

Revised

ORC EPA

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

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-49-0014</u> | Source & | <u>fiberglass reinforced plastics</u> |
| Owner: | <u>Jeraco Enterprises, Incorporated</u> | Air | <u>manufacturing and surface</u> |
| | | Cleaning | <u>coating operations and</u> |
| Address: | <u>135 Sodom Road</u> | Device: | <u>associated activities, as</u> |
| | <u>Milton, PA 17847</u> | | <u>described in condition 3 herein</u> |
| Attn: | <u>Larry D. Fawcett</u> | Location: | <u>Milton Borough</u> |
| | <u>President</u> | | <u>Northumberland 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: APR 03 1997


Environmental Program Manager

cc: Harrisburg
File

PERMIT CONDITIONS
PERMIT NO.: OP-49-0014
COMPANY: Jeraco Enterprises, Incorporated

4. 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.
5. 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 fiberglass reinforced plastics manufacturing or spray layup operation, incorporating three dry-filter spray booths (one gel coat spray booth and 2 chop spray booths)
 - a fiberglass automotive accessory surface coating operation, incorporating two spray booths, an open-face booth, an 'enclosure' booth, a curing booth and a paint mix room
 - various activities involving the use of small quantities of miscellaneous volatile organic compound-containing materials (surface preparation, mold upkeep, final product cleaning, etc. but not including the use of solvents for the cleanup of spray equipment)
 - eight 'small combustion sources' - five natural gas-fired space heaters (total 975,000 Btu/hr), two natural gas-fired makeup air units (total 3,628,000 Btu/hr) and one #2 fuel oil-fired space heater (525,000 Btu/hr)
 - two storage tanks - one 6,500 gallon polyester resin tank and one 1,500 gallon #2 fuel oil tank

PERMIT CONDITIONS

PERMIT NO.: OP-49-0014

COMPANY: Jeraco Enterprises, Incorporated

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 fiberglass reinforced plastics manufacturing or spray layup operation shall be operated at all times in accordance with the equipment standards, material restrictions and volatile organic compound emission limitations specified in conditions 11 and 12 below.
8. 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 fiberglass automotive accessory surface coating operation shall be operated at all times in accordance with the equipment standards, material restrictions and volatile organic compound emission limitations specified in conditions 15 and 16 below. Additionally, all clear coatings (transparent top coats) used in the subject surface coating operation shall contain no more than 5.0 pounds of volatile organic compound per gallon of coating (as applied).
9. 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 source category.
 - 'miscellaneous' volatile organic compound-containing material usage, as described in condition 3 above
 - small combustion sources
 - storage tanks
10. Pursuant to Section 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall maintain records necessary to demonstrate compliance with the RACT requirements contained above. Compliance with the recordkeeping provisions of condition 21 below shall be considered as meeting this requirement.
11. Pursuant to the best available technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the operation of the spray layup operation shall not result in the emission of more than 50.2 tons of styrene or 63 tons of total volatile organic compounds per calendar year (as calculated by the Department).

PERMIT CONDITIONS

PERMIT NO.: OP-49-0014

COMPANY: Jeraco Enterprises, Incorporated

12. Pursuant to the best available technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, no gel coat material used in the spray layup operation shall contain in excess of 37% styrene by weight, nor shall any resin used in the spray layup operation contain in excess of 36% styrene by weight. Additionally, all gel coat and resin shall be applied using airless spray systems (or equivalent or better, as determined by the Department).
13. The exhausts of each of the three spray booths incorporated in the spray layup operation shall be equipped with particulate filters at all times when the booths are in operation.
14. The company shall perform such stack testing as the Department may request for the determination of styrene or volatile organic compound emission rates from any portion of the spray layup operation.
15. Pursuant to the best available technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the total volatile organic compound emissions from the surface coating operation shall not exceed 30 tons per calendar year, 1000 pounds per day or 100 pounds per hour (as determined by the Department).
16. Pursuant to the best available technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, all coating materials used in the surface coating operation shall contain no more than 6.68 pounds of volatile organic compounds per gallon of coating (as applied). Additionally, all coatings shall be applied using a high volume low pressure (HVLV) spray system (or equivalent or better spray system, as determined by the Department). Note: Clear topcoats are also subject to additional restrictions contained in condition 8 of this operating permit.
17. All spray booths in which surface coatings are being applied shall be equipped with overspray control providing a minimum particulate matter removal efficiency of 99%.
18. Total facility-wide volatile organic compound emissions shall not exceed 93 tons per calendar year (as determined by the Department).
19. The only cleanup solvent to be used for spray line flushing and spray equipment cleanup activities associated with the surface coating and spray layup operations shall be acetone, unless Department approval is granted for the use of an alternative cleanup solvent.
20. All solvents used for spray line cleaning shall be flushed into closed containers; under no circumstances shall cleanup solvent be removed from spray lines by spraying through a spray gun. All containers of solvent and waste solvent shall be kept closed when not in actual use and all solvent-wet rags, etc. shall be stored in closed containers when not in actual use. Under no circumstances shall

PERMIT CONDITIONS

PERMIT NO.: OP-49-0014

COMPANY: Jeraco Enterprises, Incorporated

waste solvent be disposed of via evaporation or solvent-wet rags, etc. be treated or pretreated prior to disposal or reuse by subjecting them to air drying or any other means of solvent removal which would cause solvent to be evaporated into the air.

21. The company shall maintain comprehensive accurate records of the following:
- a) gallons of each coating material used in the surface coating operation
 - b) pounds of volatile organic compounds per gallon of each coating before addition of diluents/additives
 - c) gallons of each diluent/additive used and the volatile organic compound content of each
 - d) mix ratio of each coating and associated diluents/additives
 - e) quantity of each resin used in the spray layup operation and the styrene content of each
 - f) quantity of each gel coat used in the spray layup operation and the styrene content of each
 - g) quantity of catalyst used in the spray layup operation, and identity of catalyst
 - h) quantity of acetone used in the facility
 - i) quantity of each 'other' volatile organic compound-containing material used at the facility (materials which do not fall into one of the above categories), and volatile organic compound content of each

The records for a) through d) above shall be maintained on a daily basis. All records generated pursuant to this condition shall be retained onsite for at least two years from date of generation and shall be made available to Department personnel upon request.

22. Within 30 days following the end of each calendar quarter, the company shall submit to the Department a report containing the following:
- a) the total volatile organic compound emissions generated by the surface coating operation during the quarter
 - b) at least one example of a daily surface coating record prepared pursuant to condition 21 above during the quarter
 - c) the total quantity of each resin used in the spray layup operation during the quarter
 - d) the total quantity of each gel coat used in the spray layup operation during the quarter
 - e) the total quantity of catalyst used in the spray layup operation during the quarter
 - f) the total quantity of acetone used in the facility during the quarter
 - g) the total volatile organic compound emissions generated by the use of 'other' materials (as recorded for part i) of condition 21 above) during the quarter.

This report shall include all background information and calculations used in the derivation of the emission figures requested in a) and g).

