

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHCENTRAL REGION - FIELD OPERATIONS
AIR QUALITY PROGRAM

RACT OPERATING PERMIT

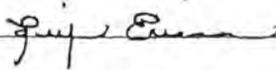
In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source described below.

Permit No: <u>07-02010</u>	Source & Air Cleaning Device: <u>Copper and Brass Tubing</u>
Owner: <u>Small Tube Manufacturing, LLC</u>	Production Facility <u>(See Attached)</u>
Address: <u>PO Box 1674</u> <u>Altoona, PA 16603-1674</u>	
Attention: <u>Mr. Clint Blunier</u> <u>General Manager</u>	Location: <u>Allegheny Township, Blair County</u>

This 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. in compliance with the specifications and conditions of the Reasonably Available Control Technology (RACT) plan;
 - 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.
3. See attached.

Issued: February 27, 2006


Program Manager

Southcentral Region 07-02010
Altoona District
Permits

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SMALL TUBE MANUFACTURING, LLC

Source, Continued

The volatile organic compounds (VOC) emissions from this facility are the result of the use and application of VOC-containing solvents used within four production areas of the copper and brass tubing processing operation. This operation includes the following: 11 block draw machines, one Capstan block draw machine, 15 tubing straighteners, one degreaser/test tank, one deburring/degreasing station, and five finishing coil winders. These workstations, engaged in the production of copper and brass tubing products, have been designated as the source. All VOC emissions are fugitive and no control device is necessary or appropriate.

Conditions, Continued

3. Total annual VOC emissions from the facility shall not exceed 73 tons. The 73-ton per year limit shall be based on the current 12-month running total and shall include the VOC emissions associated with the copper and brass tubing manufacturing process.
4. The total VOC emission rate shall not exceed 11.8 pounds of VOC emitted per ton of copper and brass tubing produced during any consecutive 12-month running total.
5. Storage buckets, containers, etc. used for the storage, transfer of use of VOC-containing solvents, spent cleanup solvent, or spent cotton wicks shall be equipped with self-closing safety lids, where applicable. If self-closing safety lids are not available or practical, the company shall take adequate measures to ensure that such containers are closed in such a manner that prevent excessive emissions of VOCs.
6. Records of solvent use on each of the 15 tubing straighteners, and each of the five coil winders shall be maintained for each shift that the equipment is in operation. These records shall be maintained at the above location and be made available to the Department at any time.
7. Records of solvent used at the degreaser/test tank and the deburring/degreasing station shall be maintained. At a minimum, each time that solvent is replenished to these tanks, the quantity of fresh solvent replenished shall be recorded.
8. The solvent quantities determined in Conditions 6 and 7 above, shall be totaled on a monthly basis. This monthly total shall be added to the previous 11 monthly totals to determine the solvent use and VOC emissions for the consecutive 12-month running total.
9. On a monthly basis, the total tons of straightened copper and brass tubing produced shall be maintained and the sum of the previous consecutive 11-month totals, in tons, shall be calculated. This total along with the total VOC emissions determined in Condition 8 above shall be used to determine compliance with the VOC emission rate specified in Condition 4 above.

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Conditions, Continued

10. For all VOC-containing solvents at the facility, annual reports containing, but not limited to, the following data shall be submitted to the Altoona District Supervisor:
- a. Chemical Stock No./Name and Manufacturer
 - b. Chemical Use (e.g., degreasing agent)
 - c. Density in Pounds per Gallon
 - d. VOC Constituent(s) of Each Chemical Used
 - e. Percent Solvents (by weight) of the VOC Constituent(s) of Each Chemical
 - f. Gallons per Month of the Chemical Used during Each Calendar Year
 - g. Pounds per Year of VOC Emissions from Each Chemical
 - h. Monthly VOC Emissions, in Pounds, for the Reporting Period
 - i. Total VOC Emissions, in Pounds, for the Reporting Period
 - j. Monthly Copper and Brass Tubing Production, in Tons, for the Reporting Period
 - k. Pounds of VOC Emitted per Ton of Copper and Brass Tubing Produced a Monthly Basis and Overall Total for the Reporting Period
 - l. Monthly VOC Emission Rate, Reported as Pounds of VOC Emissions per Ton of Copper and Brass Tubing Produced, as required by Condition 4

Each report (January 1 through December 31) is due no later than March 1 of the following year for each operating year authorized by the operating permit or its renewal.

11. Should credits be desired for those cleanup solvents sent off-site for either recycling or incineration at a legally permitted facility, the following information will be required:
- a. The quantities being disposed of.
 - b. The VOC content of the cleanup solvents being disposed of.
 - c. Documentation to verify the above.
12. Manufacturer supplied VOC Data Sheets and/or Material Safety Data Sheets for all chemicals used and cleanup solvents utilized at the facility within the most recent two years shall be maintained at the above location and be made available to the Department at any time.
13. The degreaser/testing tank and the deburring/degreasing station are subject to and shall comply with the requirements of 25 Pa. Code § 129.63.
14. Records shall be maintained in accordance with 25 Pa. Code § 129.95.

