ER-40-28 Rev: 6/79

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES 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 Resources, the Department hereby issues this permit for the operation of the air contamination source described below.

39-0002	Source &	(See Condition 3)
1139 Lehigh Avenue	Air	
Whitehall, PA 18052-5599	Cleaning	(Source Specific)
	Device	
Wayne J. Switzer Manager Environmental, Health & Safety	Location	1139 Lehigh Avenue Whitehall Township Lehigh County
	Tarkett, Inc. 1139 Lehigh Avenue Whitehall, PA 18052-5599 Wayne J. Switzer	Tarkett, Inc. 1139 Lehigh Avenue Air Whitehall, PA 18052-5599 Cleaning Device Wayne J. Switzer Location Manager

is permit is subject to the following conditions:

- 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.
- This permit is valid only for the specific equipment, location and owner named (2)

SEE ATTACHED.

Failure to comply with the conditions placed on this permit is in 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 Resources will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

MAY 31 1995

Thomas A. DiLazaro Program Manager

Air Quality Program

Issued

- (3) This Operating Permit incorporates Reasonable Available Control Technology (RACT) determinations for Nitrogen Oxides (NOx) and Volatile Organic Compounds (VOC's) as required by Title I provisions of the CAAA, and 25 PA Code Section 129.91 through 129.95 for the sources listed in the following table. This Operating Permit supersedes the Operating Permits issued for the sources which are listed in the table. The terms and conditions of the Operating Permits found in the table are included in this Operating Permit.
 - (A) The RACT for VOC emissions from the sources listed below shall never exceed the following:

(1)(a)	SOURCE	<pre>VOC LIMIT (ton/year)</pre>	Permit Number	
	Saturator	50.0	39-318-075	
	4 Meter Line	214.4	39-313-028 (Curing	Oven)
	(4 Meter Line Curing Oven & Urethane Coater)		39-318-085 (Uretha	ne Coating)
	Printer (12 ft.			
	Rotogravure)	27.6	39-313-025	
	Felt Mill (Hydropulper & Paper Machine)	18.48		
	Resin Mix Room	15.48	39-313-008	
	Ink Blending Room	15.37	NONE	

- (b) All clean-up solvent usage operations must comply with Best Available Technology to minimize VOC emissions. All cleaning operations must store new and used cleaning solvents in closed containers. A record of the quantity, identity, usage and recovery of all VOC's used in clean-up operations for the entire facility must be calculated on a monthly basis (12 month rolling sum).
- (B) THe RACT for NOx emissions from the entire facility shall never exceed the following:
 - Less than 100 tons of NOx per year (12 month rolling sum).
 - (2) Emission limits must be confirmed through fuel records and AP-42 emission calculations.

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NOx EMISSION SOURCE	NUMBER OF UNITS	
Boiler #6	1	
Boiler #5	1	
Print Dryers	6	
Hot Oil Heater	1	
4 Meter Line Dryers	14	
Saturator IR Cure	1	
Paper Machine Dryer	1	
Reeco Oxidizer	2	
Hot Water Heaters	4	
Space Heaters	21	

39-313-008 - Resin Mix Room:

- (1) This permit covers the following sources:
 - a. Six (6) basecoat resin mixing tanks and one (1) drum mixer - Dusty Dustless Baghouse JA-120-S.
 - Five (5) Topcoat resin mixing tanks Dusty Dustless Baghouse JA-120-S.
 - Bulk resin handling system Semco DCV-260 fabric collector.
- (2) The aforementioned source(s) may be operated and used only so long as any associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.
- (3) The company shall keep on hand a sufficient quantity of spare fabric collector bags for the fabric collector(s) associated with the aforementioned source(s) in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the source(s) and fabric collector(s).
- (4) The storage and handling of the material collected in the air cleaning device(s) associated with the aforementioned source(s) shall not at any time result in the emission of fugitive air contaminants in excess of the limitations specified in Section 123.1 of Chapter 123 of the Rules and Regulations of the Department of Environmental Resources.
- (5) The fabric collector(s) must be equipped with a device for monitoring the pressure differential across the collector(s).

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39-313-025 - 12' Rotogravure Printer and Associated Dryers:

- Tarkett shall maintain the following information for all the coatings used in conjunction with rotogravure printer. These records shall be maintained for a period of two years and shall be made available to the Department upon request.
 - a. Daily coating quantity in gallons of coating as applied.
 - b. The coating composition.
 - Percent solids by volume
 - 2. Percent solvent by volume.

 - Percent water by volume
 Pounds of VOC per gallon minus water.
 - Solvent density
- (2) Tarkett shall record the quantity and identity of all VOC solvents used for cleanup purposes on the rotogravure printer on a daily basis. These records shall be maintained for a period of two years and shall be made available to the Department upon request.
- Tarkett shall maintain a temperature measuring and recording device on the Reeco thermal incinerator that shows the temperature of the gases exiting the combustion chamber or zone.
- The company shall maintain on hand copies of the temperature monitoring records for a period of two (2) years and shall make these records available to the Department upon request.
- (5) The company shall abide by the Preventative Maintenance Plan/Contract for the REECO Incinerator submitted to the Department on October 5, 1993. The company shall also maintain on hand records of visits as outlined in the Reeco Incinerator Preventive Maintenance Plan/Contract for a period of two (2) years. The company shall make these records available to the Department upon request.

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39-313-028 - 4-METER CURING OVEN:

- (1) The company must record the following information for the sources covered under this Operating Permit:
 - Daily coating quantity in gallons of coating as applied.
 - b. The coating composition.
 - 1. Percent solids by volume
 - Percent solvent by volume.
 - Percent water by volume
 - Pounds of VOC per gallon minus water.
 - 5. Solvent density
- (2) The information required by Condition 1 shall be submitted in the identical format currently in use by the company; and, is submitted on a quarterly basis to the Department. This information shall be submitted within thirty (30) days after the end of the quarter.
- (3) Tarkett shall maintain a temperature measuring and recording device on the Reeco thermal incinerator that shows the temperature of the gases exiting the combustion chamber or zone.
- (4) The company shall maintain on hand copies of the temperature monitoring records for a period of two (2) years and shall make these records available to the Department upon request.
- (5) The company shall abide by the Preventative Maintenance Plan/Contract for the REECO Incinerator submitted to the Department on October 5, 1993. The company shall also maintain on hand records of visits as outlined in the Reeco Incinerator Preventive Maintenance Plan/Contract for a period of two (2) years. The company shall make these records available to the Department upon request.

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39-318-075 - Two Gell Units/One Oil Heater:

- (1) VOC emissions from this source shall never exceed 50 tons per year.
- (2) The aforementioned source(s) may be operated and used only so long as any associated air pollution control specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.
- (3) 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 Resources) 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).
- (4) Tarkett shall maintain daily coating formulations and the quantity in pounds of coating as applied. These records shall be maintained for a period of two (2) years and shall be made available to the Department upon request.
- (5) Tarkett shall record the quantity and identity of all VOC solvents used for cleanup purposes on the Drum Gell Units on a daily basis. These records shall be maintained for a period of two years and shall be made available to the Department upon request.
- (6) The Clermont Demister must be equipped with a device for monitoring the pressure differential across the collector.

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39-318-085 - Urethane Coating Operation:

- (1) The company must record the following information for the sources covered under this Operating Permit.
 - Daily coating quantity in gallons of coating as applied.
 - b. The coating composition.

 - Percent solids by volume
 Percent solvent by volume.
 - Percent water by volume
 - 4. Pounds of VOC per gallon minus water.
 - Solvent density
- (2) The information required by Condition 1 shall be submitted in the identical format currently in use by the company; and, is submitted on a quarterly basis to the Department. This information shall be submitted within thirty (30) days after the end of the quarter.
- (4) Record keeping 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 is operating permit, 25 PA Code Section 129.95, such that records provide sufficient data and calculations to clearly demonstrate that the requirements of PA Code Sections 129.91-4 are met. The file shall include, but not be limited to: a record of all VOC containing

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compounds used at the facility as well as calculations on the individual source emissions and entire facilities VOC emissics (updated emissions (updated monthly/12 month rolling sum); the felt will must maintain monthly records of the hydropulper feed materials for all batches, the paper machine slurry feed rates and hours of operation; the 4 Meter Line must maintain monthly records of the urethane types, urethane usage, and hours of operation; 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 date on which such measurements, records or data are recorded. These records shall be made available to the Department upon request.

(5) If requested by the Department, the company shall perform a stack test in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Resources within the time specified by the Department.