

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-23-0025</u>	Source(s)	<u>Facility VOC RACT</u>
Owner	<u>The Fibre-Metal Products Company</u>	Air	<u></u>
Address	<u>P.O. Box 248</u>	Cleaning	<u></u>
	<u>Concordville, PA 19044</u>	Device	<u></u>
Attention	<u>Mr. Barry P. Durham</u>	Location	<u>Concord Township</u>
	<u>Vice-President of</u>		<u>Delaware County</u>
	<u>Manufacturing Operations</u>		<u></u>

This permit is subject to the following conditions:

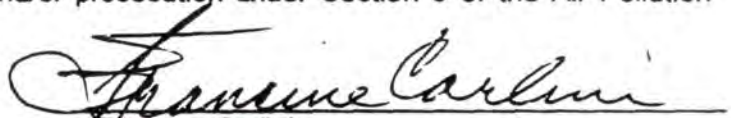
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of any applicable plan approval issued;
 - c. operated and maintained in a manner consistent with good operating 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 02/20/1998

Expires 02/20/2003


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (RN)310-11

PLAN APPROVAL CONDITIONS
PERMIT NO. OP-23-0025
FIBRE-METAL PRODUCTS COMPANY

CONDITIONS (continued):

3. This Operating Permit incorporates the 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 manufacturing of safety products at Fibre-Metal.

4. This Operating Permit includes the following sources:

PLANT	Source (Area of Operation)
Helmet Manufacturing	Emergency generator (Utility room) Production - Preform Products (CC2) Production- Vulcanized helmets (CC2) Production- SMC Products (CC3) Paint booth (CC3) Paint booth (CC4) Pad printing (CC5) Solvent recovery still (CC1, CC2 ,Mix room) Etching (CC5) Parts cleaner and washer using Cleaning fluid -FM (CC5 and Mix room)
MTD (Machine and Tool Die Shop)	Parts Cleaner

5. This Operating Permit also includes the following miscellaneous sources found in Manufacturing and MTD plants.

Thirty-five heaters and Four air exchangers
Three fiber presses
Five burners and etchers
Water heater
Miscellaneous cleaners, mold releasing agents, lubricants, dielectrics and rust preventors

6. The expiration date shown on the Operating Permit is for State purposes. For Federal enforcement purposes the RACT provisions of the Operating Permit shall remain in affect as part of the State Implementation Plan (SIP), until replaced pursuant to 40 CFR 51, and approved by the US Environmental Protection Agency (EPA).

7. Pursuant to the RACT provisions of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the following shall be operated and maintained in accordance with manufacturers specifications and good air pollution control practices : CC2 - Production of preform products, CC3 - Production of SMC products, CC3 Paint booth, CC4 Paint booth, Parts cleaners and washer using Cleaning Fluid (FM), and other uses of Cleaning Fluid (FM).

**PLAN APPROVAL CONDITIONS
PERMIT NO. OP-23-0025
FIBRE-METAL PRODUCTS COMPANY**

CONDITIONS (continued):

8. Facility and source VOC RACT emission limits shall be as follows:

- a. Total facility emissions shall not exceed - 140 TPY on a 12 month rolling basis.
- b. Production of SMC Products (CC3) - 0.183 lb. VOC per lb. of product.
- c. Paint Booth (CC3) - 5.97 lb. VOC per gallon of coating.
- d. Paint Booth (CC4) - 7.74 lb. VOC per gallon of coating.
- e. Parts Cleaner and Washer using FM Fluid (CC5 and Mix Room) - 6.80 lb. VOCs per gallon of coating.
- f. Cleaning Fluid-FM (the whole facility) - 6.8 lb. VOC per gallon of coating.

9. The potential to emit volatile organic compounds (VOCs) from each of the following source categories shall never exceed 3 pounds per hour, 15 pounds per day or 2.7 tons per year. 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 of the source contained in the respective source category.

Emergency Generator

Production of vulcanized helmets (CC2 operation area)

Pad Printing (CC5 operation area)

Solvent recovery still (CC2, CC2, and mix room)

Etching (CC5 operation area)

Lubricating fluids (MTD)

Dielectric fluids (MTD)

Parts cleaner (MTD)

Thirty five roof mounted space heaters and four air exchangers

Three fiber presses

Five burners and etchers

Water heater

Miscellaneous cleaners, mold releasing agents, lubricants and rust preventors

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

- a. Records shall provide sufficient data and calculations to clearly demonstrate that the requirements of Conditions 8 and 9 are met.
- b. Data or information required to determine compliance with Conditions 8 and 9 shall be recorded and maintained in a time frame consistent with the averaging period of the requirements.

PLAN APPROVAL CONDITIONS
PERMIT NO. OP-23-0025
FIBRE-METAL PRODUCTS COMPANY

CONDITIONS (continued):

- c. Records shall be retained for at least two (2) years and be made available to the Department upon request.
11. The source may not be operated without a valid operating permit. Operation without an appropriate permit from the Department may be subject to enforcement action.

General Conditions

12. 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 Resources, 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 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 is required.
13. The company shall immediately notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be 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 or in excess of the limitations specified in any condition contained herein. A written report shall be submitted to the Department within two working days following the incident describing the malfunctions and corrective actions taken.
14. 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 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).
15. The issue of an Operating Permit is contingent upon the aforementioned sources being constructed, maintained and operated as stated upon the application and supplemental materials submitted for plan approval and upon satisfactory demonstration that any air contaminants emitted are in compliance with the requirements of section and 123.41, all sections of Chapter 123 of Article III of the Rules and Regulations of the Department of Environmental Protection, as well as in compliance with the requirements specified in, or established pursuant to, any other applicable rule or regulation contained in Article III.

PLAN APPROVAL CONDITIONS
PERMIT NO. OP-23-0025
FIBRE-METAL PRODUCTS COMPANY

CONDITIONS (continued):

- ~~16.~~ 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 of Article III of the Rules and Regulations of the Department of Environmental Protection, and Condition (8) above or is causing the emission of these contaminants or any other type of air contaminants 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 applicable limitations.
- ~~17.~~ 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 30 days prior to the expiration date of this permit.
- An annual operating permit administration fee is to be submitted with an Annual Operating Permit Administration Fee Transmittal form. All necessary forms can be obtained from the Department upon request.
18. Any notification required as a result of any condition herein should be directed to: Regional Air Quality Manager, Department of Environmental Protection, Lee Park Suite 6010, 555 North Lane, Conshohocken, PA 19428, telephone 610-832-6242.

Re 30 (RN)310-10

