

OPERATING PERMIT RENEWAL CONDITIONS
PERMIT NO. OP-15-0035
LNP ENGINEERING PLASTICS, INC.

CONDITIONS (continued):

3. This Operating Permit incorporates Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the CAAA, and 25 PA Code §§ 129.91 through 129.95 for the following sources:
 - two production process lines: Vertron Pultrusion and Thermocomp Compounding
 - three natural gas fired heat cleaning ovens(furnace) with afterburners; Pollution Control Product(PCP) Model No. SCRT-16XL and Model No. IGG 52 , Guspro Model No. GP-32
 - five natural gas fired Reznor Roof space heaters: 250,000 BTU per hour rated heat input (each)
 - two degreasing operations: (open top area less than 10 square feet).
 - maintenance operation
 - QC Testing Process
4. This Operating Permit supersedes, and incorporates the terms and conditions of, for heat cleaning oven Model No. SCRT-16XL issued under the Operating Permit No. 15-323-003 and heat cleaning oven Model No. GP-32 covered under Plan Approval No. 15-399-039.
5. Total VOC emissions from this facility shall not exceed 69.1 ton per year calculated on a 12 month rolling average basis.
6. VOC emissions from the two (2) vapor degreasers, five (5) Reznor space heaters, QC Testing Process and Maintenance Operations shall be less than three pounds per hour, 15 pounds per day, or 2.7 TPY for each source category.
7. VOC RACT for the three (3) heat cleaning ovens shall be the following:
 - f) Pollution Control Products Model SCTR-16XL and Model IGG 52 Cleaning Ovens:
 - * The primary chamber temperature shall not exceed 600°F until the operating temperature of the secondary chamber reaches 1400°F with a retention time of 0.5 seconds or greater.
 - * Furnace temperature shall be maintained by two separate, independent water spray systems that cycle on and off in response to the pre-determined primary chamber temperature of 900°F and stack temperature of 1500°F. The furnace temperature controls

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CONDITIONS (continued):

will operate such that each water spray system serves as a back-up system in case one should become plugged or otherwise fail.

- * No organic coatings or plastics which contain halogens such as chlorine, fluorine, or bromine shall be processed in this furnace.

b) Guspro Model GP-32 Cleaning Oven:

- * The burners shall be fired and modulated so that the primary chamber temperature shall not exceed 500°F. until the operating temperature of the secondary chamber reaches 1450°F with a retention time of 0.78 seconds or greater:
- * No organic coatings or plastics which contain halogens such as chlorine, fluorine, or bromine shall be processed in this furnace.

8. VOC RACT for all sources, except the three heat cleaning ovens, identified in Condition No. 3 shall be the operation and maintenance of the sources in accordance with manufacturers specifications and good air pollution control practices.
9. LNP Engineering Plastics, Inc. shall supplement their existing safety and ISO 9000 training procedures with VOC training programs for all new and existing personnel involved in the manufacturing operations. This training shall address work practices that would serve to keep VOC emissions from various plant activities to a minimum as well as the requirements of all applicable State and Federal regulations.

Training program requirements, may at the facilities' discretion, be combined with existing safety and procedural training.

10. LNP Engineering Plastics, Inc. shall maintain records in accordance with the minimum recordkeeping requirements of 25 PA Code § 129.95. At a minimum, this shall include:
 - Records shall provide sufficient data and calculations to clearly demonstrate that the requirements of Condition No. 5, 6, 7, 8 and 9 are met.
 - Data or information required to determine compliance with Condition No. 5, 6, 7, 8, and 9 shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
 - Records shall be retained for at least two years and be made available to the Department upon request.

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CONDITIONS (continued):

The Department reserves the right to revise the frequency of reporting requirements if it warrants.

Conditions 11 through 14 reflect requirements previously contained in Operating Permit No. 15-323-003.

11. The source covered under this Operating Permit is a controlled pyrolysis cleaning furnace manufactured by Pollution Control Products Company.

This furnace must be equipped with two water spray systems to separately control the maximum temperature in the primary furnace chamber and the stack. One of the water spray systems must be automatically turned on when the primary chamber temperature goes above 900°F. The other spray system must be automatically turned on when the stack temperature goes above 1500°F.

12. No organic coatings or plastics which contain halogens such as chlorine, fluorine, or bromine shall be processed in this furnace.
13. The furnace covered under this Operating Permit must operate (after a reasonable start-up period) at a minimum stack temperature of 1400°F. No material shall be charged until the stack temperature reaches 1400°F.

Conditions 15 through 20 reflect requirements previously contained in Plan Approval No. 15-399-039

15. The source covered under this Plan Approval, issued to LNP Engineering Plastics, Inc., is a heat cleaning oven manufactured by Guspro, Model GP-32 unit.
16. The operation of the heat cleaning oven shall not exceed the following emission limits:

particulate matter → 0.04 gr/dscf

17. The heat cleaning shall burn natural gas only.
18. This heat cleaning oven shall be equipped with a device to visually indicate the secondary combustion chamber exit gas temperature.
19. The burners associated with this heat cleaning oven shall be fired and modulated so as to maintain a secondary combustion chamber exit gas temperature of at least 1450°F.
20. The owner shall record the hours of operation of the heat cleaning oven and the temperature of the secondary combustion chamber exit gases on a daily basis.

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CONDITIONS (continued):

21. General Conditions:

- a) 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 RACT application (as approved by the Department), and in accordance with any conditions set forth herein.
- b) The operation of the aforementioned source(s) shall not at any time result in the emission of any 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, the company shall conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with 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 notifies the company that testing required.
- c) The company shall within an hour of occurrence notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results 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.
- d) If at any time the permittee causes, permits or allows any unauthorized 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 unauthorized modifications, malfunctions 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 operator use said air contamination source(s).
- e) The expiration shown on this RACT operating permit is for State purposes. For Federal Enforcement purposes the RACT provisions of this operating permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 FR 51 and approved by the US Environmental Protection Agency (EPA). The operating permit shall become enforceable by the US EPA upon its approval of the above as a revision to the SIP.
- f) 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

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CONDITIONS (continued):

administration fees as specified in Section 127.703 of the Rules and Regulations of the Department of Environmental Resources. These fees shall be paid in the form of a check payable to the "Commonwealth of Pennsylvania-Clean Air Fund". The request for renewal should be made on 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.

All necessary forms can be obtained from the Department upon request.

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
Telephone: (610) 832-6242

Re 30 (RN)260-16