



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

STATE ONLY OPERATING PERMIT

Issue Date: December 3, 2019

Effective Date: January 1, 2020

Expiration Date: December 31, 2024

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

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

State Only Permit No: 38-05037

Synthetic Minor

Federal Tax Id - Plant Code: 23-1930330-1

Owner Information

Name: ZIMMERMAN CHAIR SHOP
Mailing Address: 1486 COLEBROOK RD
LEBANON, PA 17042-9507

Plant Information

Plant: ZIMMERMAN CHAIR SHOP/LEBANON
Location: 38 Lebanon County 38916 North Cornwall Township
SIC Code: 2511 Manufacturing - Wood Household Furniture

Responsible Official

Name: GLENN ZIMMERMAN
Title: OWNER
Phone: (717) 273 - 2706

Permit Contact Person

Name: DANIEL J O'CONNELL
Title: CONSULTANT (COVANTA ENV)
Phone: (717) 454 - 5143

[Signature] _____
WILLIAM R. WEAVER, SOUTH CENTRAL REGION AIR PROGRAM MANAGER



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General State Only Requirements

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

Section C. Site Level State Only Requirements

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

Section D. Source Level State Only Requirements

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

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

Section E. Source Group Restrictions

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



SECTION A. Table of Contents

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

Section F. Alternative Operating Scenario(s)

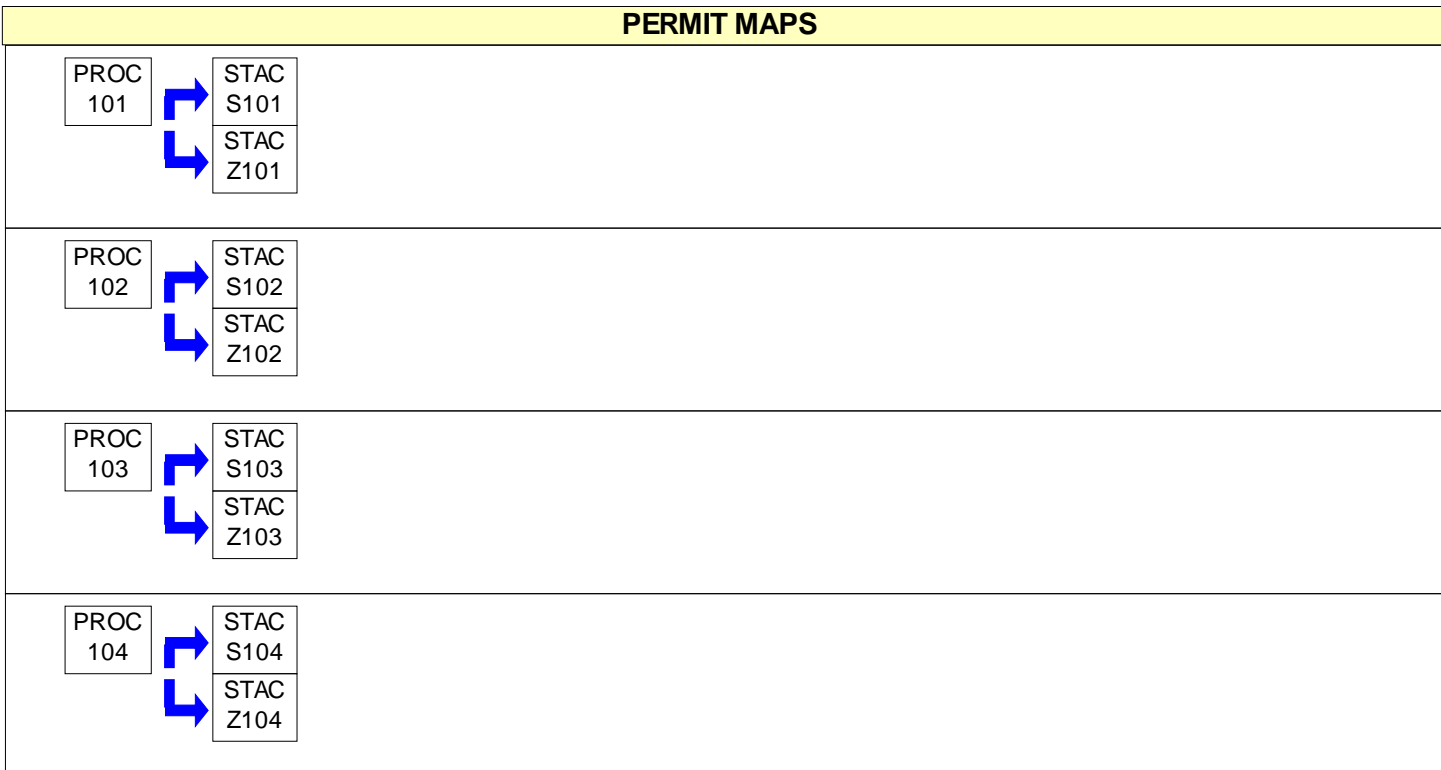
- F-I: Restrictions
- F-II: Testing Requirements
- F-III: Monitoring Requirements
- F-IV: Recordkeeping Requirements
- F-V: Reporting Requirements
- F-VI: Work Practice Standards
- F-VII: Additional Requirements

Section G. Emission Restriction Summary

Section H. Miscellaneous

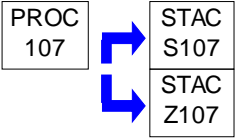
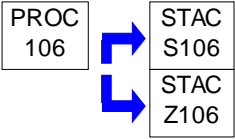
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	STAIN BOOTH W/ PAINT POCKETS FILTER	1.700 Lbs/HR	COATING-VOCS
102	SEALER BOOTH W/ PAINT POCKETS FILTER	2.020 Lbs/HR	COATING-VOCS
103	TOPCOAT BOOTH W/ PAINT POCKETS FILTER	2.850 Lbs/HR	COATING-VOCS
104	FRAME BOOTH W/ COTTON VINYL ACETATE BINDER FILTER	0.230 Lbs/HR	COATING-VOCS
106	TOPCOAT BOOTH [#2] W/ PAINT POCKETS FILTER	2.820 Lbs/HR	COATING-VOCS
107	STAIN BOOTH [#2] W/ PAINT POCKETS FILTER	1.670 Lbs/HR	COATING-VOCS
S101	STACK FOR STAIN BOOTH		
S102	STACK FOR SEALER BOOTH		
S103	STACK FOR TOPCOAT BOOTH		
S104	STACK FOR FRAME BOOTH		
S106	STACK FOR TOPCOAT BOOTH [#2]		
S107	STACK FOR STAIN BOOTH [#2]		
Z101	FUGITIVE EMISSIONS		
Z102	FUGITIVE EMISSIONS		
Z103	FUGITIVE EMISSIONS		
Z104	FUGITIVE EMISSIONS		
Z106	FUGITIVE EMISSIONS		
Z107	FUGITIVE EMISSIONS		

PERMIT MAPS



PERMIT MAPS



**SECTION B. General State Only Requirements****#001 [25 Pa. Code § 121.1]****Definitions.**

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

#002 [25 Pa. Code § 127.446]**Operating Permit Duration.**

(a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.

(b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

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

(a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.

(b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

(c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).

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

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

(d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.

(e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).

(f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]**Operating Permit Fees under Subchapter I.**

(a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

#008 [25 Pa. Code § 127.441]**Need to Halt or Reduce Activity Not a Defense.**

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

#009 [25 Pa. Code §§ 127.442(a) & 127.461]**Duty to Provide Information.**

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

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

#010 [25 Pa. Code § 127.461]**Revising an Operating Permit for Cause.**

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

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

#011 [25 Pa. Code §§ 127.450 & 127.462]**Operating Permit Modifications**

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

**SECTION B. General State Only Requirements**

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

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

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

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

#012 [25 Pa. Code § 127.441]**Severability Clause.**

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

#013 [25 Pa. Code § 127.449]**De Minimis Emission Increases.**

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

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

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

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

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

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

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

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

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

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

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

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

#014 [25 Pa. Code § 127.3]**Operational Flexibility.**

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

(1) Section 127.14 (relating to exemptions)

(2) Section 127.447 (relating to alternative operating scenarios)

(3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)

(4) Section 127.449 (relating to de minimis emission increases)

(5) Section 127.450 (relating to administrative operating permit amendments)

**SECTION B. General State Only Requirements**

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

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

#015 [25 Pa. Code § 127.11]**Reactivation**

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

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

#016 [25 Pa. Code § 127.36]**Health Risk-based Emission Standards and Operating Practice Requirements.**

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

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

#017 [25 Pa. Code § 121.9]**Circumvention.**

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

#019 [25 Pa. Code §§ 127.441(c) & 135.5]**Sampling, Testing and Monitoring Procedures.**

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

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

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

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

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

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

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

#021 [25 Pa. Code § 127.441(a)]**Property Rights.**

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

#022 [25 Pa. Code § 127.447]**Alternative Operating Scenarios.**

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

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

No person shall permit the emission into the outdoor atmosphere of any fugitive air contaminant from a source other than the following:

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

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

The permittee shall not allow fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, condition #001 (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

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

No person shall 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.

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

No person shall 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:

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

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

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

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

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

- (a) The company shall keep the volatile organic compound (VOC) emissions generated from the entire facility, including clean-up below 50 tons per year, 12-month rolling average.
- (b) The company shall keep hazardous air pollutant (HAP) emissions generated from the wood surface coating and manufacturing operation including clean-up below 10 tons per year for any single HAP, including any fugitive emissions and below 25 tons per year for cumulative HAPs, including any fugitive emissions, 12-month rolling average, respectively.

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

- (a) No person shall conduct the open burning of materials in such a manner that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
 - (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life and property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health.
- (b) The requirements of Section (a), above, do not apply when 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) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
 - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
 - (4) A fire set solely for recreational or ceremonial purposes.
 - (5) A fire set solely for cooking food.
- (c) This permit does not constitute authorization to burn solid waste pursuant to Section 610 (3) of the Solid Waste Management Act, 35 P.S. Section 6018.610 (3), or any other provision of the Solid Waste Management Act.

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

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

- (a) For surface coatings applied as they are received from the manufacturer, the permittee may demonstrate compliance with the applicable standard by obtaining EPA Method 24 certification testing from the manufacturer, or by maintaining VOC/HAP data sheets from the manufacturer.
- (b) In the absence of EPA Method 24 certification testing from the manufacturer, or VOC/HAP data sheets from the manufacturer, allowed under part (a), above, the permittee shall perform EPA Method 24 certification testing on all surface coatings applied as received from the manufacturer.
- (c) The permittee may use calculated VOC content values in lieu of EPA Method 24 certification testing for multi-part surface

**SECTION C. Site Level Requirements**

coatings where the permittee maintains VOC/HAP data sheets for all surface coating constituents (i.e. coatings, pigments, thinners/cutting solvents), and also maintains documentation from the manufacturer as to the recommended mix ratio of the parts. In the event of any inconsistency between the calculated VOC content and data obtained from EPA Method 24 certification testing, the latter shall take precedence.

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

The Department reserves the right to require exhaust stack testing of the sources as necessary during the permit term to verify emissions for purposes including emission fees, malfunctions or permit condition violations.

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

The permittee shall conduct a monthly inspection around the facility periphery during daylight hours when the sources are in operation, to detect visible emissions, fugitive emissions, and malodorous air contaminants as follows:

(a) Visible emissions in excess of the limits specified in Condition #004, Section C. Visible emissions may be measured according to the methods specified in Condition #011, Section C. As an alternative, facility personnel who observe such visible emissions shall report each incident to the Department within two hours of each occurrence and make arrangements for a certified observer to read the visible emissions.

(b) Presence of fugitive particulate matter beyond the plant property boundaries, as stated in Condition #002, Section C.

(c) Presence of odors beyond the facility property boundaries that have the potential to be malodorous as stated in Condition #003, Section C.

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

The permittee shall maintain records of inspections around the plant periphery. The records shall include, at minimum, the following information:

1. The name of the company representative monitoring these instances.
2. The date and time of the observation.
3. The wind direction during each observation.
4. A description of any emissions and/or malodors observed and actions taken to mitigate them. If none, record "NONE."

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

Unless otherwise noted, all records required by this and subsequent operating permits shall be maintained for the most recent five-year period and shall be readily available to the Department upon request. The most recent two years of records must be retained at the facility. The remaining three years of records may be retained off site. The records may be retained on paper, microfilm, microfiche or computer disks. If the records are retained on computer disks, the records must be in commonly available software. Commonly available software is usually compatible with a Microsoft application such as Word or Excel. For records kept off site, readily available is defined as available within one business day.

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

(a) The permittee shall keep detailed records of all EPA Method 24 certification testing that has been done for all new and existing solvent-borne compliant coatings that have been through a compositional change.

(b) The permittee shall keep detailed records of all EPA Method 24 certification testing provided by the manufacturer for all solvent-borne compliant coatings.

(c) The permittee shall keep monthly records of all VOC and HAP emissions from the facility to demonstrate compliance with Section C, Site Level Requirement Condition #006.

**SECTION C. Site Level Requirements****V. REPORTING REQUIREMENTS.****# 014 [25 Pa. Code §127.442]****Reporting requirements.**

The permittee shall report malfunctions to the Department. As defined in 40 CFR Section 60.2 and incorporated by reference in 25 Pa. Code Chapter 122, a malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

a. Malfunctions which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two hours after discovery of the incident. Telephone reports can be made to the Air Quality Program at (610) 916-0100 during normal business hours, or to the Department's Emergency Hotline at any time. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at <https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx>. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.

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

Malfunctions shall be reported to the Department at the following:

PA DEP, Reading District Office
Air Quality Program
1005 Cross Roads Blvd
Reading, PA 19605

015 [25 Pa. Code §135.3]**Reporting**

An annual report containing monthly records, unless otherwise specified, material throughputs, operating hours and quantities of all air contaminants listed in Section C, Condition #006, shall be submitted to the Air Quality District Supervisor.

The report for January 1 through December 31 is due no later than March 1 of the following year for each operating year authorized by the permit.

VI. WORK PRACTICE REQUIREMENTS.**# 016 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee shall take all reasonable actions to prevent particulate matter from the sources identified in the Site Level Requirements, condition #001, from becoming airborne. These actions shall include, but not be limited to, the following:

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

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

(c) Paving and maintenance of roadways.

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

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION C. Site Level Requirements****VIII. COMPLIANCE CERTIFICATION.**

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

IX. COMPLIANCE SCHEDULE.

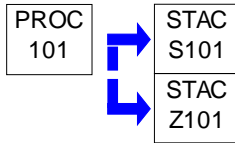
No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: STAIN BOOTH W/ PAINT POCKETS FILTER

Source Capacity/Throughput: 1.700 Lbs/HR COATING-VOCS

Conditions for this source occur in the following groups: BOOTHS
G001**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 102

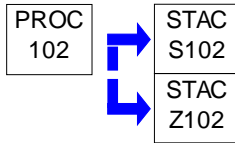
Source Name: SEALER BOOTH W/ PAINT POCKETS FILTER

Source Capacity/Throughput:

2.020 Lbs/HR

COATING-VOCS

Conditions for this source occur in the following groups: BOOTHS
G001

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 103

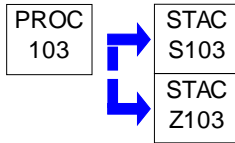
Source Name: TOPCOAT BOOTH W/ PAINT POCKETS FILTER

Source Capacity/Throughput:

2.850 Lbs/HR

COATING-VOCS

Conditions for this source occur in the following groups: BOOTHS
G001

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

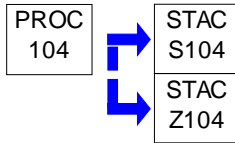
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 104

Source Name: FRAME BOOTH W/ COTTON VINYL ACETATE BINDER FILTER

Source Capacity/Throughput: 0.230 Lbs/HR COATING-VOCS

Conditions for this source occur in the following groups: BOOTHS
G001**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

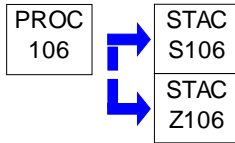
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 106

Source Name: TOPCOAT BOOTH [#2] W/ PAINT POCKETS FILTER

Source Capacity/Throughput: 2.820 Lbs/HR COATING-VOCS

Conditions for this source occur in the following groups: BOOTHS
G001**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

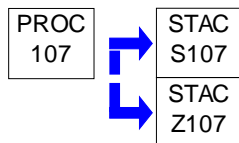
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: STAIN BOOTH [#2] W/ PAINT POCKETS FILTER

Source Capacity/Throughput: 1.670 Lbs/HR COATING-VOCS

Conditions for this source occur in the following groups: BOOTHS
G001**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION E. Source Group Restrictions.**

Group Name: BOOTHS

Group Description: BOOTHS

Sources included in this group

ID	Name
101	STAIN BOOTH W/ PAINT POCKETS FILTER
102	SEALER BOOTH W/ PAINT POCKETS FILTER
103	TOPCOAT BOOTH W/ PAINT POCKETS FILTER
104	FRAME BOOTH W/ COTTON VINYL ACETATE BINDER FILTER
106	TOPCOAT BOOTH [#2] W/ PAINT POCKETS FILTER
107	STAIN BOOTH [#2] W/ PAINT POCKETS FILTER

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

No person shall permit the emission into the outdoor atmosphere of particulate matter from any booth in this group in a manner that the concentration of the particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

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

(a) All coatings, associated with the wood furniture manufacturing operations, as applied, shall comply with the following requirements below:

- (1) Topcoats and enamels 3.0 lbs VOC/lb coating solids
- (2) Washcoats 14.3 lbs VOC/lb coating solids
- (3) Final repair coat 3.3 lbs VOC/lb coating solids
- (4) Basecoats 2.2 lbs VOC/lb coating solids
- (5) Cosmetic specialty coatings 14.3 lbs VOC/lb coating solids
- (6) Sealers 3.9 lbs VOC/lb coating solids

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

(1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.

(2) The permittee requests in writing, and the Department approves, in writing, the exemption prior to use of the coating.

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

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

Where:

- VOCB = VOC content in lb VOC/lb coating solids
- Wo = Weight percent of VOC (Wv-Ww-Wex)
- Wv = Weight percent of total volatiles (100%-weight percent solids)
- Ww = Weight percent of water
- Wex = Weight percent of exempt solvents
- Wn = Weight percent of solids of the as applied coating

[25 Pa. Code Section 129.52(b)(1)(i), (ii) and (iii), 129.52(d), Table I Category 11, 129.52(h)(1) and (2)]

**SECTION E. Source Group Restrictions.****II. TESTING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Sampling and testing shall be done in accordance with the procedures and test methods specified in Chapter 139 (relating to sampling and testing).

[25 Pa. Code Section 129.52(b)(1)(iv)]

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.**# 004 [25 Pa. Code §129.52]****Surface coating processes**

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

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

(b) The records shall be maintained for a period of 5 years and be made available upon request.

[25 Pa. Code 129.52(c)]

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

(a) Annual reports containing, but not limited to, the following data for each surface coating applied at the facility shall be submitted to the Reading District Supervisor. The report for each January 1 through December 31 period is due no later than March 1 of the following year for each operating year authorized by the operating permit or its renewal.

- (1) coating identification
- (2) coating use (e.g., extreme performance coating)
- (3) pounds of VOC per gallon coating (minus water)
- (4) coating density
- (5) solvent density
- (6) percent solvents (volume) - (minus EPA exempted solvents)
- (7) percent solids (volume)
- (8) percent water (volume)
- (9) gallons per month of coating used (plus water)
- (10) gallons per month of coating used (minus water)
- (11) the type and amount of cleanup solvents utilized
- (12) gallons per month of paint thinner washcoat used
- (13) annual VOC emissions from surface coating operations expressed in pounds

(b) An annual report containing data for all surface coating wastes used at the facility shall be submitted to the Reading

**SECTION E. Source Group Restrictions.**

District Supervisor.

- (1) gallons per quarter of waste solvents, waste paints or mixtures shipped from the facility
- (2) waste profile or sampling data for two shipments, conducted semiannually
- (3) identification of the waste disposal company for each shipment

VI. WORK PRACTICE REQUIREMENTS.**# 006 [25 Pa. Code §129.52]****Surface coating processes**

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

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

[25 Pa. Code Section 129.52(f)]

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

The owner or operator of a wood furniture manufacturing facility is subject to 25 Pa. Code §§ 129.52, and 129.101 through 129.107 shall comply with the more stringent emissions limitation or applicable requirement.

**SECTION E. Source Group Restrictions.**

Group Name: G001

Group Description: 129.101 thru 129.107

Sources included in this group

ID	Name
101	STAIN BOOTH W/ PAINT POCKETS FILTER
102	SEALER BOOTH W/ PAINT POCKETS FILTER
103	TOPCOAT BOOTH W/ PAINT POCKETS FILTER
104	FRAME BOOTH W/ COTTON VINYL ACETATE BINDER FILTER
106	TOPCOAT BOOTH [#2] W/ PAINT POCKETS FILTER
107	STAIN BOOTH [#2] W/ PAINT POCKETS FILTER

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

001 [25 Pa. Code §129.102]

Emission Standards

An owner or operator of a facility subject to this section, § § 129.101 and 129.103—129.107 shall limit VOC emissions from wood furniture manufacturing operations by:

(1) Applying either waterborne topcoats or a combination of sealers and topcoats and strippable spray booth coatings with a VOC content equal to or less than the standards specified in Table IV:

TABLE IV REQUIREMENTS:

Emission Limits of VOC for Wood Furniture Manufacturing Sealers, Topcoats and Strippable Spray Booth Coatings As Applied, in Pounds of VOC Per Pound of Coating Solids (kg VOC/kg of Coating Solids), by Category

(1) Waterborne Topcoats: 0.8

(2)(i) High solids coating systems, Sealer: 1.9

(2)(ii) High solids coating systems, Topcoat: 1.8

(3)(i)(a) Acid-cured alkyd amino systems, Acid-cured alkyd amino sealer: 2.3

(3)(i)(b) Acid-cured alkyd amino systems, Acid-cured alkyd amino conversion varnish topcoat: 2.0

(3)(ii)(a) Acid-cured alkyd amino systems, Other sealer: 1.9

(3)(ii)(b) Acid-cured alkyd amino systems, Acid-cured alkyd amino conversion varnish topcoat: 2.0

(3)(iii)(a) Acid-cured alkyd amino systems, Acid-cured alkyd amino sealer: 2.3

(3)(iii)(b) Acid-cured alkyd amino systems, Other topcoat: 1.8

(4) Waterborne strippable spray booth coating: 0.8

END OF TABLE IV REQUIREMENTS:

(2) [NA - EMISSION AVERAGING NOT USED]

(3) [NA - ADD-ON CONTROLS NOT USED]

(4) [NA - COMBO METHOD NOT USED]

**SECTION E. Source Group Restrictions.****II. TESTING REQUIREMENTS.**

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

III. MONITORING REQUIREMENTS.**# 002 [25 Pa. Code §129.104]****Compliance procedures and monitoring requirements.**

(a) Compliance methods. An owner or operator of a facility subject to the emission standards in § 129.102 (relating to emission standards) shall demonstrate compliance with those provisions by using one or more of the following methods:

(1) To support that each sealer, topcoat and strippable spray booth coating meets the requirements of § 129.102(1) (relating to emission standards):

(i) Maintain CPDSs for each of the coatings.

(ii) Maintain documentation showing the VOC content of the as applied coating in lbs VOC/lb solids, if solvent or other VOC is added to the coating before application.

(iii) Perform sampling and testing in accordance with the procedures and test methods in Chapter 139 (relating to sampling and testing).

(2) [NA - ADD-ON CONTROLS NOT USED]

(b) Initial compliance.

(1) Compliant coatings. An owner or operator of a facility subject to § 129.102(1) that is complying through the procedures in subsection (a)(1) shall submit an initial compliance status report as required by § 129.106(a) (relating to reporting requirements), stating that compliant sealers, topcoats and strippable spray booth coatings are being used by the facility.

(2) [NA - NO CONTINUOUS COATERS]

(3) [NA - ADD-ON CONTROLS NOT USED]

(4) Work practice implementation plan. An owner or operator of a facility subject to the work practice standards of § 129.103 (relating to work practice standards) shall submit an initial compliance status report as required by § 129.106(a), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

(c) Continuous compliance demonstrations. An owner or operator of a facility subject to the requirements of this section and § § 129.101—129.103 and 129.105—129.107 shall submit, in writing, to the Department a compliance certification with the semiannual report required by § 129.106(b).

(1) Compliant coatings. An owner or operator of a facility subject to § 129.102 that is complying through the procedures specified in subsection (a)(1) shall demonstrate continuous compliance by the following:

(i) Using compliant coatings.

(ii) Maintaining records that demonstrate the coatings are compliant.

(iii) Submitting a compliance certification which states that compliant sealers, topcoats, or both, and strippable spray booth coatings have been used each day in the semiannual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance.

(2) [NA - NO CONTINUOUS COATERS]

(3) [NA - ADD-ON CONTROLS NOT USED]

**SECTION E. Source Group Restrictions.**

(4) Work practice implementation plan. An owner or operator of a facility subject to the work practice standards of § 129.103 shall demonstrate continuous compliance by following the work practice implementation plan and submitting a compliance certification which states that the work practice implementation plan is being followed, or should otherwise identify the periods of noncompliance with the work practice standards and the reasons for noncompliance.

(d) Compliance certification requirements. The compliance certification shall be signed by a responsible official of the company that owns or operates the facility. In addition to the certification requirements of this section, the certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

IV. RECORDKEEPING REQUIREMENTS.**# 003 [25 Pa. Code §129.105]****Recordkeeping requirements**

(a) Requirement. The owner or operator of a wood furniture manufacturing operation shall keep records to demonstrate compliance with this section and § § 129.101—129.104, 129.106 and 129.107. The records shall be maintained for at least 5 years.

(b) Compliant coatings. The following records shall be maintained to demonstrate compliance with § 129.102 (relating to emission standards).

(1) A certified product data sheet for each coating and strippable spray booth coating subject to the emission limits of § 129.102.

(2) The VOC content as applied, lbs VOC/lb solids (kg VOC/kg solids), of each coating and strippable spray booth coating subject to the emission limits of § 129.102, and copies of data sheets documenting how the as applied values were determined.

(c) [NA - NO CONTINUOUS COATERS]

(d) [NA - ADD-ON CONTROLS NOT USED]

(e) Work practice implementation plan. The owner or operator of a facility subject to the work practice standards of § 129.103 (relating to work practice standards) shall maintain onsite copies of the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including:

(1) Records demonstrating that the operator training program is in place.

(2) Records maintained in accordance with the leak inspection and maintenance plan.

(3) Records associated with the cleaning and washoff solvent accounting system.

(4) Records associated with the limitation on the use of conventional air spray guns showing total coating usage and the percentage of coatings applied with conventional air spray guns for each semiannual reporting period.

(5) Records showing the VOC content of compounds used for cleaning booth components, except for solvent used to clean conveyors, continuous coaters and their enclosures or metal filters.

(6) Copies of logs and other documentation developed to demonstrate that the other provisions of the work practice implementation plan are followed.

(f) In addition to the recordkeeping requirements of subsection (a), the owner or operator of a facility that complies with § 129.103 or § 129.104(a)(1) shall maintain a copy of the compliance certifications submitted in accordance with § 129.106(b) (relating to reporting requirements) for each semiannual period following the compliance date.

(g) The owner or operator of a facility shall maintain a copy of the other information submitted with the initial status report required by § 129.106(a) and the semiannual reports required by § 129.106(b).

**SECTION E. Source Group Restrictions.****V. REPORTING REQUIREMENTS.****# 004 [25 Pa. Code §129.106]****Reporting requirements**

(a) Initial compliance report date. The initial compliance report shall be submitted to the Department within 60 days after the compliance date specified in § 129.101(b) and (c) (relating to general provisions and applicability). The report shall include the items required by § 129.104(b) (relating to compliance procedures and monitoring requirements).

(b) Semiannual compliance report dates. When demonstrating compliance in accordance with § 129.104(a)(1) or (2), a semiannual report covering the previous 6 months of wood furniture manufacturing operations shall be submitted to the Department according to the following schedule:

(1) The first report shall be submitted within 30 calendar days after the end of the first 6-month period following the compliance date specified in § 129.101(b) and (c).

(2) Subsequent reports shall be submitted within 30 calendar days after the end of each 6-month period following the first report.

(3) Each semiannual report shall include the information required by § 129.104(c) and (d), a statement of whether the facility was in compliance or noncompliance and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.

VI. WORK PRACTICE REQUIREMENTS.**# 005 [25 Pa. Code §129.103]****Work practice standards**

(a) Work practice implementation plan. Within 60 days after the compliance date specified in § 129.101(b) or (c) (relating to general provisions and applicability), an owner or operator of a facility subject to the requirements in this section and §§ 129.101, 129.102 and 129.104—129.107 shall:

(1) Prepare and maintain a written work practice implementation plan that defines work practices for each wood furniture manufacturing operation and addresses the provisions in subsections (b)—(j). The owner or operator of the facility shall comply with the work practice implementation plan.

(2) Make available the written work practice implementation plan for inspection by the Department upon request. If the Department determines that the work practice implementation plan does not adequately address the criteria specified in subsections (b)—(j), the Department may require that the facility owner or operator modify the plan.

(b) Operator training program. New and existing personnel, including contract personnel, who are involved in coating, cleaning or washoff operations or implementation of the requirements of this section, §§ 129.101, 129.102 and 129.104—129.107 shall complete an operator training program.

(1) For a facility subject to § 129.101(b), new personnel hired after June 10, 2000, shall be trained upon hiring. For a facility subject to the requirements of § 129.101(c), new personnel shall be trained upon hiring.

(2) For a facility subject to § 129.101(b), existing personnel hired before June 10, 2000, shall be trained by December 11, 2000. For a facility subject to § 129.101(c), existing personnel shall be trained at least 6 months before the compliance date.

(3) Personnel shall be given refresher training annually.

(4) A copy of the written operator training program shall be maintained with the work practice implementation plan. The operator training program shall include the following:

(i) A list of all current personnel by name and job description that are required to be trained.

(ii) An outline of the subjects to be covered in the initial and annual refresher training sessions for each position or group of personnel.

(iii) Lesson plans for courses to be given at the initial and annual refresher training sessions that include, at a

**SECTION E. Source Group Restrictions.**

minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize coating usage and overspray and appropriate management of cleanup wastes.

(iv) A description of the methods to be used at the completion of the initial or annual refresher training sessions to demonstrate and document successful completion.

(v) A record of the date each employe is trained.

(c) Leak inspection and maintenance plan. An owner or operator of a facility shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan which shall include the following:

(1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings or solvents.

(2) An inspection schedule.

(3) The methods for documenting the date and results of each inspection and any repairs that were made.

(4) The time frame between identifying a leak and making the repair, which shall adhere to the following schedule:

(i) A first attempt at repairs, including tightening of packing glands, shall be made within 5 working days after the leak is detected.

(ii) Final repairs shall be made within 15 working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.

(d) Cleaning and washoff solvent accounting system. A solvent accounting form shall be developed to account for solvents used in cleaning and washoff operations. The information recorded on the form shall include the following:

(1) The total number of pieces processed through washoff operations each month and the reason for the washoff operations.

(2) The name and total quantity of each solvent used each month for:

(i) Cleaning activities.

(ii) Washoff operations.

(3) The name and total quantity of each solvent evaporated to the atmosphere each month from:

(i) Cleaning activities.

(ii) Washoff operations.

(e) Spray booth cleaning. An owner or operator of a facility may not use compounds containing more than 8.0% by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, the facility shall use no more than 1.0 gallon of solvent to prepare the booth prior to applying the booth coating.

(f) Storage requirements. An owner or operator of a facility shall use normally closed containers for storing coating, cleaning and washoff materials.

(g) Application equipment requirements. An owner or operator of a facility may not use conventional air spray guns to apply coatings except under any of the following circumstances:

(1) To apply coatings that have a VOC content no greater than 1.0 lb VOC/lb solids (1.0 kg VOC/kg solids), as applied.

**SECTION E. Source Group Restrictions.**

- (2) For touch-up and repair coatings under one of the following circumstances:
- (i) The coatings are applied after completion of the wood furniture manufacturing operation.
 - (ii) The coatings are applied after the stain and before any other type of coating is applied, and the coatings are applied from a container that has a volume of no more than 2.0 gallons.
- (3) The spray is automated, that is, the spray gun is aimed and triggered automatically, not manually.
- (4) The emissions from the surface coating process are directed to a VOC control system.
- (5) The conventional air spray gun is used to apply coatings and the cumulative total usage of those coatings is no more than 5.0% of the total gallons of coating used during each semiannual reporting period.
- (6) The conventional air spray gun is used to apply stain on a part for which the Department notifies the operator, in writing, of its determination that it is technically or economically infeasible to use any other spray application technology. To support the facility's claim of technical or economic infeasibility, a videotape, a technical report or other documentation shall be submitted to the Department showing either independently or in combination, the following:
- (i) The production speed is too high or the part shape is too complex for one operator to coat the part, and the application station is not large enough to accommodate an additional operator.
 - (ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- (h) Line cleaning. The solvent used for line cleaning shall be pumped or drained into a normally closed container.
- (i) Spray gun cleaning. The solvent used to clean spray guns shall be collected into a normally closed container.
- (j) Washoff operations. The emissions from washoff operations shall be controlled by the following:
- (1) Using normally closed containers for washoff operations.
 - (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

VII. ADDITIONAL REQUIREMENTS.**# 006 [25 Pa. Code §129.101]****General provisions and applicability**

- (a) Beginning June 10, 2000, this section and §§ 129.102—129.107 apply to each wood furniture manufacturing facility located in a county included in the northeast ozone transport region or in a county designated as severe, serious, moderate or marginal ozone nonattainment that emits or has the potential to emit 25 tons or more per year of VOCs from wood furniture manufacturing operations.
- (b) [NA - SUBJECT TO (c)]
- (c) An existing wood furniture manufacturing facility that increases its actual emissions or potential to emit to 25 tons per year or more of VOCs from wood furniture manufacturing operations shall comply with this section and §§ 129.102—129.107 within 1 year after becoming subject to subsection (a), except for those facilities which have RACT determinations approved by the EPA as revisions to the SIP prior to June 10, 2000.
- (d) [NA - EXISTING SOURCE]
- (e) The owner or operator of a wood furniture manufacturing facility subject to this section, §§ 129.52 and 129.102—129.107 shall comply with the more stringent emissions limitation or applicable requirement for wood furniture manufacturing operations in § 129.52 or this section and §§ 129.102—129.107.
- (f) The VOC standards in § 129.102 Table IV do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

**SECTION E. Source Group Restrictions.**

(1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.

(2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

007 [25 Pa. Code §129.107]

Special provisions for facilities using emissions averaging approach

(a) -(g) [NA - EMISSION AVERAGING NOT USED]



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

#001

This permit renewal includes the sources & conditions of Operating Permit No. 38-05037 which was issued March 11, 2014. This permit renewal supersedes that permit.

#002

All of the capacity/throughput values listed in Sections A and D are for informational purposes only and are not operating limits unless stated so in conditions in Section D or Section E.

#003

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

Source ID 105, Halogen Batch Curing Tunnel (electric)

Wood working stations

Wood fired furnace



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