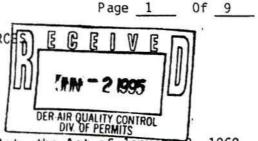
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

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 Resources, the Department hereby issues this permit for the operation of the air contamination source described below.

39-0004	Source &	(Condition 3)
Mack Trucks, Inc.	Air	
2100 Mack Boulevard P.O. Box M	Cleaning	
Allentown, PA 18105-5000	Device	
Mr. Carl Johns	Location	Lower Macungie Township
Manager Environmental Affairs		Northampton County
	Mack Trucks, Inc. 2100 Mack Boulevard P.O. Box M Allentown, PA 18105-5000 Mr. Carl Johns Manager	Mack Trucks, Inc. 2100 Mack Boulevard P.O. Box M Cleaning Allentown, PA 18105-5000 Mr. Carl Johns Manager Location

his permit is subject to the following conditions:

- (1) That the source and any associated air cleaning devices are to be:
 - (a) operated in such a manner as not to cause air pollution;
 - (b) 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.

Failure to comply with the conditions placed on this permit is in 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 Resources will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued

MAY 31 1995

Thomas A. Dilazaro, Program Manager

Air Quality Program

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(3) This Operating Permit incorporates Reasonable Available Control Technology (RACT) determinations for Nitrogen Oxides (NOx) and Volatile Organic Compounds (VOC's) as required by Title I provisions of the CAAA and 25 PA Code Section 129.91 through 129.95 for the sources listed in the following table. This Operating Permit supersedes the Operating Permits issued for the sources which are listed in the table. The terms and conditions of the Operating Permits found in the table are included in this Operating Permit.

SOURCE	PERMIT NUMBER
Small Parts/Oven	39-318-088
Cab Color/Oven & Undercoat	39-318-090
Final/Oven	39-318-091
"O"-Line	39-318-092
"G" Chassis/Oven with "H" Chassis	39-318-093
Multi-Tone/Oven	39-318-094
"H" Chassis/Oven with "G" Chassis	39-318-095
3-Cleaver Brooks Boilers	39-302-068

- (4) The VOC RACT for clean-up solvent usage at the entire facility shall not exceed 91.0 tons per year. All cleaning operations must store new and used cleaning solvents in closed containers. A record of the quantity and identity of all VOC's used in clean-up operations for the entire facility must be recorded on an annual basis.
- (5) The following sources are regulated under Presumptive RACT:
 - The four (4) 6-cylinder engines, two (2) Cummins series NT-85-5-F2, one (1) Caterpillar series 3304, and one (1) Detroit series 92 are limited to an annual capacity factor of less than 5%, or an emergency standby engine operating less than 500 hours in a consecutive 12-month period. This source shall be operated and maintained in accordance with good air pollution control practices
- (6) NOx RACT for the Three (3) Cleaver Brooks 67.1 MMBtu per hour Boilers shall be limited to their potential emissions and shall never exceed the following:

441 gallons fuel oil/hour/boiler

(7) VOC RACT for the facility is regulated by source and listed below:

(A) 39-318-088 Small Parts/Oven

1. The operation of the source is limited to 12,500 trucks per year.

 The maximum volatile organic compound (VOC) emissions from this source cannot exceed 175.0 lbs/day and 21.9 tons per year based on coating usage.

The maximum coating usage from this source cannot exceed 50 gallons

per day and 12,500 gallons per year.

4. The total amount of VOC emissions from clean up solvent usage at the entire facility cannot exceed 91.0 tons per year.

5. All coatings used for this source shall not exceed an in-line average

of 3.5 lbs VOC/gallon minus water for any 24-hour period.

6. The company shall keep on hand chemical composition data for all coatings used by this source and shall record on a daily basis all coatings and any VOC solvent or thinner usage for this source.

7. The information required by condition (6) of this Operating Permit shall be submitted in an approved format on a quarterly basis to the Department. This information shall be submitted within thirty (30) days after the end of the quarter.

3. The company shall record the quantity and identity of all VOC solvents used for clean up purposes for the entire plant facility on

an annual basis.

9. The information required by condition (8) of this Operating Permit shall be submitted in an approved format on a annual basis to the Department. This information shall be submitted within ninety (90) days after the end of the year.

(B) 39-318-090 Cab Color Spray Paint Booth/Undercoat & Oven

1. The operation of the source is limited to 12,500 trucks per year.

 The maximum volatile organic compound (VOC) emissions from the cab color operation cannot exceed 612.5 lbs/day and 76.6 tons per year based on coating usage.

The maximum coating usage from the cab color operation cannot exceed

175 gallons per day and 43,750 gallons per year.

4. The total amount of VOC emissions from clean up solvent usage at the

entire facility cannot exceed 91.0 tons per year.

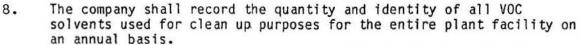
All coatings used for the cab color operation shall not exceed an in-line average of 3.5 lbs VOC/gallon minus water for any 24-hour period.
 The company shall keep on hand chemical composition data for all

The company shall keep on hand chemical composition data for all coatings used by the cab coating operation and shall record on a daily basis all coatings and any VOC solvent or thinner usage for the

cab color operation.

7. The information required by condition (6) of this Operating Permit shall be submitted in an approved format on a quarterly basis to the Department. This information shall be submitted within thirty (30) days after the end of the quarter.

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9. The information required by condition (8) of this Operating Permit shall be submitted in an approved format on a annual basis to the Department. This information shall be submitted within ninety (90) days after the end of the year.

The maximum volatile organic compound (VOC) emission from the undercoat operation cannot exceed 153.5 lbs/day and 19.2 tons per year based on coating usage.

11. The maximum coating usage from the undercoat operation cannot exceed 50 gallons per day and 12,500 gallons per year.

12. All coatings for the undercoating operation shall not exceed 3.07 lbs VOC/gallon.

13. The company shall keep on hand chemical composition data for all coatings used by the undercoat operation and shall record on a daily basis all coatings and any VOC solvent or thinner usage for the undercoat operation.

14. The information required by condition (13) of this Operating Permit shall be submitted in a approved format on a quarterly basis to the Department. This information shall be submitted within thirty (30) days after the end of the quarter.

(C) 39-318-091 Final Touch-Up Paint Spray Booth & Oven

- The operation of the source is limited to 50 trucks per day, 250 trucks per week and 12,500 trucks per year.
- The maximum volatile organic compound (VOC) emissions from this source cannot exceed 87.5 lbs/day and 10.9 tons per year based on coating usage.
- The maximum coating usage from this source cannot exceed 25 gallons per day and 6,250 gallons per year.
- 4. The total amount of VOC emissions from clean up solvent usage at the entire facility cannot exceed 91.0 tons per year.
- All coatings used for this source shall not exceed an in-line average of 3.5 lbs VOC/gallon minus water for any 24-hour period.
- 6. The company shall keep on hand chemical composition data for all coatings used by this source and shall record on a daily basis all coatings and any VOC solvent or thinner usage for this source.
- 7. The information required by condition (6) of this Operating Permit shall be submitted in an approved format on a quarterly basis to the Department. This information shall be submitted within thirty (30) days after the end of the quarter.

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- 8. The company shall record the quantity and identity of all VOC solvents used for clean up purposes for the entire plant facility on an annual basis.
- 9. The information required by condition (8) of this Operating Permit shall be submitted in an approved format on a quarterly basis to the Department. This information shall be submitted within ninety (90) days after the end of the year.

(D) 39-318-092 "O" Line Chassis Paint Spray Booth

- 1. The operation of the source is limited to 50 trucks per day, 250 trucks per week and 12,500 trucks per year.
- The maximum volatile organic compound (VOC) emissions from this source cannot exceed 87.5 lbs/day and 10.9 tons per year based on coating usage.
- The maximum coating usage from this source cannot exceed 25 gallons per day and 6,250 gallons per year.
- 4. The total amount of VOC emissions from clean up solvent usage at the entire facility cannot exceed 91.0 tons per year.
- All coatings used for this source shall not exceed an in-line average of 3.5 lbs VOC/gallon minus water for any 24-hour period.
- 6. The company shall keep on hand chemical composition data for all coatings used by this source and shall record on a daily basis all coatings and any VOC solvent or thinner usage for this source.
- 7. The information required by condition (6) of this Operating Permit shall be submitted in an approved format on a quarterly basis to the Department. This information shall be submitted within thirty (30) days after the end of the quarter.
- 8. The company shall record the quantity and identity of all VOC solvents used for clean up purposes for the entire plant facility on an annual basis.
- 9. The information required by condition (8) of this Operating Permit shall be submitted in an approved format on a annual basis to the Department. This information shall be submitted within ninety (90) days after the end of the year.

(E) 39-318-093 "G" Line Chassis Paint Spray Booth & Oven

- The operation of this source and the "H" line chassis paint booth and oven are limited to a total of 12,500 trucks per year. The total of 12,500 trucks per year can be distributed between either chassis line.
- 2. The maximum volatile organic compound (VOC) emissions from this source and the "H" line chassis paint spray booth and oven cannot exceed 1455.5 lbs/day and 180.5 tons per year based on coating usage. The aforementioned daily and yearly VOC emissions can be distributed between either chassis line.

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> 3. The maximum coating usage from this source and the "H" line chassis paint spray booth and oven cannot exceed 413 gallons per day and 103,125 gallons per year. The aforementioned daily and yearly coating usage can be distributed between either chassis line.

4. The total amount of VOC emissions from clean up solvent usage at the

entire facility cannot exceed 91.0 tons per year.

All coatings used for this source shall not exceed an in-line average of 3.5 lbs VOC/gallon minus water for any 24-hour period. 5.

6. The company shall keep on hand chemical composition data for all coatings used by this source and shall record on a daily basis all coatings and any VOC solvent or thinner usage for this source.

7. The information required by condition (6) of this Operating Permit shall be submitted in an approved format on a quarterly basis to the Department. This information shall be submitted within thirty (30) days after the end of the quarter.

8. The company shall record the quantity and identity of all VOC solvents used for clean up purposes for the entire plant facility on

an annual basis.

9. The information required by condition (8) of this Operating Permit shall be submitted in an approved format on a quarterly basis to the Department. This information shall be submitted within ninety (90) days after the end of the year. Conditions (2) and (3) of this Operating Permit supercede

10. Conditions (4) and (5) of the Plan Approval issued March 23, 1993.

(F) 39-318-094 Multi-Tone Paint Spray Booth & Oven

1. The operation of this source is limited to a total of 12,500 trucks per year.

2. The maximum volatile organic compound (VOC) emissions from this source cannot exceed 133 lbs/day and 16.4 tons per year based on coating usage.

The maximum coating usage from this source cannot exceed 38 gallons 3. per day and 9,375 gallons per year.

4. The total amount of VOC emissions from clean up solvent usage at the entire plant facility cannot exceed 91.0 tons per year.

All coatings used for this source shall not exceed an in-line 5. average of 3.5 lbs VOC/gallon minus water for any 24-hour period.

6. The company shall keep on hand chemical composition data for all coatings used by this source and shall record on a daily basis all coatings and any VOC solvent or thinner usage for this source.

The information required by condition (6) of this Operating Permit 7. shall be submitted in an approved format on a quarterly basis to the Department. This information shall be submitted within thirty (30)

days after the end of the quarter.

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- 8. The company shall record the quantity and identity of all VOC solvents used for clean up purposes for the entire plant facility on an annual basis.
- 9. The information required by condition (8) of this Operating Permit shall be submitted in an approved format on a quarterly basis to the Department. This information shall be submitted within ninety (90) days after the end of the year.

(G) 39-318-095 "H" Line Chassis Paint Spray Booth & Oven

- The operation of this source and the "G" line chassis paint booth and oven are limited to a total of 12,500 trucks per year which can be distributed between either chassis line.
- The maximum volatile organic compound (VOC) emissions from this source and the "G" line chassis paint spray booth and oven cannot exceed 1455.5 lbs/day and 180.5 tons per year based on coating usage. The aforementioned daily and yearly VOC emissions can be distributed between either chassis line.
- 3. The maximum coating usage from this source and the "G" line chassis paint spray booth and oven cannot exceed 413 gallons per day and 103,125 gallons per year. The aforementioned daily and yearly coating usage can be distributed between either chassis line.
- 4. The total amount of VOC emissions from clean up solvent usage at the entire plant facility cannot exceed 91.0 tons per year.
- All coatings used for this source shall not exceed an in-line average of 3.5 lbs VOC/gallon minus water for any 24-hour period.
- 6. The company shall keep on hand chemical composition data for all coatings used by this source and shall record on a daily basis all coatings and any VOC solvent or thinner usage for this source.
- 7. The information required by condition (6) of this Operating Permit shall be submitted in an approved format on a quarterly basis to the Department. This information shall be submitted within thirty (30) days after the end of the quarter.
- 8. The company shall record the quantity and identity of all VOC solvents used for clean up purposes for the entire plant facility on an annual basis.

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- The information required by condition (8) of this Operating Permit shall be submitted in an approved format on an annual basis to the Department. This information shall be submitted within ninety (90) days after the end of the year.
- (8) Record keeping and reporting requirements are as follows:
 - (a) The company shall maintain a file containing all records and other data that are required to be collected pursuant to the various provisions of is operating permit, 25 PA Code Section 129.95, such that records provide sufficient data and calculations to clearly demonstrate that the requirements of PA Code Sections 129.91-4 are met. The file shall include, but not be limited to: quantity of fuel used on a daily basis, total facility VOC emission calculated on a monthly basis (12 month rolling sum), all air pollution control systems performance evaluations and records of calibration checks, adjustments and maintenance performed on all equipment which is subject to this Operating Permit. All measurements, records and other data required to be maintained by the company shall be retained for at least two years following the date on which such measurements, records or data are recorded.
- (9) If requested by the Department, the company shall perform a stack test in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Resources within the time specified by the Department.