

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

ORC
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-49-0005</u>	Source &	<u>fiberglass reinforced plastics</u>
Owner:	<u>Truck Accessories Group East,</u> <u>A Division of Truck Accessories</u> <u>Group, Inc. (Leer)</u>	Air	<u>manufacturing and surface</u>
Address:	<u>200 Housels Run Road</u> <u>Milton, PA 17847</u>	Cleaning	<u>coating operations and</u>
Attn:	<u>David A. Walter,</u> <u>Quality Assurance Manager</u>	Device:	<u>associated activities</u>
		Location:	<u>Milton Borough</u> <u>Northumberland County</u>

This permit is subject to the following conditions:

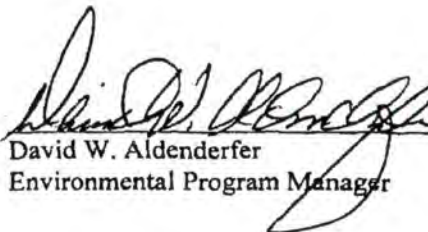
1. That the source(s) and any associated air cleaning device(s) are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of the applicable plan approval(s) issued;
 - c. operated and maintained in a manner consistent with good 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:

MAR 26 1999


David W. Aldenderfer
Environmental Program Manager

cc: Harrisburg
File

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3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by the provisions of Title I of the Clean Air Act Amendments and 25 Pa. Code Sections 129.91 through 129.95 for the following sources:
 - a. fiberglass reinforced plastics truck cap manufacturing operation consisting of two gel coat booths (only 1 of which may be used at any given time), one chopped fiberglass/resin spray lay-up booth or station, an air dry and cure area and associated gel coat and resin spray equipment/roll up equipment cleanup activities
 - b. fiberglass reinforced plastics truck cap surface coating operation consisting of five paint spray booths, a drying oven and associated paint spray equipment cleanup activities
 - c. truck cap surface preparation area
 - d. resin storage tank
 - e. paint mixing room
4. The expiration date shown in this permit is for state purposes. For federal enforcement purposes the conditions of this operating permit which pertain to the implementation of RACT regulations shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency (EPA).
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, all gel coat and lamination resins used in the fiberglass reinforced plastics truck cap manufacturing operation identified in condition 3 herein shall contain no more than 35% styrene by weight. Additionally, all gel coat and lamination resins used in the respective operation shall contain vapor-suppression agents.
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, all gel coat and resin sprayed in the fiberglass reinforced plastics truck cap manufacturing operation identified in condition 3 herein shall be applied using airless or air-assisted airless spray systems (or equivalent or better, as determined by the Department).
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, the fiberglass reinforced plastics truck cap manufacturing operation identified in condition 3 herein shall at all times be operated in accordance with the requirements specified in conditions 14 and 15 herein. Additionally, the only cleaning solvents or solutions which may be used for gel coat and resin spray equipment/roll up

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equipment cleanup activities associated with the fiberglass reinforced plastics truck cap manufacturing operation are acetone and solvents or solutions which contain less than 2.0 pounds of volatile organic compounds per gallon of solvent or solution. All solvents or solutions used for gel coat and resin spray line cleaning shall be flushed into closed containers and shall be done so under the minimum pressure possible. Under no circumstances shall cleanup solvent or solution be removed from gel coat and resin spray lines by spraying through a spray gun into the air. Under no circumstances shall cleanup solvent or solution be removed from gel coat and resin spray lines by spraying through a spray gun at a pressure which would unnecessarily promote atomization of the solvent or solution.

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, the fiberglass reinforced plastics truck cap surface coating operation identified in condition 3 herein shall at all times be operated in accordance with the requirements specified in conditions 17, 18, 19 and 21 herein. Additionally, all clear coatings (transparent top coats) used in the subject surface coating operation shall contain no more than 4.5 pounds of volatile organic compounds per gallon of coating, as applied.
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, the only cleaning solvents or solutions which may be used in the truck cap surface preparation area identified in condition 3 herein are acetone and solvents or solutions which contain less than 2.0 pounds of volatile organic compounds per gallon of solvent or solution. Additionally, all solvents or solutions used in this area must be applied by hand wiping. None are to be spray applied. All containers of cleaning solvents or solutions used in this area shall be kept closed when not in actual use and all solvent or solution-wet rags, etc. shall be stored in closed containers when not in actual use. Under no circumstances shall waste cleaning solvent or solution from this area be disposed of via evaporation or solvent or solution-wet rags, etc. be treated or pretreated prior to disposal or reuse by subjecting them to air drying or any other means of solvent or solution removal which would cause solvent or solution to unnecessarily be evaporated into the air.
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.
 - paint mixing room
 - resin storage tank

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11. Pursuant to Section 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the permittee shall maintain such records as are necessary to demonstrate compliance with all RACT requirements contained herein. These records shall include, but are not necessarily limited to,:

- all of the information required by condition 22 herein
- the identity, styrene content (% by weight) and amount of each gel coat used during each individual month in the fiberglass reinforced plastics truck cap manufacturing operation identified in condition 3 herein
- the identity, styrene content (% by weight) and amount of each lamination resin used during each individual month in the fiberglass reinforced plastics truck cap manufacturing operation identified in condition 3 herein.
- The identity, volatile organic compound content (% by weight) and amount of each solvent or cleaning solution used during each individual month for gel coat and resin spray equipment/roll up equipment clean up activities associated with the fiberglass reinforced plastics truck cap manufacturing operation identified in condition 3 herein
- The amount of spent cleanup solvent or solution generated during each individual month from the gel coat and resin spray equipment/roll up equipment cleanup activities associated with the fiberglass reinforced plastics truck cap manufacturing operation identified in condition 3 herein which is shipped off-site in liquid form
- The identity, volatile organic compound content (% by weight) and amount of each cleanup solvent or solution used in during each individual month in the truck cap surface preparation area identified in condition 3 herein

All of the records generated pursuant to this condition shall be retained on-site for at least two years and shall be provided to the Department upon request. Additionally, all records generated for each calendar quarter shall be submitted to the Department by no later than the 30th day of the month following the respective calendar quarter (reports due each April 30, July 30, October 30 and January 30).

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12. This operating permit is issued for the operation of a fiberglass reinforced plastics truck cap manufacturing operation consisting of one gel coat booth or station and one chopped fiberglass/resin spray layup booth or station as well as any associated curing areas and equipment cleanup activities. The exhausts from the gel coat and spray layup booths or stations shall be equipped with filters.
13. The permittee shall perform such stack testing upon the fiberglass reinforced plastics truck cap manufacturing operation as the Department may request.
14. The permittee shall, wherever and whenever possible, utilize cleanup solvent handling practices designed to minimize the evaporation of cleanup solvent into the atmosphere. Under no circumstances, shall cleanup solvent be stored in uncovered containers or be disposed of by allowing it to evaporate into the atmosphere.
15. The combined volatile organic compound and acetone emissions from the fiberglass reinforced plastics truck cap manufacturing operation, including any emissions occurring from associated cleanup activities, shall not exceed 55 tons per year (as determined by the Department).
16. This operating permit is used for the operation of a truck cap surface coating operation consisting of 5 paint spray booths as well as any associated drying/curing and equipment cleanup activities.
17. Pursuant to the best available technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the total volatile organic compound emissions from the respective truck cap surface coating operation, including the volatile organic compound emissions from any associated cleanup activities, shall not exceed 93.9 tons per year (as determined by the Department).
18. Pursuant to the best available technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, none of the coatings applied in the respective truck cap coating operation shall contain volatile organic compounds in excess of 6.28 pounds of volatile organic compounds per gallon of coating (minus water), as mixed for application. (The solvent density adjustment discussed in Section 129.52 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection need not be applied in determining compliance with this limitation). Note: Clear top coats are also subject to an additional restriction contained in condition 8 of this operating permit.

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19. Pursuant to the best available technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, all coatings applied in the respective surface coating operation shall be applied using high volume low pressure (HVLV) spray systems (or spray systems having an equivalent, or better, transfer efficiency, as determined by the Department).
20. Pursuant to the best available technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the spray booths incorporated in the surface coating operation shall be equipped with exhaust filter media having a minimum particulate removal efficiency of 99% at any time that surface coating is occurring in the booths.
21. Pursuant to the best available technology provisions of Sections 127.1 and 127.12 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, all solvents used for spray line cleaning shall be flushed into closed containers and shall be done so under the minimum pressure possible. Under no circumstances shall cleanup solvent be removed from spray lines by spraying through a spray gun into the air. Under no circumstances shall cleanup solvent be removed from spray lines by spraying through a spray gun at a pressure which would unnecessarily promote atomization of the solvent. All containers of coating components and cleanup solvent shall be kept closed when not in actual use and solvent-wet rags, etc. shall be stored in closed containers when not in actual use. Under no circumstances shall waste coating components or waste solvent be disposed of via evaporation or solvent-wet rags, etc. be treated or pretreated prior to disposal or reuse by subjecting them to air drying or any other means of solvent removal which would cause solvent to unnecessarily be evaporated into the air.
22. The permittee shall maintain comprehensive accurate records of the coating components and cleaning solvents used in the respective truck cap surface coating operation on a monthly basis. These records shall be maintained such that compliance with the emission limitations specified in both condition 17 and condition 18 herein, as well as condition 8 herein, can be readily determined from an examination of said records. At a minimum, these records shall contain the following for each month:
 - a. the identity, quantity and volatile organic compound content of every individual volatile organic compound-containing component, cleanup solvent and other material used in the truck cap surface coating operation during the month.
 - b. the mix ratio the automatic clearcoat proportioner system was set at during the month as well as the identity and quantity of each component mixed in the proportioner during that month (Note: If the mix ratio is changed during the month, the quantity of each component used at each different mix ratio must be recorded).

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- c. the actual mix ratio used for every batch of clearcoat mixed manually during the month (if any) as well as the identity and quantity of each component used for each individual manually-mixed batch of clearcoat.
- d. the identity and quantity of each component mixed together for each individual batch of every type of coating (primer, basecoat, colorcoat, etc), other than clearcoat, mixed during the month.
- e. the quantity and volatile organic compound content of the waste coatings generated during the month.
- f. the identity and quantity of all cleanup solvents used during the month exclusively for cleanup activities associated with the truck cap surface coating operation.
- g. the amount of spent cleanup solvent generated during the month exclusively by the cleanup activities associated with the truck cap surface coating operation which is shipped off site in liquid form.

The permittee shall also submit such updated coating component, cleanup solvent, etc. composition data and/or waste coating/waste solvent volatile organic compound analyses as the Department may request.

- 24. 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 applications(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any condition set forth herein.

