



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

STATE ONLY NATURAL MINOR OPERATING PERMIT

Issue Date: May 23, 2023

Effective Date: May 23, 2023

Expiration Date: May 23, 2028

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

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

State Only Permit No: 39-00018

Natural Minor

Federal Tax Id - Plant Code: 11-2112637-1

Owner Information

Name: STANLEY VIDMAR INC
Mailing Address: 11 GRAMMES RD
ALLENTOWN, PA 18103-4760

Plant Information

Plant: STANLEY VIDMAR INC/ALLENTOWN
Location: 39 Lehigh County 39001 Allentown City
SIC Code: 2522 Manufacturing - Office Furniture, Except Wood

Responsible Official

Name: CRAIG STARK
Title: PLANT MANAGER
Phone: (610) 776 - 3962 Email: craig.stark@sbdinc.com

Permit Contact Person

Name: MARK NEETZ
Title: EH&S TECHNICIAN
Phone: (610) 776 - 3978 Email: mark.neetz@sbdinc.com

[Signature] _____
MARK J. WEJKSZNER, NORTHEAST REGION AIR PROGRAM MANAGER



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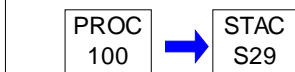
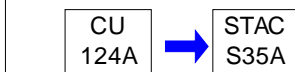
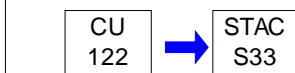
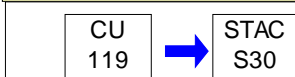
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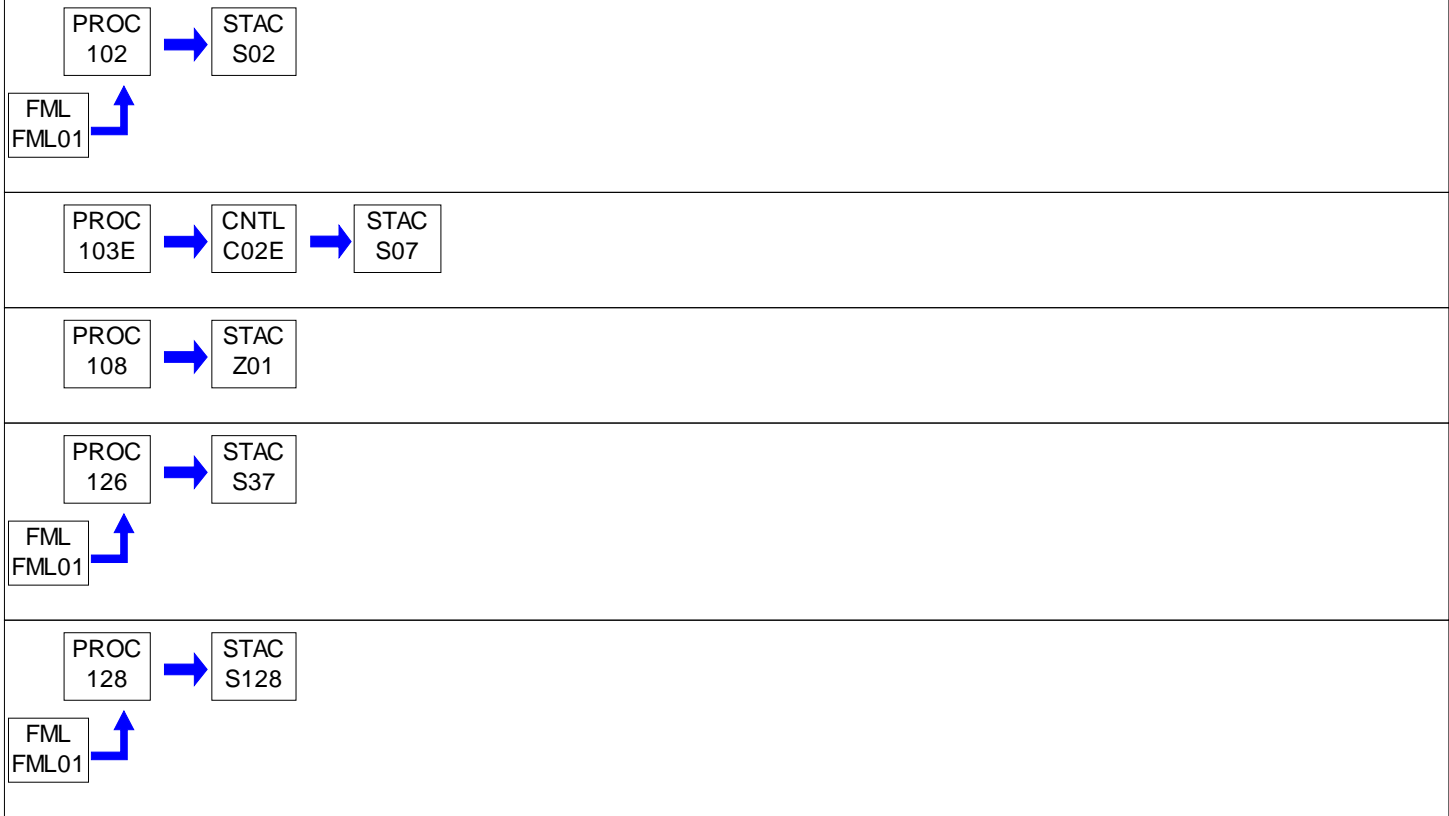
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
119	CEILING HEATER 1	3.200 MMBTU/HR	
122	OLD LINE WASHING HEATER	5.000 MMBTU/HR	
124A	OLD LINE AIR MAKE-UP UNIT	4.000 MMBTU/HR	
100	OLD LINE DRYING OVEN		
102	OLD LINE BAKE OVEN		
103E	OLD LINE SPRAYBOOTH E		
108	CLEAN-UP SOLVENT		
126	BURN-OFF OVEN GP4-39-003		
128	BURN-OFF OVEN GP4-39-005		
C02E	DRY FILTER FOR 103E		
FML01	NATURAL GAS		
S02	STACK - SOURCE 102		
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S128	STACK - BURN-OFF OVEN		
S29	STACK - SOURCE 100		
S30	STACK - CEILING HEATER 1		
S33	STACK - O/LN WASHING SYSTEM		
S35A	STACK - SOURCE 124A		
S37	STACK - BURN-OFF OVEN		
Z01	FUGITIVE EMISSIONS - CLEAN-UP SOLVENT		

PERMIT MAPS



PERMIT MAPS



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

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

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

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) The permittee may not permit the emission into the outdoor atmosphere of a 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) Sources and classes of sources other than those identified in paragraphs (1)-(7), 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.

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

The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in SECTION C - Condition #001, if such emissions are visible at the point the emissions pass outside the person's property.

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

The permittee 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.

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

(a) The permittee 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.

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

(a) The limitations of SECTION C - Condition #004 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 SECTION C - Condition #001.

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

[Authority for this condition is also derived from 25 Pa. Code, Section 129.92]

The total VOC emissions from coatings, cleaning solvents, and any other sources of combustion or process shall be limited to 275 tons of VOC per year (12- month rolling sum).

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

All sampling, testing and analysis in compliance with the requirements of any section of this permit shall be done in accordance with SECTION B - General Requirements #019.

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

Upon the request of the Department, the permittee shall conduct performance (stack) tests in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department. The permittee will provide adequate sampling ports, safe sampling platforms, and adequate utilities for the performance by the Department of tests on such source(s). The Department will set forth, in the request, the time period in which the facilities shall be provided, as well as the specifications for the facilities.

009 [25 Pa. Code §139.2]**Sampling by others.**

(a) Sampling and testing done by persons other than the Department may be accepted by the Department provided that:

- (1) The Department has been given reasonable notice of the sampling and testing and has been given reasonable opportunity to observe and participate in the sampling and testing.
- (2) The sampling and testing is conducted under the direct supervision of persons qualified, by training and experience, to conduct such sampling and testing.
- (3) Procedures for the sampling and testing are in accord with the provisions of this chapter.
- (4) The reports of the sampling and testing are accurate and comprehensive.

III. MONITORING REQUIREMENTS.**# 010 [25 Pa. Code §123.43]****Measuring techniques**

(a) 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.

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

(a) The permittee shall conduct weekly inspections of the facility perimeter, during daylight hours when the plant is in operation, to detect visible, fugitive, and malodor emissions as follows:

- (1) Visible emissions in excess of the limits stated in SECTION C - Condition #004.
 - (i) Visible emissions may be measured according to the methods specified in SECTION C - Condition #010, or alternatively, plant personnel who observe any visible emissions (i.e. emissions in excess of 0% opacity) will report the incident of visible emissions to the Department within four (4) hours of each incident and make arrangements for a certified observer to verify the opacity of the emissions.

**SECTION C. Site Level Requirements**

(2) The presence of fugitive emissions visible beyond the boundaries of the facility, as stated in SECTION C - Condition #002.

(3) The presence of malodor emissions beyond the boundaries of the facility, as stated in SECTION C - Condition #003.

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

(a) The permittee shall keep a logbook of weekly facility inspections performed. The logbook shall include the name of the company representative performing the inspections, any instances of exceedances of visible emissions limitations, visible fugitive emissions limitations and malodorous air emission limitations, and the name of the manager informed if a potential exceedance is observed. The permittee shall also record any and all corrective action(s) taken to abate each recorded deviation to prevent future occurrences.

(b) The records shall be kept for a five (5) year period and shall be made available to the Department upon request.

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

All records, reports, and analysis results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with SECTION B - General Requirements #020 and shall be made available to the Department upon written or verbal request within a reasonable time.

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

[Authority for this condition is also derived from 25 Pa. Code, Section 129.95]

(a) The company shall maintain a file containing all records and other data that are required to be collected pursuant to the various provisions of the operating permit, 25 Pa. Code, Section 129.95, such that records provide sufficient data and calculations to clearly demonstrate that the requirements of Pa. Code, Section 129.91-129.94 are met.

(b) The file shall include, but not be limited to, a record of all VOC containing compounds used at the facility as well as calculations on the entire facility's VOC emissions (updated monthly), all air pollution control systems performance evaluations and records of calibration checks, adjustments and maintenance performed on all equipment which is subject to 25 Pa. Code, Section 129.91-129.94.

(c) All measurements, records and other data shall be retained for at least five (5) years following the date on which such measurements, records or data are recorded.

V. REPORTING REQUIREMENTS.**# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) On a semi-annual basis the permittee shall compile a report of all logged instances of exceedance of the fugitive and visible emission limitations, SECTION C - Conditions #001 and #004, that occurred during the previous six (6) months, to be submitted to the Department within thirty (30) days of the close of the six-month reporting period (reporting periods usually are from January 1 - June 30 and July 1 - December 31).

(b) If no exceedances were detected this report shall be retained on site and made available to the Department upon request.

016 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Authority for this condition is also derived from 25 Pa. Code, Section 129.95]

(a) The permittee shall prepare a VOC emission report in tons per year on a 12-month rolling sum basis.

(b) The permittee shall submit the report to the Department on a semi-annual basis within thirty (30) days after the

**SECTION C. Site Level Requirements**

reporting period.

017 [25 Pa. Code §135.3]**Reporting**

(a) The owner or operator shall submit by March 1 of each year, a source (AIMS) report for the preceding calendar year. The report shall include information for all 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.

(b) The source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

VI. WORK PRACTICE REQUIREMENTS.**# 018 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

(a) The permittee 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.

019 [25 Pa. Code §129.14]**Open burning operations**

(a) The permittee may not permit the open burning of material in an air basin.

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

- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (5) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of such structure.
- (6) A fire set solely for recreational or ceremonial purposes.
- (7) A fire set solely for cooking food.

**SECTION C. Site Level Requirements****VII. ADDITIONAL REQUIREMENTS.**

020 [25 Pa. Code §127.1]

Purpose.

No person may permit air pollution as that term is defined in the Clean Air Act.

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 119

Source Name: CEILING HEATER 1

Source Capacity/Throughput: 3.200 MMBTU/HR

Conditions for this source occur in the following groups: GROUP 01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

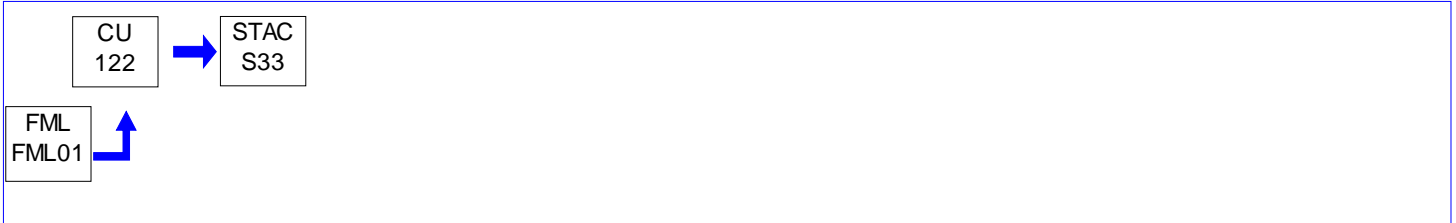
**SECTION D. Source Level Requirements**

Source ID: 122

Source Name: OLD LINE WASHING HEATER

Source Capacity/Throughput: 5.000 MMBTU/HR

Conditions for this source occur in the following groups: GROUP 01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 124A

Source Name: OLD LINE AIR MAKE-UP UNIT

Source Capacity/Throughput: 4.000 MMBTU/HR

Conditions for this source occur in the following groups: GROUP 01

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

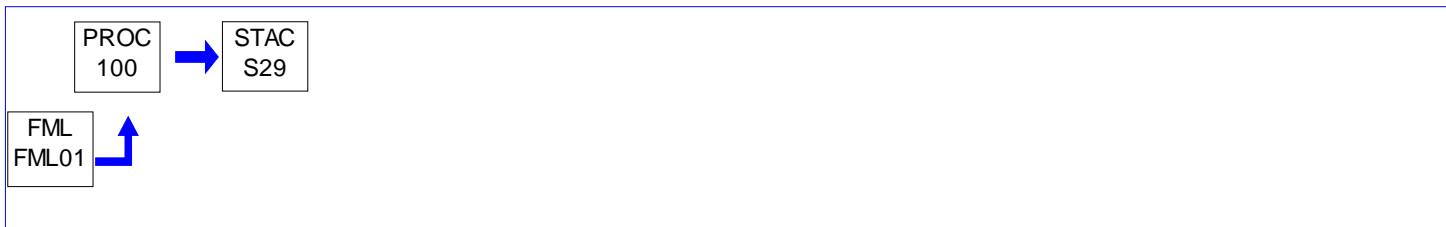
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 100

Source Name: OLD LINE DRYING OVEN

Source Capacity/Throughput:

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

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from this source in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

002 [25 Pa. Code §123.21]**General**

The permittee may not 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.**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Authority for this Condition is also derived from 25 Pa. Code, Section 129.93]

Presumptive RACT for this source shall be the maintenance and operation of the source in accordance with manufacturers specifications. The source shall be operated and maintained in accordance with good air pollution practices.

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

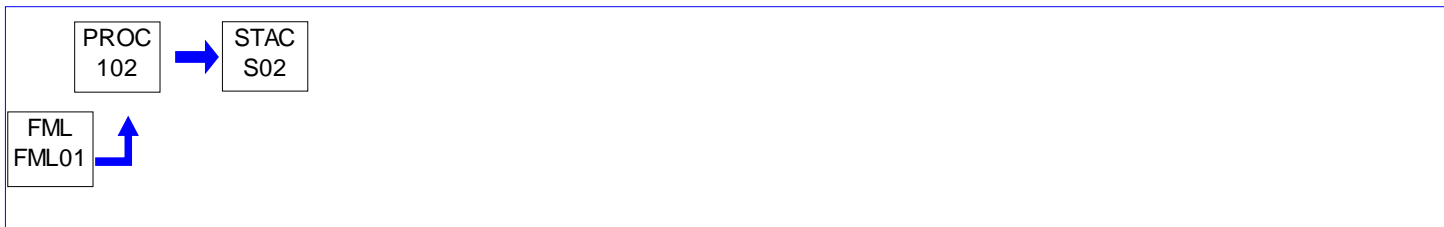
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: OLD LINE BAKE OVEN

Source Capacity/Throughput:

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

The permittee may not permit the emission into the outdoor atmosphere of particulate matter from this source in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

002 [25 Pa. Code §123.21]**General**

The permittee may not permit the emission into the outdoor atmosphere of sulfur oxides from this 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.**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Authority for this Condition is also derived from 25 Pa. Code, Section 129.93]

Presumptive RACT for this source shall be the maintenance and operation of the source in accordance with manufacturers specifications. The source shall be operated and maintained in accordance with good air pollution practices.

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

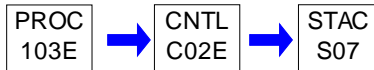
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: 103E

Source Name: OLD LINE SPRAYBOOTH E

Source Capacity/Throughput:

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

The permittee may not permit the emission into outdoor atmosphere of particulate matter from this source in a manner that the concentration of particulate matter in the effluent gas shall exceed 0.04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

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

[Authority for this condition is also derived from 25 Pa. Code, Section 129.92]

This source is subject to emission regulations contained in 25 Pa. Code, Section 129.52 as per the RACT PERMIT. The facility shall maintain records to demonstrate compliance with the limitation of 25 Pa. Code, Section 129.52 for metal furniture coatings. The weight of VOCs per gallon of coating (minus water) is equal to 3.0 pounds or less after adjustment to a standard solvent density of 7.36 pounds per gallon and to a solid basis.

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

(a) The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the spray painting/coating process of this Source Group unless the VOCs content of each as applied coating is equal to or less than 5.06 pounds of VOCs per gallon coating solids or:

(b) The VOC content of the as applied coating, expressed in units of VOC per volume 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. TESTING REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The VOC content of each batch of coating must be determined in accordance with EPA Reference Method 24 or 24A, and in accordance with the provisions of 25 Pa. Code, Chapter 139. Alternatively the permittee may obtain this information from the supplier if certification is in accordance with Reference Method 24 or 24A.

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

If requested by the Department, the permittee shall perform a stack test of the spraybooth, in accordance with the provisions

**SECTION D. Source Level Requirements**

of 25 Pa. Code, Chapter 139, within time frame specified by the PADEP.

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The spraybooth must be equipped with a device for monitoring the pressure differential across the system.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Authority for this condition is also derived from 25 Pa. Code, Section 129.95 and 129.52.]

(a) The permittee shall record the total amount of coating used by the spraybooth on a daily basis. The data recorded shall include, but not be limited to:

- (1) The gallons of coating used,
- (2) The coating density before and after addition of diluents,
- (3) The gallons of diluents used and the density of diluents,
- (4) The gallons of water contained in the coating, and
- (5) The batch number of the coating applied, the weight percent of the organic volatiles in the coating (pounds per gallon of coating) in accordance with Method 24 or 24A, and the date of the certification.

(b) All records and analysis results generated in compliance with the requirements of this permit shall be maintained in accordance with SECTION B - General Requirement #020.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The pressure differential measured across the spraybooth filter shall be recorded weekly.

(b) These records shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

009 [25 Pa. Code §129.52]

Surface coating processes

(a) The permittee shall comply with all applicable requirements of 25 Pa. Code 129.52 for Surface Coating Processes.

(b) The permittee shall keep on hand chemical composition data for all the coatings used in the paint spraybooths, and shall record on a daily basis the amount of these coatings and any volatile organic compound (VOC) solvent or thinner usage for these booths. Recordkeeping shall be in a format approved by the Department.

010 [25 Pa. Code §129.52]

Surface coating processes

(a) 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.

**SECTION D. Source Level Requirements**

- (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.

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

[Authority for this condition is also derived from 25 Pa. Code, Section 129.95]

(a) The permittee shall, on a semi-annual basis, compile a report for submission to the Department. This report shall include, but not be limited to the following data concerning the previous six months:

- (1) The total consumption of each coating as applied in gallons, and
- (2) The estimated actual emissions of Volatile Organic Compound (VOCs) (in tons) per 12-month rolling sum.

VI. WORK PRACTICE REQUIREMENTS.**# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain and operate equipment in accordance with accepted industry practices to optimize efficiency and good engineering practices.

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

The permittee shall keep on hand a sufficient quantity of spare filters for the spraybooth associated with this source in order to be able to immediately replace any panel filters requiring replacement due to deterioration resulting from routine operation of the sources.

014 [25 Pa. Code §129.52]**Surface coating processes**

(a) These sources and any associated air cleaning devices shall be operated in such a manner as to not cause air pollution in compliance with the specification and conditions of this operating permit.

(b) These sources shall be operated and maintained in a manner consistent with good air pollution practices.

VII. ADDITIONAL REQUIREMENTS.

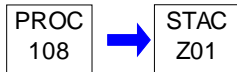
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: CLEAN-UP SOLVENT

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

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

The permittee shall record on a daily basis the cleaning solvents usage, in gallons, in a log book, and also keep the chemical composition data for cleaning solvents. The log book shall be maintained by the EHS Coordinator or designee and provided 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.**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The process shall be operated and maintained in a manner consistent with good air pollution practices. All solvent laden rags used for cleaning activities must be kept only in air-tight containers with a lid until disposal.

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: 126

Source Name: BURN-OFF OVEN GP4-39-003

Source Capacity/Throughput:

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

The operation of a burn off oven shall not at any time result in the emission of:

(a) Particulate matter emissions in excess of:

(1) 0.04 gr/dscf as specified in 25 Pa. Code §123.13(c)(i) for units installed prior to March 29, 1997.

(2) 0.02 gr/dscf as specified in 25 Pa. Code §123.13(b) for units installed on or after March 29, 1997.

(b) Visible emissions from air pollution control devices in excess of the following limitations:

(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.

(c) Sulfur compound emissions in excess of 500 parts per million, by volume, dry basis, as specified in 25 Pa. Code §123.21.

(d) Odor emissions in such a manner that the malodors are detectable outside the property of the permittee as specified in 25 Pa. Code §123.31.

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

LIMITATIONS:

(a) The burn-off oven is limited to remove cured hydrocarbon coatings, grease or oils from metal parts. The burn-off oven shall not be used to burn coatings that contain halogenated hydrocarbons like PVC or Teflons.

(b) The burn-off oven must be fueled by natural gas supplied by a public utility, liquefied petroleum gas, or by commercial fuel oils which are No.2 or lighter.

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

(a) If, at any time, the Department has cause to believe that air contaminant emissions from a burn-off oven covered by this Operating Permit are in excess of the limitations specified in, or established pursuant to, any applicable regulation contained in 25 Pa. Code, Subpart C, Article III, the permittee shall conduct tests deemed necessary by the Department to determine the actual emission rate(s).

(b) The permittee shall perform such testing in accordance with applicable provisions of 25 Pa. Code Chapter 139 (relating to sampling and testing) and in accordance with any restrictions or limitations established by the Department at the time the

**SECTION D. Source Level Requirements**

permittee is notified, in writing, of the testing requirement.

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

The permittee shall install, maintain, and operate a temperature indicator and recorder to measure and record the temperature in the secondary chamber of the burn-off oven.

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

(a) The permittee shall comply with applicable monitoring, recordkeeping and reporting requirements set forth in 25 Pa. Code Chapter 135 (relating to reporting of sources), 139 (relating to sampling and testing), the Air Pollution Control Act, the Clean Air Act, or the regulations thereunder as applicable to the source.

(b) The permittee shall, upon Department request, provide fuel analysis, or fuel samples, of the fuel used in the burn off oven. The permittee shall install, maintain, and operate a temperature indicator and recorder to measure and record the temperature in the secondary chamber of the burn-off oven.

(c) Records under this Operating Permit shall be kept for a period of five (5) years and shall be made available to the Department upon its request.

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

Records of the temperature indicator and recorder measurements for the burn-off oven should be kept for a minimum of five (5) years and provided 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.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The burn-off oven and any associated air cleaning devices shall be:

- (1) Operated in such a manner as not to cause air pollution.
- (2) Operated and maintained in a manner consistent with good operating and maintenance practices.

(3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this Operating Permit.

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

For units installed on or after October 12, 1996, the burn off oven secondary chamber shall be maintained at a minimum temperature of 1400°F during the period of operation. This minimum temperature of 1400°F must be established prior to the commencement of parts burn off in the burn off chamber. Instrumentation shall be provided for the monitoring of the secondary chamber temperature. The minimum retention time of gas within the secondary chamber shall be 0.5 seconds.

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall comply with applicable conditions stated in GP4-39-003.

**SECTION D. Source Level Requirements**

Source ID: 128

Source Name: BURN-OFF OVEN GP4-39-005

Source Capacity/Throughput:

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

The operation of a burn off oven shall not at any time result in the emission of:

(a) Particulate matter emissions in excess of:

- (i) 0.04 gr/dscf as specified in 25 Pa. Code §123.13(c)(i) for units installed prior to March 29, 1997.
- (ii) 0.02 gr/dscf as specified in condition 4 of this section for units installed on or after March 29, 1997.

(b) Visible emissions from air pollution control devices in excess of the following limitations:

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

(c) Sulfur compound emissions in excess of 500 parts per million, by volume, dry basis, as specified in 25 Pa. Code §123.21.

(d) Odor emissions in such a manner that the malodors are detectable outside the property of the permittee as specified in 25 Pa. Code §123.31.

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

If, at any time, the Department has cause to believe that air contaminant emissions from a burn off oven covered by this Permit are in excess of the limitations specified in, or established pursuant to, any applicable regulation contained in 25 Pa. Code, Subpart C, Article III, the permittee shall conduct tests deemed necessary by the Department to determine the actual emission rate(s).

The permittee shall perform such testing in accordance with applicable provisions of 25 Pa. Code Chapter 139 (relating to sampling and testing) and in accordance with any restrictions or limitations established by the Department at the time the permittee is notified, in writing, of the testing requirement.

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

The permittee shall comply with applicable monitoring, recordkeeping and reporting requirements set forth in 25 Pa. Code Chapter 135 (relating to reporting of sources), 139 (relating to sampling and testing), the Air Pollution Control Act, the Clean Air Act, or the regulations thereunder as applicable to the source.

The permittee shall, upon Department request, provide fuel analysis, or fuel samples, of the fuel used in the burn off oven. The permittee shall install, maintain, and operate a temperature indicator and recorder to measure and record the temperature in the secondary chamber of the burn off oven.

**SECTION D. Source Level Requirements**

Records under this permit shall be kept for a period of five (5) years and shall be made available to the Department upon its request.

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

This Burn Off Ovens Permit authorizes construction of Burn Off Oven(s) that meets best available technology (BAT) required under 25 Pa code §§127.1 and 127.12(a)(5). For the purposes of this permit, BAT shall include installation of a secondary chamber capable of reducing particulate matter emissions to or below 0.02 grains per dry standard cubic foot (gr/dscf) corrected to 12% CO₂.

The burn off oven secondary chamber shall be designed to: a) maintain a minimum temperature of 1400°F during the period of operation; and, b) have a minimum retention time of gas within the secondary chamber of at least 0.5 seconds.

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

For units installed on or after October 12, 1996, the burn off oven secondary chamber shall be maintained at a minimum temperature of 1400°F during the period of operation. This minimum temperature of 1400°F must be established prior to the commencement of parts burn off in the burn off chamber. Instrumentation shall be provided for the monitoring of the secondary chamber temperature. The minimum retention time of gas within the secondary chamber shall be 0.5 seconds

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

Any burn off oven operating under this Burn Off Ovens Permit must comply with the terms and conditions of the permit. The burn off ovens and any associated air cleaning devices shall be:

- (a) Operated in such a manner as not to cause air pollution.
- (b) Operated and maintained in a manner consistent with good operating and maintenance practices.
- (c) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this Burn Off Ovens Permit.

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

Burn off ovens shall not be used to burn coatings that contain halogenated hydrocarbons like PVC, or Teflons.

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

The permittee shall comply with applicable conditions stated in GP4-39-005.

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 01

Group Description: COMBUSTION UNITS

Sources included in this group

ID	Name
119	CEILING HEATER 1
122	OLD LINE WASHING HEATER
124A	OLD LINE AIR MAKE-UP UNIT

I. RESTRICTIONS.**Emission Restriction(s).****# 001 [25 Pa. Code §123.11]****Combustion units**

(a) The permittee may not permit the emission into the outdoor atmosphere of particulate matter, expressed as PM, from each combustion source in excess of the following rate:

- (1) 0.4 Lbs/MMBTU of Total Suspended Particulate.

002 [25 Pa. Code §123.22]**Combustion units**

[Compliance with the requirements specified in this streamlined permit condition assures compliance with the provisions in 40 CFR 52.2020(c)(1)]

(a) The permittee may not permit the emission into outdoor atmosphere of Sulfur Dioxides, expressed as SO₂, from each boiler in excess of the following rate:

- (1) 3.0 pounds of sulfur dioxide per million BTU of heat input over any 1-hour period.

Fuel Restriction(s).**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

These combustion units shall only be fired by natural gas.

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).

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

[Authority for this Condition is also derived from 25 Pa. Code, Section 129.93]

Presumptive RACT for this source shall be the maintenance and operation of the source in accordance with manufacturers specifications. The source shall be operated and maintained in accordance with good air pollution practices.

VII. ADDITIONAL REQUIREMENTS.

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



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

The initial Natural Minor Operating Permit application was received on July 6, 2022. The annual operating permit maintenance fee shall be submitted to the Department in accordance with 25 Pa. Code, Chapter 127, Section 127.703. The annual maintenance fees are due no later than December 31, annually.

This permit includes conditions RACT PERMIT NO. 39-0031 issued 06/12/1998.

The following is a list of sources that have been determined by the Department to be of minor significance under 25 Pa. Code, Chapter 127, Section 127.14(a)(8) and are not regulated in this Operating Permit. However, this determination does not exempt the sources from compliance with all applicable air quality regulations specified in 25 Pa. Code Chapters 121-143:

Powder washer stage 0 heaters (3)
Powder Dry-Off Oven
Powder Cure Oven
E-Coat Drying Oven
Ceiling Heaters (19)

Request for Determination's (RFDs)

- (1) Old Source 117 - powder touch-up booth. RFD approved.
- (2) Old Source 118 - oven- powder touch-up booth. RFD approved.
- (3) Old Sources 126 & 127 - powder coat preheat heaters. RFD approved.
- (4) Old Sources 128 & 129 - powder coat dry off and cure ovens along with its stacks. RFD approved.
- (5) Four (4) powder coat pretreatment heaters. RFD approved.

These minor sources are required to track and record the use of Natural Gas on the new powder coating line to assure compliance with the limit of 1 tpy NO_x for each.

- (6) E-coat process. RFD approved - Source is subject to 25 Pa Code Section 129.52 for Surface coating processes.
- (7) Touch up paint booth. RFD approved

RACT II

Pursuant to 129 Pa. Code §129.96, the facility is not subject to presumptive or case-by-case RACT II requirements.



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