

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.	OP-15-0031	Source(s)	Facility VOC RACT
Owner	Monsey Products Company	Air	
Address	P.O. Box 368	Cleaning	
	Kimberton, PA 19442	Device	
Attention	Mr. John Kinast	Location	Cold Stream Road
	Environmental Engineer		East Pikeland Township
			Chester County

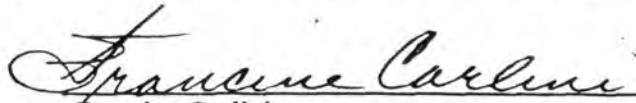
This permit is subject to the following conditions:

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 06/04/1998


Francine Carlini
Regional Manager
Air Quality

~~Expires 06/03/2003~~

cc: Division of Permits, RCSOB
Administration
SEFO
Re (RN)241-18

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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 sources listed in Table 1 below:

TABLE 1

Source	Capacity (Gallons)
Tanks 1, 2, 3, 4	20,000 each
Tank 18	18,000
Tanks 21, 22, 24	30,000 each
Tanks 23, 25, 26	30,000
Mixers 1, 2, 3, 4, 6, 9	1,500
Mixer 5	3,000
Mixers 11, 12	550 each
Mixer 88	1500
Aromatic 100 mixer	-
Advasol mixer	250
Two small mixers (Wax Mixing Tanks)	300 each
Process piping equipment	Various components
Combustion Units (4)	Maximum 8.65 MMBtu/hr combined

4. This Operating Permit supersedes and incorporates all previously issued Operating Permits bearing numbers 15-309-002 and 15-313-030A. The terms and conditions of all these Operating Permits are incorporated into this permit.
5. 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 U.S. Environmental Protection Agency (EPA).
6. **Emission Limitations:**
- a. The Volatile Organic Compound (VOC) RACT for all the Mixers shall be the use of covers (lids) on mixing tanks at all times except during loading.
 - b. The total VOC emissions from the seven mixers Nos. 1, 2, 3, 4, 5, 6, and 9, as exhausted through a common stack, shall not exceed 75 tons per year based on a 12 month rolling sum basis.
 - c. The total VOC emissions from the whole facility shall not exceed 78.7 tons per year based on a 12 month rolling sum basis.
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CONDITIONS (continued):

- d. For purposes of RACT, the emissions of VOC from each deminimus source category shall not exceed 3 lbs/hour, 15 lbs/day or 2.7 tons/year on a 12 month rolling sum basis. The following sources listed in Table 1 of Condition 3 are deminimus Source categories:
- i. All storage tanks
 - ii. All mixers except 1, 2, 3, 4, 5, 6 and 9
 - iii. Process piping equipment
 - iv. Combustion Units
7. VOC RACT for all tanks, mixers No. 11, 12, 88, aromatic mixer, advasol mixer, wax mixers, process pipes, and four combustion units shall be installation and operation in accordance with manufacturers specifications and good air pollution control practices.
8. 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 No. 6 are met.
 - b. A quarterly report shall be submitted to the regional office verifying compliance with condition No. 6 (b&c). This report shall be submitted within 30 days following each calendar quarter.
 - c. Data or information required to determine compliance with condition No. 6 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.

From Operating Permit No. 15-313-030A

- ~~9.~~ This Operating Permit is for the clay emulsion plant consisting of 3 bag opening stations No. 86, 87, 88 and one tankhood station. The emissions from these stations are ducted to the baghouse during loading.
- ~~10.~~ The allowable particulate matter emissions from this clay emulsion plant shall not exceed 0.005 lb/hr.
- ~~11.~~ This clay emulsion plant process shall not use any VOC or asbestos in its additives or process.
- ~~12.~~ The fabric collector(s) must be equipped with a device for monitoring the pressure differential across the collector(s).

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CONDITIONS (continued):

- ~~13.~~ Minimum pressure drop across the baghouse shall be 1.5 inch wg.
- ~~14.~~ Baghouse cleaning is to be done manually, shall be carried out at least once per week, and shall be recorded when completed. A monthly maintenance logbook shall be kept for this source and control equipment.
- ~~15.~~ During those periods of time when the fabric bags in the fabric collector(s) associated with the aforementioned source(s) are being shaken the source(s) may not be operated.
- ~~16.~~ The company shall keep on hand a sufficient quantity of spare fabric collector bags, at least three, for the fabric collector(s) associated with the aforementioned source(s) in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of the source(s) and fabric collector(s).

General Conditions

- ~~17.~~ The company shall minimize any fugitive emissions from the process operations by closing covers over process mixers at any time the collection system is not in use.
- ~~18.~~ If at any time it is determined that the operation of the aforementioned source(s) is causing the emission of particulate matter in excess of the limitations specified in condition No. 10 or emit fugitive air contaminants in excess of the limitations specified in Section 123.1, Chapter 123 of Article III of the Rules and Regulations of the Department of Environmental Protection, or is causing the emission of either of these or any other type of air contaminant in excess of the limitations specified in, or established pursuant to, any other applicable rule or regulation contained in Article III, the company shall notify the Department immediately and shall take immediate steps, including the installation of additional air pollution control equipment, if necessary, to reduce the emissions to within the applicable limitations.
- ~~19.~~ 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.
- ~~20.~~ 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 Rule 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 Rule and Regulations of the Department of

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CONDITIONS (continued):

- ~~21.~~ 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 by 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 action taken.
- ~~22.~~ If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rule 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).
- ~~23.~~ 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 Act 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.
- ~~24.~~ Any notification required as a result of any condition herein should be directed to:

Regional Air Quality Manager
Lee Park, 555 North Lane, Suite 6010
Conshohocken, PA 19428
Telephone: (610) 832-5148

Re 30 (RN)241-17

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CONDITIONS (continued):

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.