

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - BUREAU OF AIR QUALITY

E C E 1 1 5
JAN 20 1999
DEP AIR QUALITY
DIV OF PERMITS

OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the Rules and Regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below:

Permit No.	<u>OP-23-0021</u>	Source(s)	<u>Floor Covering Operation as Describe Herein</u>
Owner	<u>Congoleum Corporation</u>	Air	<u></u>
Address	<u>Ridge Road and Yates Avenue</u>	Cleaning	<u></u>
	<u>Marcus Hook, PA 19081</u>	Device	<u></u>
Attention	<u>Mr. Robert G. Rucker</u>	Location	<u>Trainer Borough</u>
	<u>Director, Environmental Affairs</u>		<u>Delaware County</u>

This permit is subject to the following conditions:

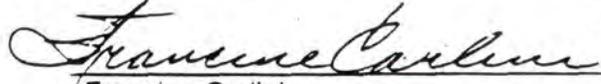
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of all applicable plan approvals issued;
 - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

(SEE ADDITIONAL CONDITIONS ATTACHED)

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the Rules and Regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued 12/31/1998

Expires 12/30/2003


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (SMC98)205-2A

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CONDITIONS (continued):

3. This Operating Permit incorporates the Reasonable Available Control Technology (RACT) determinations for the sources in Condition 5 and 6, as required by Title I provisions of the CAAA, and 25 PA Code §§ 129.91 through 129.95 for the floor covering operation at Congoleum Corporation. This Operating Permit supersedes Operating Permit No. 23-302-086A. The terms and conditions of Operating Permit No. 23-302-086A are incorporated into this Operating Permit. The terms and conditions of Plan Approval No. 23-318-001E and Plan Approval No. 23-313-010 will be incorporated into this Operating Permit, when the appropriate Operating Permits amendments are issued.
4. ~~The expiration date shown on the operating permit is for state purposes. For Federal enforcement purposes the RACT provisions of the Operating Permit shall remain in affect as part of the State Implementation Plan (SIP), until replaced pursuant to 40 CFR Part 51, and approved by the US Environmental Protection Agency (EPA).~~
5. VOC REQUIREMENTS
 - A. Line 121 oven with afterburner, and Line 50 oven with afterburner shall comply with Title 25 PA Code Section 129.52.
 - B. Sources identified as building 28 press and building 121 press shall comply with Title 25 PA Code Section 129.67. Press 28 shall use only water based inks.
 - C. The following RACT requirements are determined in accordance with Sections 129.91 through 129.95. RACT for the following sources shall be operation and maintenance as per manufacturers specifications and good air pollution control practices:
 - building 26 mix area,
 - building 124 mix area,
 - building 28 press cleaning,
 - building 121 press cleaning,
 - building 28, 50 and 121 ovens,
 - miscellaneous propane sources,
 - miscellaneous lab ovens,
 - building 28 ink mix,
 - building 17 ink mix,
 - ultra violet equipment,
 - garage,
 - plant maintenance,
 - miscellaneous storage areas

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CONDITIONS (continued):

- D. ~~RACT for building 124 mix area shall be conversion of organic solvent based inks to water based inks. Building 124 mix area shall not emit VOC emissions of more than 7.2 tons per year (tpy) as a 12 month rolling sum. Compliance will be verified through the use of production records, mass balance calculations or emission factors.~~
- E. ~~Building 26 coating mix, Building 28 press cleaning and Building 121 press cleaning shall not emit VOC emissions of more than 5.4 tpy, 15.9 tpy and 15.9 tpy respectively as a 12 month rolling sum. Compliance will be verified through the use of production records, mass balance calculations or emission factors.~~
6. Nitrogen Oxides (NO_x) RACT Requirements
- A. RACT for the following sources shall be inspection, operation and maintenance as per manufacturers specifications and good air pollution control practices:
- Line 121 oven with afterburner.
 - Line 50 oven with afterburner,
 - Boiler No. 10,
 - miscellaneous gas heaters (less than 600,000 BTUs)
 - Building 110 afterburner
 - 1 MMBTU/hr boiler (Aerco)
- B. RACT for sources identified as Boiler Nos. 11 and 12 shall be an annual tune-up in compliance with Title 25 PA Code Section 129.93(b)(2) through (5).
7. The company shall maintain the records required to conform with the minimum recordkeeping requirements of 25 PA Code Section 129.95. At a minimum this shall include:
- a. Records to provide sufficient data and calculations to clearly demonstrate that the requirements of Condition No. 5 are met.
 - b. Records shall be maintained for at least two years and shall be made available to the Department upon request.

CONDITIONS INCORPORATED FROM OPERATING PERMIT
NO. 23-302-086A

8. ~~The two boilers covered under this Operating Permit No. 23-302-125 are manufactured by Cleaver Brooks and are rated at 50.2 MMBTU/hr (model No. 6B200-600).~~

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CONDITIONS (continued):

9. The two boilers formerly covered under this Operating Permit No. 23-302-125 shall be limited to 50.2 MMBTU/hr when fired either by natural gas or No. 2 fuel oil.
10. The fuel oil burned in these boilers shall be limited to 0.2% sulfur.
11. This permit consolidates permits numbered 23-302-086 and 23-302-125.
12. This permit supersedes operating permit No. 23-302-086 issued in 1980 and operating permit No. 23-302-125 issued on April 13, 1990.

ERC CONDITONS

13. Congoleum Corporation is granted a total of 157.9 tons per year (tpy) of volatile organic compounds (VOCs) ERCs and 5.2 tpy of NOx ERCs.
14. The 157.9 tpy of VOCs credits are created from the conversion of solvent-based inks to water based inks on Press 28. These VOC credits will not expire for use as offsets. However, the ERCs in the registry may be proportionally reduced if the Department or Environmental Protection Agency (EPA) as per 25 Pa. Code Section 127.206(c) promulgates new requirements.
15. For the purposes of creating ERCs pursuant to 25 Pa. Code Sections 127.207 through 127.209, the Press No. 28 shall not emit VOCs emissions more than 14.8 tpy as a 12 month rolling sum.
16. Press No. 28 shall no longer be controlled by No. 110 afterburner. The 5.2 tpy of NOx credits are therefore granted due to the removal of No. 110 afterburner as a result of overcontrol of Press No. 28.
17. These ERCs may be used, traded or sold after the approved entry of ERCs by the Department in the Pennsylvania ERC Registry system.
18. Congoleum Corporation and any subsequent user of these credits shall comply with the requirements of 25 Pa. Code Sections 127.206 through 127.209.

COMMON CONDITIONS

19. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with

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CONDITIONS (continued):

the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, ~~where applicable~~, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

20. If at any time the permittee causes, permits or allows any modification (~~as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Protection~~) of the aforementioned air contamination source(s), the operation and use of which is authorized by this permit, or causes, permits or allows any modifications, malfunction or removal of any air pollution control device required as a condition of this permit, then and in that event, this permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).
21. The aforementioned source(s) may be operated and used ~~only so long as required air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.~~
22. This operating permit supersedes all previously issued ~~operating permits and temporary operating permits bearing the same number.~~
23. The operation of the aforementioned source(s) shall not at any time result in the emission of any air contaminant in excess of the limitations specified in any condition contained herein or in excess of the limitations specified in, or established pursuant to any applicable rule or regulation contained in Article III of the Rules and Regulations of the ~~Department of Environmental Protection.~~
24. The company shall immediately notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the ~~Rules and Regulations of the Department of Environmental Protection or in excess of the limitations specified in any condition contained herein.~~
25. This Operating Permit is valid for a limited period of time and may be renewed before its expiration. Requests for an Operating Permit renewal must be in writing and must be accompanied by the appropriate permit application processing and annual permit administration fees as specified in Section 127.703 of the Rules and Regulations of the ~~Department of Environmental Protection.~~ These fees shall be paid in the form of a check

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CONDITIONS (continued):

payable to the "Commonwealth of Pennsylvania - Clean Air Fund". ~~The request should be made using the appropriate application form and must be received by the Department along with a completed Air Pollution Control Act Compliance Review form no later than 30 days prior to the expiration date of this permit.~~

26. ~~Any notification required as a result of any condition herein should be directed to:~~

~~Regional Air Quality Manager
Pennsylvania Department of Environmental Protection
Suite 6010
Lee Park, 555 North Lane
Conshohocken, PA 19428~~

Re 30 (SMC98)205-2B