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## RACT PLAN APPROVAL

Facility: Cardone Industries Address: 5670 Rising Sun Ave. Philadelphia, PA, 19120 PLID: 3887 Owner: Cardone Attention: Thomas Anderson

Source(s): Miscellaneous degreasing operations with; miscellaneous products including adhesives, solvents, aerosols, architectural and touch-up sprays;

In accordance with provisions of the Pennsylvania Code, Title 25, Chapter 129.91 thru 129.95, Air Management Services (AMS) has approved the RACT proposal plans for Cardone on the above indicated air contamination source(s).

The RACT plan approval is subject to the following conditions:

1. The purpose of this Plan Approval is to establish Volatile Organic Compound (VOC) Reasonably Available Control Technology (RACT) for Cardone. This includes the following emission sources and control equipment:

- A. Emission Sources
- (1) Degreasing operations with solvent re-processing and storage: Stoddard solvent is used in degreasing operations. Used solvent is sent to a reprocessing area for recovery and storage.
- Miscellaneous architectural coatings.
- B. Control Equipment
- (1) Non-contact refrigerated condenser
- 2. This approval authorizes:
  - A. The installation of the non-contact refrigerated condenser on solvent re-processing and storage vents to comply with RACT requirements of 25 PA Code 129.91(f).
  - All architectural coating used at Cardone shall comply with Air Management Regulation V, Section VIII.
- 3. RACT Implementation Schedule
  - A. Upon issuance of this approval, Cardone shall begin immediate implementation of the measures necessary to comply with the approved RACT proposal.
  - B. Cardone shall install the refrigerated vapor condenser on its solvent re-processing and storage tanks by May 30th, 1995.
- 4. Testing Requirements
  - A. Cardone must perform VOC emission tests on the vapor condenser to determine emission rates from the condenser vent. The tests shall be performed within 60 days of the unit startup.
  - B. At least (60) days prior to the test, the Cardone shall submit to AMS for approval, the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.
  - C. At least thirty (30) days prior to the test, the AMS shall be informed of the date and time of the test.

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- 5 Recordkeeping and Reporting Requirements
  - Cardone shall maintain a file containing all the records and other data that are required to be collected to demonstrate compliance with VOC RACT requirements of 25 PA Code 129.91-129.94.
  - B The records shall provide sufficient data and calculations to clearly demonstrate that the requirements of §129.91-129.94 are met.
  - C. Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
  - D. Records shall be retained for at least two years and shall be made available to the Department on request.
- 6. The operation of the aforementioned sources shall not at any time result in the emission of visible air contaminants in excess of the limitations specified in Section 123.41, particulate matter in excess of the limitations specified in Section 123.11 or sulfur oxides in excess of the limitations specified in Section 123.22, all Sections of Chapter 123 of Article III of the Rules and Regulations of the Department of Environmental Resources, or in the emission of any of these or any other type of air contaminant in excess of the limitations specified in, or established pursuant to, any other applicable rule or regulation contained in Article III.
- 7. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) 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.
- Revisions to any emission limitations incorporated in this RACT Approval will require resubmission as revision to the PA State Implementation Plan. The applicant shall bear the cost of public hearing and notification required for EPA approval as stipulated in 25 PA Code §129.91(h).