



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

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date: November 29, 2022

Effective Date: November 29, 2022

Expiration Date: October 31, 2027

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

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

State Only Permit No: 25-00930

Synthetic Minor

Federal Tax Id - Plant Code: 27-1334603-1

Owner Information

Name: DONJON SHIPBUILDING AND REPAIR, LLC

Mailing Address: 220 E BAYFRONT PKWY
ERIE, PA 16507-2402

Plant Information

Plant: DONJON SHIPBUILDING & REPAIR LLC/ERIE

Location: 25 Erie County

25001 Erie City

SIC Code: 3731 Manufacturing - Ship Building And Repairing

Responsible Official

Name: JOHN A WITTE, JR

Title: PRESIDENT / CEO

Phone: (908) 964 - 8812

Email: john.witte@donjon.com

Permit Contact Person

Name: JOHN NEKOLOFF

Title: ENVIRONMENTAL MGR

Phone: (814) 455 - 6442

Email: john.nekoloff@donjonshipbuilding.com

[Signature] _____

ERIC A. GUSTAFSON, NORTHWEST REGION AIR PROGRAM MANAGER



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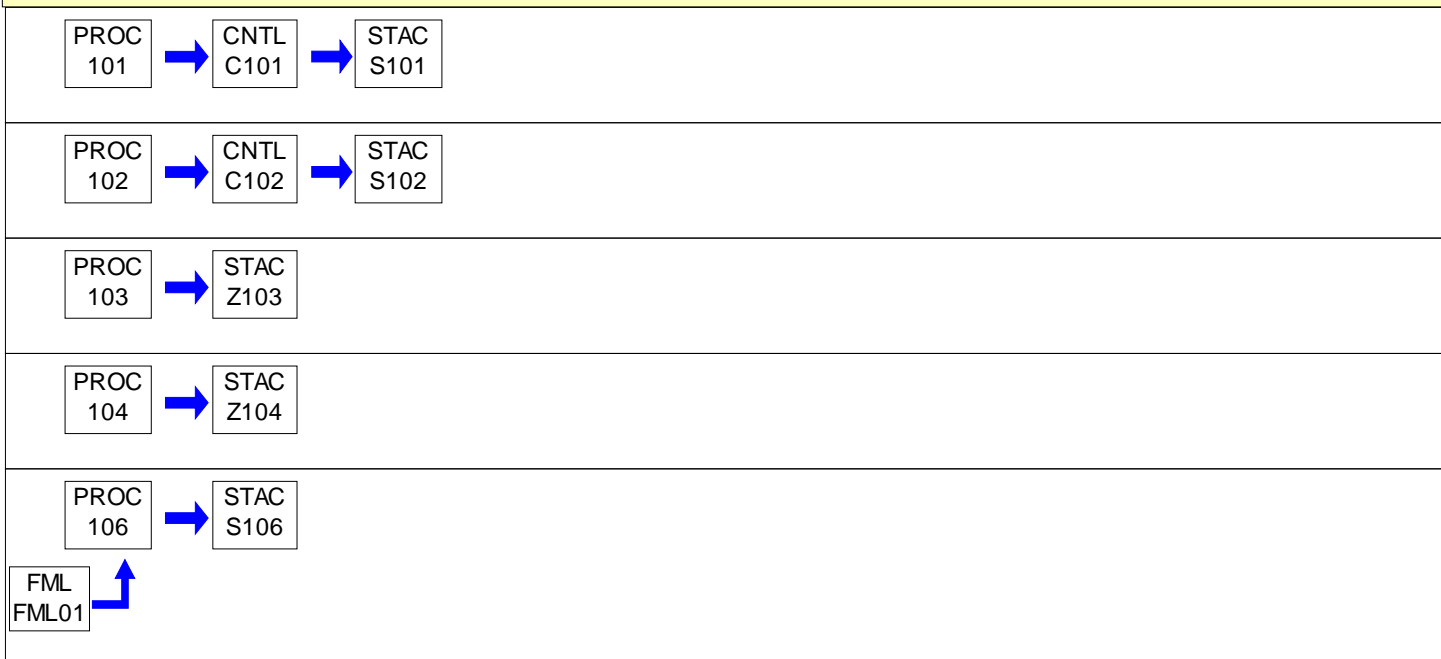
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	WHEELABRATOR BLASTING CABINET	1.000 Lbs/HR	STEEL PLATES & STEEL
102	PAINT SPRAY BOOTH	1.000 Lbs/HR	PRIMER
103	SHIP ABRASIVE BLASTING	1.000 Lbs/HR	SHIPS, STEEL SHOT
104	SHIP PAINTING	1.000 Lbs/HR	COATINGS
106	PREHEAT CABINET	0.640 MMBTU/HR	
		0.640 MCF/HR	Natural Gas
C101	DUST COLLECTOR FOR BLASTING CABINET		
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**SECTION B. General State Only Requirements****#001 [25 Pa. Code § 121.1]****Definitions.**

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

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

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

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

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

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

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

(c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]**Operating Permit Modifications**

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

(2) One ton of NO_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)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P. S. § § 4001—4015).

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

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

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations.

(7) [Not applicable]

(8) [Not applicable]

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

(i) the emissions are of minor significance with respect to causing air pollution; and

(ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

(b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) [Paragraph (c) of the regulation is printed under WORK PRACTICE REQUIREMENTS in this section of permit.]

(d) [Paragraph (d) of the regulation is not applicable to this facility.]

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

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions) [Condition #002 above] if such emissions are visible at the point the emissions pass outside the person's property.

**SECTION C. Site Level Requirements****# 004 [25 Pa. Code §123.31]****Limitations**

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

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

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

- (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.

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

The limitations of 25 Pa. Code § 123.41 (relating to limitations) [Condition #005 above] shall not apply to a visible emission in any of the following instances:

- (1) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in 25 Pa. Code § 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions). [123.1(a)(1) -- (9) are printed under Emission Restrictions of Condition #002 in this section of permit.]
- (4) [Not applicable]

007 Elective Restriction

(a) Facility wide VOC emissions shall not exceed 49.5 tons during any consecutive 12-month period. [This operating permit restriction assures compliance with Plan Approval 25-960A Condition 7.]

(b) Facility wide emissions of all HAPs combined shall not exceed 24.5 tons during any consecutive 12-month period.

(c) Facility wide emissions of any single HAP shall not exceed 9.5 tons during any consecutive 12-month period.

[From application for State Only Operating Permit received Dec. 1, 2003.]

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.**# 008 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

**SECTION C. Site Level Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 009 elective restriction**

- (a) The permittee shall keep records of all VOC and HAP containing materials consumed at this facility each month.
- (b) The quantity of VOC, individual HAP, and combined HAP emissions shall be determined for each month.
- (c) The permittee shall then, on a monthly basis, determine the 12-month rolling total of VOC, individual HAP, and combined HAP emissions. This 12-month rolling total is the current months emissions added to the prior eleven months emissions for each category.
- (d) These records shall be maintained on site for a minimum of 5 years and be made available to the department upon request.

V. REPORTING REQUIREMENTS.**# 010 [25 Pa. Code §127.11a]****Reactivation of sources.**

- (a) Except as provided by §127.215 (relating to reactivation), a source which has been out of operation or production for at least 1 year but less than or equal to 5 years may be reactivated and will not be considered a new source if the following conditions are satisfied:
 - (1) The owner or operator shall, within 1 year of the deactivation submit to the Department and implement a maintenance plan which includes the measures to be taken, including maintenance, upkeep, repair or rehabilitation procedures, which will enable the source to be reactivated in accordance with the terms of the permit issued to the source.
 - (2) The owner or operator shall submit a reactivation plan to the Department for approval at least 60 days prior to the proposed date of reactivation. The reactivation plan shall include sufficient measures to ensure that the source will be reactivated in compliance with the permit requirements. The permittee may submit a reactivation plan to the Department at any time during the term of its operating permit. The reactivation plan may also be submitted to and reviewed by the Department as part of the plan approval or permit application or renewal process.
 - (3) The owner or operator of the source shall submit a notice to the Department within 1 year of deactivation requesting preservation of emissions in the inventory and indicating the intent to reactivate the source.
 - (4) The owner or operator of the source shall comply with the terms and conditions of the maintenance plan while the source is deactivated, and shall comply with the terms of the reactivation plan and operating permit upon reactivation.
 - (5) The owner or operator of the source with an approved reactivation plan and operating permit shall notify the Department in writing at least 30 days prior to reactivation of the source.
- (b) A source which has been out of operation or production for more than 5 years but less than 10 years may be reactivated and will not be considered a new source if the following conditions are satisfied:
 - (1) The owner or operator of the source complies with the requirements of subsection (a).
 - (2) The owner or operator of the source obtains a plan approval and operating permit which requires that the emission of air contaminants from the source will be controlled to the maximum extent, consistent with the best available technology as determined by the Department as of the date of reactivation.
- (c) A source which has been out of operation for 10 or more years shall meet the requirements of this chapter applicable to a new source.
- (d) [Paragraph §127.11a(d) is not applicable.]
- (e) [Paragraph §127.11a(e) is not applicable since this facility is not located in a nonattainment area.]

**SECTION C. Site Level Requirements**

(f) The source shall have an operating permit prior to reactivation.

011 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall submit semi-annual notification letters of the facility's progress in reducing VOC emissions.

[From plan approval 25-930A Condition 12.]

VI. WORK PRACTICE REQUIREMENTS.**# 012 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

(a) - (b) [Paragraphs (a) and (b) of 25 Pa. Code § 123.1 are printed under Emission Restrictions in this section of permit.]

(c) A person responsible for any source specified in 25 Pa. Code § 123.1(a)(1) -- (7) or (9) [Condition 002 above] shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(1) 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.

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

(3) Paving and maintenance of roadways.

(4) 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.

(d) [Paragraph (d) of the regulation is not applicable to this facility.]

013 [25 Pa. Code §129.14]**Open burning operations**

(a) Air basins. No person may permit the open burning of material in an air basin.

(b) [Not applicable.]

(c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:

(1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public 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) [Not applicable]

(5) [Not applicable]

(6) A fire set solely for recreational or ceremonial purposes.

(7) A fire set solely for cooking food.

(d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:

**SECTION C. Site Level Requirements**

(1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

(2) [Not applicable]

(3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:

(i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.

(ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.

(4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

[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.]

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Requirements**

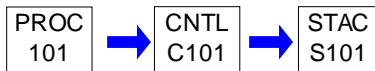
Source ID: 101

Source Name: WHEELABRATOR BLASTING CABINET

Source Capacity/Throughput:

1.000 Lbs/HR

STEEL PLATES & STEEL SHOT

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Particulate emissions from this source shall not exceed 0.02 grain/dscf.

[From Plan Approval Number 25-0930A, Condition #5.]

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

The pressure drop range across the control device shall be maintained within the following range.

- 0.2 to 0.6 inches water gage.

[This range is derived from a Nov. 7, 2022, email from the permit contact.]

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

(a) The pressure drop across the control device shall be recorded at least once per day on days that the source is operating.

(b) If the pressure drop range is exceeded, the corrective action shall be documented.

(c) The records of pressure drop range shall be maintained for at least 5 years.

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.**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The sources shall not operate when the control device is not operating.

[From Plan Approval Number 25-0930A, Condition #6.]



SECTION D. Source Level Requirements

(b) A magnehelic gauge shall be permanently installed and maintained at a conveniently readable location to indicate the pressure drop across each collector.

[From Plan Approval Number 25-0930A, Condition #14.]

(c) The facility shall maintain sufficient replacement cartridges for the blasting dust collection system onsite or shall have immediate access to spare cartridges in the event of failure. The blasting system shall not be operated if the collection system is not operating within manufacturer's specifications.

[From Plan Approval Number 25-0930A, Condition #15.]

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The number of spare cartridge filters that shall be maintained on site or within immediate access is 25 percent of the total number of cartridges used in the dust collector.

[The wheelabrator dust collector uses a total of 35 cartridge filters and 25 percent is 8.75; therefore, 9 spares should be available.]

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 102

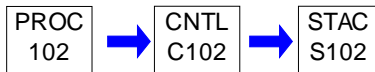
Source Name: PAINT SPRAY BOOTH

Source Capacity/Throughput:

1.000 Lbs/HR

PRIMER

Conditions for this source occur in the following groups: 1 - SURFACE COATING
2 - SHIPBUILDING CTG

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) Particulate emissions from this source shall not exceed 0.02 grain/dscf.

[From Plan Approval Number 25-0930A, Condition #5.]

(b) VOC's from the paint booth shall not exceed 27.8 tons per year in any twelve (12) month rolling period.

[From Plan Approval Number 25-0930A, Condition #7.]

(c) The weight of VOC per volume of as applied coating must be equal to or less than 2.52 lbs/gallon (3.706 lbs VOC/gallon of coating solids which is approximately 444 grams VOC per liter of coating solids) unless the owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

[From Plan Approval Number 25-0930A, Condition #8.]

[Compliance with this VOC emission limit assures compliance with the VOC emission limit contained in 25 Pa. Code 129.52, Table I, Category Number 10(g) - Miscellaneous Metal Parts & Products - all other coatings.]

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.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The pressure drop across the filters shall be maintained in the appropriate pressure drop range, as dictated by the gauge manufacturer and previous gauge operating parameters.

[From Plan Approval Number 25-0930A, Condition #13.]

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

The pressure drop range across the control device shall be maintained within the following range.

- 0.05 to 0.30 inches water gage.

[This range is derived from a Nov. 7, 2022, email from the permit contact.]

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Pressure drop readings will be recorded weekly and a record of the readings and a maintenance log, which would include when filters are changed, will be kept for 5 years.

[From Plan Approval Number 25-0930A, Condition #13 as amended in the 2022 operating permit issuance to change the requirement for the period of maintaining records from 2 years to 5 years.]

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.**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The sources shall not operate when the control device is not operating.

[From Plan Approval Number 25-0930A, Condition #6.]

(b) The manometer, measuring pressure drop across the dry filter bank shall be maintained in working, readable condition at all times.

[From Plan Approval Number 25-0930A, Condition #13.]

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

This source is permitted to operate in the automatic or manual mode.

[Approval for this condition is derived from the November 1, 2001, Department Chapter 127 Inspection Report for plan approval 25-930A, Section 13 Remarks.]

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

The permittee shall maintain 25 percent spare filters on site.

[The paint booth uses a total of 62 cartridge filters (32 for supply and 32 for exhaust); 25 percent is 15.5, therefore, 16 spares should be available.]

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**

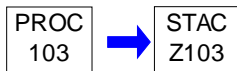
Source ID: 103

Source Name: SHIP ABRASIVE BLASTING

Source Capacity/Throughput:

1.000 Lbs/HR

SHIPS, STEEL SHOT

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

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

(a) The facility shall make reasonable efforts to prevent fugitive emissions from the ship abrasive blasting operations, including tarping the blasting area.

(b) The permittee shall take all proper measures to dispose of waste from the Ship Abrasive Blasting operation before a ship enters or departs the Bay Area.

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 104

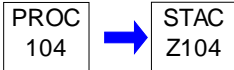
Source Name: SHIP PAINTING

Source Capacity/Throughput:

1.000 Lbs/HR

COATINGS

Conditions for this source occur in the following groups: 1 - SURFACE COATING
2 - SHIPBUILDING CTG

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Paragraphs (a) and (b) of this condition were modified at the September 26, 2017, permit modification to include the "Control Techniques Guidelines (CTG) for Shipbuilding and Ship Repair Operations (Surface Coating)" as promulgated August 27, 1996, in 61 FR 44050. (<https://www.govinfo.gov/content/pkg/FR-1996-08-27/pdf/96-21827.pdf>) The CTG requirements will be included in the SIP submitted to the EPA.]

(a) The VOC content of the primer surface coatings shall not exceed 3.4 pounds of VOC per gallon of coating minus water (as applied) or 6.26 pounds of VOC per gallon of solids applied (which is approximately 750 grams VOC per liter of coating solids). The primer used shall not exceed the CTG cold weather limitations, the CTG warm weather limitations, or 750 grams VOC per liter coating solids; whichever is more restrictive (lower).

[From Plan Approval Number 25-318-104, Condition #5 as modified on Sept. 26, 2017 to include the CTG requirements.]

[Compliance with this condition assures compliance with the requirements of 25 Pa. Code 129.52, Table I, Category 10(e) - Miscellaneous Metal Parts & Products, air-dried coatings.]

(b) The VOC content of the topcoat surface coatings shall not exceed 3.3 pounds of VOC per gallon of coating minus water (as applied) or 6.42 pounds of VOC per gallon of solids applied (which is approximately 769 grams VOC per liter of coating solids). The topcoat surface coatings used shall not exceed the appropriate CTG cold and warm weather limitations or 769 grams VOC per liter of coating solids, whichever is more restrictive (lower)

[From Plan Approval Number 25-318-104, Condition #6 as modified on Sept. 26, 2017 to include the CTG requirements.]

(c) The VOC emissions from this surface coating operation shall not exceed 32.4 tons during any consecutive twelve (12) month period. The VOC emissions from this surface coating plus the associated cleanup operations shall not exceed 34.0 tons per year.

[From Plan Approval Number 25-318-104, Condition #7.]

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).



SECTION D. Source Level Requirements

IV. RECORDKEEPING REQUIREMENTS.

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

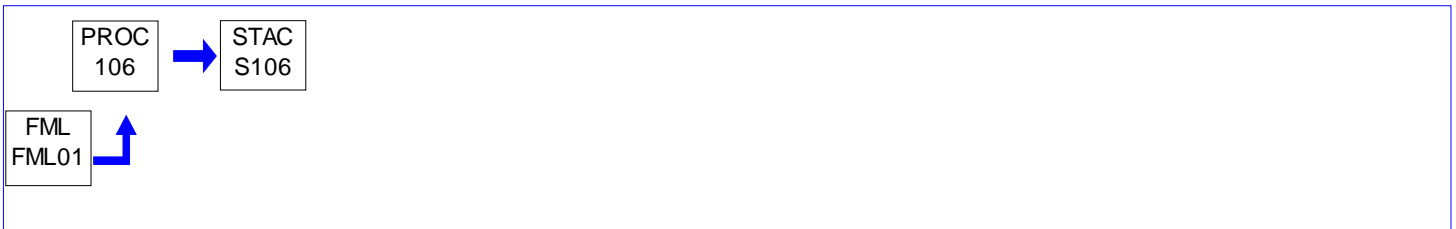
**SECTION D. Source Level Requirements**

Source ID: 106

Source Name: PREHEAT CABINET

Source Capacity/Throughput: 0.640 MMBTU/HR

0.640 MCF/HR Natural Gas

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

001 [25 Pa. Code §123.13]

Processes

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

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

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

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

**SECTION E. Source Group Restrictions.**

Group Name: 1 - SURFACE COATING

Group Description: Requirements from 25 Pa. Code § 129.52 for Surface Coating

Sources included in this group

ID	Name
102	PAINT SPRAY BOOTH
104	SHIP PAINTING

I. RESTRICTIONS.**Emission Restriction(s).****# 001 [25 Pa. Code §129.52]****Surface coating processes**

(a) This section applies to a surface coating process category, regardless of the size of the facility, which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year since January 1, 1987.

(b) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from a surface coating process category listed in Table I, unless one of the following limitations is met:

(1) The VOC content of each as applied coating is equal to or less than the standard specified in Table I. [Table 1 is printed below.]

(i) 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:

$$\text{VOC} = (\text{Wo})(\text{Dc})/\text{Vn}$$

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)

Dc = Density of coating, lb/gal, at 25°C

Vn = Volume percent of solids of the as applied coating

(ii) [Paragraph (b)(1)(ii) of the regulation is not applicable to this source.]

(iii) 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 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 solvents

Wn = Weight percent of solids of the as applied coating

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

(2) [Paragraph (b)(2) of the regulation is not applicable to this source.]

(c) [Paragraph (c) of the regulation is printed under RECORDKEEPING REQUIREMENTS in this section of the permit.]



SECTION E. Source Group Restrictions.

(d) The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this section and § 129.67 (relating to graphic arts systems). A surface coating process which seeks to comply with this section through the use of an exempt solvent may not be included in any alternative standards.

(e) If more than one emission limitation under miscellaneous metal parts and products applies to a specific coating, the least stringent emission limitation applies.

(f) [Paragraph (f) of the regulation is not applicable to this source.]

(g) [Paragraph (g) of the regulation is printed under RECORDKEEPING REQUIREMENTS in this section of the permit.]

(h) The VOC standards in Table I 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 owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

(i) - (j) [Paragraphs (i) and (j) of the regulation are not applicable to this source.]

(k) Section 129.52d(a)(5)(i) (relating to control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings) applies to surface coating processes regulated under Table I, Category 10, miscellaneous metal parts and products. Aerosol coatings must meet the requirements of 40 CFR Part 59, Subpart E (relating to National volatile organic compound emission standards for aerosol coatings).

Table I
Emission Limits of VOCs in Surface Coatings by Process Category
Weight of VOC per Volume of Coating Solids

Categories 1 through 9, 10(a) through 10(d), 10(f), and 11(a)-(f) are not applicable to these sources.

Categories 10(e) and 10(g) apply to Sources 102 and 104, but are streamlined out of this permit in favor of the more restrictive VOC restrictions in Section D of this permit for Source 102 and Source 104.

[This regulation is printed as amended October 22, 2016, in 46 Pa. B. 6758]

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[The following definition is from 25 Pa. Code §121.1]

Air dried coating -- Coatings which are dried by the use of air or forced warm air at temperatures up to 194 °F.

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 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).

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

The records to demonstrate compliance with 25 Pa. Code §129.52 shall be maintained for 5 years and shall be submitted to the Department upon request.

[This operating permit condition assures compliance with 25 Pa. Code §129.52(g).]

003 [25 Pa. Code §129.52]**Surface coating processes**

(a) - (b) [Paragraphs (a) and (b) of the regulation are printed under RESTRICTIONS in this section of the permit.]

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

(1) The following parameters for each coating, thinner and other component as supplied:

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

(ii) The volume used.

(iii) The mix ratio.

(iv) The density or specific gravity.

(v) The weight percent of total volatiles, water, solids and exempt solvents.

(vi) The volume percent of solids for Table I surface coating process categories 1—10.

(2) The VOC content of each coating, thinner and other component as supplied.

(3) The VOC content of each as applied coating.

(d) - (f) [Paragraphs (d)-(f) of the regulation are printed under RESTRICTIONS in this section of the permit.]

(g) [Paragraph (g) is streamlined out of the permit in favor of an operating permit condition for this source requiring that records be maintained for 5 years.]

(h) - (j) [Paragraphs (h)-(j) of the regulation are printed under RESTRICTIONS in this section of the permit.]

[This regulation is printed as amended October 22, 2016, in 46 Pa. B. 6758]

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

The permittee shall maintain and operate the source in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

**SECTION E. Source Group Restrictions.****VII. ADDITIONAL REQUIREMENTS.****# 005 [25 Pa. Code §121.1 A - L]****Definitions.**

[Selected definitions from 25 Pa. Code § 121.1 are printed below, as the regulation was amended January 15, 2021. Refer to regulation for remaining definitions.]

Air dried coating -- Coatings which are dried by the use of air or forced warm air at temperatures up to 194 °F.

Cosmetic specialty coatings -- Materials including padding stains, shading stains, sap stains, spatter stains, fillers, waxes and inks applied to enhance wood finishes.

Miscellaneous metal parts and products -- Items made of ferrous or nonferrous metals, including large farm machinery, small farm machinery, small appliances, commercial and industrial machinery, fabricated metal products and items listed under the Standard Industrial Classification Codes 3300—3999. The term does not include cans, coils, automobiles, light-duty trucks, metal furniture, magnet wire, large appliances, aerospace vehicles or components and automobile refinishing and customized top coating of automobiles and trucks, if production since January 1, 1987, has not exceeded 34 vehicles per day.

[The selected definitions are printed here from the regulation as current with the amendment January 16, 2021, in 51 Pa. B. 283.]

**SECTION E. Source Group Restrictions.**

Group Name: 2 - SHIPBUILDING CTG

Group Description: Requirements related to the Shipbuilding Control Technique Guidelines Document (CTG)

Sources included in this group

ID	Name
102	PAINT SPRAY BOOTH
104	SHIP PAINTING

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The facility shall not exceed the following limits "as applied" based on the (CTG) for Ship Building and Ship Repair Operations (Surface Coating) as published in the Federal Register on August 27, 1996.

Coating Category	VOC limits (see notes a, b)		
	Grams/liter coating (minus water and exempt compounds)	t > or = 4.5 °C	t < 4.5 °C (See note d)
General use	340	571	728
Specialty:			
Air flask	340	571	728
Antenna	530	1,439	
Antifoulant	400	765	971
Heat resistant	420	841	1,069
High-gloss	420	841	1,069
High-temperature	500	1,237	1,597
Inorganic zinc high-build	340	571	728
Military exterior	340	571	728
Mist	610	2,235	
Navigational aids	550	1,597	
Nonskid	340	571	728
Nuclear	420	841	1,069
Organic zinc	360	630	802
Pretreatment wash primer	780	11,095	
Repair and maint. of thermoplastics	550	1,597	
Rubber camouflage	340	571	728

**SECTION E. Source Group Restrictions.**

Sealant for thermal spray aluminum	610	2,235	
Special marking	490	1,178	
Speciality interior	340	571	728
Tack coat	610	2,235	
Undersea weapons systems	340	571	728
Weld-through precon. primer	650	2,885	

Notes:

a: The limits are expressed in two sets of equivalent units. Either set of limits may be used to demonstrate compliance.

b: To convert from g/L to lb/gal, multiply by (3.785 L/gal)(1/453.6 lb/g) or 1/120. For compliance purposes, metric units define the standards.

c: VOC limits expressed in units of mass of VOC per volume of solids were derived from the VOC limits expressed in units of mass of VOC per volume of coating assuming the coatings contain no water or exempt compounds and that the volumes of all components within a coating are additive.

d: These limits apply during cold-weather time periods (i.e., temperatures below 4.5 °C). Cold-weather allowances are not given to coatings in categories that permit less than 40 percent solids (nonvolatiles) content by volume. Such coatings are subject to the same limits regardless of weather conditions.

[From August 27, 1996, Federal Register, 61 FR 44053.]

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

Measurement, calculation, sampling and testing methodologies. The following measurement, calculation, sampling and testing methodologies shall be used to determine the amount of VOC emissions from Ship Building and Ship Repair Surface Coating operations:

- (1) Measurements of the volatile fraction of coatings shall be performed according to the following, as applicable:
 - (i) EPA Reference Method 24.
 - (ii) Appendix A of 40 CFR Part 63, Subpart II (relating to National emission standards for hazardous air pollutants for Shipbuilding and Ship Repair Surface Coating).
 - (iii) Manufacturer's formulation data.
- (2) Calculations of the VOC emissions and rates shall be performed according to the following, as applicable:
 - (i) A Guideline for Surface Coating Calculations, EPA-340/1-86-016, including updates and revisions.
 - (ii) Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings, EPA-450/3-84-019, including updates and revisions.
- (3) Sampling and testing shall be performed according to the procedures and test methods specified in Chapter 139 (relating to sampling and testing).

**SECTION E. Source Group Restrictions.**

(4) Another method or procedure that has been approved in writing by the Department and the EPA.

III. MONITORING REQUIREMENTS.

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

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

The owner or operator shall maintain records sufficient to demonstrate compliance with the CTG by keeping the following records:

(a) The owner or operator shall maintain daily records of the following parameters for each coating, thinner, component or cleaning material as supplied:

- (i) The name and identification number.
- (ii) The volume used.
- (iii) The mix ratio.
- (iv) The density or specific gravity.
- (v) The weight percent of total volatiles, water, solids and exempt solvents.
- (vi) The volume percent of solids for each EDP coating.
- (vii) The VOC content.

(b) The owner or operator shall maintain a daily record of the VOC content of each as applied coating or cleaning material.

(c) The owner or operator shall:

- (i) Compile the records monthly and maintain them for a minimum of 5 years.
- (ii) Submit the records to the Department in an acceptable format upon receipt of a written request from the Department.

(d) The owner or operator shall maintain the written work practice plan specified for the cleaning materials onsite and make it available to the Department upon request.

V. REPORTING REQUIREMENTS.

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

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

The owner and operator shall comply with the following work practices for:

(a) Coating-related activities. An owner and operator shall:

- (i) Store all VOC-containing coatings, thinners and coating-related waste materials in closed containers.
- (ii) Ensure that mixing and storage containers used for VOC-containing coatings, thinners and coating-related waste materials are kept closed at all times except when depositing or removing these materials.
- (iii) Minimize spills of VOC-containing coatings, thinners and coating-related waste materials and clean up spills immediately.

**SECTION E. Source Group Restrictions.**

(iv) Convey VOC-containing coatings, thinners and coating-related waste materials from one location to another in closed containers or pipes.

(v) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.

(b) Cleaning materials. An owner and operator shall develop and implement a written work practice plan to minimize VOC emissions from cleaning and purging of equipment associated with all coating operations for which emission limits are required. The written plan must specify practices and procedures to ensure that VOC emissions from the following operations are minimized:

- (i) Ship body wiping.
- (ii) Coating line purging.
- (iii) Flushing of coating systems.
- (iv) Cleaning of spray booth grates.
- (v) Cleaning of spray booth walls.
- (vi) Cleaning of spray booth equipment.
- (vii) Cleaning external spray booth areas.
- (viii) Other housekeeping measures, including:

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

(B) Ensuring that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.

(C) Minimizing spills of VOC-containing cleaning materials and cleaning up spills immediately.

(D) Conveying VOC-containing cleaning materials from one location to another in closed containers or pipes.

(E) Minimizing VOC emissions from cleaning of storage, mixing and conveying equipment.

VII. ADDITIONAL REQUIREMENTS.**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.****Appendix A. Procedure to Determine VOC Contents of Coatings to Which Thinning Solvent Will Be Added**

For a coating to which thinning solvent is routinely or sometimes added, the owner or operator shall determine the VOC content as follows:

(1) Prior to the first application of each batch, designate a single thinner for the coating and calculate the maximum allowable thinning ratio (or ratios, if the effected source complies with the cold-weather limits in addition to the other limits specified in Table 1 for each batch as follows:

$$R = ((V_s)(\text{VOC limit}) - (m_{\text{voc}})) / D_{\text{th}} \quad [\text{Equation 1}] \quad [\text{Source: } \text{https://www.govinfo.gov/content/pkg/FR-1996-08-27/pdf/96-21827.pdf}]$$

Where:

R = Maximum allowable thinning ratio for a given batch (L thinner/L coating as supplied);

V_s = Volume fraction of solids in the batch as supplied (L solids/L coating as supplied);

VOC limit = Maximum allowable as applied VOC content of the coating (g VOC/L solids);

m_{voc} = VOC content of the batch as supplied (g VOC/L coating as supplied);

D_{th} = Density of the thinner (g/L).

**SECTION E. Source Group Restrictions.**

If V_s is not supplied directly by the coating manufacturer, the owner or operator shall determine V_s as follows:

$V_s = 1 - (m_{\text{volatiles}} / D_{\text{avg}})$ [Equation 2] [Source: <https://www.govinfo.gov/content/pkg/FR-1996-08-27/pdf/96-21827.pdf>]

Where:

$m_{\text{volatiles}}$ = Total volatiles in the batch, including VOC, water, and exempt compounds (g/L coating); and

D_{avg} = Average density of volatiles in the batch (g/L).

In addition, the owner or operator may choose to construct nomographs, based on Equation 1, similar or identical to the one provided in Appendix C (Figure 1) of the CTG for Shipbuilding and Ship Repair Operations (Surface Coating) published in the Federal Register on August 27, 1996, as a means of easily estimating the maximum allowable thinning ratio. The VOC Data Sheet included as Appendix D also provides useful information in determining compliance with the applicable VOC coating limit. [Reference 61 FR 44056 and 61 FR 44057 at: <https://www.govinfo.gov/content/pkg/FR-1996-08-27/pdf/96-21827.pdf>]

(2) Prior to the first application of each batch, notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch of the coating by affixing a label to each container of coating or through another means approved by the Department.

(3) By the 15th day of each calendar month, determine the volume of each batch of the coating used, as supplied, during the previous month.

(4) By the 15th day of each calendar month, determine the total allowable volume of thinner for the coating used during the previous month as follows:

[See 40 CFR § 63.785 for Equation 3. A copy of equation 3 is available at the following web address. <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-II/section-63.785>]

where:

V_{th} = Total allowable volume of thinner for the previous month (L thinner);

V_b = Volume of each batch, as supplied and before being thinned, used during non-cold-weather days of the previous month (L coating as supplied);

R_{cold} = Maximum allowable thinning ratio for each batch used during cold-weather days (L thinner/L coating as supplied);

V_{b-cold} = Volume of each batch, as supplied and before being thinned, used during cold-weather days of the previous month (L coating as supplied);

i = Each batch of coating; and

n = Total number of batches of the coating.

(5) By the 15th day of each calendar month, determine the volume of thinner actually used with the coating during the previous month.

(6) If the volume of thinner actually used with the coating [paragraph (5) of this section] is less than or equal to the total allowable volume of thinner for the coating [paragraph (4) of this section], then compliance is demonstrated for the coating for the previous month, unless a violation is revealed using Method 24 of appendix A to 40 CFR part 60.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Terms used in the Control Techniques Guidelines (CTG) for Ship Building and Ship Repair Operations (Surface Coating)

**SECTION E. Source Group Restrictions.**

as published in the Federal Register on August 27, 1996 are as follows:

Add-on control system means an air pollution control device such as a carbon absorber or incinerator that reduces pollution in an air stream by destruction or removal prior to discharge to the atmosphere.

Affected source means any shipbuilding or ship repair facility having surface coating operations with a minimum 1,000 liters (L) (264 gallons [gal]) annual marine coating usage that is subject to this subpart.

Affirmative defense means, in the context of an enforcement proceeding, a response or a defense put forward by a defendant, regarding which the defendant has the burden of proof, and the merits of which are independently and objectively evaluated in a judicial or administrative proceeding.

Air flask specialty coating means any special composition coating applied to interior surfaces of high pressure breathing air flasks to provide corrosion resistance and that is certified safe for use with breathing air supplies.

Antenna specialty coating means any coating applied to equipment through which electromagnetic signals must pass for reception or transmission.

Antifoulant specialty coating means any coating that is applied to the underwater portion of a vessel to prevent or reduce the attachment of biological organisms and that is registered with the EPA as a pesticide under the Federal Insecticide, Fungicide, and Rodenticide Act.

As applied means the condition of a coating at the time of application to the substrate, including any thinning solvent.

As supplied means the condition of a coating before any thinning, as sold and delivered by the coating manufacturer to the user.

Batch means the product of an individual production run of a coating manufacturer's process. A batch may vary in composition from other batches of the same product.

Bitumens mean black or brown materials that are soluble in carbon disulfide and consist mainly of hydrocarbons.

Bituminous resin coating means any coating that incorporates bitumens as a principal component and is formulated primarily to be applied to a substrate or surface to resist ultraviolet radiation and/or water.

Certify means, in reference to the volatile organic compounds (VOC) content or volatile organic hazardous air pollutants (VOHAP) content of a coating, to attest to the VOC content as determined through analysis by Method 24 of appendix A to 40 CFR part 60 or through use of forms and procedures outlined in appendix A of this subpart, or to attest to the VOHAP content as determined through an Administrator-approved test method. In the case of conflicting results, Method 24 of appendix A to 40 CFR part 60 shall take precedence over the forms and procedures outlined in appendix A to this subpart for the options in which VOC is used as a surrogate for VOHAP.

Coating means any material that can be applied as a thin layer to a substrate and which cures to form a continuous solid film.

Cold-weather time period means any time during which the ambient temperature is below 4.5 °C (40 °F) and coating is to be applied.

Container of coating means the container from which the coating is applied, including but not limited to a bucket or pot.

Cure volatiles means reaction products which are emitted during the chemical reaction which takes place in some coating films at the cure temperature. These emissions are other than those from the solvents in the coating and may, in some cases, comprise a significant portion of total VOC and/or VOHAP emissions.

Epoxy means any thermoset coating formed by reaction of an epoxy resin (i.e., a resin containing a reactive epoxide with a curing agent).

**SECTION E. Source Group Restrictions.**

Exempt compounds means specified organic compounds that are not considered VOC due to negligible photochemical reactivity. Exempt compounds are specified in 40 CFR 51.100(s).

Facility means all contiguous or adjoining property that is under common ownership or control, including properties that are separated only by a road or other public right-of-way.

General use coating means any coating that is not a specialty coating.

Hazardous air pollutants (HAP) means any air pollutant listed in or pursuant to section 112(b) of the CAA.

Heat resistant specialty coating means any coating that during normal use must withstand a temperature of at least 204 °C (400 °F).

High-gloss specialty coating means any coating that achieves at least 85 percent reflectance on a 60 degree meter when tested by ASTM D523-89 (incorporation by reference—see §63.14).

High-temperature specialty coating means any coating that during normal use must withstand a temperature of at least 426 °C (800 °F).

Inorganic zinc (high-build) specialty coating means a coating that contains 960 grams per liter (8 pounds per gallon) or more elemental zinc incorporated into an inorganic silicate binder that is applied to steel to provide galvanic corrosion resistance. (These coatings are typically applied at more than 2 mil dry film thickness.)

Major source means any source that emits or has the potential to emit, in the aggregate, 9.1 megagrams per year (10 tons per year) or more of any HAP or 22.7 megagrams per year (25 tons per year) or more of any combination of HAP.

Maximum allowable thinning ratio means the maximum volume of thinner that can be added per volume of coating without violating the standards of §63.783(a), as determined using Equation 1 of this subpart.

Military exterior specialty coating or Chemical Agent Resistant Coatings (“CARC”) means any exterior topcoat applied to military or U.S. Coast Guard vessels that are subject to specific chemical, biological, and radiological washdown requirements.

Mist specialty coating means any low viscosity, thin film, epoxy coating applied to an inorganic zinc primer that penetrates the porous zinc primer and allows the occluded air to escape through the paint film prior to curing.

Navigational aids specialty coating means any coating applied to Coast Guard buoys or other Coast Guard waterway markers when they are recoated aboard ship at their usage site and immediately returned to the water.

Nonskid specialty coating means any coating applied to the horizontal surfaces of a marine vessel for the specific purpose of providing slip resistance for personnel, vehicles, or aircraft.

Nonvolatiles (or volume solids) means substances that do not evaporate readily. This term refers to the film-forming material of a coating.

Normally closed means a container or piping system is closed unless an operator is actively engaged in adding or removing material.

Nuclear specialty coating means any protective coating used to seal porous surfaces such as steel (or concrete) that otherwise would be subject to intrusion by radioactive materials. These coatings must be resistant to long-term (service life) cumulative radiation exposure (ASTM D4082-89 [incorporation by reference—see §63.14]), relatively easy to decontaminate (ASTM D4256-89 or 94 [reapproved 1994] [incorporation by reference—see §63.14]), and resistant to various chemicals to which the coatings are likely to be exposed (ASTM D3912-80 [incorporation by reference—see §63.14]). [For nuclear coatings, see the general protective requirements outlined by the U.S. Nuclear Regulatory Commission in a report entitled “U.S. Atomic Energy Commission Regulatory Guide 1.54” dated June 1973, available through the Government Printing Office at (202) 512-2249 as document number A74062-00001.]

**SECTION E. Source Group Restrictions.**

Operating parameter value means a minimum or maximum value established for a control device or process parameter that, if achieved by itself or in combination with one or more other operating parameter values, determines that an owner or operator has complied with an applicable emission limitation or standard.

Organic zinc specialty coating means any coating derived from zinc dust incorporated into an organic binder that contains more than 960 grams of elemental zinc per liter (8 pounds per gallon) of coating, as applied, and that is used for the expressed purpose of corrosion protection.

Pleasure craft means any marine or fresh-water vessel used by individuals for noncommercial, nonmilitary, and recreational purposes that is less than 20 meters in length. A vessel rented exclusively to or chartered by individuals for such purposes shall be considered a pleasure craft.

Pretreatment wash primer specialty coating means any coating that contains a minimum of 0.5 percent acid, by mass, and is applied only to bare metal to etch the surface and enhance adhesion of subsequent coatings.

Repair and maintenance of thermoplastic coating of commercial vessels (specialty coating) means any vinyl, chlorinated rubber, or bituminous resin coating that is applied over the same type of existing coating to perform the partial recoating of any in-use commercial vessel. (This definition does not include coal tar epoxy coatings, which are considered "general use" coatings.)

Rubber camouflage specialty coating means any specially formulated epoxy coating used as a camouflage topcoat for exterior submarine hulls and sonar domes.

Sealant for thermal spray aluminum means any epoxy coating applied to thermal spray aluminum surfaces at a maximum thickness of 1 dry mil.

Ship means any marine or fresh-water vessel used for military or commercial operations, including self-propelled vessels, those propelled by other craft (barges), and navigational aids (buoys). This definition includes, but is not limited to, all military and Coast Guard vessels, commercial cargo and passenger (cruise) ships, ferries, barges, tankers, container ships, patrol and pilot boats, and dredges. For purposes of this subpart, pleasure crafts and offshore oil and gas drilling platforms are not considered ships.

Shipbuilding and ship repair operations means any building, repair, repainting, converting, or alteration of ships.

Special marking specialty coating means any coating that is used for safety or identification applications, such as markings on flight decks and ships' numbers.

Specialty coating means any coating that is manufactured and used for one of the specialized applications described within this list of definitions.

Specialty interior coating means any coating used on interior surfaces aboard U.S. military vessels pursuant to a coating specification that requires the coating to meet specified fire retardant and low toxicity requirements, in addition to the other applicable military physical and performance requirements.

Tack specialty coating means any thin film epoxy coating applied at a maximum thickness of 2 dry mils to prepare an epoxy coating that has dried beyond the time limit specified by the manufacturer for the application of the next coat.

Thinner means a liquid that is used to reduce the viscosity of a coating and that evaporates before or during the cure of a film.

Thinning ratio means the volumetric ratio of thinner to coating, as supplied.

Thinning solvent: see Thinner.

Undersea weapons systems specialty coating means any coating applied to any component of a weapons system intended to be launched or fired from under the sea.

**SECTION E. Source Group Restrictions.**

Volatile organic compounds (VOC) is as defined in §51.100(s) of this chapter.

Volatile organic hazardous air pollutants (VOHAP) means any compound listed in or pursuant to section 112(b) of the CAA that contains carbon, excluding metallic carbides and carbonates. This definition includes VOC listed as HAP and exempt compounds listed as HAP.

Weld-through preconstruction primer (specialty coating) means a coating that provides corrosion protection for steel during inventory, is typically applied at less than 1 mil dry film thickness, does not require removal prior to welding, is temperature resistant (burn back from a weld is less than 1.25 centimeters [0.5 inch]), and does not normally require removal before applying film-building coatings, including inorganic zinc high-build coatings. When constructing new vessels, there may be a need to remove areas of weld-through preconstruction primer due to surface damage or contamination prior to application of film-building coatings.

[Source 61 FR 44054 at <https://www.govinfo.gov/content/pkg/FR-1996-08-27/pdf/96-21827.pdf>]



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Descriptor		
101	WHEELABRATOR BLASTING CABINET		
Emission Limit		Pollutant	
0.020	gr/DRY FT3	[Plan approval 25-0930A]	TSP
102	PAINT SPRAY BOOTH		
Emission Limit		Pollutant	
0.020	gr/DRY FT3	[Plan approval 25-0930A]	TSP
3.706	Lbs/Gal	of solids - All coatings [Plan approval 25-0930A]	VOC
27.800	Tons/Yr	(12-month rolling total) [Plan approval 25-0930A]	VOC
104	SHIP PAINTING		
Emission Limit		Pollutant	
6.260	Lbs/Gal	of solids - Primer [Plan Approval 25-318-104]	VOC
6.420	Lbs/Gal	of solids - Topcoat [Plan Approval 25-318-104]	VOC
32.400	Tons/Yr	(12-month rolling total) [Plan Approval 25-318-104]	VOC
34.000	Tons/Yr	surface coating including cleanup operations [Plan Approval 25-318-104]	VOC
106	PREHEAT CABINET		
Emission Limit		Pollutant	
500.000	PPMV	[25 Pa Code 123.21]	SOX
0.040	gr/DRY FT3	[25 Pa Code 123.13]	TSP

Site Emission Restriction Summary

Emission Limit		Pollutant
49.500 Tons/Yr	(12-month rolling total)	VOC
24.500 Tons/Yr	(12-month rolling total all combined HAPs)	Hazardous Air Pollutants
9.500 Tons/Yr	(12-month rolling total each single HAP)	Hazardous Air Pollutants

**SECTION H. Miscellaneous.**

(a) This facility is located at 220 East Bayfront Parkway, Erie, PA 16507.

This facility is a SYNTHETIC MINOR with respect to Potential Emissions of regulated air pollutants.

The following eFACTS ID's are assigned to this facility for this permit issuance:

Permit number: 25-00930

Records Management System (RMS) Facility Name: Donjon Shipbuilding & Repair

RMS ID: 83056

APS ID: 709557

Master Auth ID: 528677

Client ID: 277938

Site ID: 518751

Primary Facility (PF) ID: 545005

(b) The Capacity/Throughput numbers listed in Section A, the Site Inventory List, and provided in Section D of this permit for individual sources are for informational purposes only and are not to be considered enforceable limits. The actual enforceable emission and operating limits for each source, with the correct number of significant digits, are listed in Sections C, D, and E of this permit. The Emission Restriction Summary in Section G of this permit is for information purposes only and is not to be used to establish enforceable limits.

(c) Abbreviations used in this permit:

Schematics:

FML: Fuel material location

CU: Combustion Unit

PROC: Process

CNTL: Control device

STAC: Stack. The stack can represent either the emission point or fugitive emissions in a permit map.

Pollutants:

CO: Carbon Monoxide

NOx: Nitrogen Oxides

SOx: Sulfur Oxides

TSP: Total Suspended Particulate (includes both filterable and condensable)

PM10: Particulate Matter less than 10 microns

PM2.5: Particulate Matter less than 2.5 microns

VOC: Volatile Organic Compounds

HAP: Hazardous Air Pollutant

Source ID: Department assigned ID number for the source

Source Name: Department assigned name for the source

Capacity/Throughput: The maximum rated capacity or throughput for the source. The maximum rated capacity or throughput is not considered an enforceable limit. Enforceable limits are contained within the conditions of the permit.

Fuel/Material: The fuel/material assigned to SCC for the source

AIMS: Air Information Management System -- the DEP electronic database for permitting and emission reports

CFR: Code of Federal Regulations

CTG: Control Techniques Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating) as promulgated August 27, 1996, in 61 FR 44050. [<https://www.govinfo.gov/content/pkg/FR-1996-08-27/pdf/96-21827.pdf>]

Department: Pennsylvania Department of Environmental Protection (the DEP)

eFacts: Environmental Facility Application Compliance Tracking System -- the DEP electronic database for inspection reports

NESHAP: National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63)

NSPS: New Source Performance Standards (40 CFR Part 60)

NWRO: Northwest Regional Office of PA DEP

RFD: Request for Determination of Changes of Minor Significance & Exemption from plan approval.

SCC: Source Classification Code as defined by EPA

Source: An air contamination source (25 Pa. Code § 121.1).

(d) All reports, submittals, and other communications required by this permit shall be submitted electronically to the PA DEP Northwest Regional office located at the following address. Web addresses for electronic submittals to this office are below.

**SECTION H. Miscellaneous.**

Bureau of Air Quality
Department of Environmental Protection
230 Chestnut Street
Meadville, PA 16335
814-332-6940 (phone)
814-332-6121 (fax)
Office Hours 8 a.m. - 4 p.m.
800-541-2050 (after hours)

(i) Spills and other emergencies should be reported immediately to DEP by telephone at 800-541-2050.

(ii) Submittals of Asbestos Abatement and Demolition/Renovation Notification Forms should be made via the Online Asbestos Notification System. Information and links are located at this web address:

<https://www.dep.pa.gov/Business/Air/BAQ/BusinessTopics/Pages/Asbestos.aspx>

(iii) Submittals of Annual emissions inventory, if required, must be made via the DEP's AES*Online secure website. Information and links are located at this web address:

<https://www.dep.pa.gov/Business/Air/BAQ/BusinessTopics/Emission/Pages/default.aspx>

(iv) Submittals pertaining to emissions testing, specifically test protocols and test reports, shall be made by emailing electronic copies submissions to both PSIMS Administration in Central Office and to Regional Office AQ Program at the following e-mail addresses:

CENTRAL OFFICE:
RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE:
RA-EPNWstacktesting@pa.gov

(v) The 15-day advance notifications of emissions testing dates and supplemental testing information shall be submitted directly to:

(1) the DEP's OnBase electronic upload website where it will be forwarded to the Northwest Regional Office Air Quality Inspector. Upload the written notification at this web address:

<https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx>

(2) IF the Protocol Reviewer at Central Office Division of Source Testing requested a copy of the notification, then submit a copy to the email address provided by the protocol reviewer.

(vi) Submittals of RFD's shall be made via the DEP's Greenport website at <https://greenport.pa.gov>

(vii) All other submittals to this office should be made via the DEP's OnBase electronic upload website at this web address:

<https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx>

(e) Submittals to the EPA are made to the EPA Region III office.

The regional EPA address is:

Section Chief
U.S. Environmental Protection Agency Region III
Enforcement and Compliance Assurance Division
Air Section (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

(e) For the purpose of this operating permit, the following sources/activities have been determined to be of minor significance with respect to emissions of regulated air pollutants and have no applicable emission, testing, monitoring, recordkeeping, or reporting requirements.

**SECTION H. Miscellaneous.**

- one Plasma Cutting Table consisting of a plasma saw with a water table where submerged cuts are performed indoors in the fabrication area (RFD 9/15/09);
- one Stiffener Stitch Welder and 3 Torit Fume Control EZ Trunk systems which vent indoors (RFD 9/15/09);
- two Submerged Arc Welders which weld plates on the automated welding line and two SPS-5000 weld flux recovery systems (RFD 9/15/09);
- an 18 kW electric post-cure heated cabinet at the exit of the paint booth line.

(f) For the purpose of this operating permit, in accordance with 25 Pa. Code Section 127.11a and Section 127.215, the permittee is required, within 1 year of the deactivation of the source, to submit and implement a maintenance plan and submit a notice requesting preservation of emissions in the inventory. The maintenance plan shall include the measures to be taken including maintenance, upkeep, repairs or rehabilitation procedures, which will enable the source to be reactivated in accordance with the terms of the permit issued to the source.

(g) This permit, effective December 19, 2014, is renewed on December 19, 2014.

(h) This permit was modified and renewed on September 26, 2017 to incorporate the CTG for Shipbuilding requirements.

(i) This State Only operating permit renewal, effective November 29, 2022, is issued on November 29, 2022.



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