

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

EPA

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-49-0003</u>	Source &	<u>wrestling mat manufacturing</u>
Owner:	<u>Resilite Sports Products, Inc.</u>	Air	<u>operations, as described herein</u>
		Cleaning	<u></u>
Address:	<u>P.O. Box 764</u>	Device:	<u></u>
	<u>Sunbury, PA 17801</u>		<u></u>
Attn:	<u>Mr. Paul H. Gilbert,</u>	Location:	<u>Point Township</u>
	<u>General Manager</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: SEP 23 1998


Environmental Program Manager

cc: Harrisburg
File

PERMIT CONDITIONS
PERMIT NO.: OP-49-0003
COMPANY: Resilite Sports Products, Inc.

3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by the provisions of Table I of the Clean Air Act Amendments and 25 Pa. Code Sections 129.91 through 129.95 for the following wrestling mat manufacturing operations:
- a. adhesive application operations (1 spray booth & 1 spray station).
 - b. mat finish and cure operations (4 spray bays).
 - c. mat reconditioning operations.
 - d. spray equipment cleanup operations.
 - e. air stripper (remediation of contaminated groundwater).
 - f. 16,800,000 BTU/hour #2 fuel oil-fired Continental boiler.

This operating permit supersedes operating permit 49-302-015.

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 combined volatile organic compound (VOC) emissions from all operations existing at this facility, other than the air stripper and boiler identified in condition 3e and 3f herein, shall not exceed the following:
- a. a total of 1575 tons for the period beginning upon the date of issuance of this operating permit and ending 3 years from said date.
 - b. a total of 725 tons during any consecutive 12 month period occurring within the 3 year period identified in condition 5a. herein.
 - c. a total of 425 tons during any consecutive 12 month period occurring after the conclusion of the 3 year period identified in condition 5a. herein.
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, no adhesive used in this facility shall contain VOCs in excess of 5.98 pounds per gallon of adhesive (minus water), as applied.

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, no organic solvent-based mat coating material used in this facility shall contain VOCs in excess of 6.83 pounds of VOCs per gallon of coating (minus water), as applied, and no water-based mat coating material shall contain in excess of 1.0 pound of VOCs per gallon of coating (minus water), as applied.
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, no equipment shall be cleaned with VOC-containing solvents or cleaning materials other than spray guns and spray gun components. Additionally, the cleaning of all spray guns and spray gun components shall consist of soaking these items in closed containers of cleaning solvent. Under no circumstances shall VOC containing solvents or cleaning materials be sprayed through a spray gun into the atmosphere.
9. 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, all containers of VOC containing adhesives, mat coating materials, cleaning solvents, etc. shall be kept closed except when transferring material into or out of the containers.
10. 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.
 - a. air stripper identified in condition 3e. herein.
 - b. Continental boiler identified in condition 3f. herein.
11. Resilite shall at all times maintain copies of manufacturer's formulation or composition data sheets for all adhesives, mat coating materials, cleaning solvents and other VOC-containing materials used at this facility within the previous 2 years and shall make this information available to the Department at any time during normal business hours. These data sheets are to contain all of the information needed to determine compliance with the requirements specified in conditions 6 and 7 herein.
12. Resilite shall maintain a mat reconditioning/cleanup solvent log in which the following data is to be recorded:
 - a. identification, quantities and dates of use of all VOC-containing solvents used for mat reconditioning.
 - b. identification, quantities and dates of use of all VOC-containing solvents used for cleanup of spray guns and spray gun components.
 - c. identification, quantities and dates of use of all VOC-containing solvents used for cleanup purposes other than mat reconditioning and spray gun cleanup.

- d. quantities and dates of shipment of all spent mat reconditioning solvent and cleanup solvent shipped offsite for disposal or recycle.

This information is to be retained for at least 2 years and shall be made available to the Department upon request.

13. Resilite shall expeditiously implement the "Employee Training Program" and "Leak Detection and Maintenance Program" described in the 6/21/95 submittal made to Mr. Kirit Dalal of the Department of Environmental Protection by Ms. Cynthia Matthews of Rettew Associates on behalf of Resilite Sports Products, Inc. for all new and existing Resilite employees involved in adhesive application, mat coating material application, mat reconditioning and spray equipment cleanup activities. This training shall additionally address the requirements of this operating permit as well as the requirements of any applicable state and federal regulations.
14. Pursuant to Section 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, Resilite shall keep accurate, comprehensive records sufficient to demonstrate compliance with the RACT requirements specified herein. These shall, at a minimum, include the records required by condition 12 herein and the following:
 - a. identity and amount of each adhesive used per month as well as the identity and amount of any diluent (thinner, etc.) added to the adhesive.
 - b. the mix ratio (gallons of diluent per gallon of adhesive) for each batch of adhesive used to which diluent was added.
 - c. identity and amount of each mat coating material used per month as well as the identity and amount of any diluent (thinner, etc.) added to the mat coating material.
 - d. the mix ratio (gallons of diluent per gallon of coating material) for each batch of coating material used to which diluent was added.
 - e. gallons of groundwater processed through the air stripper per year as well as the VOC concentration in the influent to the air stripper (to be determined at least once per calendar quarter).

The records generated pursuant to this condition shall be submitted to the Department on a quarterly basis with the exception of the air stripper data which shall be submitted annually. The data for each calendar quarter shall be submitted by no later than the 30th day of the month following the respective quarter, or in the case of the air stripper, the 30th day of the month following the respective year.

The Department reserves the right to revise the type or frequency of reporting should it determine that revision is needed to accurately monitor compliance with the RACT requirements specified in any condition contained herein or with any requirements specified in Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection.

Conditions 15 and 16 herein pertain to the Continental boiler identified in condition 3f herein which previously operated pursuant to operating permit 49-302-015 (which is hereby superseded by the issuance of this RA CT operating permit).

15. This boiler is to be fired only on gas (natural or LP) or #2 fuel oil to which there has been no reclaimed or waste oil or other waste materials added. Additionally, the sulfur content of the #2 oil fired in this boiler shall not, at any time, exceed .5% (by weight).
16. The company shall, upon Department request, provide fuel analyses, or fuel samples, of the fuel used in the aforementioned boiler(s).

