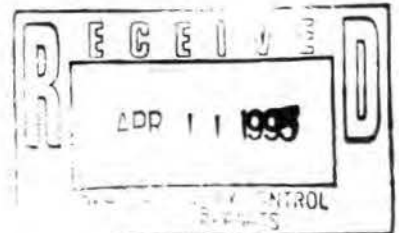


Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Air Quality Control

RACT APPROVAL

PERMIT NUMBER : OP 16-021

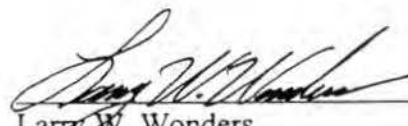


Owner:	Crawford Furniture Manufacturing Corp.	Source &	See attached
Address:	Route 28 North	Air Cleaning	Page 4
	Box 156	Device	
	New Bethlehem, Pa. 16242		
Attention:	William McGregor	Location:	Route 28, N,
	Plant Manager		Redbank Twp.
			Clarion,
			County

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P. L. 2119, as amended, and with Chapter 127 of the Rules and Regulations of the Department of Environmental Resources, the Department on **MAR 27 1995** approved plans for achieving compliance by the above indicated air contamination source(s) with the requirements of 25 Pa Code Section 129.91 through 129.95.

The operating permit is subject to the following conditions:

1. The facility is to be operated in accordance with the plan submitted with the application as approved herein.
2. The facility shall implement the RACT plan by May 31, 1995.
3. See attached.


Larry W. Wonders
Regional Air Quality Manager

3. VOC emissions from this facility shall not exceed 90 tons per year to commence January 1, 1995.
2. The facility shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices within 60 days of RACT Operating Permit implementation which addresses the following issues:
 - a) Operator Training Course which includes:
 - i) A list of all personnel by name and job description that are required to be trained;
 - ii) An outline of the subjects to be covered in the initial and refresher training for each person or group of personnel;
 - iii) Lesson plans for courses to be given at the initial refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - iv) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
 - b) Leak Inspection and Maintenance Plan which includes:
 - i) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply finishing materials or organic solvents;
 - ii) An inspection schedule;
 - iii) Methods for documenting the date and results of each inspection and any repairs that were made;
 - iv) The timeframe between identifying a leak and making a repair, which adheres to the following schedule:
 - a) A first attempt at repair shall be made no later than 5 working days after the leak is detected; and
 - b) Final repairs shall be made within 15 working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.
 - c) Cleaning Solvent Accounting System which will record:
 - i) The quantity and type of organic solvent used each month for wash-off and cleaning;
 - ii) The number of pieces washed off, and the reason for the wash-off; and
 - iii) The quantity of spent organic solvent generated from each activity, and the quantity that is recycled onsite or disposed offsite each month; and
3. The facility shall use normally closed containers for storing finishing and cleaning materials.

4. The source shall not use conventional air spray guns for applying finishing materials except under the following circumstances:
 - i) To apply finishing materials that have a VOC content no greater than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied;
 - ii) For final touch-up and repair;
 - iii) If spray is automated, not manual;
 - iv) If emissions are directed to a control device;
 - v) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology.

5. The facility shall maintain records of the following:
 - a) A list of each finishing material and strippable booth coating;
 - b) The VOC and solids content, as applied, of each finishing material and strippable booth coating, and copies of data sheets documenting how the as applied values were determined.
 - c) Total VOC usage per month, to show compliance with 90 ton per year emission limit defined in condition #2. Compliance will be shown, based on a twelve month average usage of VOC containing material.

6. The facility shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
 - a) Records demonstrating that the operator training program is in place;
 - b) Records maintained in accordance with the inspection and maintenance plan;
 - c) Records associated with the cleaning solvent accounting system;
 - d) Records associated with the implementation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual reporting period;
 - e) Records showing the VOC content of solvent used for cleaning booth components, except for solvent used to clean conveyors, continuous coaters and their enclosures, and/or metal filters; and
 - f) Copies of logs and other documentation developed to demonstrate that the other provisions of the work practice implementation plan are followed.

7. The facility shall maintain all records for a minimum of 5 years.

8. The facility shall use coatings in compliance with 25 Pa Code Section 129.52, Table I (11), only.

9. Failure to maintain the records required by above listed conditions shall constitute a violation of this Operating Permit for each day records are not maintained.

10. Any information required to be submitted as part of the above conditions shall be submitted to Mr. Devendra Verma, Engineering Services Chief, Air Quality Control, Northwest Regional Office, 1012 Water Street, Meadville, PA 16335.
11. This RACT approval applies to the emission of NOx and VOC pollutants, only. Emission of other pollutants, including criteria pollutants, shall be governed by the existing Plan Approvals, Operating Permits, and applicable requirements of the Rules and Regulations of the Department. Such approval, permits, and requirements are incorporated herein by reference and made part of this permit.

RACT Source Listing

Source 102 Wiping Stain Process

Source 103 Wood Sealer Process

Source 105 Wood Lacquer Top Coat Process