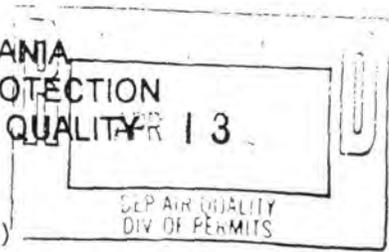


COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
FIELD OPERATIONS - BUREAU OF AIR QUALITY

RACT

**OPERATING PERMIT**  
(Revised 03/31/1998)



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:

<b>Permit No.</b>	<u>OP-09-0030</u>	<b>Source(s)</b>	<u>Facility NOx &amp; VOC Sources</u>
<b>Owner</b>	<u>MSC Pre Finish Metals, Inc.</u>	<b>Air</b>	<u></u>
<b>Address</b>	<u>1295 New Ford Mill Road</u>	<b>Cleaning</b>	<u></u>
	<u>Morrisville, PA 19067</u>	<b>Device</b>	<u></u>
<b>Attention</b>	<u>Mr. Michael L. Hayes</u>	<b>Location</b>	<u>1295 New Ford Mill Road</u>
	<u>Environmental Specialist</u>		<u>Falls Township</u>
			<u>Bucks County</u>

This permit is subject to the following conditions:

1. That the source(s) 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 ADDITIONAL CONDITIONS ATTACHED)

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 11/07/1996  
Expires 11/07/2001

Francine Carlini  
Regional Manager  
Air Quality

cc: Division of Permits, RCSOB  
Administration  
SEFO  
Re (KAL97)198-7

**OPERATING PERMIT CONDITIONS**  
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**CONDITIONS (continued):**

3. This operating permit is issued to the owner for the operation of the following sources:
  - A. Coil Coater System
  - B. Laminator/Embosser
  - C. Six (6) Space Heaters
  - D. Storage Tanks
  - E. VOC Sources with the Emissions under the De Minimus Level
  
4. The expiration date shown on the Operating Permit is for state purposes. For Federal enforcement purposes the RACT provisions of the Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by the U.S. EPA upon its approval of the above as a revision to the SIP.
  
5. This operating permit supersedes the previously issued operating permit bearing the number 09-399-018.
  
6. Requirements for the Coil Coater System:
  - A. Source Description  

The system includes Midland Ross Corporation manufactured two(2) coil coaters, two (2) baking ovens and the associated thermal oxidizer.
  
  - B. Operating Requirements
    1. The company shall operate the coil coater system in compliance with 25 PA Code Section 129.52.
    2. The thermal oxidizer shall be operated and maintained in accordance with manufacturer's specifications and good air pollution control practices.
    3. The thermal oxidizer shall be equipped with a temperature measuring and recording device which continuously indicates and records the temperature of the combustion chamber.
    4. The thermal incinerator shall be operated in such a manner that the temperature of the combustion chamber is maintained at a minimum of 1200°F to assure the destruction efficiency of 90%.

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**CONDITIONS (continued):**

5. The exhaust gas from the ovens shall not by-pass the thermal oxidizer unless the coaters are applying water-based coatings which are in compliance with 25 PA Code Section 129.52 (b)(1).
6. The company shall not start the first production run before the thermal oxidizer combustion chamber temperature reaches 1200°F. The thermal oxidizer combustion chamber temperature shall be kept at 1200°F for at least half hour after the last production run and cleanup operation.
7. The cleaning towels, rags and tools shall be placed in closed containers immediately after use.
8. The waste solvent shall be disposed of by acceptable means.
9. The company shall properly maintain the oven burners by following the steps listed below:
  - a. An annual adjustment or tune-up shall be conducted on the ovens. This adjustment shall include, but not limited to the following:
    - (1). Inspection, adjustment, cleaning or replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
    - (2). Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO<sub>x</sub> and to the extent practicable minimize emissions of CO.
    - (3). Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.
  - b. The company shall record each adjustment conducted under the procedures in paragraph a in a permanently bound log book or other method approved by the Department. This log shall contain, at a minimum, the following information:
    - (1) The date of the tuning procedure.
    - (2) The name of the service company and technicians.
    - (3) The final operating rate or load.
    - (4) The final CO and NO<sub>x</sub> emission rates.
    - (5) The final excess oxygen rate.
    - (6) Other information which may be required in the subsequent operating permit.

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**CONDITIONS (continued):**

C. Emission Limitations

1. The VOC emissions from equipment cleanup solvent shall not exceed 26.8 tons per year.
2. The water based coatings applied shall not contain VOC content in excess of 2.60 pounds per gallon of coating minus water.

D. Recordkeeping Requirements

1. The company shall record the following information for each of the coatings and cleanup solutions used on the coaters:
  - a. daily coating quantity in gallons and pounds of coatings as applied;
  - b. the coating composition:
    - (1) percent solids by volume
    - (2) percent solvent by volume
    - (3) percent water by volume
    - (4) pounds of VOC per gallon minus water
    - (5) solvent density
  - c. the amount of cleanup solvent used, the amount of solvent waste shipped out and the date of the shipment.
  - d. the records of the gases temperature in the thermal oxidizer combustion chamber
  - e. the records necessary to demonstrate that Condition 6.C.1 is met.

7. Requirement for the Laminator/Embosser

A. Source Description

The laminator is manufactured by GFU Corporation Model No. 89268.  
The embosser is manufactured by PRO/ECO, Model No. RTE-2-265-60.

B. Operating Requirements

1. The VOC emissions from the laminator/embosser shall be ducted to the thermal incinerator specified in Condition 6 A. of this Operating Permit.

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**CONDITIONS (continued):**

2. The thermal oxidizer shall be operated in any occasion that the laminator/embosser is operating and shall meet all the requirements specified in Condition 6.B of this Operating Permit.

8. Requirements for Storage Tanks

A. Source Description

Tank Nos.	Material Stored	Capacity (gallons)
1A	Waste Solvent	8,000
2A	Paint	8,000
3A	Cleaning Solvent (VT3)	6,000
Propane 1	Propane	30,000
Propane 2	Propane	30,000
Propane 3	Propane	30,000

- B. Except tank <sup>2</sup>3A, pressure relief valve shall be installed on each tank, and set at the pressures specified 25 Pa. Code Section 129.57.

- C. Tank <sup>2</sup>3A shall be used for storing organic liquids with a vapor pressure equal to or less than 1.5 psi under actual storage conditions.

- D. The owner shall record the following information for each tank:

1. type of material
2. annual through put
3. number of turnovers

9. Requirements for Space Heaters

A. Source Description

Manufacturer	Model	Capacity	Fuel (MMBtu/hr)
E.K. Campbell	75	3.3	Natural Gas
E.K. Campbell	75	3.3	Natural Gas
E.K. Campbell	70	0.54	Natural Gas
Bryant	48-579A	0.5	Natural Gas
Rheem	RRGE-225-075DKR	0.22	Natural Gas
Rheem	RRGE-225-075DKR	0.22	Natural Gas

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**CONDITIONS (continued):**

- B. The owner shall operate and maintain the heaters in accordance with manufacturer's specifications and good air pollution control practices.
10. Requirement for VOC Sources with the Emissions under the De Minimus Level
- A. Source Description
    - 1. Parts Washing Unit (Graymills, Model No. DM132.)
    - 2. Waste Transfer Area
    - 3. Solvent Distiller
    - 4. Drum Filling Operation
    - 5. Laboratory Hoods
  - B. The owner shall record the type and the amount of VOC solvent used and the amount of waste solvent generated for each source category on a monthly basis.
  - C. Each container, drum tank for solvent and waste solvent storage shall be kept closed when it is not in use.
  - D. The owner shall record the amount of waste solvent shipped out on a monthly basis.
  - E. The VOC emissions from each source category shall not exceed 2.7 tons per year.
11. General Conditions:
- A. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be 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 be required to 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 it notifies the company that testing is required.

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**CONDITIONS (continued):**

- B. The company, within one hour of occurrence, shall notify the Department, at 610-832-6241, of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting 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. A written report shall be submitted to the Department within two working days following the incident describing the malfunctions and corrective actions taken.
- C. If at any time the permittee causes, permits or allows any 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 modifications, malfunction 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 operate or use said air contamination source(s).
- D. Records required under this operating permit shall be kept for a period of two (2) years and shall be made available to the Department upon its request.
- E. This Operating Permit supersedes the Operating Permit bearing the same number and issued on November 7, 1996. This Operating Permit denotes a change of ownership from Pre Finish Metals, Inc.

Re 30 (KAL97)198.8

