consistency with 25 Pa. Code §123.1.

(7) The following changes were made to reflect regulatory changes. (See Changes to Permit section of this Review Memo for details): Section C Conditions #009(b) and #017; and Section D, Source ID Nos. C02 and C05 Condition #002.



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

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