

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-46-0070</u>	Source(s)	<u>Facility VOC RACT</u>
Owner	<u>Finnaren & Haley, Inc.</u>	Air	<u></u>
Address	<u>901 Washington Street</u>	Cleaning	<u></u>
	<u>Conshohocken, PA 19428</u>	Device	<u></u>
Attention	<u>E. Richard Harkins</u>	Location	<u>Whitemarsh Township</u>
	<u>Plant Manager</u>		<u>Montgomery County</u>
			<u></u>

This permit is subject to the following conditions:

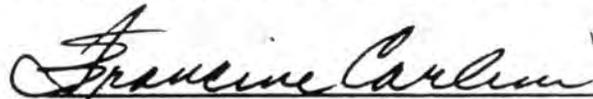
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of any applicable plan approval issued;
 - c. operated and maintained in a manner consistent with good operating 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 03/05/1998

Expires 03/05/2003


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (JCD)251-5

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FINNAREN & HALEY, 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.
4. This Operating Permit covers seven (7) Lacquer Mix Tanks, three (3) Ball Mills, seven (7) stationary & three (3) portable High Speed Dispersion Tanks, five (5) Sandmills, four (4) Millroom Mixers, twenty eight (28) Letdown Tanks, eight (8) Container Fill stations, three (3) Solvent Storage Tanks, and two (2) Boilers.
5. The total Potential to Emit (PTE) Volatile Organic Compounds (VOC) emission from the facility shall not exceed 162 tons per year on a 12- consecutive month rolling average.
6.
 - a. The VOC emissions from the following category of sources shall not exceed 3 pounds per hour, 15 pounds per day, or 2.7 tons per year on a 12-consecutive month rolling basis: (1) two boilers, (2) three solvent storage tanks, (3) Ball Mill, (4) Sandmill and (5) Millroom Mix.
 - b. The VOC emissions from each of the following sources shall not exceed the specified pounds per day.

[REDACTED]	[REDACTED]
Three Dispersion tanks (combined)	473
All Let Down Tanks (combined)	142
Container Fill Station (combined)	172

- c. Compliance with Conditions 5, 6(a), and 6(b) shall be verified with material balance and the use of USEPA Compilation of Air Pollutant Emission Factors, "AP-42" emission factors.
7. Finnaren and Haley shall operate this facility in accordance with the following requirements:
 - a. All dispersers shall be equipped with a cover which completely covers the mixer, except for an opening no larger than necessary to allow for safe clearance of any mixer shaft. Such a cover shall extend at least 1/2 inch beyond the outer rim.
 - b. All covers shall remain closed, except when production, sampling, maintenance, or inspection procedures require access.
 - c. All covers shall be maintained in good condition, such that when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim.
 - d. Lacquer Mix, and Let Down Tanks shall be equipped with lids, and shaft packing glands.
 - e. All the sources identified in Condition No. 4 shall be operated and maintained in accordance with manufacturer's specification and good air pollution control practices.

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CONDITIONS (continued):

8. VOC emission from the facility shall be recorded at least on a monthly basis and included in quarterly reports that are to be submitted to the Department.
9. Company shall implement an employee training program for all new and existing personnel involved in mixing operations to minimize the VOC emissions therefrom. This training shall address the requirements of this operating permit as well as the requirements of all applicable State and Federal regulations. The training program will 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, that include appropriate techniques for minimizing VOC emissions, and that cover the effect of VOCs on the environment.
 - d. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion
10. **RACT Monitoring, Recordkeeping, and Reporting Requirements:**

Finnaren and Haley 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 5 and 6 are met.
 - b. Finnaren and Haley shall inspect lids and covers of the Lacquer Mix, the Ball Mill, the High Speed Dispersion of Water Based Paints, the High Speed Dispersion of Solvent Based Paints, the Sandmill for Solvent Based Paint, the Millroom Mixer, and the Letdown Tanks/Tubs on a weekly basis.
 - c. Data or information required to determine compliance with Conditions 5, 6, 8, and 9 shall be recorded and maintained in a time frame consistent with the averaging period of the requirements.
 - d. Records shall be retained for at least five years and be made available to the Department upon request.
11. The expiration date shown on the Operating Permit OP-46-0070 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).

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CONDITIONS (continued):

12. Finnaren and Haley 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.

~~13. 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 volatile organic compounds in excess of the limitation 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.~~

14. 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.

~~15. 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 thirty (30) days prior to the expiration date of this operating permit. All necessary forms can be obtained from the Department upon request.~~

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

Regional Air Quality Manager
Department of Environmental Protection (DEP)
555 North Lane, S 6010
Conshohocken, Pa. 19428