

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

COPY

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>36-2022</u>	Source & Air Cleaning Device: <u>Surface Coating Operation</u>
Owner: <u>Bird-In-Hand Wood Works, Inc.</u> <u>Childcraft, Inc./Mfg. Division</u>	<u>(See Attached)</u>
Address: <u>3031 Industry Drive</u> <u>Lancaster, PA 17603</u>	
Attention: <u>Mr. John Steffy</u> <u>Director, Plant Operations</u>	Location: <u>East Hempfield Township</u> <u>Lancaster 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. This operating permit is valid for a limited time only and may be renewed before its expiration. Requests for an operating permit renewal must be in writing and must be accompanied by a fee in the amount of \$600 payable to the "Commonwealth of Pennsylvania - Clean Air Fund." The request should be made on the attached Interim Application for Renewal of a Permit to Operate form and must be received by the Department along with a completed Compliance History form (attached) no later than JAN 1 2000.
4. See 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: SEP 27 1995
Expires: June 30, 2000

[Signature]
Program Manager

Southcentral Region 36-2022
Lancaster District
EPA, Region III
Permits

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BIRD-IN-HAND WOODWORKS, INC.

CHILDCRAFT, INC./MFG. DIVISION

Source, Continued

The surface coating operation includes the following sources:

<u>Source</u>	<u>Manufacturer</u>
#1 Curtain Coater	Gasway
#2 Spray Booth	Graco
#3 Spray Booth	Graco
#4 Spray Booth	Graco
#5 Curtain Coater	Gasway

Conditions, Continued

4. The company shall use air assisted airless or high volume low pressure (HVLP) spray guns for spray booths.
5. The volatile organic compound (VOC) emissions from the surface coating operation including clean-up covered under the Operating Permit No. 36-2022 shall never exceed 49 tons per year calendar year, 500 pounds per day or 100 pounds per hour. The calendar year is from 12:00 a.m. January 1 through 11:59 p.m. December 31. The rate of emissions per day is emissions from 12:00 a.m. through 11:59 p.m. on the same calendar day.
6. The coatings, as applied, for wood furniture finishing operation shall be in compliance with 25 Pa. Code, §129.52, Table I, Item No. 11.
7. Annual reports including coating identification, type of coating (clear topcoat, etc.), pounds of VOC per gallon of coating minus water, coating density, solvent density, consumption of coatings per year, pounds per year of VOC emissions, and total hours per year of operation shall be submitted to the Lancaster District Supervisor. 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 permit or its renewal. Also, the report must contain monthly usage of coatings and its VOC emissions.
8. Any new coating or any compositional change in an existing coating shall be reported to the Lancaster District Supervisor prior to its use. Information to be reported shall include as specified in Condition 7.
9. Manufacturer supplied VOC Data Sheets and/or Material Safety Data Sheets for all coatings applied at this facility within the most recent two years shall be maintained at the above location and be made available to the Department at any time.

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BIRD-IN-HAND WOODWORKS, INC.

CHILDCRAFT, INC./MFG. DIVISION

Conditions, Continued

10. Waterborne topcoats shall be used for all three spray booths. Waterborne sealers for all three spray booths shall be used effective September 1, 1995. The company will continue its efforts to change conventional finishes in curtain coaters to waterborne finish.
11. The company shall maintain an organic solvent accounting form to record quantity and type of solvent used, quantity of spent organic solvent generated, disposed off-site, and recycled on-site, etc.
12. The company shall implement a training program for all new and existing personnel involved in finishing and cleaning operations. A copy of the training program must be maintained with the work practice implementation plan. A training program shall include, at a minimum, the following:
 - a. A list of all personnel by name and job description that are required to be trained;
 - b. An outline of the subjects to be covered in the initial and refresher training for each person, or group of personnel;
 - c. Lesson plans for courses to be given at the initial and the annual refresher training to minimize VOC emissions that include, at a minimum, appropriate application techniques, appropriate cleaning procedures, appropriate equipment setup, and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - d. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
13. The company shall maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
 - a. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply finishing materials or organic solvents;
 - b. An inspection schedule;
 - c. Methods for documenting the date and results of each inspection and any repairs that were made; and

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BIRD-IN-HAND WOODWORKS, INC.

CHILDCRAFT, INC./MFG. DIVISION

Conditions, Continued

~~d. The time frame between identifying a leak and making the repair, which adheres to the following schedule:~~

~~(1) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five (5) working days after the leak is detected, and~~

~~(2) Final repairs shall be made within fifteen (15) working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three (3) months.~~