



FROM Harold Wynkoop *HW*
Facilities Permitting Section
Air Quality Program

TO William R. Weaver *WRW 5/9/19*
Program Manager
Air Quality Program

THRU Tom Bianca, P.E. *TJB 5-8-19*
Environmental Engineering Manager
Air Quality Permitting

DATE May 1, 2019

RE Plan Approval No. 07-03064A (B.3. File)
Cove Mountain Wood Products
Taylor Township, Blair County

ADDENDUM

The proposed plan approval was sent to the applicant for comment on February 14, 2019. The applicant expressed concerns to DEP Operations staff regarding the requirement to keep daily records for surface coating operations. Maintaining daily records is a requirement specified in 25 Pa. Code, § 129.52(c) and cannot be changed. No other comments were received from the applicant.

The Pennsylvania Bulletin notice of proposed plan approval issuance was published on March 2, 2019. During the public comment period, DEP Operations staff followed up with an individual who had called to informally express concern regarding the facility and the draft permit. The caller was concerned that the amount of emissions permitted annually is not averaged over the course of the year but might be emitted in higher amounts over a shorter period of time. DEP Operations staff advised the caller that the rolling VOC emission limits in the draft permit help ensure that emissions are spread out more evenly over a longer time period. The caller also expressed concern about an RTO being determined as economically infeasible in this case. DEP Operations staff explained that the costs presented in the DEP's permit review memo were based on the cost per ton of VOC controlled. DEP Operations staff also noted that carbon (media) filters are referenced in the draft plan approval. The caller also expressed concern as to why the facility would not switch to water-based coatings, citing a Pittsburgh area based company, and stating that the odor problem would cease upon switching to water based coatings. However, DEP notes that it has no way of determining whether this result would actually occur, especially given that no malodor violations connected with the facility have yet been documented. Furthermore, the products being used by the facility meet DEP's Best Available Technology determination, which involves compliance with 25 Pa. Code Section 129.52, using an equivalency approach under 25 Pa. Code Section 129.51.

DEP Operations staff also explained DEP's odor regulation, citing the difference between what is determined to be an odor and a malodor. DEP's has promptly investigated all odor complaints regarding this facility, and would expect to do so in the future. During each of the previous site visits, DEP was unable to detect conditions that would constitute a malodor violation. This included one specific site visit where DEP utilized a FLIR camera in an attempt to define the specific location of the any emissions plume. The caller stated that they have no odor concerns during the winter months but anticipate odors returning as warmer weather draws near, and agreed to continue to call DEP if any problems are noted. The 30-day public comment period ended on April 1, 2019.

Since the facility is a source of VOCs that has submitted a plan approval application demonstrating compliance with 25 Pa. Code, Chapter 129 (relating to standards for sources) using § 129.51(a) (relating to general), a notice of proposed plan approval issuance was completed and sent by the Department to the applicant, the EPA and any state within 50 miles of the facility.

The notice was published in the Altoona Mirror on February 23, 24 & 25, 2019. The 30-day comment period ended on March 27, 2019.

A notice of proposed plan approval issuance was given to each neighboring state located within 50 miles of the facility. Specifically, an email that contained the same information as the Pennsylvania Bulletin notice was sent on February 14, 2019 to each of the following:

- Ms. Karen Irons of Maryland;
- Ms. Carrie McCumbers and Ms. Stephanie E. Hammonds of West Virginia.

There were no comments from any of the above notified neighboring states.

In accordance with the provisions contained in 25 Pa. Code, § 129.51(a)(6), plan approvals incorporating alternate VOC compliance methods pursuant to § 129.51 shall be reviewed by EPA. The proposed plan approval and notice of proposed plan approval issuance was sent to EPA for comment on February 14, 2019. In an email received on February 28, 2019, EPA stated that they had no comment.

It is my recommendation that the plan approval, with conditions, be issued.

c.c. Permits
SCRO 07-03064A (B.3. File)
Altoona District

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 for the Cove Mountain Wood Products.
 Issued Air Quality Plan Approval No. 07-03064A
 Taylor Township, Blair County

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Wynkoop, Harold

From: Cove Moutain Wood Products <sales@covemtn.net>
Sent: Monday, March 4, 2019 5:26 PM
To: Wynkoop, Harold
Subject: [External] Public Notice
Attachments: scan0137.pdf; scan0136.pdf

***ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.*

Hal,

Here you go on the proof of publication.

Thanks
Nevin Sweigart
Cove Mountain Wood Products

PROOF OF PUBLICATION OF NOTICE IN ALTOONA MIRROR

PUBLIC NOTICE
NOTICE OF INTENT TO ISSUE A PLAN APPROVAL AND OPERATING PERMIT
 Blair County

07-03064A: Cove Mountain Wood Products (4168 Cove Mountain Road, Roaring Spring, PA 16673) for the construction and temporary operation of two coating booths and millworking operations at the facility located in Taylor Township, Blair County. Potential emissions are expected to be: 25 tons per year of VOCs, 7.36 tons per year of HAPs, and less than one ton per year of PM. The facility is a State Only facility. DEP's review of the information submitted by the applicant indicates that the air contamination sources as constructed or modified will comply with all regulatory requirements pertaining to air contamination sources and the emission of air contaminants including the best available technology requirement (BAT) of 25 Pa. Code Section 127.1 and 127.12; 25 Pa. Code Section 129.52 - Surface coating processes, and 25 Pa. Code Section 129.51 - General. Based on these findings, the Department proposes to issue a plan approval for the proposed construction. If, after the project has been implemented, the Department determines that the sources are constructed and operated in compliance with the plan approval conditions and the specification of the application for plan approval, the requirements established in the plan approval may be incorporated into an Operating Permit pursuant to the provisions of 25 Pa. Section Code Chapter 127.

Copies of the application, DEP's analysis and other documents used in the evaluation of the application are available for public review during normal business hours at the PA DEP Southcentral Regional Office, at 909 Elmerton Avenue, Harrisburg, PA 17110.

A person may oppose the proposed plan approval, or may provide the Department with additional information to consider in its review, or may request a public hearing, by filing a written protest with the Department at the address listed above. Each written comment must contain the following:

- Name, address and telephone number of the person submitting the comments.
- Identification of the proposed permit by the permit number listed above.
- A concise statement regarding the relevancy of the information or objections to the issuance of the permit.

A 30-day comment period, from the date of publication of this notice, will exist for the submission of comments, protests, or for requests for a public hearing.

A public hearing may be held, if the Department of Environmental Protection, in its discretion, decides that such a hearing is warranted based on the comments received. The Department will give notice of any scheduled public hearing at least thirty days in advance of the hearing as per 25 PA Code, Section 127.48. The hearing notice will be published in the Pennsylvania Bulletin and a newspaper of general circulation where the facility is located.

Mr. Thomas Bianca, P.E., New Source Review Chief, may be contacted at 717-705-4863, or at PA DEP Air Quality Program, 909 Elmerton Avenue, Harrisburg, PA 17110, for additional information or for the submission of comments, protests, or requests for a public hearing.

Plan approvals issued to sources identified in 25 Pa. Code Section 127.44(b)(1) - (4) or plan approvals issued to source with limitations on the potential to emit may become part of the SIP, and will be submitted to EPA for review and approval.

February 23, 24 and 25, 2019

**STATE OF PENN
 COUNTY OF**

Ray E
 General Manager of
 published at Number 3
 of Blair, and State of P

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not interested in the subject
 allegations in the foregoing

tue.

February 25, 2019

Debra D Miller
 er, Notary Public

My Commission expires

Commonwealth of Pennsylvania
 Notarial Seal
DEBRA D MILLER, Notary Public
 ALTOONA CITY, BLAIR COUNTY
 My Commission Expires July 25, 2021

PROOF OF PUBLI



ALTOONA MIRROR

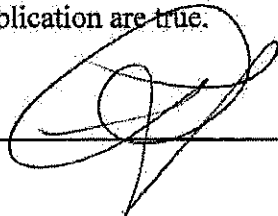
STATE OF PENNSYLVANIA
COUNTY OF BLAIR

Ray Eckenrode, being duly sworn says: That he is the General Manager of the ALTOONA MIRROR, a newspaper of general circulation, published at Number 301 Cayuga Avenue, Township of Logan, City of Altoona, County of Blair, and State of Pennsylvania.

That said newspaper was established as a daily newspaper of general circulation on the Thirteenth Day of June 1874, since which date said newspaper has been published daily in the City of Altoona; that a copy of the printed notice, hereto attached, is exactly as the same was printed and published in the regular edition of the daily ALTOONA MIRROR published on the following date(s), viz:

February 23, 24 & 25, 2019

The affiant further deposes and declares that he is not interested in the subject matter of the aforesaid notice of publication and that all allegations in the foregoing statement as to time, place and character of publication are true.



Sworn to and subscribed before me the 28 day of February, 2019.


Debra D. Miller, Notary Public

My Commission expires

Commonwealth of Pennsylvania
Notarial Seal
DEBRA D MILLER, Notary Public
ALTOONA CITY, BLAIR COUNTY
My Commission Expires July 25, 2021

submitting the comments, identification of the proposed Plan Approval/Operating Permit including the permit number and a concise statement regarding the relevancy of the information or objections to issuance of the permit.

A person wishing to request a hearing may do so during the 30-day comment period. A public hearing may be held, if the Department, in its discretion, decides that a hearing is warranted based on the information received. Persons submitting comments or requesting a hearing will be notified of the decision to hold a hearing by publication in the newspaper, the *Pennsylvania Bulletin* or by telephone, when the Department determines this type of notification is sufficient. Requests for a public hearing and any relevant information should be directed to the appropriate Department Regional Office.

Permits issued to the owners or operators of sources subject to 25 Pa. Code Chapter 127, Subchapter D or E, or located within a Title V facility or subject to 25 Pa. Code § 129.51(a) or permits issued for sources with limitations on their potential to emit used to avoid otherwise applicable Federal requirements may be submitted to the United States Environmental Protection Agency for review and approval as a revision to the State Implementation Plan. Final Plan Approvals and Operating Permits will contain terms and conditions to ensure that the sources are constructed and operating in compliance with applicable requirements in the Air Pollution Control Act (35 P.S. §§ 4001—4015), 25 Pa. Code Chapters 121—145, the Federal Clean Air Act (42 U.S.C.A. §§ 7401—7671q) and regulations adopted under the Federal Clean Air Act.

Persons with a disability who wish to comment and require an auxiliary aid, service or other accommodation to participate should contact the regional office listed before the application. TDD users may contact the Department through the Pennsylvania AT&T Relay Service at (800) 654-5984.

Intent to Issue Plan Approvals and Intent to Issue or Amend Operating Permits under the Air Pollution Control Act (35 P.S. §§ 4001—4015) and 25 Pa. Code Chapter 127, Subchapter B. These actions may include the administrative amendments of an associated operating permit.

Southcentral Region: Air Quality Program, 909 Elmerston Avenue, Harrisburg, PA 17110.

Contact: Thomas Hanlon, Facilities Permitting Chief, 717-705-4862, Thomas Bianca, New Source Review Chief, 717-705-4863, or William Weaver, Regional Air Quality Manager, 717-705-4702.

07-03064A: Cove Mountain Wood Products (4168 Cove Mountain Road, Roaring Spring, PA 16673) to authorize the installation and operation of two existing coating booths and millworking operations at the facility located in Taylor Township, **Blair County**. Potential emissions are projected to be: 25 tons per year of VOCs; 7.36 tons per year of HAPs; and less than one ton per year of PM. The facility is a State Only facility. The draft plan approval includes provisions that will allow for compliance with 25 Pa. Code § 129.52 VOC restrictions by way of an equivalency calculation pursuant to 25 Pa. Code § 129.51(a). DEP's review of the information submitted by the applicant indicates that the air contamination sources as constructed or modified will comply with all regulatory requirements pertaining to air contamination sources and the emission of air contaminants including the best available technology requirement

(BAT) of 25 Pa. Code §§ 127.1 and 127.12; 25 Pa. Code § 129.52—Surface coating processes; and 25 Pa. Code § 129.51—General. Based on these findings, the Department proposes to issue a plan approval for the proposed construction. If, after the project has been implemented, the Department determines that the sources are constructed and operated in compliance with the plan approval conditions and the specification of the application for plan approval, the requirements established in the plan approval may be incorporated into an Operating Permit pursuant to the provisions of 25 Pa. Code Chapter 127.

Department of Public Health, Air Management Services: 321 University Avenue, Philadelphia, PA 19104.

Contact: Edward Wiener, Chief—Telephone: 215-685-9426.

OP18-000039: South Eastern Pennsylvania Transportation Authority, Berridge/Courtland Maintenance Shop (200 West Wyoming Avenue, Philadelphia, PA 19140) for the operation of a public transportation facility in the City of Philadelphia, **Philadelphia County**. The facility's air emission sources include: two each 10,043 MMBtu/hr Boilers; two each 5,021 MMBtu/hr Boilers; one 2.95 MMBtu/hr heater; one 3.95 MMBtu/hr heater; one 0.5 MMBtu/hr hot water heater; five each <0.72 MMBtu/hr pressure washers; three each 0.82 MMBtu/hr steam washers; two <0.63 MMBtu/hr space heaters; one 0.5 MMBtu/hr and one 1 MMBtu/hr Catalyst Regeneration Units; four each 0.305 MMBtu/hr unit heaters; twenty-seven solvent parts washers; three spray booths; two stage 2 vapor recovery units; two non-heatset printing presses; one 200 kW and one 561 kW emergency generator; two cyclone vacuums, and 258 kW two-engine dynamometers.

The operating permit will be issued under 25 Pa. Code, Philadelphia Code Title 3 and Air Management Regulation XIII. Permit copies and other supporting information are available for public inspection at AMS, 321 S. University Avenue, Philadelphia, PA 19104. For further information, contact Edward Wiener at (215) 685-9426.

Persons wishing to file protest or comments on the above operating permit must submit the protest or comments within 30 days from the date of this notice. Any protests or comments filed with AMS must include a concise statement of the objections to the permit issuance and the relevant facts upon which the objections are based. Based upon the information received during the public comment period, AMS may modify the operating permit or schedule a public hearing. The hearing notice will be published in the *Pennsylvania Bulletin* and a local newspaper at least thirty days before the hearing.

OPERATING PERMITS

Intent to Issue Title V Operating Permits under the Air Pollution Control Act (35 P.S. §§ 4001—4015) and 25 Pa. Code Chapter 127, Subchapter G.

Southcentral Region: Air Quality Program, 909 Elmerston Avenue, Harrisburg, PA 17110.

Contact: Thomas Hanlon, Facilities Permitting Chief, 717-705-4862, Thomas Bianca, New Source Review Chief, 717-705-4863, or William Weaver, Regional Air Quality Manager, 717-705-4702.

36-05025: Texas Eastern Transmission LP, Marietta (1462 River Road, Marietta, PA 17547) to issue a Title V Operating Permit for the natural gas compressor station located in East Donegal Township, **Lancaster**

Wynkoop, Harold

From: Bertram, Emily <Bertram.Emily@epa.gov>
Sent: Thursday, February 28, 2019 8:34 AM
To: Wynkoop, Harold
Subject: [External] RE: Cove Mountain Wood Products Proposed Plan Approval 07-03064A

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.

Hi Hal,

Thank you for submitting the plan approval for Cove Mtn Wood Products. EPA has no comments to offer at this time.

Emily

Emily Bertram
Physical Scientist
Office of Permits and State Programs
Air Protection Division
U.S. EPA Region 3
1650 Arch Street, 3AP10
Philadelphia, PA 19103
215-814-5273
bertram.emily@epa.gov

From: Wynkoop, Harold <hwynkoop@pa.gov>
Sent: Thursday, February 14, 2019 9:18 AM
To: Bertram, Emily <Bertram.Emily@epa.gov>
Cc: Maldonado, Zelma <Maldonado.Zelma@epa.gov>; Weaver, William <wiveaver@pa.gov>; Bianca, Tom <tbianca@pa.gov>
Subject: Cove Mountain Wood Products Proposed Plan Approval 07-03064A

Dear Emily,

In accordance with the provisions contained in 25 Pa. Code, § 129.51(a)(6), plan approvals incorporating alternate VOC compliance methods pursuant to 129.51 shall be reviewed by the EPA. Attached for your review are the proposed plan approval and review memo for Cove Mountain Wood Products, which contains a VOC equivalency proposal pursuant to § 129.51. Cove Mountain Wood Products is located in Taylor Township, Blair County PA. Also attached are the public notices required for issuance. The attached Pa. Bulletin notice is scheduled for publication on March 2, 2019 and the date of publication in the Pa. Bulletin officially starts the EPA 30-day review period.

Please feel free to contact me if you have any questions.

Thank you,

Hal Wynkoop | Air Quality Permitting
Department of Environmental Protection | Air Quality
Southcentral Regional Office

Wynkoop, Harold

From: Wynkoop, Harold
Sent: Thursday, February 14, 2019 9:59 AM
To: 'karen.irons@maryland.gov'
Subject: Intent to Issue an Air Quality plan approval

Dear Karen,

Cove Mountain Wood Products is a source of VOCs that has submitted a plan approval application demonstrating compliance with 25 Pa. Code, Chapter 129 (relating to standards for sources) using § 129.51(a) (relating to general) and is located within 50 miles of Maryland. Below is notice of Pennsylvania DEP's Intent to Issue an Air Quality plan approval for Cove Mountain Wood Products. The notice is scheduled for publication in the Pennsylvania Bulletin on March 2, 2019.

03 SC Intent to Issue PA & Issue Amend OP

07-03064A: Cove Mountain Wood Products (4168 Cove Mountain Road, Roaring Spring, PA 16673) for the construction and temporary operation of two coating booths and millworking operations at the facility located in Taylor Township, Blair County. Potential emissions are expected to be: 25 tons per year of VOCs; 7.36 tons per year of HAPs; and less than one ton per year of PM. The facility is a State Only facility. DEP's review of the information submitted by the applicant indicates that the air contamination sources as constructed or modified will comply with all regulatory requirements pertaining to air contamination sources and the emission of air contaminants including the best available technology requirement (BAT) of 25 Pa. Code §§ 127.1 and 127.12; 25 Pa. Code § 129.52 - Surface coating processes; and 25 Pa. Code § 129.51 - General. Based on these findings, the Department proposes to issue a plan approval for the proposed construction. If, after the project has been implemented, the Department determines that the sources are constructed and operated in compliance with the plan approval conditions and the specification of the application for plan approval, the requirements established in the plan approval may be incorporated into an Operating Permit pursuant to the provisions of 25 Pa. Code Chapter 127.

Hal Wynkoop | Air Quality Permitting
Department of Environmental Protection | Air Quality
Southcentral Regional Office
909 Elmerton Avenue | Harrisburg, PA 17110
Phone: 717.705.4887 | Fax: 717.705.4830
www.dep.pa.gov

Wynkoop, Harold

From: Wynkoop, Harold
Sent: Thursday, February 14, 2019 9:54 AM
To: 'Carrie.McCumbers@wv.gov'; 'Stephanie.E.Hammonds@wv.gov'
Subject: Intent to Issue an Air Quality plan approval

Dear Carrie and Stephanie,

Cove Mountain Wood Products is a source of VOCs that has submitted a plan approval application demonstrating compliance with 25 Pa. Code, Chapter 129 (relating to standards for sources) using § 129.51(a) (relating to general) and is located within 50 miles of West Virginia. Below is notice of Pennsylvania DEP's Intent to Issue an Air Quality plan approval for Cove Mountain Wood Products. The notice is scheduled for publication in the Pennsylvania Bulletin on March 2, 2019.

03 SC Intent to Issue PA & Issue Amend OP

07-03064A: Cove Mountain Wood Products (4168 Cove Mountain Road, Roaring Spring, PA 16673) for the construction and temporary operation of two coating booths and millworking operations at the facility located in Taylor Township, Blair County. Potential emissions are expected to be: 25 tons per year of VOCs; 7.36 tons per year of HAPs; and less than one ton per year of PM. The facility is a State Only facility. DEP's review of the information submitted by the applicant indicates that the air contamination sources as constructed or modified will comply with all regulatory requirements pertaining to air contamination sources and the emission of air contaminants including the best available technology requirement (BAT) of 25 Pa. Code §§ 127.1 and 127.12; 25 Pa. Code § 129.52 - Surface coating processes; and 25 Pa. Code § 129.51 - General. Based on these findings, the Department proposes to issue a plan approval for the proposed construction. If, after the project has been implemented, the Department determines that the sources are constructed and operated in compliance with the plan approval conditions and the specification of the application for plan approval, the requirements established in the plan approval may be incorporated into an Operating Permit pursuant to the provisions of 25 Pa. Code Chapter 127.

Hal Wynkoop | Air Quality Permitting
Department of Environmental Protection | Air Quality
Southcentral Regional Office
909 Elmerton Avenue | Harrisburg, PA 17110
Phone: 717.705.4887 | Fax: 717.705.4830
www.dep.pa.gov

Wynkoop, Harold

From: Wynkoop, Harold
Sent: Thursday, February 14, 2019 7:59 AM
To: 'Cove Mountain Wood Products'
Cc: Bianca, Tom; Weaver, William (DEP)
Subject: Draft Plan Approval 07-03064A
Attachments: Cove Newspaper Notice.docx; Draft 07-03064A.PDF

Nevin,

Please see the attached draft plan approval per your application #07-03064A. Please provide any comments that you may have by March 16, 2019.

The attached newspaper notice must be published within 10 calendar days (by February 24, 2019) of this email. The notice needs to be published on at least three (3) separate days in a prominent place and size in a newspaper of general circulation in the county in which the source is to be located. Newspapers usually have a Public Notice section located in the classified advertisements. Proof of the publication shall be filed with the Department within one (1) week thereafter. A plan approval will not be issued by the Department in the event of failure by the applicant to submit the proof of publication. The newspaper notice is required per 25 Pa. Code, Section 127.44(c).

Please confirm receipt of this email.

Feel free to contact me with any questions that you may have.

Thank you,

Hal Wynkoop | Air Quality Permitting
Department of Environmental Protection | Air Quality
Southcentral Regional Office
909 Elmerton Avenue | Harrisburg, PA 17110
Phone: 717.705.4887 | Fax: 717.705.4830
www.dep.pa.gov

PUBLIC NOTICE

NOTICE OF INTENT TO ISSUE A PLAN APPROVAL AND OPERATING PERMIT

Blair County

07-03064A: Cove Mountain Wood Products (4168 Cove Mountain Road, Roaring Spring, PA 16673) for the construction and temporary operation of two coating booths and millworking operations at the facility located in Taylor Township, Blair County. Potential emissions are expected to be: 25 tons per year of VOCs; 7.36 tons per year of HAPs; and less than one ton per year of PM. The facility is a State Only facility. DEP's review of the information submitted by the applicant indicates that the air contamination sources as constructed or modified will comply with all regulatory requirements pertaining to air contamination sources and the emission of air contaminants including the best available technology requirement (BAT) of 25 Pa. Code §§ 127.1 and 127.12; 25 Pa. Code § 129.52 - Surface coating processes; and 25 Pa. Code § 129.51 - General. Based on these findings, the Department proposes to issue a plan approval for the proposed construction. If, after the project has been implemented, the Department determines that the sources are constructed and operated in compliance with the plan approval conditions and the specification of the application for plan approval, the requirements established in the plan approval may be incorporated into an Operating Permit pursuant to the provisions of 25 Pa. Code Chapter 127.

Copies of the application, DEP's analysis and other documents used in the evaluation of the application are available for public review during normal business hours at the PA DEP Southcentral Regional Office, at 909 Elmerton Avenue, Harrisburg, PA 17110.

A person may oppose the proposed plan approval, or may provide the Department with additional information to consider in its review, or may request a public hearing, by filing a written protest with the Department at the address listed above. Each written comment must contain the following:

- Name, address and telephone number of the person submitting the comments.
- Identification of the proposed permit by the permit number listed above.
- A concise statement regarding the relevancy of the information or objections to the issuance of the permit.

A 30-day comment period, from the date of publication of this notice, will exist for the submission of comments, protests, or for requests for a public hearing.

A public hearing may be held, if the Department of Environmental Protection, in its discretion, decides that such a hearing is warranted based on the comments received. The Department will give notice of any scheduled public hearing at least thirty days in advance of the hearing as per 25 PA Code, Section 127.48. The hearing notice will be published in the Pennsylvania Bulletin and a newspaper of general circulation where the facility is located.

Mr. Thomas Bianca, P.E., New Source Review Chief, may be contacted at 717-705-4863, or at PA DEP Air Quality Program, 909 Elmerton Avenue, Harrisburg, PA 17110, for additional information or for the submission of comments, protests, or requests for a public hearing.

Plan approvals issued to sources identified in 25 Pa. Code § 127.44(b)(1) -(4) or plan approvals issued to source with limitations on the potential to emit may become part of the SIP, and will be submitted to EPA for review and approval.

February 14, 2019

Mr. Paul D. Closson
Supervisor
Taylor Township Board of Supervisors
7217 Woodbury Pike
Roaring Spring, PA 16673

Re: Cove Mountain Wood Products
Draft Air Quality Plan Approval No. 07-03064A
Taylor Township, Blair County

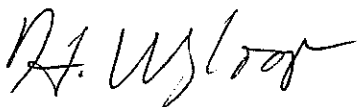
Dear Mr. Closson:

Our records indicate that you have commented to DEP regarding issues related to the application for Air Quality Plan Approval No. 07-03064A for the Cove Mountain Wood Products facility located in Taylor Township, Blair County.

After considering the public comments received regarding this matter, DEP is proposing for public comment a draft air quality plan approval for the facility. For your convenience, DEP has posted the materials relevant to this action on the internet. These documents can be accessed by navigating to DEP's website at www.dep.pa.gov, and clicking the following links: Regional Resources, Southcentral Regional Office, Community Information, Cove Mountain Wood Products.

If you do not have a web access, you may schedule review of the documents described above at our Southcentral Regional Office by contacting Tim Fuller of DEP at 717-705-4732. In the alternative, if you would like paper copies of the documents, please contact Dawne Wilkes of DEP at 717-705-4702, and copies will be provided subject to applicable fees. If you have any technical difficulties accessing the documents posted on DEP's website, please click the "Contact Us" link at the bottom of the web page.

Sincerely,



Hal Wynkoop
Permit Reviewer
Air Quality Program

cc: Southcentral Region



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

February 14, 2019

Mr. Patrick D. Frazier
Lock Mountain Strawberries
269 Lock Mountain Road
Martinsburg, PA 16662

Re: Cove Mountain Wood Products
Draft Air Quality Plan Approval No. 07-03064A
Taylor Township, Blair County

Dear Mr. Frazier:

Our records indicate that you have commented to DEP regarding issues related to the application for Air Quality Plan Approval No. 07-03064A for the Cove Mountain Wood Products facility located in Taylor Township, Blair County.

After considering the public comments received regarding this matter, DEP is proposing for public comment a draft air quality plan approval for the facility. For your convenience, DEP has posted the materials relevant to this action on the internet. These documents can be accessed by navigating to DEP's website at www.dep.pa.gov, and clicking the following links: Regional Resources, Southcentral Regional Office, Community Information, Cove Mountain Wood Products.

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Sincerely,

Hal Wynkoop
Permit Reviewer
Air Quality Program

cc: Southcentral Region



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

February 14, 2019

Mr. William H. Replogle
4194 Cove Mountain Road
Roaring Spring, PA 16673

Re: Cove Mountain Wood Products
Draft Air Quality Plan Approval No. 07-03064A
Taylor Township, Blair County

Dear Mr. Replogle:

Our records indicate that you have commented to DEP regarding issues related to the application for Air Quality Plan Approval No. 07-03064A for the Cove Mountain Wood Products facility located in Taylor Township, Blair County.

After considering the public comments received regarding this matter, DEP is proposing for public comment a draft air quality plan approval for the facility. For your convenience, DEP has posted the materials relevant to this action on the internet. These documents can be accessed by navigating to DEP's website at www.dep.pa.gov, and clicking the following links: Regional Resources, Southcentral Regional Office, Community Information, Cove Mountain Wood Products.

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Sincerely,

Hal Wynkoop
Permit Reviewer
Air Quality Program

cc: Southcentral Region



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

PLAN APPROVAL

Issue Date: May 1, 2019

Effective Date: May 1, 2019

Expiration Date: October 27, 2019

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 construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval 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 plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 07-03064A

Federal Tax Id - Plant Code: 81-1139656-1

Owner Information

Name: COVE MTN WOOD PROD
Mailing Address: 4168 COVE MOUNTAIN RD
ROARING SPRING, PA 16673-8213

Plant Information

Plant: COVE MTN WOOD PROD/TAYLOR TWP
Location: 07 Blair County 07921 Taylor Township
SIC Code: 2511 Manufacturing - Wood Household Furniture

Responsible Official

Name: NEVIN SWEIGART
Title: OWNER
Phone: (814) 329 - 0484

Plan Approval Contact Person

Name: NEVIN SWEIGART
Title: OWNER
Phone: (814) 329 - 0484

[Signature]

WILLIAM R. WEAVER, SOUTH CENTRAL REGION AIR PROGRAM MANAGER



Plan Approval Description

This plan approval authorizes the construction and temporary operation of two coating booths and millworking operations at the facility.

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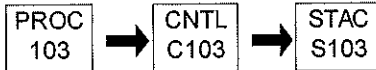
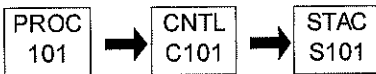
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	MILLWORKING OPERATIONS		
102	LINEAR COATING BOOTH		
103	COATING SPRAY BOOTH		
C101	MILLWORKING DUST COLLECTOR		
C102	DRY FILTERS		
C103	DRY FILTERS		
S101	DUST COLLECTOR STACK		
S102	LINEAR COATING BOOTH STACK		
S103	COATING BOOTH STACK		

PERMIT MAPS

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

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

#002 [25 Pa. Code § 127.12b (a) (b)]**Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]**Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 15 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]**Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]**Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.12b]**Plan Approval terms and conditions.**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

#007 [25 Pa. Code § 127.32]**Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(4) & 35 P.S. § 4008 & § 114 of the CAA]**Inspection and Entry**

(a) 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.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

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

#009 [25 Pa. Code 127.13a]**Plan Approval Changes for Cause**

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

- (a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.
- (b) 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.
- (c) The permittee fails to submit a report required by this plan approval.
- (d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

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

#011 [25 Pa. Code § 127.12c]**Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

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

#012 [25 Pa. Code § 127.12(9) & 40 CFR Part 68]**Risk Management**

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

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

(1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:

**SECTION B. General Plan Approval Requirements**

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or the Environmental Protection Agency concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

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

#013 [25 Pa. Code § 127.25]**Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

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

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

- (a) Construction or demolition of a building or structure.
- (b) Grading, paving and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of material.
- (f) Sources and classes of sources other than those identified above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code Section 123.1(b), that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution.
 - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air standard.

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

No person shall emit particulate matter into the outdoor atmosphere from a source specified in Condition #001 if the emissions are visible at the point the emissions pass outside the person's property.

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

No person shall permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

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

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

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

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

The emission limitation of 25 Pa. Code Section 123.41 shall not apply when:

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

SECTION C. Site Level Plan Approval Requirements**II. TESTING REQUIREMENTS.****# 006 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

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

007 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

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

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 certified, to measure plume opacity with the naked eye or with the aid of devices approved by the Department.

009 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall conduct a weekly inspection around the plant periphery during daylight hours when the plant is in production to detect visible emissions, fugitive visible emissions and malodors as follows:

- (a) Visible emissions in excess of the limits stated in Section C, Condition #004. Visible emissions may be measured according to the methods specified in Section C, Condition #008, or alternately, plant personnel who observe such emissions may report the incidence of visible emissions to the Department within two hours of each incident and make arrangements for a certified observer to verify the visible emissions.
- (b) The presence of fugitive visible emissions beyond the plant property boundaries, as stated in Section C, Condition #002.
- (c) The presence of odorous air contaminants beyond the plant property boundaries as stated in Section C, Condition #003.

IV. RECORDKEEPING REQUIREMENTS.**# 010 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

All records required by this plan approval shall be maintained for the most recent five-year period and made available to Department representatives upon request.

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

(a) The permittee shall maintain records of the weekly inspections referenced in Section C, Condition #009. The records shall include, at a minimum, the following information:

- (1) The name of the company representative monitoring each inspection.
- (2) The date and time of each inspection.

**SECTION C. Site Level Plan Approval Requirements**

(3) The wind direction during each inspection.

(4) A description of the visible emissions, fugitive visible emissions (beyond the plant property boundaries), and malodorous air contaminants (beyond the plant property boundaries) observed, if any, and actions taken to mitigate them. If no visible emissions or fugitive visible emissions or malodors are observed, then document that none were observed.

(b) The permittee shall retain these records for a minimum of five (5) years. The records shall be made available to the Department upon its request.

012 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall calculate monthly emissions for each calendar month and total emissions for each consecutive 12-month period for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The monthly emissions shall be calculated on a source by source basis.

013 [25 Pa. Code §135.3]**Reporting**

Source owners or operators shall maintain and make available upon request by the Department, records including computerized records that may be necessary to comply with 25 Pa. Code Sections 135.3 and 135.21 (relating to reporting, and emission statements). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

V. REPORTING REQUIREMENTS.**# 014 [25 Pa. Code §127.442]****Reporting requirements.**

The permittee shall report malfunctions which occur at the facility to the Department. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner that may result in an increase in air emissions above minor significance. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

(a) When the malfunction poses an imminent and substantial danger to the public health and safety or harm to the environment, the notification shall be reported immediately to the Department by telephone. The telephone report of such malfunctions shall occur no later than two hours after the incident.

- (1) The notice shall describe the:
 - (i) name and location of the facility;
 - (ii) nature and cause of the malfunction or breakdown;
 - (iii) time when the malfunction or breakdown was first observed;
 - (iv) expected duration of excess emissions; and
 - (v) estimated rate of emissions.

(2) The owner or operator shall notify the Department immediately when corrective measures have been accomplished.

(3) The permittee shall submit a written report of instances of such malfunctions to the department, in writing, within three (3) days of the of the telephone report.

(4) The owner or operator shall submit reports on the operation and maintenance of the source to the Regional Air Program Manager at such intervals and in such form and detail as may be required by the Department. Information required in the reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and maintenance schedules.

SECTION C. Site Level Plan Approval Requirements

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

(c) Malfunctions shall be reported to the Department at the following address:

PADEP
Air Quality District Supervisor
3001 Fairway Drive
Altoona, PA 16602

Telephone reports can be made to the Air Quality Program at (814) 946-7290 during normal business hours or to the Department's Emergency Hotline: (866) 825-0208 at any time.

015 [25 Pa. Code §135.3]**Reporting**

a) Unless otherwise approved in writing by DEP, the permittee shall submit by March 1 of each year a source 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.

016 [25 Pa. Code §135.4]**Report format**

All source reports shall contain sufficient information to enable the Department to complete its emission inventory. Source reports shall be made by the source owner or operator in a format specified by the Department.

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.**# 017 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee shall take all reasonable actions to prevent particulate matter from the sources identified in Section C, Condition #001(a) through (f) from becoming airborne. These actions shall include, but are not limited to, the following:

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

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

(c) Paving and maintenance of roadways.

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

018 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Operation of any air emissions source is contingent upon proper operation of its associated emissions control system, unless otherwise approved by the Department.

**SECTION C. Site Level Plan Approval Requirements****# 019 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

All air pollution sources and air pollution control devices referenced in this permit shall be operated and maintained in accordance with the manufacturer's general recommendations and good air pollution control practices.

020 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Within 90 days of issuance of this plan approval, the permittee shall submit an administratively complete application for a State Only operating permit.

021 [25 Pa. Code §129.14]**Open burning operations**

No person may permit the open burning of material at the facility except when the open burning operations result from:

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

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

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 101

Source Name: MILLWORKING OPERATIONS

Source Capacity/Throughput:

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

001 [25 Pa. Code §123.13]

Processes

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

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall weekly, monitor and record pressure drop readings on dust collector, Source ID C101 to assure proper operation in accordance with the manufacturer's requirements.

A maintenance log shall be maintained of all repairs performed on the dust collector, including, but not limited to bag change-out and repairs to the dust collector.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The dust collector, Source ID C101 shall be equipped with instrumentation to monitor the differential pressure across the collector on a continuous basis.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The dust collector, Source ID C101, shall be operated at all times when the Millworking Operations are in operation.

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

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

SECTION D. Source Level Plan Approval Requirements

Source ID: 102

Source Name: LINEAR COATING BOOTH

Source Capacity/Throughput:

Conditions for this source occur in the following groups: SG01

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

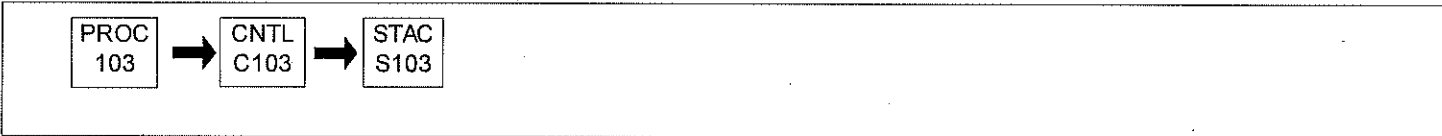
No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).



SECTION D. Source Level Plan Approval Requirements

Source ID: 103 Source Name: COATING SPRAY BOOTH
Source Capacity/Throughput:

Conditions for this source occur in the following groups: SG01



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

SECTION E Source Group Plan Approval Restrictions

Group Name: SG01
 Group Description: Surface coating operations
 Sources included in this group

ID	Name
102	LINEAR COATING BOOTH
103	COATING SPRAY BOOTH

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

001 [25 Pa. Code §123.13]

Processes

No person shall cause or permit the emission into the outdoor atmosphere of particulate matter from any Source Group ID SG01 coating booth in such 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 §127.12b]

Plan approval terms and conditions.

The total volatile organic compound (VOC) emissions from wood furniture manufacturing operations shall be less than 25 tons per year, based on a consecutive 12-month running total.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

As an alternative to compliance with the VOC content limitations of 25 Pa Code 129.52 as specified in Condition #004, the permittee may demonstrate compliance by using an emissions averaging approach as specified in Condition #018, below.

004 [25 Pa. Code §129.52]

Surface coating processes

(a) The VOC content, as applied of the surface coatings utilized in wood furniture manufacturing surface coating operations shall be equal to or less than the appropriate allowables (expressed as lbs VOC per lb coating solids) as specified in Table I (category 11) of 25 Pa. Code § 129.52.

(1) Topcoats and enamels	3.0
(2) Washcoat	14.3
(3) Final repair coat	3.3
(4) Basecoats	2.2
(5) Cosmetic specialty coatings	14.3
(6) Sealers	3.9

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

- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The permittee requests in writing, and the Department approves, in writing, the exemption prior to use of the coating.

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

$$\text{VOC} = (W_o) / (W_n)$$

Where:

SECTION E. Source Group Plan Approval Restrictions.

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

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

II. TESTING REQUIREMENTS.**# 005 [25 Pa. Code §129.52]****Surface coating processes**

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

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

III. MONITORING REQUIREMENTS.**# 006 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

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

(a) For surface coatings applied as they are received from the manufacturer, the permittee may demonstrate compliance with the applicable standard by obtaining EPA Method 24 certification testing from the manufacturer, or by maintaining VOC/HAP data sheets from the manufacturer.

(b) In the absence of EPA Method 24 certification testing from the manufacturer, or VOC/HAP data sheets from the manufacturer, allowed under part (a), above, the permittee shall perform EPA Method 24 certification testing on all surface coatings applied as received from the manufacturer.

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

007 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall weekly, inspect the coating booth filters and monitor pressure drop readings across the filters on each coating booth in Source Group ID SG01 to assure proper operation in accordance with the manufacturer's requirements.

The permittee shall keep records of the weekly pressure drop readings and coating booth filter inspections as well as any coating booth filter replacements.

IV. RECORDKEEPING REQUIREMENTS.**# 008 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Manufacturer-supplied VOC/HAP data sheets for all coatings applied at this facility shall be kept on site for the most recent five years and shall be made available to Department representatives upon request.

SECTION E. Source Group Plan Approval Restrictions.**# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall keep detailed records of the following:

- a. All EPA Method 24 certification testing provided by the manufacturer for all solvent-borne coatings.
- b. All EPA Method 24 certification testing performed on all solvent-borne coatings.

010 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall calculate and record VOC emissions from wood furniture manufacturing operations for each calendar month and for each consecutive 12-month period.

011 [25 Pa. Code §129.52]**Surface coating processes**

The permittee shall maintain records sufficient to demonstrate compliance with this section. At a minimum, the permittee shall maintain daily records of the following:

- (1) The following parameters for each coating, thinner and other component as supplied and as applied
 - (a) The coating identification (name and number)
 - (b) The Table I surface coating process category (e.g., Wood furniture manufacturing operations - 11(e) cosmetic specialty coatings)
 - (c) VOC content stated in lb VOC / lb coating solids
 - (d) The volume used (gallons).
 - (e) The mix ratio
 - (f) The density at 25 Degrees Celsius (lb/gallon)
 - (g) The weight percent of total volatiles (100% - weight percent solids)
 - (h) The weight percent water
 - (i) The weight percent exempt solvents
 - (j) The weight percent of VOC (weight percent total volatiles - weight percent water - weight percent exempt solvents)
 - (k) The volume percent solids
 - (l) The weight percent solids
 - (m) The VOC content (lb/gallon)
 - (n) The HAP content, by type (lb/gallon)
- (2) The type and amount of clean-up solvent usage (gallons).
- (3) The HAP (by type) and VOC content of clean-up solvents used (lb/gallon).
- (4) Volume and identification of waste coatings, solvents, or mixtures sent off-site for recycling or disposal.
- (5) Volume of any coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings used in accordance with Condition #004(b) in this Section.
- (6) Volume of any cosmetic specialty coatings applied using atomized air spray equipment and records that document how you comply with Condition #016(b) in this Section.

The records shall be maintained for a period of the most recent 5 years and be made available upon request.

[Additional authority for this condition is derived from 25 Pa Code, Section 129.52(c)]

**SECTION E. Source Group Plan Approval Restrictions.****V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.**# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall not allow the operation of any Source Group ID SG01 coating booth unless it is equipped with dry filters designed for particulate matter control.

013 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Unless otherwise approved by DEP in writing, the permittee shall not allow the operation of any Source Group ID SG01 coating booth unless it is equipped with media filters designed for odor control.

014 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Pursuant to the Best Available Technology (BAT) provisions of 25 PA Code §§ 127.1 and 127.12, the permittee shall adhere to the following workpractices:

- (a) Store all VOC containing materials, including used shop towels, in normally closed containers. All containers shall be nonabsorbent.
- (b) All mixing and storage containers used for VOC-containing materials shall be kept closed at all times except when depositing or removing these materials. All mixing activities shall be performed in enclosed equipment or containers equipped with covers.
- (c) Good housekeeping practices shall be followed at all times. Spills of materials containing VOCs shall be minimized and shall be cleaned up immediately with cleaning cloths or other methods that will minimize the evaporation of VOCs into the atmosphere.
- (d) Solvent-laden cleaning cloths shall be kept in normally closed containers when not in use.
- (e) All VOC containing materials shall be conveyed from one location to another in closed containers or pipes.
- (f) Minimize VOC emissions from cleaning of application, storage, mixing and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent, and all spent solvent is captured in normally closed containers.

015 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Coating booths, in Source Group ID SG01 shall each be equipped with a device to measure the pressure drop across the coating booth filters.

016 [25 Pa. Code §129.52]**Surface coating processes**

- (a) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from the application of wood furniture coatings unless the coatings are applied using electrostatic, airless, curtain coating, roller coating, hand roller, hand brush, flow coating, dip coating or high volume-low pressure application equipment.
- (b) Air atomized sprays may be used to apply cosmetic specialty coatings if the volume of the cosmetic specialty coating is less than five percent by volume of the total coating used at the facility or to apply final repair coatings.

[25 Pa. Code Section 129.52(f)]

SECTION E. Source Group Plan Approval Restrictions.**VII. ADDITIONAL REQUIREMENTS.****# 017 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall provide the following information to obtain credit for waste coatings and solvents sent off-site for recycling or incineration at a legally permitted facility:

- (a) gallons per quarter of waste solvents, coatings or mixtures shipped from the facility.
- (b) waste profile or sampling data for each shipment.
- (c) identification of the waste disposal company for each shipment.

018 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee may use the following emissions averaging approach as an alternative to meeting the requirements of 25 Pa. Code Section 129.52 in Condition 004(a), above:

(1) The permittee shall use the emissions averaging approach in order to demonstrate compliance for all sealers, topcoats, washcoats, final repair coats, basecoats, and cosmetic specialty coatings used on a facility-wide basis, including any future coatings in those categories, whether compliant or non-compliant.

(2) Total allowable emissions, compliant coatings (AECC) shall be calculated as follows on a monthly basis:

$$AECC = \sum_i (V_i \times D_i \times H_i \times R_i)$$

Where:

- i = material
- V_i = volume of material i used on each source
- D_i = density of material i
- H_i = the weight fraction of solids contained in material i
- R_i = the regulatory VOC content limit in pounds of VOC per pound of solids for material i.

(3) Total actual emissions (TAE) shall be calculated as follows on a monthly basis:

$$TAE = \sum_i (V_i \times D_i \times G_i)$$

Where:

- i = material
- V_i = volume of material i used on each source
- D_i = density of material i
- G_i = the weight fraction of VOCs contained in material i

(4) TAE shall be less than or equal to AECC.

(5) The permittee shall keep the following records:

(i) Daily records of the following data:

- (A) name of material;
- (B) product number;
- (C) material density;
- (D) volume of each material used on each source;
- (E) VOC content in pounds per pound of solids for each material;
- (F) VOC content in percent by weight for each material;
- (G) the solids content in percent by weight for each material; and,
- (H) the regulatory VOC content limit in pounds of VOC per pound of solids for each material.

(ii) Monthly calculations of AECC (Allowable Emissions, Compliant Coatings) and TAE (Total Actual Emissions) used to

**SECTION E. Source Group Plan Approval Restrictions.**

verify that TAE is less than or equal to AECC.

(6) The permittee shall submit quarterly reports of the calculations of AECC and TAE verifying that TAE is less than or equal to AECC. The quarterly reports shall be submitted to the Department no later than March 1, June 1, September 1 and December 1 for the previous calendar quarter.



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Plan Approval facility.



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

The following miscellaneous sources do not require any work practice standards, testing, monitoring, reporting and recordkeeping requirements:

0.193 mmBtu/hr natural gas fired boiler (Coatings Building)

0.200 mmBtu/hr natural gas fired boiler (Woodworking/Shop Building)



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