



Plan Approval  
Approval No. 06-1006  
Brentwood Industries, Inc.

Conditions (continued):

- (2) The Plastic Parts Manufacturing Facility consists of the following sources:
  - a) Glue Machine (Brentwood) and Drying Area (Cooling Tower Packing)
  - b) Hand Gluing Operation and Drying Area (Heavy Gauge)
  - c) Paint Spray Booth (Binks) and Drying Area (Small Parts Coating)
  - d) Paint Spray Booth (Paasche) and Drying Area (Small Parts Coating)
- (3) This Plan Approval is issued for the purpose of defining the Department's VOC Reasonably Available Control Technology (RACT) determination for the sources of the company's Reading Plant and the construction of a new Glue Machine.
- (4) This Plan Approval establishes the VOC RACT for the Cooling Tower Packing Glue Machine and Drying Area as:
  - a) The VOC content of the glues used in the new machine No. 5 shall not exceed 6.29 #/gallon.
  - b) By March 1, 1996, the existing glue machines Nos. 1, 2, 3 and 4 shall have been removed from production, with only the new machine (No. 5) remaining.
  - c) The emissions of VOCs shall be reduced by 87% from the existing machines to the new machine, (No. 5) based on a per machine emission rate (to be determined by mass balance). This reduction applies only to production emissions and not clean-up, mixing and storage.
  - d) The annual emissions from the new machine (No. 5) shall not exceed 10 TPY of volatile organic compounds.
- (5) This Plan Approval establishes the VOC RACT for the Heavy Gauge Packing Hand Gluing Operations as:
  - a) The VOC emissions from the operation shall not exceed 2.7 TPY.
  - b) The VOC emissions shall be reduced from the present operation by 63% (to be determined by mass balance). This reduction applies only to production emissions and not clean-up, mixing and storage.
- (6) This Plan Approval establishes the VOC RACT for all Gluing Operations clean-up and mixing and storage of glue as: VOC emissions shall not exceed 2.7 TPY and good air pollution control practices.

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- (7) This Plan Approval establishes the VOC RACT for the Plastic Parts Surface Coating as:
- a) The VOC content of the plastic parts coatings, as applied, when using actual solvent density, shall be equal to or less than 4.7 #/gal (minus water after adjusting to a standard solvent density of 7.36 #/gal and to a solids basis as per 25 Pa. Code §129.52.
  - b) The VOC emissions from the coating process shall not exceed 2.7 TPY.
  - c) The VOC emissions from the cleanup, paint handling and storage shall not exceed 2.7 TPY and good air pollution control practices.
- (8) Annual reports containing, but not limited to, the following data for each coating shall be submitted to the Lancaster District Supervisor:
- a) coating identification
  - b) coating use (e.g., extreme performance coating)
  - c) pounds of VOC per gallon coating (minus water)
  - d) coating density
  - e) solvent density
  - f) % solvents (volume) - (minus EPA exempted solvents)
  - g) % solids (volume)
  - h) % water (volume)
  - i) gallons per year of coating (plus water)
  - j) gallons per year of coating used (minus water)
  - k) pounds per year of VOC emissions

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 Operating Permit or its renewal.

- (9) The company shall also submit an annual report for the Gluing Operations to the Department in the same format as required for the Surface Coating Operation in Condition No. 8.

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- ~~(10) Any new coating or glue or any compositional change in an existing coating (other than color changes) shall be reported to the Lancaster District Supervisor within thirty (30) days of its use. The information to be reported shall include items a) through h) of the above condition no. 8.~~
- ~~(11) Manufacturer supplied VOC Data Sheets and/or Material Safety Sheets for all coatings and glues applied at this facility within the most recent two (2) years shall be maintained at the above location and be made available to the Department at any time.~~
- (12) The company shall record the quantity and identity of all VOC solvents used for cleanup purposes on the gluing and surface coating operations on a daily basis. These records shall be maintained and shall be made part of the company's annual "AIMS" report to the Department.
- ~~(13) The company shall within sixty (60) days of the process changes conduct measurements of both gluing operations to verify the compliance with the percent reductions achieved by the changes in the production methods.~~
- ~~(14) The company shall submit to the Department at least sixty (60) days before the measurements the procedures to be taken to verify the percent reductions.~~
- ~~(15) Results of the measurements shall be submitted to the Department within thirty (30) day of the completion of the measurements.~~
- ~~(16) The operation of the source(s) shall not result in visible or malodorous emissions.~~
- (17) Records required under this Plan Approval shall be kept for a period of five (5) years and shall be made available to the Department upon its request.
- ~~(18) This Plan Approval authorizes temporary operation of the source(s) covered by this Plan Approval provided the following conditions are met:~~
- ~~(a) The Department must receive written notice from the Owner/Operator of the completion of construction and the Operator's intent to commence operation at least five (5) working days prior to the completion of construction. The notice shall state when construction will be completed and when the Operator expects to commence operation.~~

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- ~~(b) Operation is authorized only to facilitate the start up and shakedown of sources and air cleaning devices, to permit operations pending the issuance of an Operating Permit or to permit the evaluation of the source(s) for compliance with all applicable regulations and requirements.~~
- ~~(c) This condition authorizes temporary operation of the source(s) for a period of one hundred eighty (180) days from the date of commencement of operation, provided the Department receives notice from the Owner/Operator pursuant to Subpart (a), above.~~
- ~~(d) The Owner/Operator may request an extension if compliance with all applicable regulations and Plan Approval requirements has not been established. The extension request shall be submitted in writing at least fifteen (15) days prior to the end of this period of temporary operation and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established.~~
- ~~(e) The notice submitted by the Owner/Operator pursuant to Subpart (a), above, prior to the expiration of this Plan Approval, shall modify the Plan Approval expiration date. The new Plan Approval expiration date shall be one hundred eighty (180) days from the date of the written notice.~~
- (19) The total VOC emissions from these sources, including cleanup solvents, shall not exceed 100#/hr, 1000#/day or 22T/yr.

