

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

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MAY 9 1998  
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-09-0028</u>	Source(s)	<u>Facility NO<sub>x</sub> and VOC RACT</u>
Owner	<u>Endura Products, Inc.</u>	Air	<u></u>
Address	<u>45 N. Fourth Street</u>	Cleaning	<u></u>
	<u>Quakertown, PA 18951</u>	Device	<u></u>
Attention	<u>Mr. Scott Simoneau</u>	Location	<u>Quakertown Borough</u>
	<u>Plant Engineer</u>		<u>Bucks County</u>

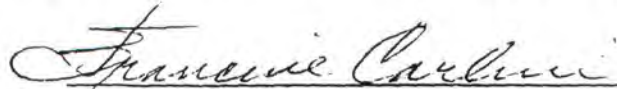
This permit is subject to the following conditions:

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. in compliance with the specifications and conditions of any plan approval 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 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 05/13/1998

  
Francine Carlini  
Regional Manager  
Air Quality

Expires 05/12/2003

cc: Division of Permits, RCSOB  
Administration  
SEFO  
Re 30 (RN)9820-3

OPERATING PERMIT RENEWAL CONDITIONS  
PERMIT NO. OP-09-0028  
ENDURA PRODUCTS, INC.

CONDITIONS (continued):

3. This Operating Permit includes Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the CAAA, and, 25 Pa. Code Sections 129.91 through 129.95 for the sources listed in Condition No. 4. This Operating Permit supersedes and incorporates previously issued Permit Nos. 09-302-056 and 09-315-010.
4. The sources covered by this permit are Nos. 6, 7, and 9 saturators; Nos. 8 and 10 coaters, parts-washers; Nos. 5, 6, and 7 boilers, four make-up-air units, two emergency generators, No. 7 straight pass oven, No. 8 big & small ovens, and No. 10 oven.
5. Saturators Nos. 6, 7, and 9, and coaters, Nos. 8 and 10 shall operate in compliance with 25 Pa. Code Section 129.52.
6. Each of the two (2) emergency generators shall operate for less than 500 hours in a consecutive 12-month period.
7. RACT for the two (2) emergency standby generators shall be maintenance and operation in accordance with manufacturers specifications.
8. NOx and VOC RACT for all sources mentioned in Condition No. 4, excluding coaters and saturators, shall be the operation and maintenance of the sources in accordance with manufacturer's specifications and good air pollution control practices.
9. The VOC emissions from the parts washers and the splice glue operation shall individually not exceed 2.7 tons on a 12-month rolling basis.
10. Endura Products shall limit the hours of operation of strip-coat, splice-glue, and parts washers to 5475, 2000, and 1460 hours respectively in a 12 month rolling period.
11. ~~A. Endura Products shall employ a Work Practice Implementation Plan.  
The work practice implementation plan shall include the following:
  1. All new and existing personnel, including contract personnel, who are involved in the cleaning and strip-coat operations shall receive training in how to reduce VOC usage and the knowledge of the requirements of this operating permit as well as the requirements of all applicable State and Federal regulations.
  2. All personnel shall be given refresher training annually.
  3. Endura Products shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
    - i. A list of all personnel by name and job description that are required to be trained.~~

OPERATING PERMIT RENEWAL CONDITIONS  
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CONDITIONS (continued):

- ~~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 initial and annual refresher training for each person, or group of personnel.~~
- ~~iv. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.~~

B. Cleaning Solvent Accounting System

Endura Products shall develop and use an organic cleanup solvent and strip coat accounting form, that is Department approved, and record:

- i. the quantity and type of organic solvent used for cleaning.
- ii. the quantity of spent organic solvent generated from cleaning and whether it is recycled onsite or disposed offsite.

C. Cleaning Procedures

Endura Products shall implement the following cleaning procedures to reduce cleaning solvent emissions. These procedures shall include the following:

- i) Steam-can, coater, and saturator cleaning and wash-off practices shall be conducted using compounds containing minimum VOCs.
- ii) Good manufacturing practices shall be followed to minimize the quantities of VOC containing solvents used.
- iii) Rags or other materials used in cleaning operations shall be stored in a normally closed container designed to safely handle these materials.
- iv) Normally closed tanks or devices such as plunger cans shall be used for wash-off operations.
- v) Any drip cans shall be covered after dripping has ceased. The splicing adhesive's drip-can shall be covered.
- vi) Where practical, dripping shall be minimized by tilting each part to drain solvent.

D. Strip-coat application techniques:

- i) Good manufacturing practices shall be followed to minimize the quantities of strip-coat used to protect the coaters and saturators.
- ii) Storage and application containers shall be closed when not dispensing the product from the containers.
- iii) Drip-cans shall be covered after dripping has ceased.
- iv) Minimal time shall be employed to apply the strip-coat compound.
- v) All tools used to apply the strip-coat compound shall be stored or disposed of in a closed container.



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CONDITIONS (continued):

12. The company shall use normally closed containers for storing cleaning materials and strip-coat compounds.
13. Monitoring, Recordkeeping, and Reporting Procedures:  
Endura Products 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, including solvent content, solvent usage, and operating hours, to clearly demonstrate that the requirements of Conditions 5, 6, 7, 8, 9, and 10 are met.
  - b. Data or information required to determine compliance with Conditions 6, 9, and 10 shall be recorded and maintained in a time frame consistent with the averaging period of the requirements.
  - c. Records shall be retained for at least five years and be made available to the Department upon request.
14. The expiration date shown on the Operating Permit OP-09-0028 is for State purposes only. For Federal enforcement purposes the RACT portion of this Operating Permit shall remain in effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed pursuant to 40 CFR 51 and approved by United States Environmental Protection Agency (EPA).
- ~~15. 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 Protection) of the aforementioned air contamination source(s), the operation and use of which is authorized by this permit, or causes, permits and 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).~~
- ~~16. 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 RACT application (as approved by the Department), and in accordance with any conditions set forth herein.~~
- ~~17. Endura Products shall not at any time allow emissions of any 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.~~

OPERATING PERMIT RENEWAL CONDITIONS  
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CONDITIONS (continued):

- ~~18.~~ If at any time it is determined that the operation of the aforementioned source(s) is causing the emission of visible air contaminants in excess of the limitations specified in Section 123.41, or malodorous air contaminants in excess of the limitations specified in Section 123.31, or is causing the emission of these contaminants or any other type of air contaminant in excess of the limitations specified in this permit and specified in, or established pursuant to, any other applicable rule or regulation contained in Article III, the owner shall take immediate steps, including the installation of additional air cleaning device(s), if necessary, to reduce the air contaminant emissions to within the applicable limitations.
- ~~19.~~ 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 Rules 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 Rules 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 required.
- ~~20.~~ This operating permit is valid for a limited period of time and may be renewed before its expiration. Requests for an operating permit renewal must be in writing and must be accompanied by the appropriate permit application processing and annual permit administration fees as specified in Section 127.703 of the Rules and Regulations of the Department of Environmental Protection. These fees shall be paid in the form of a check payable to the "Commonwealth of Pennsylvania -Clean Air Fund." The request should be made using the appropriate application form and must be received by the Department along with a completed Air Pollution Control Act Compliance Review form no later than 60 days prior to the expiration date of this permit.

All necessary forms can be obtained from the Department upon request.

- ~~21.~~ Any notification required as a result of any condition herein should be directed to:

Regional Air Quality Manager  
DEP  
Suite 6010  
Lee Park, 555 North Lane  
Conshohocken, Pa.19428

