



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

OPERATING PERMIT

edited

revised

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-41-0002</u>	Source &	<u>truck and van manufacturing</u>
Owner:	<u>Grumman Olson, Division of</u>	Air	<u>processes, as described in</u>
	<u>Grumman Allied Industries</u>	Cleaning	<u>condition 3 herein</u>
Address:	<u>R.D. 1, Box 441</u>	Device:	<u></u>
	<u>Montgomery, PA 17752</u>		<u></u>
Attn:	<u>Mr. Kenneth Kohler</u>	Location:	<u>Clinton Township</u>
	<u></u>		<u>Lycoming County</u>

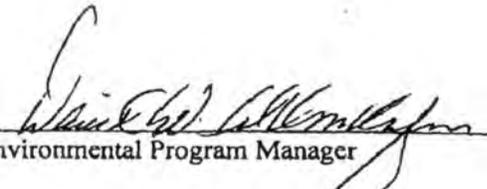
This permit is subject to the following conditions:

1. That the source(s) and any associated air cleaning device(s) are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of the applicable plan approval(s) 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 attached for additional conditions.

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: SEP 25 1997


Environmental Program Manager

cc: Harrisburg
File

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3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by the provisions of Title I of the Clean Air Act Amendments and 25 Pa. Code Sections 129.91 through 129.95 for the following sources:
- a) truck and van assembly operations, including all adhesive, sealant and other related material usage (does not include cleaning activities identified in parts b and c of this condition or any surface coating activities).
 - b) all organic solvent-using cleaning activities associated with the truck and van manufacturing process (other than the surface coating equipment cleanup activities identified in part c of this condition).
 - c) surface coating equipment cleanup activities
 - d) "pallet reefer" manufacturing operation
 - e) thirty-five natural gas-fired heaters (total 68.42 million Btu/hr), as listed in the company's 6/16/97 "Sources of Minor Significance" submission
 - f) emergency sources - 126 horsepower propane-fired emergency electric generator and 225 horsepower diesel-fired emergency fire pump
 - g) four storage tanks - one 110 gallon diesel fuel tank, two 240 gallon diesel fuel tanks, and one 240 gallon gasoline tank
5. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall minimize volatile organic compound emissions from the truck and van assembly operations and organic solvent-using cleaning activities identified in conditions 3(a) and 3(b) herein through the use of good material management practices. These practices shall include keeping all volatile organic compound-containing materials in closed containers except when in an active state of use and storing any solvent-wet rags, etc. in closed containers pending reuse or disposal. These sources shall additionally comply with the emission limitations specified in conditions 18 and 20 below.

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6. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall minimize volatile organic compound emissions from surface coating equipment cleanup activities identified in condition 3(c) herein through the use of good solvent management practices, as follow. All cleanup solvents shall be stored in closed containers except when in active use. All cleanup solvent flushed through paint lines and spray guns shall be flushed into closed containers. Under no circumstances shall cleanup solvent be sprayed into the air through spray guns, or used in other such fashions which promote evaporative loss and prevent used solvent recovery. All solvent-wet rags, etc. shall be stored in closed containers pending reuse or disposal. This source shall additionally meet the emission limitation specified in condition 19 below.
7. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall minimize volatile organic compound emissions from the pallet reefer manufacturing operation identified in condition 3(d) herein by complying with the work practice standards specified in conditions 27 and 28 below. This source shall additionally comply with the emission limitation specified in condition 30 below.
8. The potential to emit volatile organic compounds from each of the following source categories shall never exceed 3 pounds per hour, 15 pounds per day or 2.7 tons per year, as determined by the Department. Should any of these limitations ever be exceeded for any of the source categories listed below, a detailed RACT analysis which meets the criteria specified in Section 129.92 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection must be submitted to the Department for each source contained in the respective category.
 - natural gas-fired heaters identified in condition 3(e) herein
 - emergency sources identified in condition 3(f) herein
 - storage tanks identified in condition 3(g) herein
9. The company shall maintain such records as may be necessary to demonstrate compliance with the RACT requirements specified above. Compliance with the recordkeeping and reporting requirements contained in conditions 33 and 34 below shall be sufficient for this purpose.

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11. The aforementioned source(s) may be operated and used only so long as any associated 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.
12. This operating permit is issued for the operation of the sources identified in condition 3 above as well as for the operation of a surface coating operation used to coat truck and van bodies and parts. The surface coating operation includes:
 - two "tunnel" spray booths employing waterwash systems for overspray control
 - a "small parts" spray booth
 - six Spray Booth Systems, Inc. spray booths used for undercoating application, rear frame painting, two-tone painting and touchup/repair work (and the construction of which was approved by plan approval 41-318-029B).
14. Pursuant to the best available technology provisions of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, all undercoating materials used in the surface coating operation shall contain no more than 2.8 pounds of volatile organic compounds per gallon of coating (minus water) and shall be applied using airless spray (or any other method having the same or higher transfer efficiency, as determined by the Department).

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Additionally, the water-based undercoating products which were identified in plan approval application #41-318-029B shall be used wherever and whenever possible. The standard solvent density correction of Section 129.52 need not be used in determining compliance with the volatile organic compound content limitation contained in this condition.

15. Conditions 13 and 14 notwithstanding, any coating application method may be used for legitimate touchup and repair work.
16. All coating materials applied in the surface coating operation shall meet the volatile organic compound content requirements of Section 129.52 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection. Additionally, none shall contain any methylene chloride or 1,1,1 trichloroethane.
17. The six Spray Booth Systems, Inc. spray booths and the small parts spray booth shall be equipped with high-efficiency spray booth exhaust filters at all times when surface coatings are being applied.
18. The volatile organic compound emissions resulting from the use of adhesives, sealants and other related materials in the truck and van assembly operations identified in condition 3a herein shall not exceed 1.7 pounds per vehicle manufactured, on an average basis in any 12 consecutive month period, nor shall they exceed a total of 8.5 tons in any 12 consecutive month period.
19. The volatile organic compound emissions resulting from the use of organic solvents for surface coating equipment cleanup purposes shall not exceed 2.0 pounds per painted vehicle manufactured, on an average basis in any 12 consecutive month period, nor shall they exceed a total of 10.0 tons in any 12 consecutive month period.
20. The volatile organic compound emissions resulting from the organic solvent-using cleaning activities identified in condition 3b herein (does not include surface coating equipment cleanup) shall not exceed 2.0 pounds per vehicle manufactured, on an average basis in any 12 consecutive month period, nor shall they exceed 10.0 tons in any 12 consecutive month period.
21. Pursuant to the best available technology provisions of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the combined volatile organic compound emissions from the six Spray Booth Systems, Inc. surface coating spray booths shall not exceed 65 tons in any 12 consecutive month period, as determined by the Department. This includes any emissions generated by surface coating equipment cleanup in or associated with these booths.

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23. The polyurethane foam components, cleaning solvents, sealants, liquid wax and PVC pipe assembly materials used in the pallet reefer manufacturing operation shall not be changed from those identified in the applications and supplemental materials submitted for plan approval nor shall any additional materials containing volatile organic compounds, methylene chloride, 1,1,1 trichloroethane, chlorofluorocarbons (CFCs), fluorocarbons (FCs) or hydrochlorofluorocarbons (HCFCs) be used in the pallet reefer manufacturing operation without first obtaining Department approval.
24. Pallet reefer production shall not exceed 5,000 units per year.
25. Polyurethane foam polyol resin component (Chempol 030-4141), isopropyl alcohol and liquid wax usage in the pallet reefer manufacturing operation shall not exceed, respectively, 62.88 pounds, 16 fluid ounces and 1 fluid ounce per pallet reefer on an average basis in any 12 consecutive month period.
26. Thermaclean evaporative loss from the pallet reefer manufacturing operation shall not exceed 35 fluid ounces per pallet reefer on an average basis in any 12 consecutive month period.
27. All Thermaclean flushed through the foam head and associated lines in the pallet reefer manufacturing operation shall be flushed into a closed container.
28. All isopropyl alcohol and wiping rags, etc. used to apply isopropyl alcohol to pallet reefer components shall be stored in closed containers when not in actual use and, when shipped offsite for disposal or treatment, shall be shipped in closed containers.
29. The dichlorofluoroethane or HCFC-141b emissions from the pallet reefer manufacturing operation shall not exceed 3.5 tons in any 12 consecutive month period (as calculated by the Department).
30. The volatile organic compound emissions from the pallet reefer manufacturing operation, excluding any emissions generated by the surface coating of pallet reefers in one of the aforementioned spray booths, shall not exceed 17 tons in any 12 consecutive month period (as calculated by the Department).

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31. The combined volatile organic compound emissions from all sources located in or at this facility shall not exceed 149.05 tons in any 12 consecutive month period (as determined by the Department). The company shall maintain all material usage records necessary to demonstrate compliance with this limitation.
32. Any exceedance of the 149.05 ton per 12 consecutive month emission cap contained in condition 31 above will constitute not only a violation of this operating permit but also a retroactive violation of the Department's New Source Review regulations contained in Sections 127.201 - 127.217 of Article III of the Rules and Regulations of the Department of Environmental Protection. Additionally, any future plant addition or modification which causes any increase in potential volatile organic compound emissions above the 149.05 ton per 12 consecutive month emission cap must meet all applicable requirements of the aforementioned New Source Review regulations.
33. The company shall maintain accurate, comprehensive records of the following:
 - a. the amounts and types of all surface coating materials used in the surface coating operation
 - b. the amounts and types of all organic solvents used for *surface coating equipment* cleanup purposes
 - c. the amount of each surface coating equipment cleanup solvent which is recovered and shipped offsite in liquid form for reclaim or disposal
 - d. the amounts and types of any surface coating materials shipped offsite for reclaim or disposal
 - e. the amounts and types of all coatings, reducers, etc. used for touchup/repair purposes in the surface coating operation
 - f. the amounts and types of any additive materials added to surface coatings (e.g. anti-crater, dry accelerator, etc.)
 - g. the amounts and types of all organic solvents used for cleaning activities *other than* surface coating equipment cleanup
 - h. the amounts and types of all VOC-containing adhesives and sealants used in truck and van assembly operations
 - i. the total number of vehicles manufactured
 - j. the number of painted vehicles manufactured
 - k. the number of pallet reefers manufactured
 - l. the amount of polyurethane component A used in the pallet reefer manufacturing operation
 - m. the amount of polyurethane component B used in the pallet reefer manufacturing operation

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- n. the amount of isopropyl alcohol used in the pallet reefer manufacturing operation
- o. the amount of liquid mold release wax used in the pallet reefer manufacturing operation
- p. the amount of Thermaclean used in the pallet reefer manufacturing operation
- q. the amount of sealant used in the pallet reefer manufacturing operation
- r. the amount of PVC primer used in the pallet reefer manufacturing operation
- s. the amount of PVC cement used in the pallet reefer manufacturing operation
- t. the amount of Thermaclean/foam waste shipped offsite
- u. the amounts and types of any other VOC-containing materials used anywhere in the plant which do not fit any of the categories listed above (list each individual material separately and indicate what it is used for)

For all of the above categories, where applicable, *each individual material used* must be tracked and recorded separately. All records shall be based on actual, empirical usage data; usage estimates are not acceptable. The records for items (a), (b) and (c) shall be maintained in such a way that the usage of these materials in the six Spray Booth Systems, Inc. spray booths can be differentiated from the usage of these materials in the other spray booths (and, additionally, such that usage in the "tunnel" spray booths can be differentiated from usage in the "small parts" spray booth). All records shall be retained for at least two years from date of generation.

- 34. The records for items (a) through (h) in condition 33 above shall be kept on a daily basis and organized into a monthly format. The records for items (i) through (u) shall be maintained on a monthly basis. The monthly records for each three month calendar quarter shall be submitted to the Department by the 30th day of the following month. (For example, records for January, February and March are due by April 30.)
- 35. The operation of the aforementioned sources shall not at any time result in the emission of volatile organic compounds in excess of the limitations specified in any condition contained herein or in excess of the limitations specified in Section 129.52 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, or in the emission of these contaminants 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.