

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - BUREAU OF AIR QUALITY

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-23-0008</u>	Source(s)	<u>Facility VOC Sources</u>
Owner	<u>Zenith Products Corporation</u>	Air	<u></u>
Address	<u>200 Commerce Drive</u>	Cleaning	<u></u>
	<u>Aston, PA 19014</u>	Device	<u></u>
Attention	<u>Mr. Briggs Fletcher</u>	Location	<u>Commerce Drive</u>
	<u>Director, Industrial Engineering</u>		<u>Aston Township</u>
			<u>Delaware County</u>

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

(SEE ADDITIONAL CONDITIONS ATTACHED)

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.

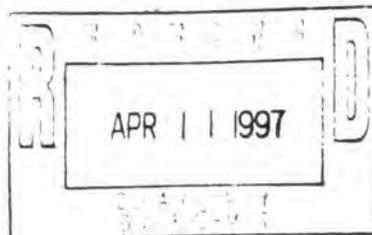
Issued 04/07/1997

Expires ~~04/07/2002~~

Francine Carlini

Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (KAL)35.15



OPERATING PERMIT CONDITIONS
PERMIT NO. OP-23-008
ZENITH PRODUCTS CORPORATION

CONDITIONS (continued):

3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the Clean Air Act Amendments, and 25 Pa. Code Section 129.91 through 129.95 for two spray booths, cleanup operations and two cold cleaning degreasers.
4. The expiration date shown in this operating permit, is for state purposes only. For Federal enforcement purposes the RACT provisions of the operating permit 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). ~~The operating permit shall become enforceable by the US EPA upon its approval of the above as a revision to the SIP.~~

5. **RACT Implementation**

- A. Reasonably Available Control Technology (RACT) for the cleanup operations shall be administrative controls and include the following:

1. **Operator Training Course**

The company shall implement a training program for all new and existing personnel who are involved with coating or cleaning operations. All personnel shall be given refresher training annually. The training program shall include the following:

- i. A list of all personnel by name and job description that are required to be trained;
- ii. An outline of the subjects to be covered in the initial and refresher training for each person or group of personnel;
- iii. Lesson plans for courses to be given at the training that include appropriate application techniques to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
- iv. A description of the methods to be used at the completion of training to demonstrate and document successful completion.

**OPERATING PERMIT CONDITIONS
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ZENITH PRODUCTS CORPORATION**

CONDITIONS (continued):

1. Leak Detection and Maintenance Program

The company shall prepare and maintain a written leak inspection and maintenance plan that provides for the following:

- i. At a minimum, a monthly visual inspection for all equipment used to transfer or apply finishing materials or organic solvents;
- ii. Maintenance of a log documenting the date and results of each inspection and any repairs that were made;
- iii. A first attempt at repair to be made no later than 5 working days after the leak is detected; and
- iv. Final repairs to be made within 15 working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.

3. Cleaning Solvent Accounting system

The company shall develop an organic solvent accounting program to record the following:

- i. The quantity and type of organic solvent used for cleanup;
- ii. The quantity of spent organic solvent generated from cleanup activities, and whether the solvent is recycled on-site or disposed off-site; and
- iii. The monthly quantity of organic solvent used for cleanup disposed off-site and recycled on-site; and report these monthly usages once per year or as requested by DEP.

4. Material Storage

The company shall use closed containers for storing coating and cleaning materials.

5. Cleanup Solvent Management

The company shall pump or drain all organic solvent used for line and spray gun cleaning into a closed container.

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CONDITIONS (continued):

- B. Reasonably Available Control Technology (RACT) for small degreaser shall be the following:

Small degreaser to be equipped with:

- i. Equipment for draining cleaned parts.
- ii. A permanent, conspicuous label summarizing the operating requirements.

Small degreaser to be operated in accordance with the following requirements:

- iii. Do not dispose of waste solvent or transfer it to another party, such that greater than 20% of the waste solvent (by weight) can evaporate into the atmosphere; store waste solvent only in covered containers.
- iv. Cover degreaser whenever not in use.
- v. Drain cleaned parts for at least 15 seconds or until dripping ceases.

- 6. The company shall operate the two spray booths in compliance with 25 PA Code § 129.52.
- 7. The company shall operate the large degreaser in compliance with 25 PA Code § 129.63(a).
- 8. The company must record the following information for the sources covered under this Operating Permit:

A. Monthly coating quantity in gallons and pounds of coating as applied and.

B. The coating composition:

- i. percent solids by volume
- ii. percent solvent by volume
- iii. percent water by volume
- iv. pounds of VOC per gallon minus water
- v. solvent density

C. The quantity of VOC solvent used for cleanup purposes in the facility on a daily basis.

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CONDITIONS (continued):

9. Recordkeeping and Reporting Requirements:

The company shall maintain records in accordance with the minimum recordkeeping requirements of 25 PA Code § 129.95. At a minimum, this shall include:

- A. Records shall provide sufficient data and calculations to clearly demonstrate that the requirements of Condition # 5 are met.
- B. Data or information required to determine compliance with Conditions # 6 and # 8 shall be recorded and maintained in a time frame consistent with the averaging period of requirements in a permanently bound log book.
- C. Records required under this Operating Permit shall be kept for a minimum period of two years and shall be made available to the Department upon its request.

10. ~~The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.~~

11. General Conditions

- A. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rule and Regulations of the Department of Environmental Protection, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rule and Regulations of the Department of Environmental Protection, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.
- B. The company, within one hour of occurrence, shall notify the Department, at 610-832-6242, of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly by resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection. A written report shall be submitted to the Department within two working days following the incident describing the malfunctions and corrective action taken.

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CONDITIONS (continued):

- C. If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rule and Regulations of the Department of Environmental Protection) 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).

12. Any notification required as a result of any condition herein should be directed to :

Regional Air Quality Manager
Pennsylvania Department of Environmental Protection
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
Telephone: 610-832-6242

Re 30 (KAL)35.16