



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

TITLE V/STATE OPERATING PERMIT

Issue Date: October 4, 2023

Effective Date: October 4, 2023

Expiration Date: October 3, 2028

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

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 09-00030

Federal Tax Id - Plant Code: 25-1808556-2

Owner Information

Name: BRIGHTSMITH LLC
Mailing Address: 120 ENTERPRISE AVE
MORRISVILLE, PA 19067-3703

Plant Information

Plant: BRIGHTSMITH LLC/FALLS TWP
Location: 09 Bucks County 09002 Falls Township
SIC Code: 3479 Manufacturing - Metal Coating And Allied Services

Responsible Official

Name: JIM BUS
Title: PRES
Phone: (610) 395 - 8445 Ext.211 Email: jbus@atas.com

Permit Contact Person

Name: MIKE DELORENZO
Title: DIR OF OPS
Phone: (215) 337 - 7115 Email: mdelorenzo@brightsmithcoaters.com

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



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General Title V Requirements

- #001 Definitions
- #002 Prohibition of Air Pollution
- #003 Property Rights
- #004 Permit Expiration
- #005 Permit Renewal
- #006 Transfer of Ownership or Operational Control
- #007 Inspection and Entry
- #008 Compliance Requirements
- #009 Need to Halt or Reduce Activity Not a Defense
- #010 Duty to Provide Information
- #011 Reopening and Revising the Title V Permit for Cause
- #012 Reopening a Title V Permit for Cause by EPA
- #013 Operating Permit Application Review by the EPA
- #014 Significant Operating Permit Modifications
- #015 Minor Operating Permit Modifications
- #016 Administrative Operating Permit Amendments
- #017 Severability Clause
- #018 Fee Payment
- #019 Authorization for De Minimis Emission Increases
- #020 Reactivation of Sources
- #021 Circumvention
- #022 Submissions
- #023 Sampling, Testing and Monitoring Procedures
- #024 Recordkeeping Requirements
- #025 Reporting Requirements
- #026 Compliance Certification
- #027 Operational Flexibility
- #028 Risk Management
- #029 Approved Economic Incentives and Emission Trading Programs
- #030 Permit Shield
- #031 Reporting
- #032 Report Format

Section C. Site Level Title V Requirements

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

Section D. Source Level Title V Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements



SECTION A. Table of Contents

D-VI: Work Practice Standards
D-VII: Additional Requirements

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

Section E. Source Group Restrictions

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

Section F. Alternative Operating Scenario(s)

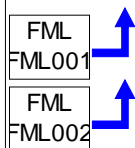
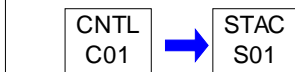
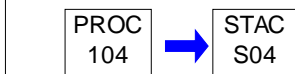
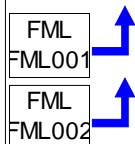
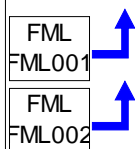
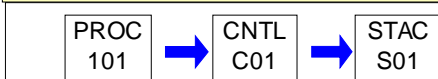
F-I: Restrictions
F-II: Testing Requirements
F-III: Monitoring Requirements
F-IV: Recordkeeping Requirements
F-V: Reporting Requirements
F-VI: Work Practice Standards
F-VII: Additional Requirements

Section G. Emission Restriction Summary

Section H. Miscellaneous

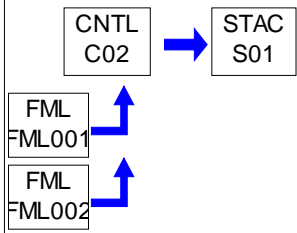
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput		Fuel/Material
101	PAINT BAKE OVEN-PRIME	25.631	MCF/HR	NATURAL GAS
		987.000	Gal/HR	Propane
		1,545.000	Lbs/HR	PAINT & SOLVENT
101A	PAINT BAKE OVEN-FINISH	25.631	MCF/HR	NATURAL GAS
		987.000	Gal/HR	Propane
		2,060.000	Lbs/HR	PAINT & SOLVENT
102	COIL COATING CLEAN UP	8.500	Lbs/HR	CLEAN UP SOLV.
104	STORAGE TANKS (6)	N/A		PAINT/SOLVENTS
107	MISCELLANEOUS SOURCES			
C01	PRIME OVEN OXIDIZER	20.000	MMCF/HR	Natural Gas
C02	FINISH OVEN OXIDIZER	20.000	MMCF/HR	Natural Gas
FML001	NATURAL GAS PIPELINE			
FML002	PROPANE TANKS			
S01	OXIDIZER STACK			
S04	TANK STACK			

PERMIT MAPS



PERMIT MAPS



**SECTION B. General Title V 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 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the act.

#003 [25 Pa. Code § 127.512(c)(4)]**Property Rights**

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

#004 [25 Pa. Code § 127.446(a) and (c)]**Permit Expiration**

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

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e), 127.503 & 127.704(b)]**Permit Renewal**

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.

(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]**Transfer of Ownership or Operational Control**

(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:

(1) The Department determines that no other change in the permit is necessary;

(2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,

(3) A compliance review form has been submitted to the Department and the permit transfer has been approved by

**SECTION B. General Title V Requirements**

the Department.

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]**Inspection and Entry**

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

- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

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

#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]**Compliance Requirements**

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

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

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

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

#009 [25 Pa. Code § 127.512(c)(2)]**Need to Halt or Reduce Activity Not a Defense**

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

**SECTION B. General Title V Requirements****#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]****Duty to Provide Information**

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

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

#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]**Reopening and Revising the Title V Permit for Cause**

(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#012 [25 Pa. Code § 127.543]**Reopening a Title V Permit for Cause by EPA**

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

#013 [25 Pa. Code § 127.522(a)]**Operating Permit Application Review by the EPA**

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

**SECTION B. General Title V Requirements****#014 [25 Pa. Code § 127.541]****Significant Operating Permit Modifications**

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#015 [25 Pa. Code §§ 121.1 & 127.462]**Minor Operating Permit Modifications**

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#016 [25 Pa. Code § 127.450]**Administrative Operating Permit Amendments**

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

#017 [25 Pa. Code § 127.512(b)]**Severability Clause**

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

#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]**Fee Payment**

(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). 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.

(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.

(c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.

**SECTION B. General Title V Requirements**

(d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

(e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.

- (1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.
- (2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.
- (3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

#019 [25 Pa. Code §§ 127.14(b) & 127.449]**Authorization for De Minimis Emission Increases**

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

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

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

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

- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
- (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

**SECTION B. General Title V Requirements**

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

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

(d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#020 [25 Pa. Code §§ 127.11a & 127.215]**Reactivation of Sources**

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

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

#021 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the

**SECTION B. General Title V Requirements**

phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]**Submissions**

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

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

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

Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

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

#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]**Sampling, Testing and Monitoring Procedures**

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#024 [25 Pa. Code §§ 127.511 & Chapter 135]**Recordkeeping Requirements**

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

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

**SECTION B. General Title V Requirements**

(5) The results of the analyses.

(6) The operating conditions as existing at the time of sampling or measurement.

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

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]**Reporting Requirements**

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

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#026 [25 Pa. Code § 127.513]**Compliance Certification**

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

**SECTION B. General Title V Requirements****#027 [25 Pa. Code § 127.3]****Operational Flexibility**

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

#028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]**Risk Management**

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:

- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
 - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

**SECTION B. General Title V Requirements**

(e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

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

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]**Approved Economic Incentives and Emission Trading Programs**

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

#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]**Permit Shield**

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

#031 [25 Pa. Code §135.3]**Reporting**

(a) 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 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.

#032 [25 Pa. Code §135.4]**Report Format**

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.**

The permittee shall not 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). The permittee shall not 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.
- (7) blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.
- (8) coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in 25 Pa. Code §§ 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations).
- (9) sources and classes of sources other than those identified in (a)-(h), 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**

The permittee shall not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a)(1-9), (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**

The permittee shall 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**

The permittee shall 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.

**SECTION C. Site Level Requirements****# 006 [25 Pa. Code §123.42]****Exceptions**

The opacity limitations as per 25 Pa. Code § 123.41 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 the sources specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions).

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

[Additional authority for this permit condition is derived from 40 C.F.R. § 63.5120(a)(1) and 40 C.F.R. § 63.5170 Table 1(3)]

The permittee shall limit organic HAP emissions from the Prime Oven Oxidizer and the Finish Oven Oxidizer to the level no more than two (2) percent of the organic HAP applied for each month during each 12 month compliance period (98% reduction of HAPs).

[Compliance with 98% reduction of HAP's shall be demonstrated through stack testing]

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

The permittee shall limit the total VOC emissions from the facility to less than 49.99 tons per year, calculated on a 12-month rolling sum.

009 [25 Pa. Code §129.14]**Open burning operations**

The permittee shall not permit the open burning of material in the Southeast Air Basin except 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 officer;
- (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 in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation;
- (5) 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;
- (6) a fire set solely for recreational or ceremonial purposes; or
- (7) a fire set solely for cooking food.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h)]

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of

**SECTION C. Site Level Requirements**

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, the most current version of the DEP Source Testing Manual, and the EPA Clean Air Act National Stack Testing Guidance, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

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

[Additional Authority for this permit condition is also derived from 25 Pa. Code 127.512(h), 25 Pa. Code 139.11 and 40 C.F.R. 63.5160(D)(1)(vii)]

(a) The permittee shall perform a stack test using 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. In accordance with 25 Pa. Code § 139.11(1), performance tests shall be conducted while the source is operating at normal operations at the facility. Brightsmith shall test under the following condition:

1. While the Finish Line Oxidizer is operating independently and
2. While the Prime Line Oxidizer and Finish Line Oxidizer are operating simultaneously.

Refer to PADEP Source Testing Program website online for further information related to source testing including Source Testing FAQ and the PADEP Source Testing Manual.

(b) The stack test shall, at a minimum, test for:

- (i) The NO_x emission rate in lb/hr - The NO_x concentrations and emission rate shall be determined in accordance with EPA Method 7E at the combined oxidizer outlet with each oxidizer running simultaneously.
- (ii) Overall destruction efficiency for HAP's (using VOC's as the surrogate) to demonstrate compliance with condition number 007 in Section C of the permit, and
- (iii) The capture and destruction efficiency to demonstrate compliance with condition number 004 in Section D, Source ID C01 and C02 for both the Prime and Finish Oven Oxidizer.

Tests shall be conducted in accordance with the provisions of EPA Method/s or other Department approved methodology and 25 Pa. Code Chapter 139. Tests shall also be conducted in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance.

(c) At least ninety (90) days prior to the test, the permittee 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 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.

Note: DEP reserves the right to revise the operating conditions of the performance tests based on the most recent DEP approved test.

**SECTION C. Site Level Requirements****# 012 [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. Plan approval number(s)
- b. Operating permit number
- c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- d. Special purpose(s) (Consent Order, RFD, RACT, 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.**# 013 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions shall 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 the Department.

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

Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

(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);

**SECTION C. Site Level Requirements**

- (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.

(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.

NOTE: The Department has approved monthly monitoring, effective April 23, 2004.

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

The permittee shall calculate the total VOC emissions in tons from the facility monthly and on a 12-month rolling sum.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]

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

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

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

The permittee shall keep records of the total VOC emissions (tons) from the facility monthly and on a 12-month rolling sum.

V. REPORTING REQUIREMENTS.**# 018 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

(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,

**SECTION C. Site Level Requirements**

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.

019 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c).]

The permittee shall submit the following:

(a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under condition #26 of section B of this permit. The annual certificate of compliance shall be submitted to the Department electronically, and to EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov. The subject line shall read: "TVOP No. 09-00030, Facility Name."

(b) A semi-annual deviation report to DEP, due by October 1 of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the obligation for the second deviation reporting period (July 1 through December 31 of the previous year).

020 [25 Pa. Code §135.3]**Reporting**

The permittee shall submit by March 1, of each year, an annual emission statement for NOx and VOC emissions for the preceding calendar year. Additionally, a description of the method used to calculate the emissions shall be included. The statement shall contain a certification by a company official or plant manager that the information contained in the statement is true and accurate.

**SECTION C. Site Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 021 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee, responsible for any source specified in 25 Pa. Code § 123.1(a)(1-9), 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, as approved by the Department, 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, water, or other suitable chemicals, as approved by the Department, 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.

022 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The permittee shall not modify any air contaminant system identified in this permit, prior to obtaining Department approval, except those modifications authorized by Condition #019(g), of Section B, of this permit.

023 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The following work practice standards shall be followed:

- (a) All VOC-containing materials shall be stored in closed, nonabsorbent, non-leaking containers when not being mixed or transferred to another container.
- (b) Cloth and paper, or other absorbent applicators, moistened with coatings, solvents or cleaning solvents, shall be stored in closed, nonabsorbent, non-leaking containers.
- (c) All spills shall be cleaned up as soon as possible.

024 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.511]

The permittee shall comply with the following "Rule Effectiveness Program":

- (a) The company shall provide at least 16 hours of introductory training to new employees and 4 hours per year of refresher training. This training shall include the training typically conducted at the facility as well as specific training on the proper operation and maintenance of the source and its control devices for those employees who are directly involved in the operation and/or maintenance of the control device. The company shall keep records of the type and amount of training provided to each operator. The records shall be kept for a minimum of five (5) years and be made available to the Department upon request.
- (b) A copy of the Operation and Maintenance (O&M) instruction for this control device shall be kept near the sources and be made available to the Department upon request.

025 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The permittee shall ensure that the source(s) and air pollution control device(s), listed in Section A and Section H, where applicable, of this permit, are operated and maintained in a manner consistent with good operating and maintenance

**SECTION C. Site Level Requirements**

practices, and in accordance with manufacturer's specifications.

VII. ADDITIONAL REQUIREMENTS.

026 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This facility is subject to all applicable regulations in accordance with 40 C.F.R. PART 63 Subpart SSSS—National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil.

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

#027 15-JAN-24

No later than this date, the Permittee shall:

(a) Conduct a stack test, performance tests shall be conducted while the source is operating at normal operations at the facility. Brightsmith shall test under the following condition:

1. While the Finish Line Oxidizer is operating independently and
2. While the Prime Line Oxidizer and Finish Line Oxidizer are operating simultaneously.

Refer to PADEP Source Testing Program website online for further information related to source testing including Source Testing FAQ and the PADEP Source Testing Manual.

(b) The stack test shall, at a minimum, test for:

- (i) The NO_x emission rate in lb/hr - The NO_x concentrations and emission rate shall be determined in accordance with EPA Method 7E at the combined oxidizer outlet with each oxidizer running simultaneously.
- (ii) Overall destruction efficiency for HAP's (using VOC's as the surrogate) to demonstrate compliance with condition number 007 in Section C of the permit, and
- (iii) The capture and destruction efficiency to demonstrate compliance with condition number 004 in Section D, Source ID C01 and C02 for both the Prime and Finish Oven Oxidizer.

Tests shall be conducted in accordance with the provisions of EPA Method/s or other Department approved methodology and 25 Pa. Code Chapter 139. Tests shall also be conducted in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance.

#028 15-MAR-24

No later than this date, the Permittee shall:

(a) Submit an electronic copy of the complete test report, including all operating conditions, shall be submitted to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office.

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), provide the first and last day of testing



SECTION C. Site Level Requirements

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, Tier II, etc.)

*** Permit Shield In Effect ***

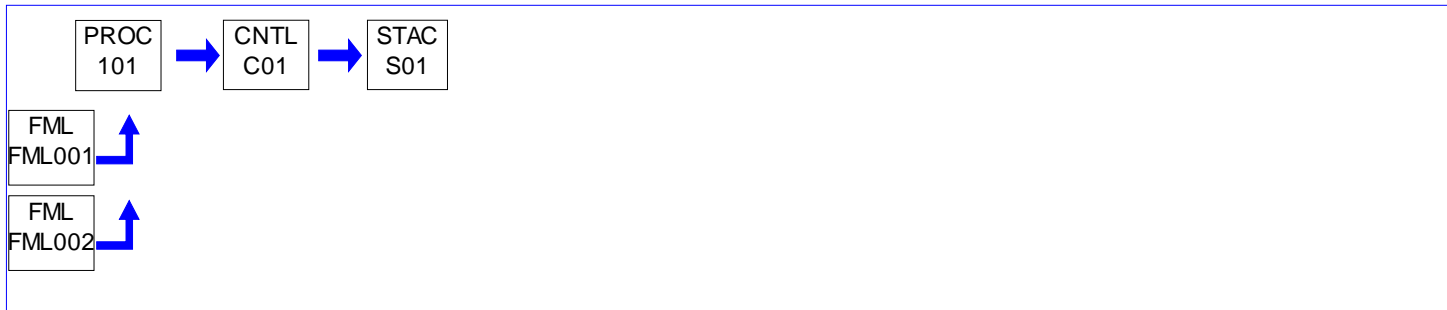
**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: PAINT BAKE OVEN-PRIME

Source Capacity/Throughput:	25.631 MCF/HR	NATURAL GAS
	987.000 Gal/HR	Propane
	1,545.000 Lbs/HR	PAINT & SOLVENT

Conditions for this source occur in the following groups: GRP1
GRP2

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall keep records of the amount and type of fuel used monthly and on a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

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

The requirements under this Source ID (101) applies to the following:

**SECTION D. Source Level Requirements**

- The Prime Coating Line
- The Prime Oven
- The Prime Quench

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

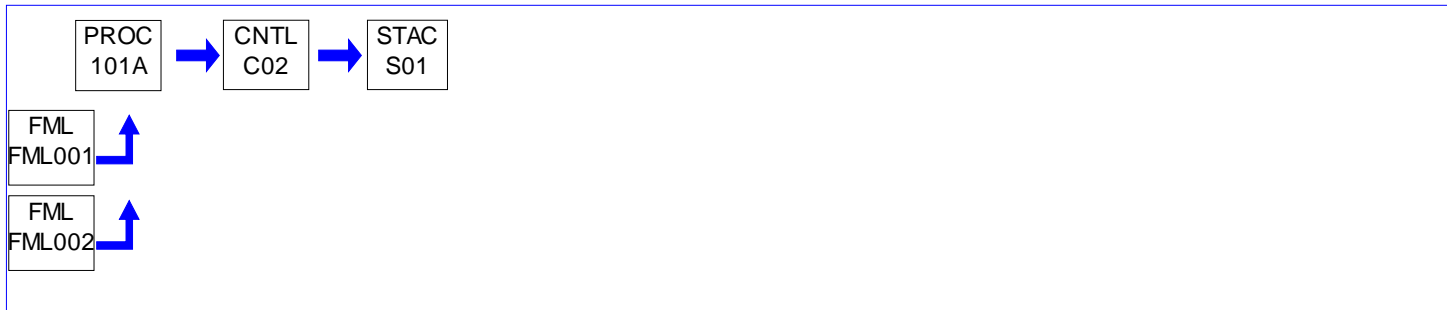
**SECTION D. Source Level Requirements**

Source ID: 101A

Source Name: PAINT BAKE OVEN-FINISH

Source Capacity/Throughput:	25.631 MCF/HR	NATURAL GAS
	987.000 Gal/HR	Propane
	2,060.000 Lbs/HR	PAINT & SOLVENT

Conditions for this source occur in the following groups: GRP1
GRP2

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall keep records of the amount and type of fuel used monthly and on a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

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

The requirements under this Source ID (101A) applies to the following:

**SECTION D. Source Level Requirements**

- The Finish coating line
- The Finish oven
- The Finish Quench

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

**SECTION D. Source Level Requirements**

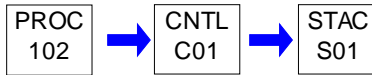
Source ID: 102

Source Name: COIL COATING CLEAN UP

Source Capacity/Throughput:

8.500 Lbs/HR

CLEAN UP SOLV.

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.512(h)]

The permittee shall limit the VOC emissions from the cleanup solvents to less than 26.8 tons per year calculated on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall monitor the amount and type of solvents used in the cleanup operations on a monthly basis.

(b) The permittee shall calculate the VOC emissions from the cleanup solvent(s) monthly and on a 12-month rolling sum.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

(a) The permittee shall keep records of the amount of solvents used in cleanup operations monthly.

(b) The permittee shall keep records of the VOC emissions from the cleanup solvents monthly and on a 12-month rolling sum.

(c) The permittee shall keep records of the MSDS and/or certified product data sheets (CPDS) for each cleaning solvent and make the MSDS/CPDS available to the Department upon request.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that all emissions from this source are routed to the Prime Oven 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 (Title V General Requirements).

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

**SECTION D. Source Level Requirements**

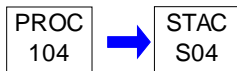
Source ID: 104

Source Name: STORAGE TANKS (6)

Source Capacity/Throughput:

N/A

PAINT/SOLVENTS

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the amount and type of solvent, waste solvent, and/or paint removed from, and/or added to, each tank, on a monthly basis.

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

The permittee shall keep records of the amount and type of solvent, waste solvent, and/or paint removed from, and/or added to, each tank on a monthly basis.

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

The permittee shall keep records of the following information for each tank:

- (a) Type of material stored and the vapor pressure of each material
- (b) Annual throughput and turnovers
- (c) The MSDS for the material stored in each tank

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

The permittee shall keep and maintain a record of the pressure or vacuum setting of the pressure relief valves on each required tank (1A, 2A, VT3 and 3A).

V. REPORTING REQUIREMENTS.

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.57]



SECTION D. Source Level Requirements

The permittee shall operate and maintain a pressure relief valve on Waste Solvent Tank (1A), Paint Storage Tank (2A) and Cleaning Solvent (VT3) Tank (3A).

The tanks mentioned above shall maintain their pressure relief valves in good operating condition and which are set to release at no less than 0.7 psig (4.8 kPa) of pressure or 0.3 psig (2.1 kPa) of vacuum or the highest possible pressure and vacuum in accordance with state or local fire codes or the National Fire Prevention Association Guideline or other National Consensus is acceptable to the Department.

VII. ADDITIONAL REQUIREMENTS.

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

The requirements under this Source ID (104) applies to the following tanks:

Tank Nos.	Material Stored	Capacity (gal.)
1A	Waste Solvent	8,000
2A	Paint	8,000
3A	Cleaning Solvent (VT3)	6,000
Propane 1	Propane	30,000
Propane 2	Propane	30,000
Propane 3	Propane	30,000

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

**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: MISCELLANEOUS SOURCES

Source Capacity/Throughput:

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

The permittee shall limit the total combined VOC emissions from this source to less than 2.7 tons per year.

II. TESTING REQUIREMENTS.

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

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

(a) The permittee shall monitor the type and amount of VOC solvent used and the amount of waste solvent generated for each source listed in the Additional Requirement condition for this Source ID on a monthly basis;

(b) The permittee shall monitor the amount of waste solvent shipped out on a monthly basis.

(c) The permittee shall calculate the total combined VOC emissions from this source monthly and on a 12-month rolling sum.

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

(a) The permittee shall keep records of the type and amount of VOC solvent used and the amount of waste solvent generated for each source listed in the Additional Requirement condition for this Source ID on a monthly basis;

(b) The permittee shall keep records of the amount of waste solvent shipped out on a monthly basis.

(c) The permittee shall keep records of the total combined VOC emissions from this source monthly and on a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

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

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

The permittee shall ensure that each container, drum tank for solvent and waste solvent storage shall be kept closed when it is not in use.

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

The source consists of the following:

**SECTION D. Source Level Requirements**

- (1) Waste Transfer Area (Storage Tank Transfer Area)
- (2) Drum/Container Filling Operations
- (3) QC Laboratory Hoods

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

**SECTION D. Source Level Requirements**

Source ID: C01

Source Name: PRIME OVEN OXIDIZER

Source Capacity/Throughput:

20.000 MMCF/HR

Natural Gas

Conditions for this source occur in the following groups: GRP2
GRP3
SUBPART SSSS

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.511 and 40 C.F.R. § 63.5150]

(a). The minimum combustion chamber temperature of the oxidizer shall be 1400°F or the average temperature of the latest passing Department approved and accepted stack test (average of the three 1-hour test runs), during coating operations, whichever is greater.

(b). Compliance with (a) shall be determined based on 3-hour block averaging periods starting at midnight.

(c). When calculating the 3-hour block average temperature, the permittee shall not include temperature recordings when no coating is taking place.

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.511]

(a). The permittee shall not start the production on the coil coating lines until the Oxidizer combustion chamber temperatures reaches the minimum operating temperature according to condition 002 for this source.

(b). The minimum combustion chamber temperature for the Oxidizer shall be maintained at 600 °F during cleanup operations.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]

(a). The permittee shall limit the combined NOx emission rate (lb/hr) from the Prime Oven Oxidizer and the Finish Oven Oxidizer during production to less than 10.0 lb/hr.

(b) The permittee shall limit the combined NOx emissions, during production and clean up, in tons per year (tpy) from the Prime Oven Oxidizer and the Finish Oven Oxidizer to less than 28.7 tons per year calculated on a 12-month rolling sum.

[Compliance with this condition, paragraph (a), shall be demonstrated through stack testing]

**SECTION D. Source Level Requirements****Control Device Efficiency Restriction(s).****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source shall have a minimum overall control efficiency (capture and destruction) of at least 90% for VOC's, the Prime and Finish Oxidizers combined.

NOTE: Compliance with this condition will be demonstrated with stack testing pursuant to Condition #011 in Section C of this permit.

II. TESTING REQUIREMENTS.

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall continuously monitor the temperature of the combustion chamber for this source while operating.

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

The permittee shall record the date, time, type of coating being applied, and VOC content of the coating if the Oxidizer drops below the minimum operating temperature. The data shall be recorded and made available to the Department upon request.

NOTE: This requirement is intended to ensure that there is sufficient information to calculate actual emissions from the facility and in no way relieves the facility of their responsibility to always operate the oxidizer at the minimum temperature as required elsewhere in this permit.

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

The permittee shall keep records of the oxidizer temperature during clean-up operations.

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

The permittee shall continuously record the temperature of the combustion chamber temperature for this source while operating.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 40 C.F.R. § 63.5190]

To determine compliance with the 3 hour block average temperature limit, the permittee shall average the temperature of the oxidizer during coating operations only and keep records of the 3-hr block averages.

The temperature recorded during times when no coating is taking place, shall not be included in the 3-hour block averages.

V. REPORTING REQUIREMENTS.

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

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code §§ 127.511 and 129.93]

- (a) The Prime Oven Oxidizer shall be operated and maintained in accordance with the manufacturer's specifications and good air pollution control practices.
- (b) The Prime Oven Oxidizer shall be equipped with a temperature measuring and recording device which continuously indicates and records the temperature of the combustion chamber.

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: C02

Source Name: FINISH OVEN OXIDIZER

Source Capacity/Throughput: 20.000 MMCF/HR Natural Gas

Conditions for this source occur in the following groups: GRP2
GRP3
SUBPART SSSS

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.511 and 40 C.F.R. § 63.5150]

(a). The minimum combustion chamber temperature of the oxidizer shall be 1400°F or the average temperature of the latest passing Department approved and accepted stack test (average of the three 1-hour test runs), during coating operations, whichever is greater.

(b). Compliance with (a) shall be determined based on 3-hour block averaging periods starting at midnight.

(c). When calculating the 3-hour block average temperature, the permittee shall not include temperature recordings when no coating is taking place.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]

(a). The permittee shall limit the combined NOx emission rate (lb/hr) from the Prime Oven Oxidizer and the Finish Oven Oxidizer during production to less than 10.0 lb/hr.

(b) The permittee shall limit the combined NOx emissions, during production and clean up, in tons per year (tpy) from the Prime Oven Oxidizer and the Finish Oven Oxidizer to less than 28.7 tons per year calculated on a 12-month rolling sum.

[Compliance with this condition, paragraph (a), shall be demonstrated through stack testing]

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.511]

(a). The permittee shall not start the production on the coil coating lines until the Oxidizer combustion chamber temperatures reaches the minimum operating temperature according to condition 001 for this source.

(b). The minimum combustion chamber temperature for the Oxidizer shall be maintained at 600 °F during cleanup operations.

**SECTION D. Source Level Requirements****Control Device Efficiency Restriction(s).****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source shall have a minimum overall control efficiency (capture and destruction) of at least 90% for VOC's.

[Compliance with this condition will be demonstrated with stack testing pursuant to Condition #011 in Section C of this permit]

II. TESTING REQUIREMENTS.

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall continuously monitor the temperature of the combustion chamber for this source while operating.

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

The permittee shall record the date, time, type of coating being applied, and VOC content of the coating if the Oxidizer drops below the minimum operating temperature. The data shall be recorded and made available to the Department upon request.

NOTE: This requirement is intended to ensure that there is sufficient information to calculate actual emissions from the facility and in no way relieves the facility of their responsibility to always operate the oxidizer at the minimum temperature as required elsewhere in this permit.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 40 C.F.R. § 63.5190]

To determine compliance with the 3 hour block average temperature limit, the permittee shall average the temperature of the oxidizer during coating operations only and keep records of the 3-hr block averages

The temperature recorded during times when no coating is taking place, shall not be included in the 3-hour block averages.

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

The permittee shall keep records of the oxidizer temperature during clean-up operations.

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

The permittee shall continuously record the temperature of the combustion chamber temperature for this source while operating.

V. REPORTING REQUIREMENTS.

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

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code §§ 127.511 and 129.93]

(a) The Finish Oven oxidizer shall be operated and maintained in accordance with the manufacturer's specifications and good air pollution control practices.

(b) The Finish Oven oxidizer shall be equipped with a temperature measuring and recording device which continuously indicates and records the temperature of the combustion chamber.

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION E. Source Group Restrictions.**

Group Name: GRP1

Group Description: Paint Bake Ovens

Sources included in this group

ID	Name
101	PAINT BAKE OVEN-PRIME
101A	PAINT BAKE OVEN-FINISH

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

1. The Finish Oven Thermal oxidizer (C02) is to operate at all times when coating is being applied at source 101A Paint Bake Oven-Finish.
2. The Prime Oven Thermal oxidizer (C01) and Finish Oven Thermal oxidizer (C02) are to operate at all times when coatings are being applied at source 101 Paint Bake Oven-Prime and source 101A Paint Bake Oven-Finish.

Throughput Restriction(s).**# 002 [25 Pa. Code §129.52]****Surface coating processes**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.512(h)]

The permittee shall ensure that:

The water-based coatings as applied, shall not contain a VOC content in excess of 2.6 pounds per gallon of coating minus water or 4.02 lbs VOC per gal coating solids (0.48 kg per liter coating solids) when operating.

II. TESTING REQUIREMENTS.

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

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

The permittee shall calculate the following:

- (1) The amount of coatings as applied (in gallons) on a daily basis
- (2) The VOC content of each coating as applied on a daily basis (may be demonstrated by certified product data sheets)
- (3) The VOC emissions for this source monthly and on a 12-month rolling sum using the data collected in paragraphs (1) and (2) above and the overall control efficiency from the most recent stack test.
- (4) The VOC content from the amount of cleanup solvent used, the amount of clean up solvent waste shipped out and the date of the shipment, monthly.

[Compliance with this condition assures compliance with 25 Pa. Code 129.52(c) and 40 C.F.R. 63.5120(a)(1)]

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

The permittee shall monitor the run time (date, start time and stop time) for the operation of this source when operating on propane.

**SECTION E. Source Group Restrictions.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

1. The permittee shall monitor, using a Department approved method, the amount and type of fuel used for the paint bake oven prime and paint bake oven finish line monthly and on a 12-month rolling sum.
2. The permittee shall calculate the NOx emissions from the paint bake oven prime and paint bake oven finish line monthly and on a 12-month rolling sum.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall record the run time (date, start time and stop time) when this source is operating on propane.

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

The permittee shall keep records of the VOC emission calculations from the entire operating line, monthly and on a 12-month rolling sum.

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

The permittee shall keep records of the following:

1. The amount and type of fuel used for the paint bake oven prime and paint bake oven finish line monthly and on a 12-month rolling sum.
2. The NOx emissions from the paint bake oven prime and paint bake oven finish line monthly and on a 12-month rolling sum.

009 [25 Pa. Code §129.52]**Surface coating processes**

[Additional Authority for this permit condition is also derived from 25 Pa. Code § 129.52(c)(1-3) and 25 Pa. Code § 129.95]

(a) For each Line, the permittee shall maintain records to demonstrate compliance with 25 Pa. Code § 129.52. The permittee shall maintain daily records of:

- (1) The following parameters for each coating, thinner and other component as applied:
 - (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 categories 1-10.
- (2) The VOC content of each coating, thinner and other component as supplied.
- (3) The VOC content of each as applied coating in pounds per gallon of coating minus water or pounds of VOC per gallon coating solids.

**SECTION E. Source Group Restrictions.**

(b) The permittee shall maintain monthly records of the amount of cleanup solvent used, the amount of solvent waste shipped out and the date of the shipment.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION E. Source Group Restrictions.**

Group Name: GRP2

Group Description: Combustion Sources (Fuel Usages)

Sources included in this group

ID	Name
101	PAINT BAKE OVEN-PRIME
101A	PAINT BAKE OVEN-FINISH
C01	PRIME OVEN OXIDIZER
C02	FINISH OVEN OXIDIZER

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION E. Source Group Restrictions.**

Group Name: GRP3

Group Description: Oxidizers

Sources included in this group

ID	Name
C01	PRIME OVEN OXIDIZER
C02	FINISH OVEN OXIDIZER

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a). The permittee shall monitor the fuel usage monthly.

(b). The permittee shall calculate the NOx emissions (tpy) monthly and on a 12-month rolling sum using the calculated emission factor from the most recently passed Department approved and accepted stack test.

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

(a). The permittee shall keep records of the NOx emissions (tpy) monthly and on a 12-month rolling sum.

(b). The permittee shall keep records of the fuel usage on a monthly basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION E. Source Group Restrictions.**

Group Name: SUBPART SSSS

Group Description: monitoring plan and 3 month testing

Sources included in this group

ID	Name
C01	PRIME OVEN OXIDIZER
C02	FINISH OVEN OXIDIZER

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is also derived from 40 C.F.R. § 63.5150]

The permittee shall maintain and keep on site, a capture system monitoring plan containing the information specified in paragraphs (i) and (ii) of this condition. The permittee shall make the monitoring plan available for inspection by the permitting authority upon request.

(i) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.

(ii) The plan also must specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in 40 C.F.R. § 63.5120. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.

(iii) The permittee must conduct monitoring in accordance with the plan.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.5150(a)(4)]

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

[Additional Authority for this permit condition is also derived from 40 C.F.R. § 63.5150]

The permittee shall keep records of when the calibration of the chart recorder, data logger, or temperature indicator was verified, every 3 months; or when the chart recorder, data logger, or temperature indicator was replaced.

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

The permittee shall keep on site a copy of the capture system monitoring plan as required by 40 C.F.R. § 63.5150.

V. REPORTING REQUIREMENTS.

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

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

**SECTION E. Source Group Restrictions.**

[Additional Authority for this permit condition is also derived from 40 C.F.R. § 63.5150]

(a). The permittee shall Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced.

(b). The permittee shall replace the equipment either if you choose not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 °Celsius, whichever is greater.

[Compliance with this condition assures compliance with 40 C.F.R. § 63.5150(a)(3)]

VII. ADDITIONAL REQUIREMENTS.

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

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



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
102	COIL COATING CLEAN UP		
Emission Limit		Pollutant	
26.800	Tons/Yr	cleanup solvent - equipment	VOC
107	MISCELLANEOUS SOURCES		
Emission Limit		Pollutant	
2.700	Tons/Yr		VOC
C01	PRIME OVEN OXIDIZER		
Emission Limit		Pollutant	
10.000	Lbs/Hr	combined emission rate for both oxidizers during production	NOX
28.700	Tons/Yr	Combined for both oxidizers calculated on a 12-month rolling sum	NOX
C02	FINISH OVEN OXIDIZER		
Emission Limit		Pollutant	
10.000	Lbs/Hr	combined emission rate for both oxidizers during production	NOX
28.700	Tons/Yr	combined limit for both oxidizers calculated on 12-month rolling sum	NOX

Site Emission Restriction Summary

Emission Limit			Pollutant
49.990	Tons/Yr	calculated on a 12-month rolling sum	VOC

**SECTION H. Miscellaneous.**

The previously issued RACT Operating Permit No. 09-0030 serves as a basis for the terms and conditions in this Title V Operating Permit for the sources listed below:

- (a) Two (2) Coil Coaters/Baking Ovens and Thermal Oxidizers
- (b) Laminator/Embosser
- (c) Space Heaters (Totaling a rated capacity of 9.7 MMBTU/Hr)
- (d) Storage tanks
- (e) Coil Coating Cleanup Operation
- (f) VOC Sources with emissions under de minimis levels

This Title V Operating Permit (Auth ID: 631359, APS ID: 346466) has been renewed.

Section C VIII (Compliance Certification), has been changed. Please note that this condition is now covered under Section B #024 and in Section C V under 127.441 Reporting.

APS: 346466 AUTH: 711704

This permit has been amended to correct a typographical error on Source ID 101 and 101A condition #002.

APS: 346466 AUTH: 722090

This permit has been amended to correct an error on Source ID 104 condition #004.

APS # 667612 AUTH # 760459

This permit has been amended to address a change of ownership from Material Sciences Corporation to Brightsmith LLC. The Department received the Change of Ownership on January 15, 2009.

December 2010, APS: 737357 AUTH: 860320

This permit has been amended to correct a typographical error in Section C under the Stack Test. The condition required testing for SO_x, NO_x and VOC. The condition will now require testing only for VOC emissions and destruction efficiency of the Thermal Oxidizers.

August 2012, AUTH: 872943 APS: 737357

This permit has been renewed.

The information in Section A is for informational purposes only.

- Source ID 106 (Laminator / Embosser) has been removed from the permit as a source. The only condition under this Source was the Rule Effectiveness Program. This condition was placed in Section C of the permit as it pertains to the entire facility.

APS: 737357 AUTH: 1056459

This AUTH is for an Administrative Amendment to incorporate the conditions from Plan Approval 09-0030A into the Title V Operating Permit.

- The plan approval changed the hourly NO_x emission limit of the combined prime and finish thermal oxidizers to 10 lb/hr.
- The amendment also alters the temperature limit recordkeeping condition to allow for 3-hour block averages.

APS: 737357 AUTH: 1138658

This Operating Permit has been renewed.

**SECTION H. Miscellaneous.**

This operating permit established a facility wide VOC emission limit of less than 49.9 tons per year, calculated on a 12-month rolling sum in order to comply with RACT II as stated in 25 Pa. Code 129.96(d).

AUTH: 1365157

This Operating Permit has been renewed.

Source ID 031A (Space Heaters) has been removed from Section D of the permit. The 9 space heaters listed under this Source ID are no longer in use. If the permittee starts to use them again, the permittee shall continue to monitor and record the NOx emissions monthly and on a 12 month rolling sum.



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