## COMMONWEALTH OF PENNSYLVANIA DEPARIMENT OF ENVIRONMENTAL PROTECTION FIELD OPERATIONS - AIR QUALITY CONTROL

#### 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.	OP-46-0051	Source(s)VOC RACT	
Owner	Schlosser Steel, Inc.	Air	
Address	P.O. Box 116-2621 Township Line Rd.	Cleaning	
	Hatfield, PA 19440	Device	
Attention	Mr. Jim Moyer	Location	Souderton Pike & Township Line Rd.
	Operations Manager		Hatfield Township
	¥		Montgomery County

; 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.
- This permit is valid only for the specific equipment, location and owner named above.

#### (SEE THE ATTACHED 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 ard/or prosecution under Section 9 of the Air Pollution Control Act.

Issued 02/01/96

FRANCINE CARLINI

Regional Manager

Expires 02/01/2001

cc: Central Office Southeast Regional Office

## Compliance Permit Conditions Permit No. OP-46-0051 Schlosser Steel, Inc.

#### Conditions (continued):

3. This Reasonably Available Control Technology (RACT) Operating Permit is issued to Schlosser Steel, Inc. (Schlosser) for the operation of their sources located at Souderton Pike & Township Line Road in Hatfield Township, Montgomery County. This Operating Permit is the Department's determination of RACT of the Volatile Organic Compound (VOC) emissions sources at this facility.

#### 4. Emission Limitation

- A. Surface coating source regulated under 25 PA Code §129.52:
  - Schlosser shall be limited to the use of coatings which do not exceed the limitation of 3.5 ponds of VOC per gallon of coating (minus water) as applied, as required by 25 PA Code §129.52 (10) (f).
- B. Sources regulated under 25 PA Code §129.91-95. Schlosser shall limit the VOC emission from part washing sources categories and cleaning operations sources to less than 3 pounds per hour, 15 pounds per day and 2.7 tons per year.

#### 5. Testing Requirements

A. Schlosser shall use EPA Method 24, or any alternative Methods as approved by Department as described in 25 PA Code 139, to determine the properties of all coating used in this Permit.

### 6. Reporting and Recordkeeping

- A. For surface coating sources:
  - 1. Schlosser shall record the following information for the sources covered under this Operating Permit:
    - a. Hours of operation of each individual source;
    - b. Daily coating quantity in gallons and pounds of coating as applied and,

### **Compliance Permit Conditions Permit**

No. OP-46-0051 Schlosser Steel, Inc.

#### Conditions (continued):

- c. The coating composition:
  - (1) percent solids by volume
  - (2) percent solvent by volume
  - (3) percent water by volume
  - (4) pounds of VCC per gallon minus water
  - (5) solvent density
- 2. An updated listing of the types and compositions of the coatings and diluents used in the aforementioned sources shall be submitted to the Department upon request.
- 3. Schlosser shall record on a daily basis the following:
  - a. coating density before and after additional diluents
  - b. gallons of diluents used
  - c. density of the diluents used
  - d. weight percent of the organic volatilize in each coating
- 4. Schlosser shall submit a report to the Department on a quarterly basis summarizing the actual and allowable daily VOC emissions (minus water) from each source indicated in Condition 4 of this operating Permit and using methods described herein. The report shall list days of noncompliance and shall be in a format approved by the Department.
- Schlosser shall keep all records for Hatfield facility of operator training course, leak inspection and maintenance plan, and cleaning solvent accounting system.
- Schlosser shall keep all records and tests generated under this permit for a period of two (2) years and make them available to the Department at its request.
- B. For sources regulated under 25 PA Code §129.91-95.

Schlosser shall keep records to demonstrate compliance with §129.95 of Pennsylvania RACT regulations. All records shall be maintained at the facility for at least two (2) years and will be made available to the Department upon request. Recordkeeping shall be conducted for VOC sources that are identified in the RACT proposal and shall include, *where appropriate*, material throughputs, or number of batches. Chemical usage, inventory records, and material balances shall be used to calculate VOC emissions using the Departments approval. All recordkeeping requirements from existing permits shall continue to be met.

7. The permittee shall complete implementation of RACT according to the following schedule:

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# Conditions (continued):

RACT Implementation Schedule

- A. Develop leak inspection and maintenance plan by March 15, 1995.
- B. Develop and implement a cleaning solvent Accounting System by April 1, 1995.
- C. Complete operator training by April 15, 1995.
- D. All proposed RACT monitoring and recordkeeping measures shall be fully implemented upon issuance of this permit.
- 8. The expiration date shown on the Operating Permit OP-46-0051 is for State proposes only. For Federal enforcement purposes the Operating Permit shall rain in effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed pursuant to 40 CFR 51 and approved by United States Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by EPA upon its approval of the above as a revision to the SIP.

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