

revised

file

ER-AQ-28  
Rev: 6/79

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

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>39-0031</u>	Source &	<u>Paint Lines &amp; Baking Ovens</u>
Owner	<u>Stanley Storage Systems, Inc.</u>	Air	<u>VMB Catalytic Oxidizer</u>
Address	<u>11 Grammes Road</u>	Cleaning	<u>&amp; Compliance Coatings</u>
	<u>P. O. Box 1151</u>	Device	<u></u>
	<u>Allentown, PA 18103</u>	Location	<u>City of Allentown</u>
Attention:	<u>Mr. Thomas R. Brobst</u>		<u>Lehigh County</u>
	<u>Facilities Manager</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 plan approval issued under the same number;
  - (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.

Failure to comply with the conditions placed on this permit is in violation of Section 27.444. 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 JUN 12 1998

*Thomas A. DiLazaro*  
 Thomas A. DiLazaro  
 Program Manager  
 Air Quality Program

JUN 12 1998
FACILITY: _____
PERMIT: _____
FILE #: _____

- (3) The following Operating Permits have been issued for this facility, any NOx and/or VOC conditions associated with these permits will be incorporated into this RACT Operating Permit upon revision of the SIP.

<u>Permit No.</u>	<u>Source</u>	<u>Air Cleaning Device</u>
39-318-074C	Paint Spray Line	Cat. Oxidizer
39-323-003	Pyrolysis Furnace	

- (4) For the paint line and VMB catalytic oxidizer
- (a) Temperature sensing and recording devices shall be installed to monitor both the pre-catalyst temperature and the post-catalyst temperature. The catalytic incinerator shall maintain an outlet operating temperature between 625°F and 700°F.
- (5) For the pyrolysis cleaning furnace and secondary burner
- (a) Temperatures shall be recorded whenever the furnace is in operation. The operating temperature of the Pyrolysis Cleaning Furnace shall be maintained between 1500°F and 1650°F. The

recording charts shall be made available to Department personnel upon request. These records shall be maintained for a period of time not less than six months.

- (6) This Operating Permit includes Reasonable Available Control Technology (RACT) determinations for spray paint operations (VOC's) for the following sources as required by Title I of the Clean Air Act Amendments; and by the 25 Pa. Code, Section 129.41-4 of the Rules and Regulations of the Department of Environmental Protection.
- (a) New Line Spray Booth (A1 through A6)
  - (b) New Line Spray Booth (B1 through B3)
  - (c) New Line Bake Oven
  - (d) Batch Spray Booth
  - (e) Batch Line Bake Oven
  - (f) Old Line Spray Booth (A through E)
  - (g) Old Line Bake Oven
  - (h) Equipment Clean-up
- (7) The permittee shall keep on hand chemical composition data for all the coatings used in the spray paint lines, and shall record on a daily basis the amount of these coatings and any Volatile Organic Compound (VOC) solvent usage for this process.
- (8) The spray paint lines are already subject to emission regulations contained in Section 129.52. The company shall maintain these emission limits as described in the RACT plan submitted and as described in this operating permit.
- (9) The total VOC emissions (coatings and cleaning solutions, and any other materials used at this facility which contains VOC's) are limited to the following:
- | <u>Pollutant</u>           | <u>Never to Exceed</u>        |
|----------------------------|-------------------------------|
| VOC (12 Month Rolling Sum) | 275 Tons/12 Month Rolling Sum |
- (10) Clean-up solvents are to be recycled as described in the RACT application. Actual VOC emissions are to be calculated and usage amounts to be recorded. Recordkeeping shall be in a format approved by the Department.
- (11) Recordkeeping 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 this operating permit, 25 Pa. Code Section 129.95, such that records provide sufficient data and calculations to clearly demonstrate that the requirements of 25 Pa. Code Sections 129.91-4 are met. The file shall include, but not be limited to: a record of all VOC containing compounds used at the facility as well as calculations on the entire facilities VOC emissions

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(updated monthly): 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 data on which such measurements, records or data are recorded. These records shall be made available to the Department upon request.