



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY NATURAL MINOR OPERATING PERMIT

Issue Date: August 16, 2021 Effective Date: November 1, 2021
Expiration Date: October 31, 2026

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: 36-03203

Natural Minor

Federal Tax Id - Plant Code: 20-1985076-1

Owner Information

Name: BENCH DOGS
Mailing Address: 10 INDUSTRIAL WAY
DENVER, PA 17517-9305

Plant Information

Plant: RLB VENTURES INC DBA BENCH DOGS/DENVER
Location: 36 Lancaster County 36924 East Cocalico Township
SIC Code: 2499 Manufacturing - Wood Products, Nec

Responsible Official

Name: RICHARD L BROADBENT
Title: PRESIDENT
Phone: (717) 967 - 8581 Ext.104 Email: rbroadbent@benchdogs.com

Permit Contact Person

Name: ANDREW BOWNE
Title: SR PROJ MGR
Phone: (717) 967 - 8591 Email: abowne@benchdogs.com

[Signature] \_\_\_\_\_
WILLIAMR. WEAVER, SOUTHCENTRAL REGION AIR PROGRAMMANAGER



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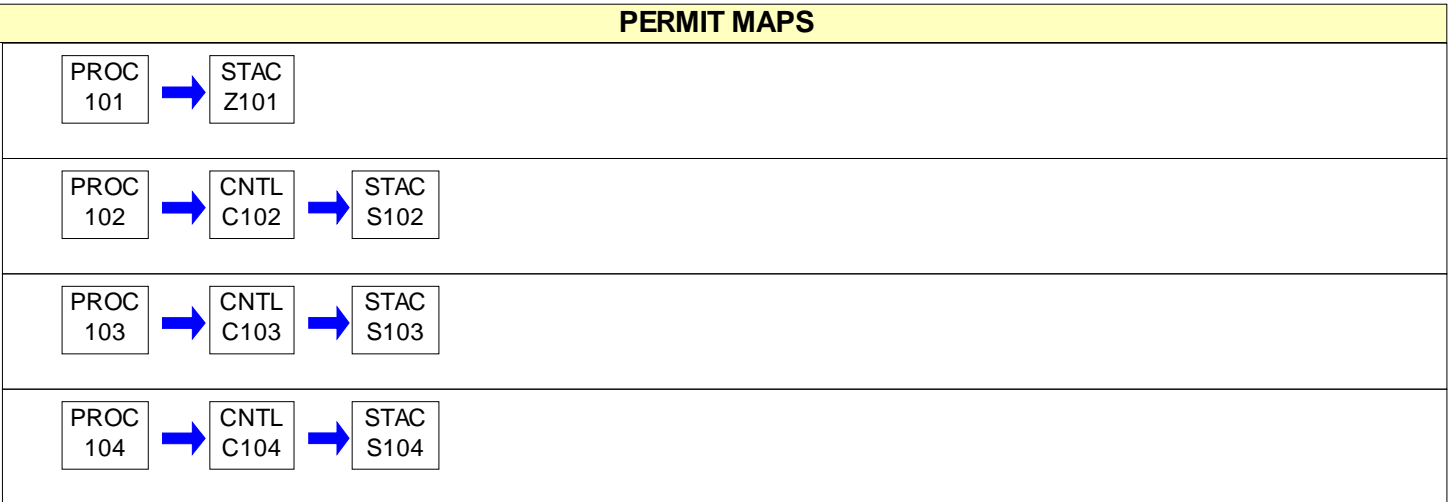
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
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103	FINISH BOOTH		
104	PAINT MIX & CLEANUP BOOTH		
C102	DRY PANEL FILTER		
C103	DRY PANEL FILTER		
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Z101	SCREEN PRINTING FUGITIVES		

**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:



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(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 §123.1]****Prohibition of certain fugitive emissions**

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

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

**# 002 [25 Pa. Code §123.2]****Fugitive particulate matter**

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

**# 003 [25 Pa. Code §123.31]****Limitations**

The permittee shall not allow the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the permittee's property.

**# 004 [25 Pa. Code §123.41]****Limitations**

The permittee shall not allow the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

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

**# 005 [25 Pa. Code §123.42]****Exceptions**

The emission limitation of Section C, Condition #004, shall not apply when:

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



## SECTION C. Site Level 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.

#### # 006 [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 certified in EPA Method 9 to measure plume opacity with the naked eye or with the aid of any device(s) approved by the Department.

#### # 007 [25 Pa. Code §127.441]

##### Operating permit terms and conditions.

The permittee shall conduct a monthly inspection around the plant periphery during daylight hours when the plant is in production to detect visible emissions, fugitive emissions, and malodorous air contaminants. Monthly inspections are necessary to determine:

- (a) The presence of visible emissions as stated in Section C, Condition #004. Visible emissions may be measured according to the methods specified in Section C, Condition #006. Alternately, plant personnel who observe visible emissions may report the incident of visible emissions to the Department within two (2) hours of the incident and make arrangements for a certified observer to measure the visible emissions.
- (b) The presence of fugitive emission beyond the plant property boundaries, as stated in Section C, Condition #002.
- (c) The presence of odorous air contaminants beyond the plant property boundaries, as stated in Section C, Condition #003.

### IV. RECORDKEEPING REQUIREMENTS.

#### # 008 [25 Pa. Code §127.441]

##### Operating permit terms and conditions.

The permittee shall maintain records of monthly inspections referenced in Section C, Condition #007. The records shall include, at a minimum, the following information:

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

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

### V. REPORTING REQUIREMENTS.

#### # 009 [25 Pa. Code §127.442]

##### Reporting requirements.

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

- (a) Malfunctions which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two hours after discovery of the incident. Telephone reports can be made to the Reading District Office at (610) 916-0100

**SECTION C. Site Level Requirements**

during normal business hours, or to the Department's Emergency Hotline at any time. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at <https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx>. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.

(b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirement of subsection (a) above, shall be reported to the Department, in writing, within five (5) days of malfunction discovery.

**VI. WORK PRACTICE REQUIREMENTS.****# 010 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

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

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

**VII. ADDITIONAL REQUIREMENTS.****# 011 [25 Pa. Code §129.14]****Open burning operations**

- (a) The permittee shall not conduct open burning of materials in such a manner that:
  - (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
  - (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
  - (3) The emissions interfere with the reasonable enjoyment of life and property.
  - (4) The emissions cause damage to vegetation or property.
  - (5) The emissions are or may be deleterious to human or animal health.
- (b) Exceptions. The requirements of Subsection (a) do not apply where the open burning operations result from:
  - (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public official.
  - (2) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
  - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
  - (4) A fire set solely for recreational or ceremonial purposes.
  - (5) A fire set solely for cooking food.

**SECTION C. Site Level Requirements**

(c) This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610 (3), or any other provision of the Solid Waste Management Act.

**VIII. COMPLIANCE CERTIFICATION.**

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

**IX. COMPLIANCE SCHEDULE.**

No compliance milestones exist.

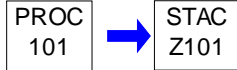


**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: SCREEN PRINTING

Source Capacity/Throughput:

**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 §127.441]****Operating permit terms and conditions.**

(a) The permittee shall maintain monthly records of the following:

- (1) Quantity of coating used;
- (2) Amount of VOC & HAP emissions (tons).

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

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General 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: 102

Source Name: LAMINATING BOOTH

Source Capacity/Throughput:

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall not permit the emission into the outdoor atmosphere of particulate matter from a source in a manner that the concentration of particulate matter in the effluent gas exceeds 0.02 grains per dry standard cubic foot.

# 002 [25 Pa. Code §129.77.]

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

On or after January 1, 2012, an owner or operator of a facility may not use or apply at the facility an adhesive, sealant, adhesive primer or sealant primer that exceeds the applicable VOC content limits, expressed as lbs VOC / gallon product, less water and exempt compounds, as specified in Table V of 25 Pa Code 129.77:

(a) Contact bond - 2.1 (250 grams VOC per liter, less water and exempt compounds)

**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).

**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.**

# 003 [25 Pa. Code §129.77.]

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

(a) This section applies to the owner or operator of a facility that uses or applies one or more of the following at the facility on or after January 1, 2012

**SECTION D. Source Level Requirements**

- (1) An adhesive, sealant, adhesive primer or sealant primer subject to the VOC content limits in Table V.
  - (2) An adhesive or sealant product applied to the listed substrate subject to the VOC content limits in Table VI.
  - (3) A surface preparation solvent or cleanup solvent.
- (b) On or after January 1, 2012, an owner or operator of a facility may not use or apply at the facility an adhesive, sealant, adhesive primer or sealant primer that exceeds the applicable VOC content limit in Table V or VI, except as provided elsewhere in this section.
- (c) On or after January 1, 2012, an owner or operator of a facility may not use or apply at the facility a surface preparation or cleanup solvent that exceeds the applicable VOC content limit or composite partial vapor pressure requirements of this section, except as provided elsewhere in this section.
- (d) The VOC content limits in Table VI for adhesives or sealants applied to particular substrates apply as follows:
- (1) If an owner or operator of a facility uses or applies at the facility an adhesive or sealant subject to a specific VOC content limit in Table V, the specific limit is applicable rather than the adhesive-to-substrate limit in Table VI.
  - (2) If an owner or operator of a facility uses or applies at the facility an adhesive to bond dissimilar substrates together, the applicable substrate category with the highest VOC content limit is the limit for this use.
- (e) An owner or operator of a facility subject to this section using or applying a surface preparation solvent or cleanup solvent at the facility may not:
- (1) Except as provided in paragraph (2) for single-ply roof membrane, use materials containing VOCs for surface preparation, unless the VOC content of the surface preparation solvent is less than 70 grams per liter of material or 0.6 pound of VOC per gallon of material.
  - (2) Use materials containing VOCs for surface preparation or cleanup when applying single-ply roof membrane, unless the composite partial vapor pressure, excluding water and exempt compounds, of the surface preparation solvent or cleanup solvent is less than or equal to 45 mm mercury at 20° C.
  - (3) Except as provided in subsection (f), use cleanup solvent materials containing VOCs for the removal of adhesives, sealants, adhesive primers or sealant primers from surfaces, other than from the parts of spray application equipment, unless the composite partial vapor pressure of the solvent is less than or equal to 45 mm mercury at 20° C.
- (f) Removal of an adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment shall be performed by one or more of the following methods:
- (1) Using an enclosed cleaning system, or an equivalent cleaning system as determined by the test method identified in subsection (z).
  - (2) Using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material or 0.6 pound of VOC per gallon of material.
  - (3) Soaking parts containing dried adhesive in a solvent if the composite partial vapor pressure of the solvent, excluding water and exempt compounds, is less than or equal to 9.5 mm mercury at 20° C and the parts and solvent are in a closed container that remains closed except when adding parts to or removing parts from the container.
- (g) NA - ADD-ON CONTROL EQUIPMENT NOT USED
- (h) An owner or operator of a facility subject to this section shall store or dispose of all absorbent materials, including cloth or paper, which are moistened with adhesives, sealants, primers, surface preparation solvents or cleanup solvents subject to this section, in nonabsorbent containers at the facility that are kept closed except when placing materials in or removing materials from the container.

**SECTION D. Source Level Requirements**

(i) An owner or operator of a facility subject to this section may not solicit, require or specify the use or application of an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent if the use or application would result in a violation of this section, unless the emissions are controlled through the use of add-on air pollution control equipment as specified in subsection (g). The prohibition of this subsection applies to all written or oral contracts created on or after January 1, 2012, under which an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent subject to this section is to be used or applied at a facility in this Commonwealth.

(j) An owner or operator of a facility subject to this section who uses or applies an adhesive, sealant, adhesive primer or sealant primer subject to this section may not add solvent to the adhesive, sealant, adhesive primer or sealant primer in an amount in excess of the manufacturer's recommendation for application, if this addition causes the adhesive, sealant, adhesive primer or sealant primer 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 as specified in subsection (g).

(k) This section does not apply to the use or application of the following compounds or products:

(1) Adhesives, sealants, adhesive primers or sealant primers being tested or evaluated in a research and development, quality assurance or analytical laboratory, if records are maintained as required in subsections (p) and (q).

(2) Adhesives, sealants, adhesive primers or sealant primers that are subject to § 129.73 (relating to aerospace manufacturing and rework) or Chapter 130, Subchapter B or C (relating to consumer products; and architectural and industrial maintenance coatings).

(3) Adhesives and sealants that contain less than 20 grams of VOC per liter of adhesive or sealant, less water and less exempt compounds, as applied.

(4) Cyanoacrylate adhesives.

(5) Adhesives, sealants, adhesive primers or sealant primers that are sold or supplied by the manufacturer or supplier in containers with a net volume of 16 fluid ounces or less, or a net weight of 1 pound or less, except plastic cement welding adhesives and contact adhesives.

(6) Contact adhesives that are sold or supplied by the manufacturer or supplier in containers with a net volume of 1 gallon or less.

(l) This section does not apply to the use of adhesives, sealants, adhesive primers, sealant primers, surface preparation solvents or cleanup solvents in the following operations:

(1) Tire repair operations, if the label of the adhesive states, "For tire repair only."

(2) The assembly, repair and manufacture of aerospace components or undersea-based weapons systems.

(3) The manufacture of medical equipment.

(4) Plaque laminating operations in which adhesives are used to bond clear, polyester acetate laminate to wood with lamination equipment installed prior to July 1, 1992. An owner or operator claiming an exemption under this paragraph shall record and maintain operational records sufficient to demonstrate compliance with this exemption, in accordance with subsections (o) thru(q).

(m) This section does not apply if the total VOC emissions from all adhesives, sealants, adhesive primers and sealant primers used or applied at the facility are less than 200 pounds or an equivalent volume, per calendar year. An owner or operator of a facility claiming exemption under this subsection shall record and maintain operational records sufficient to demonstrate compliance with this exemption, in accordance with subsections (o) thru (q).

(n) This section does not apply to the use or application of a noncomplying adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent if the total volume of noncomplying adhesives, sealants, primers, surface preparation and cleanup solvents used or applied facility-wide does not exceed 55 gallons per calendar year. An

**SECTION D. Source Level Requirements**

owner or operator of a facility claiming exemption under this subsection shall record and maintain operational records sufficient to demonstrate compliance with this exemption, in accordance with subsections (o) thru (q).

(o) Except as provided in subsection (p), each owner or operator subject to this section shall maintain records demonstrating compliance with this section, including the following information:

(1) A list of each adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent and cleanup solvent product 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 (1).

(3) The VOC content of each product on the list required under paragraph (1), as supplied.

(4) Catalysts, reducers or other components used and the mix ratio.

(5) The VOC content or vapor pressure of each product on the list required by paragraph (1), 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 (1).

(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 (1).

(p) For an adhesive, sealant, adhesive primer and sealant primer product subject to the laboratory testing exemption of subsection (k)(1), the person conducting the testing shall make and maintain records of all products used, including the following information:

(1) The product name.

(2) The product category of the material or type of application.

(3) The VOC content of the material.

(q) Records made to determine compliance with this section shall be:

(1) Maintained onsite for 5 years from the date the record is created.

(2) Made available to the Department upon receipt of a written request.

(r) Except as otherwise provided in this section, the VOC and solids content of nonaerosol adhesives (including one-part moisture cure urethane adhesives and silicone adhesives), sealants, adhesive primers, sealant primers, surface preparation solvents and cleanup solvents shall be determined using one of the following:

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

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

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

(t) The identity and concentration of exempt organic compounds shall be determined using one of the following:

**SECTION D. Source Level Requirements**

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

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

(u) The VOC content of a plastic cement welding adhesive or primer shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

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

(w) The composite partial vapor pressure of organic compounds in cleaning materials shall be determined by the following procedure:

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

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

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

(2) Calculating the composite partial vapor pressure using the following equation:

REFER TO REGULATION FOR EQUATION

(x) The vapor pressure of each single component compound shall be determined from one or more of the following:

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

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

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

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

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

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

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

(y) NA - ADD-ON CONTROL EQUIPMENT NOT USED

(z) The active and passive solvent losses from the use of an enclosed spray gun cleaning system or equivalent cleaning system, as listed in subsection (f)(1), shall be determined using the SCAQMD method, General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems, dated October 3, 1989, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

(1) The test solvent for this determination shall be a lacquer thinner with a minimum vapor pressure of 105 mm of mercury at 20° C.

**SECTION D. Source Level Requirements**

(2) The minimum test temperature shall be 15° C.

(aa) Another test method may be used to determine the VOC or solids content of a product if the request for approval of the test method meets the following requirements:

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

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

(3) The Department approves the request in writing.

(bb) For adhesive, sealant, adhesive primer or sealant primer products that do not contain reactive diluents, grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation:

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

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.

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

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

Where:

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

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

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

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

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

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

(dd) For low-solids adhesive, sealant, adhesive primer or sealant primer products, grams of VOC per liter of product thinned to the manufacturer's recommendation, including the volume of water and exempt compounds, shall be calculated according to the following equation:

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

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.

(ee) Percent VOC by weight shall be calculated according to the following equation:

**SECTION D. Source Level Requirements**

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

Where:

$W_v$  = weight of VOCs, in grams.

$W$  = weight of material, in grams.

(ff) 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).

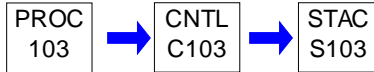


**SECTION D. Source Level Requirements**

Source ID: 103

Source Name: FINISH BOOTH

Source Capacity/Throughput:

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall not permit the emission into the outdoor atmosphere of particulate matter from a source in a manner that the concentration of particulate matter in the effluent gas exceeds 0.02 grains per dry standard cubic foot.

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

(a) Pursuant to the Best Available Technology (BAT) provisions of 25 Pa. Code Section 127.1, the VOC content, as applied of the surface coatings utilized in the surface coating operations shall be equal to or less than the appropriate allowables (expressed as lbs VOC per lb coating solids).

- (1) Topcoats and enamels = 3.0
- (2) Washcoat = 14.3
- (3) Final repair coat = 3.3
- (4) Basecoats = 2.2
- (5) Cosmetic specialty coatings = 14.3
- (6) Sealers = 3.9

(b) The VOC content of the as applied coating, expressed in units of pounds VOC per pound coating solids, shall be calculated as follows:

$$\text{VOC} = (\text{Wo})/(\text{Wn})$$

where:

- VOC = VOC content expressed in units of pounds VOC per pound coating solids
- Wo = weight percent of VOC (Wv - Ww - Wex)
- Wv = weight percent of total volatiles (100% - Wn)
- Ww = weight percent of water
- Wex = weight percent of exempt VOCs
- Wn = weight percent of solids of the as applied coating

(c) The VOC standards of subsection (a), above, do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The permittee requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

**II. TESTING REQUIREMENTS.**

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

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

The permittee shall demonstrate the VOC/HAP content of each surface coating by one of the following methods:

- (a) For surface coatings applied as they are received from the manufacturer, the permittee may demonstrate compliance with the applicable standard by obtaining EPA Method 24 certification testing from the manufacturer, or by maintaining VOC/HAP data sheets from the manufacturer.
- (b) In the absence of EPA Method 24 certification testing from the manufacturer, or VOC/HAP data sheets from the manufacturer, allowed under part (a), above, the permittee shall perform EPA Method 24 certification testing on all surface coatings applied as received from the manufacturer.
- (c) The permittee may use calculated VOC content values in lieu of EPA Method 24 certification testing for multi-part surface coatings where the permittee maintains VOC/HAP data sheets for all surface coating constituents (i.e. coatings, pigments, thinners/cutting solvents), and also maintains documentation from the manufacturer as to the recommended mix ratio of the parts. In the event of any inconsistency between the calculated VOC content and data obtained from EPA Method 24 certification testing, the latter shall take precedence.

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

(a) The permittee shall maintain records sufficient to demonstrate compliance with this section. At a minimum, the facility shall maintain daily records of the following parameters for each coating, thinner, and other components 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.
- (7) The VOC content of each coating, thinner and other component as supplied.
- (8) The VOC content of each as applied coating.

(b) The records shall be maintained for a period of 5 years and be made available upon 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.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

A person may not cause or permit the emission into the outdoor atmosphere of VOCs from the application of surface coatings unless the coatings are applied using electrostatic, airless, curtain coating, roller coating, hand roller, hand brush, flow coating, dip coating or high volume-low pressure application equipment.

Air atomized sprays may be used to apply cosmetic specialty coatings if the volume of the cosmetic specialty coating is less than 5% by volume of the total coating used at the facility or to apply final repair coatings.

**SECTION D. Source Level Requirements****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep all surface coating containers which contain VOCs tightly closed when not in use. Spills of materials containing VOCs shall be cleaned up immediately with cleaning cloths or other methods that will minimize the evaporation of VOCs into the atmosphere. Solvent-laden cleaning cloths shall be kept in closed containers when not in use.

**VII. ADDITIONAL REQUIREMENTS.**

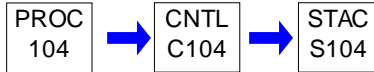
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: 104

Source Name: PAINT MIX &amp; CLEANUP BOOTH

Source Capacity/Throughput:

**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 §127.441]****Operating permit terms and conditions.**

(a) The permittee shall maintain monthly records of the following:

- (1) Quantity and identity of all VOC solvents used for cleanup purposes;
- (2) Amount of VOC & HAP emissions (tons).

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

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

The permittee shall record the following information for waste coatings, solvents or mixtures sent off-site for recycling or disposal, if deducting VOCs from waste from emission tracking.

- (a) Pounds and gallons per month of waste coating, solvents or mixtures shipped from the facility,
- (b) Waste profile or sampling data for each shipment, and
- (c) Identification of the waste disposal company for each shipment.

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

(a) The permittee shall comply with the following for cleaning materials:

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

**SECTION D. Source Level Requirements**

- (2) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.
- (4) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- (5) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.

**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.**



**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.



**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.



**SECTION H. Miscellaneous.**

#001

This permit supersedes State-Only Operating Permit No. 36-03203, issued on 10/19/16.

#002

The following sources and activities are not subject to any specific work practice standards, testing, monitoring, record keeping, or reporting requirements:

- Woodworking operations controlled by an internal venting Torit dust collector



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

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