



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: June 25, 2020 Effective Date: October 1, 2020
Expiration Date: September 30, 2025

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: 06-05020

Federal Tax Id - Plant Code: 23-1880396-1

Owner Information

Name: CRAFT MAID KITCHEN INC
Mailing Address: 501 S 9TH ST
BLDG C
READING, PA 19602-2524

Plant Information

Plant: CRAFT MAID KITCHEN INC/READING
Location: 06 Berks County 06001 Reading City
SIC Code: 2434 Manufacturing - Wood Kitchen Cabinets

Responsible Official

Name: DAVID KERSCHNER
Title: PRODUCTION MANAGER
Phone: (610) 376 - 8686

Permit Contact Person

Name: JOEY CARR
Title: DELIVERY COORDINATOR
Phone: (610) 376 - 8686 Ext.229

[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.
- #023 Reporting
- #024 Report Format

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



SECTION A. Table of Contents

- 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

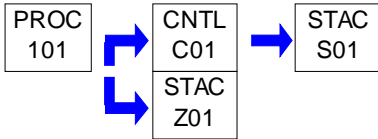
Section H. Miscellaneous



SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	SURFACE COATING OPERATIONS		
C01	DRY FILTERS FOR BOOTHS		
S01	STACKS: BOOTHS		
Z01	FUGITIVES: OFF-LINE COATING		

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 B. General State Only Requirements****#023** [25 Pa. Code §135.3]**Reporting**

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

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

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

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

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

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

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

002 [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.

003 [25 Pa. Code §123.41]**Limitations**

No person shall emit visible air contaminants into the outdoor atmosphere in such a manner that the opacity of the emission is either of the following unless otherwise stated in this permit:

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

004 [25 Pa. Code §123.42]**Exceptions**

The emission limitations for opacity (relating to limitations) do not apply to a visible emission in any of the following instances:

- a. The presence of uncombined water is the only reason for failure of the emission to meet the limitation.
- b. The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions;

**SECTION C. Site Level Requirements**

c. The emission results from sources specified in Section C, Condition #001 (relating to prohibition of certain fugitive emissions).

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

The permittee shall limit volatile organic compound (VOC) emissions from the facility to less than 25 tons during any consecutive 12-month period. This limit is based upon a 12-month rolling average and applies to each consecutive 12-month period. Compliance verification requires emissions to be calculated for each month and each consecutive 12-month period.

II. TESTING REQUIREMENTS.**# 006 [25 Pa. Code §123.43]****Measuring techniques**

Visible air contaminants may be measured using either of the following:

- a. A device approved by the Department and maintained to provide accurate opacity measurements.
- b. Observers, trained and certified, to measure plume opacity with the naked eye, as per EPA Method 9, or with the aid of any devices approved by the Department.

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

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

008 [25 Pa. Code §139.1]**Sampling facilities.**

Upon the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such source. The Department will set forth, in the request, the time period in which the facilities shall be provided as well as the specifications for such facilities.

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

The permittee shall conduct a monthly inspection during regular business workdays around the plant periphery during the daylight hours when the plant is in production to detect visible emissions, fugitive visible emissions and odorous emissions as follows:

- a. Visible emissions in excess of the limits stated in Section C, Condition #003 and Section D. Visible emissions may be measured according to the methods specified in Section C, Condition #006. As an alternative, plant personnel who observe such visible emissions shall report each incident to the Department within four hours of the occurrence and arrange for a certified observer to read the visible emissions.
- b. Presence of fugitive visible emissions beyond the plant property boundaries, as stated in Section C, Condition #014.
- c. Presence of odor beyond the plant property boundaries that have the potential to be malodorous as stated in Section C, Condition #002.

**SECTION C. Site Level Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 010 [25 Pa. Code §127.441]
Operating permit terms and conditions.**

The permittee shall maintain a logbook for recording the status of fugitive, visible and odorous emissions observed. The logbook shall include the name of the facility representative, the date and time the monitoring was conducted; wind direction and the results of the inspection.

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

The permittee shall maintain the following records:

- a. Monthly facility total of VOC emissions
- b. 12-month rolling facility total for VOC emissions

The permittee shall maintain the records in a manner approved by the Department. The emissions shall be determined using emission factors approved by the Department.

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

The permittee shall report malfunctions to the Department. A malfunction is defined as 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.

VI. WORK PRACTICE REQUIREMENTS.**# 013 [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 Condition #001, Section C 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

**SECTION C. Site Level Requirements**

trucking or earth moving equipment, erosion by water, or other means.

VII. ADDITIONAL REQUIREMENTS.**# 014 [25 Pa. Code §123.2]****Fugitive particulate matter**

No person shall permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, Condition # 001, if the emissions are visible at the point the emissions pass outside the persons property.

015 [25 Pa. Code §129.14]**Open burning operations**

No person may permit the open burning of material in the air basin except where the open burning operations result from the following:

- a. A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- b. Any fire set for the propose of instructing personnel in fire fighting, when approved by the Department.
- c. A fire set for the prevention and control of disease or pests, when approved by the Department.
- d. A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- e. A fire set solely for recreational or ceremonial purposes.
- f. A fire set solely for cooking food.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

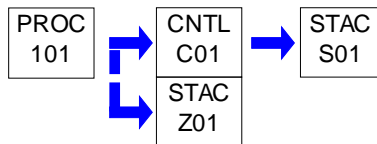
No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: SURFACE COATING OPERATIONS

Source Capacity/Throughput:

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

001 [25 Pa. Code §127.441]
Operating permit terms and conditions.

The permittee shall operate the spray booths such that they result in no visible emissions.

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

[Additional authority for this condition is derived from Section 129.52]

The permittee shall limit the volatile organic compound (VOC) content of the surface coatings used in the sources as follows:

- a. Topcoats and enamels - 3.0 pounds per pound of coating solids,
- b. Washcoats - 14.3 pounds per pound of coating solids,
- c. Final repair coat - 3.3 pounds per pound of coating solids,
- d. Basecoats - 2.2 pounds per pound of coating solids,
- e. Cosmetic specialty coatings - 14.3 pounds per pound of coating solids,
- f. Sealers - 3.9 pounds per pound of coating solids, and
- g. Stains - 14.3 pounds per pound of coating solids.

Throughput Restriction(s).

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

The permittee shall limit the amount of coating used in the spray booths to 3.0 gallon per hour (calendar month average).

Control Device Efficiency Restriction(s).

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

The permittee shall exhaust each booth through dry filter pads at all times the spraying is being conducted.

II. TESTING REQUIREMENTS.

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

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

The permittee shall weekly read and record the pressure drop across each booth's dry filter pad set.

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

If claiming credit for emission reporting purposes, the permittee shall record the following information for waste coatings, solvents or mixtures sent off-site for recycling or disposal:

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

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

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

- (a) For 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 and HAP data sheets from the manufacturer.
- (b) In the absence of EPA Method 24 certification testing from the manufacturer, or VOC and HAP data sheets from the manufacturer, allowed under part (a), above, the permittee shall perform EPA Method 24 certification testing on all 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 coatings where the permittee maintains VOC and HAP data sheets for all coating constituents, 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.

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

The permittee shall record the quantity and identity of all VOC solvents used for cleanup purposes in the surface coating operation on a daily basis. These records shall be maintained and shall be made part of the permittee's annual "AIMS" report to the Department.

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

The permittee shall keep daily records for each coating for the surface coating operation. These records shall be compiled on a monthly basis and submitted on an annual basis to the Reading District Office along with the facility's "AIMS" report.

- a. The following parameters for each coating, thinner and other component as supplied:
 1. The coating, thinner or component name and identification,
 2. The volume used,
 3. The mix used,
 4. VOC content in pounds per pound of coating solids,

**SECTION D. Source Level Requirements**

5. HAP content in pounds per pound of coating solids,
 6. The coating density or specific gravity at 25°C,
 7. The weight percent of total volatiles, including water and exempt solvents,
 8. The weight percent of water,
 9. The weight percent of exempt solvents,
 10. The weight percent VOC (volatiles minus water and exempt solvents),
 11. The weight percent HAP (volatiles minus water, exempt solvents and non-VOC solvents), and
 12. The volume percent of solids of the as applied coating.
- b. Pounds of VOC emitted.
- c. Pounds of HAP emitted.

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

The permittee shall record the following:

- a. Amount of coatings applied in the surface coating operation by month,
- b. Hours of operation by month of the surface coating operation,
- c. Emissions of particulate, VOC and HAP from the surface coating operation by month,
- d. Emissions of particulate, VOC and HAP from the surface coating operation (rolling 12-month total).

Note: The emissions shall be determined in a method approved by the Department.

V. REPORTING REQUIREMENTS.

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

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

The permittee shall maintain provisions so the Department can obtain samples of the coatings being used at each booth.

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

The permittee shall limit the VOC emissions from the cleanup of equipment in the following manner:

- a. All solvents shall be stored in plunger cans.
- b. All rags containing solvent shall be placed into storage containers (triangular red cans or others approved by the Department) for storage.
- c. All rags containing solvent shall be placed into sealed Haz-Waste drums and removed from the facility as part of disposal.

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

Equipment (a differential manometer or equivalent, as approved by the Department), shall be provided and maintained so that at any time the pressure drop across each set of dry filters can be measured.

**SECTION D. Source Level Requirements****# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

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

Where:

VOC = VOC content in lb VOC/gal of coating solids

Wo = Weight percent of VOC (Wv-Ww-Wex)

Wv = Weight percent of total volatiles (100%-weight percent solids)

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

Wn = Weight percent of solids of the as applied coating

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

The HAP content of the as applied coating, expressed in units of weight of HAP per unit of weight of coating solids, shall be calculated as follows:

$$\text{HAP}=(\text{Wh})/\text{Wn}$$

Where:

HAP = HAP content in lb HAP/lb of coating solids

Wh = Weight percent of HAP (Wv-Ww-Wex-Wnh)

Wv = Weight percent of total volatiles (100%-weight percent solids)

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

Wnh = Weight percent of non-HAP VOCs

Wn = Weight percent of solids of the as applied coating

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

The VOC content standards stated above in Condition #002 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:

- a. The quantity of coating (other than stains) 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.
- b. The permittee requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.
- c. The quantity of any single stain used does not exceed 50 gallons per year from the coating operation.



SECTION E. Source Group Restrictions.

No Source Groups exist for this permit.



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this permit.



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

(1) This is a renewal of State Only Operating Permit 06-05020 issued September 4, 2015. This permit supercedes that permit.

(2) DEP Source ID No. 102, "Cold Cleaning & Parts Cleaning" will be deleted from the renewal permit because the permittee uses only acetone (EXEMPT) in less than a 5 gallon "bucket."

(3) The following non-air sources do not require any additional work practice standards, testing, monitoring, recordkeeping or reporting requirements:

(a) one (1) 3.570 MMBtu/hr Gordon-Piatt Energy Group model #S10-G-20 natural gas-fired boiler (manufactured date October 1996).

(b) The adhesive used is not subject to 25 Pa. Code § 129.77 because it is exempt based on the fact that it contains less than 20 grams of VOC per liter, less water and less exempt compounds, as applied AND the permittee does not expect to use more than 55 gallons of the adhesive per calendar year.



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