

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-46-0036</u>	Source(s)	<u>Facility VOC and NOx RACT</u>
Owner/ Operator	<u>Ford Electronic & Refrigeration Company</u>	Air	<u></u>
Address	<u>2750 Morris Road</u>	Cleaning	<u></u>
	<u>Lansdale, PA 19446</u>	Device	<u></u>
Attention	<u>Ms. Josephine Histan</u>	Location	<u>Morris Road, Lansdale</u>
	<u>Environmental Engineer</u>		<u>Worcester Township</u>
			<u>Montgomery County</u>

This permit is subject to the following conditions:

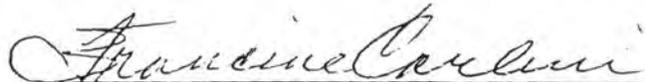
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of any plan approval issued;
 - c. operated and maintained in a manner consistent with good operating and 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 04/30/1998

~~Expires 04/30/2003~~



Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (KAL)8.7

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CONDITIONS (continued):

3. This Operating Permit incorporates Reasonably Available Control Technology (RACT) determinations, as required by Title I provisions of the Clean Air Act Amendments, and 25 Pa. Code Sections 129.91 through 129.95 for the following sources:

	Source	Manufacturer
A.	Volatile Organic Compound (VOC) Emitting Sources	
i.	Wave Solder Machine Nos. 3, 4 6 and 8	Electrovert
	Wave Solder Machine No. 9	Seho
	Wave Solder Machine No. 10	Seho
	In-Line Package Nos. 1	Comatel
	Coil Soldering No. 1	Prosys
ii.	Spray Coating No. 1	ITI
iii.	Dip Coaters Nos. 1, 2 and 3	IHEI
iv.	Selective Solder Nos. 1, 2 and 3	Pillarhouse
B.	Miscellaneous VOC Emitting Sources	
	Isopropyl Alcohol Cleaner	
	Quadrex Stripper	
	Glue Plat Washer	
	Miscellaneous Labeling Operations	
	Shrink-Wrap Machines	
	QC Oil Bath (6)	
	Heat Treating	
	Semi-Aqueous Cleaners	
	Miscellaneous Soldering Operations	
	Reflow Soldering Operations	
	Epoxy Cure Ovens	
	Print Room Drying and Firing	
	Furnaces	
	Other Minor Miscellaneous Emission Sources	

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CONDITIONS (continued):

	Source	Manufacturer
C.	NOx Emitting Sources	
	Diesel Electric Generators (5)	Caterpillar
	Emergency Generators No. 1, 2 and 3	Onan
	Fire Pumps No. 1, 2 and 3	Caterpillar
	Space Unit Heaters Nos. 1, 3, 4 and 5	Hastings
	Boiler Nos. 1, 2, 3, 4, and 5	Bryan
	Air Handlers	Maxon/Hastings
	Dock Heaters	King Air System
	Hot Water Heaters	Wickel Shield
	Walking Heaters	Williams

4. This Operating Permit supersedes and incorporates all previously issued Operating Permits/Plan Approvals bearing the Nos. 46-329-010, 46-318-026, 46-318-027, 46-399-077, 46-399-078, 46-399-079, 46-399-080, 46-399-081, and 46-399-099. The terms and conditions of all these Operating Permits and Plan Approvals are incorporated into this permit.

VOC RACT Conditions:

5. A. The VOC RACT for the wave soldering operations identified in Condition No. 3.A.i shall be the equipment modifications i.e., replacement of the flux foam type open bath with sprays and the use of spray technique.
- The VOC RACT for the selective soldering machines identified in Condition No. 3.A.iv shall be selectively fluxing and soldering of printed boards.
- B. The VOC emissions from the facility shall be as:
1. The company shall operate conformal dip coater Nos. 1, 2 and 3 in such a manner that only "solvent-less" coatings shall be used.
 2. The company shall operate conformal spray coating No. 1 in such a manner that only "solvent-less" coatings shall be used.
 3. The company shall operate soldering machine Nos. 3, 4, 6, and 8 in such a manner that the atmospheric VOC emissions from all four machines shall be less than 8 tons per year and less than 2 tons per year, per machine. Emissions shall be calculated on a 12 month rolling basis.

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CONDITIONS (continued):

4. The company shall operate soldering machine No. 9 in such a manner that the atmospheric VOC emissions from this source shall be less than 2 tons per year on a 12 month rolling basis.
5. The company shall operate soldering machine No. 10 in such a manner that the atmospheric VOC emissions from this source shall be less than 2 tons per year on a 12 month rolling basis.
6. The company shall operate in-line package No. 1 and coil soldering in such a manner as to limit its VOC emissions to less than 31 tons per year on a 12 month rolling basis.
7. The company shall operate selective soldering machine Nos. 1, 2 and 3 in such a manner that the atmospheric VOC emissions from these three machines shall be less than 5.5 tons per year on a 12 month rolling basis.

The above 5.B (1-7) VOC emissions limit were previously imposed in Operating Permit Nos. 46-318-026, 46-318-027, 46-399-077, 46-399-078, 46-399-079, 46-399-080, 46-399-081, and 46-399-099.

8. The VOC emissions from miscellaneous VOC emitting sources identified in Condition No. 3.B shall be less than 3 pounds per hour, 15 pounds per day and 2.7 tons per year from each source on a 12 month rolling basis.
6. The sources of VOC emissions, as identified above in Condition 5.B., shall be operated and maintained in accordance with manufacturers specifications. The sources shall also be operated and maintained in accordance with good air pollution control practices.
7. The company shall limit the total VOC emissions from the Worcester Township facility to less than 100 tons per year on a 12 month rolling basis.

NOx RACT Conditions:

8. NOx RACT for the five (5) electric generators shall be regulated under the presumptive RACT emission limitations, as described under 25 Pa. Code, Chapter 129.93(c)(5). Each generator must operate less than 500 hours in a consecutive 12-month period. Presumptive RACT shall be the maintenance, and operation of the source in accordance with the manufacturers specifications. The sources shall also be operated and maintained in accordance with good air pollution control practices.
9. NOx RACT for air handlers (Maxon/Hastings), five boilers (Bryan), dock heaters (King Air System), three emergency generators (Onan), three fire pumps (Caterpillar), hot water heaters (Wickel Shield), four space heaters (Hastings) and walking heaters (Williams) shall be regulated under the presumptive RACT emission limitations as described under 25 Pa. Code, Chapter

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CONDITIONS (continued):

129.93(c)(1). Each source shall be limited to a maximum heat input of 20 MMBtu/hr. The sources shall be operated and maintained in accordance with good air pollution control practices. The sources shall also be operated and maintained in accordance with good air pollution control practices. The sources shall also be operated and maintained in accordance with good air pollution control practices.

10. Recordkeeping and Reporting:

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 Condition Nos. 5, 7, 8, and 9 are met.
- B. Data or information required to determine compliance with Conditions 4, 7, 8, and 9 shall be recorded and maintained in a time frame consistent with the averaging period of the requirements.
- C. Record the quantity and identity of all VOCs used in the Worcester Township facility on an annual basis.
- D. Records shall be retained for at least five years and be made available to the Department, upon request.

Operating Permit Conditions from the Superseded Operating Permits:

- ~~11. A. The company shall operate soldering machines Nos. 3, 4, 6, and 8 with processing capacity of equal or less than 1648 electrical circuit boards per hour (412 boards/hr machine).~~
- ~~B. The company shall operate soldering machine No. 9 with processing capacity of equal or less than 412 electronic substrates per hour.~~
- ~~C. The company shall operate soldering machine No. 10 with processing capacity of equal or less than 412 electronic substrates per hour. Annual processing capacity will not exceed 1,385,000 substrates.~~
- ~~D. The company shall operate in-line package No. 1 and coil soldering with processing capacity of equal or less than 2,880 and 2,226 electronics parts, respectively, per hour.~~
- ~~E. The company shall operate selective soldering machine Nos. 1, 2 and 3 with processing capacity of equal or less than 40,000, 1,000,000, and 700,000 electronic parts per hour, respectively.~~

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CONDITIONS (continued):

- ~~12.~~ The five electric generators shall burn No. 2 fuel oil only. No reclaimed, waste oil or other waste materials shall be added to this fuel.
- ~~13.~~ The No. 2 fuel oil fired in these generators shall not, at any time, exceed 0.3% (by weight) sulfur contents, as indicated by fuel suppliers records.
- ~~14.~~ The combined operating hours of all five generators engines shall not exceed greater than 700 hours in any one year. An elapsed meter shall be installed and maintained on each unit to indicate cumulative hours operated. When needed, all units are permitted to operate 24 hours per day at full capacity.
- ~~15.~~ The total No. 2 fuel oil supplied for engines shall not exceed 89,250 gallons in one year or 15,300 gallons per day for all five generators. A flow meter shall be installed and maintained.
- ~~16.~~ The ignition timing of these engines shall be inspected, adjusted, and certified, at a minimum, once per year of operation. Inspections, adjustments and certifications shall be performed by a qualified mechanic and according to the engine manufacturer's procedures. Engine's injector timing shall be set at 3° retarded from the manufacturers recommended setting.
- ~~17.~~ At no time during the operation of any of the engines, even during the utility voluntary demand reduction (peak savings), testing, or emergency electric generation shall those limits in Condition Nos. 13 and 14 be circumvented nor shall those limits in Condition Nos. 13 and 14 be exceeded.
- ~~18.~~ The operation of the five generators shall not emit below listed air contaminants into the atmosphere in the excess of these limits:

	<u>(lb/hr) per Five Units</u>	<u>All Five Units (TPY)</u>
Particulate Matter	6.00	0.42
Nitrogen Oxide	260.00	18.20
Carbon Monoxide	170.00	11.80
Volatile Organic Compounds	2.20	0.20
Sulfur Dioxide	20.00	1.40

~~The above limits shall be determined on a 12 month rolling average.~~

- 19. 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 effect, as part of the State Implementation Plan (SIP), until replaced, pursuant to 40 CFR 51 and approved by the US Environmental Protection Agency (EPA).

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CONDITIONS (continued):

- ~~20. The company shall record the quantity and identity of all lead used at this facility on an annual basis. The company shall keep the record for at least two years and shall be made available to the Department, upon request.~~
21. The company shall keep all containers containing VOCs and HAPs tightly closed when not in use. This includes containers containing cleanup solvents and used liquids containing VOCs and HAPs. Solvent laden wipes shall be kept in closed containers when not in use.
- ~~22. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.~~
- ~~23. The sources may not be operated without a valid Operating Permit. Operation without an appropriate permit from the Department may be subject to enforcement action.~~

~~24. **General Conditions**~~

- ~~A. 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 is required.~~

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CONDITIONS (continued):

- ~~B.~~ The company, within one hour of occurrence, shall notify the Department, at 610-832-6241, 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. A written report shall be submitted to the Department within two working days following the incident describing the malfunctions and corrective actions taken.
- ~~C.~~ 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).

~~25.~~ This Operating Permit is valid for a limited period of time and may be renewed before its expiration. Request 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.

~~26.~~ Any notification required as a result of any condition herein should be directed to:

Regional Air Quality Manager
555 North Lane
Lee Park, Suite 6010
Conshohocken, PA 19428