



## PERMIT CONDITIONS

PERMIT NO.: OP-47-0002

COMPANY: Strick Corporation

LOCATION: Limestone Township, Montour County

3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by the provisions of Title I of the Clean Air Act Amendments and 25 Pa. Code Sections 129.91 through 129.95 for the following sources:
- solvent cleaning operations
  - 11 small combustion sources (as described in Table 2-1 of Strick's December 21, 1995 RACT submission)
  - two #2 fuel oil storage tanks (one 10,000 gallon and one 5,000 gallon)

This operating permit covers sources previously permitted under Operating Permit #47-399-012A and supersedes said operating permit with respect to those sources.

4. The expiration date shown in this permit is for state purposes. For federal enforcement purposes the conditions of this operating permit which pertain to the implementation of the RACT regulations 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). The operating permit shall become enforceable by the U.S. EPA upon its approval of the above as a revision to the SIP.
5. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the solvent cleaning operations shall be conducted at all times in accordance with the requirements contained in conditions 12 through 16 herein.
6. The potential to emit volatile organic compounds from each of the following source categories shall never exceed 3 pounds per hour, 15 pounds per day or 2.7 tons per year (as determined by the Department). 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 source contained in the respective source category.
- small combustion sources
  - storage tanks
7. The company shall keep accurate, comprehensive records sufficient to demonstrate compliance with the above RACT requirements. These shall include, at a minimum, the records required by condition 17 herein.

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8. During each of the first two calendar quarters following the issuance of this permit, the company shall perform testing to determine the composition of the waste solvents from the solvent cleaning operations. Separate, representative samples shall be taken from the waste of both the paint line flushing and gun cleaning operations, and each sample shall be analyzed for density as well as the percentage (by weight) of volatile organic compounds, solids and water. (The Department reserves the right to require additional such sampling and testing, at its discretion.)
9. The company shall contact the Department before taking any waste solvent samples to discuss appropriate sampling techniques and test procedures, and shall forward copies of all test results to the Department upon receipt.

*The following conditions, numbered 10 through 17, reflect requirements previously contained in Operating Permit #47-399-012A.*

10. 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).
11. 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 application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.
12. The only non-aqueous organic solvents which may be used to clean anything at the Danville Plant are Safety Kleen 6782 heavy duty lacquer thinner, Safety Kleen 6801 multi use lacquer thinner, Safety Kleen solvent 150, ZEP Cleaning Solvent, T-76 universal rinse solvent and any other equivalent material(s) (as approved by the Department). The use of any other non-aqueous organic solvent to clean anything at the Danville Plant will be considered a violation of this condition and Section 127.444 of Article III of the Rules and Regulations of the Department of Environmental Protection.
13. Safety Kleen 6782 heavy duty lacquer thinner may be used for the cleaning of spray guns. Safety Kleen 6801 multi use lacquer thinner may be used for cleaning paint lines and spray gun tips and nozzles. Safety Kleen solvent 150 may be used to clean trailer axle spindles, tools and dies, tool repair cleanups and motor pool cleanups. ZEP Cleaning Solvent may be used to clean

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trailer axle spindles, tools and dies, spray guns, paint lines, spray gun tips and nozzles, tool repair cleanups and motor pool cleanups. T-76 universal rinse solvent shall be used to clean spray guns, paint lines and spray gun tips and nozzles that have been used to apply polyol urethane or epoxy-based Champion brand coatings only. (The above solvents may be put to equivalent uses with prior Department approval.) Failure to adhere to any portion of this condition will be considered a violation of this condition and Section 127.444 of Article III of the Rules and Regulations of the Department of Environmental Protection.

14. The cleaning of spray guns, gun tips and nozzles shall consist of soaking these items in solvent cleaning sinks. No solvents shall be sprayed through the guns. Paint lines shall be cleaned by flushing solvents through the lines into closed containers. Axle spindle cleaning shall be by rag or brush only. Cleaning of tools, dies, and tool repair cleanups and motor pool cleanups shall be conducted in solvent cleaning sinks.
15. All solvents shall be stored in closed containers. Additionally, cleaning rags containing solvents shall not be air dried and shall be stored in closed containers prior to disposal.
16. Pursuant to the best available technology provisions of Section 127.1 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, the emission of volatile organic compounds from all solvents used at the Danville plant for cleanup operations shall not exceed a total of 7.5 tons per calendar year (as determined by the Department).
17. The company shall maintain accurate, comprehensive records of the following data for each organic solvent used for any type of cleaning and shall report this data to the Department on a quarterly basis:
  - (a) the amount of the specific solvent in inventory at the beginning of the first day of the calendar quarter
  - b) the amount of the specific solvent in inventory at the end of the last day of the calendar quarter
  - (c) the amount of the specific solvent placed into inventory during the calendar quarter
  - (d) the amount of the specific solvent placed into paint totes (if any) during the calendar quarter
  - (e) the amount of the specific solvent shipped offsite in liquid form (other than in paint totes) during the calendar quarter

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Separate records are to be kept for each individual solvent used. The data for a calendar quarter shall be submitted by the 15th of the first month following the respective calendar quarter (reports due on January 15, April 15, July 15 and October 15).

18. The operation of the solvent cleaning operations shall at all times be conducted in conformance with all conditions contained herein and, additionally, shall not at any time result in the emission of any air contaminant 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.
19. 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 or which otherwise results in, or may possibly be resulting in, noncompliance with the requirements specified in any condition contained herein.
20. Nothing contained in this operating permit authorizes any extension of the May 31, 1995 RACT compliance deadline.
21. 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 August 1, 2001.

Additional annual operating permit administration fees may also be required pursuant to Section 127.703. If required, these fees are to be paid by no later than August 31, 1997, August 31, 1998, August 31, 1999 and August 31, 2000. The 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.

22. Any notification required as a result of any condition herein should be directed to: Erin Fee, Air Quality Specialist, 208 West Third Street - Suite 101, Williamsport, PA 17701, telephone 717-321-6576.

