

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-15-0025</u>	Source(s)	<u>Facility VOC RACT</u>
Owner	<u>Transwall Corporation</u>	Air	<u></u>
Address	<u>1220 Wilson Drive</u> <u>P.O. Box 1930</u> <u>West Chester, PA 19380</u>	Cleaning	<u></u>
		Device	<u></u>
Attention	<u>Mr. Stephen Benn</u>	Location	<u>West Goshen Township</u>
	<u>Operations Manager</u>		<u>Chester County</u>

This permit is subject to the following conditions:

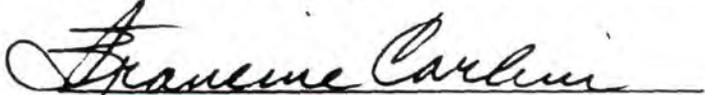
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of any applicable plan approval issued;
 - c. operated and maintained in a manner consistent with good operating 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 03/10/1998

Expires 03/10/2003


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (RN)253-16

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-15-0025
TRANSWALL CORPORATION

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. The sources covered by this permit are:

<u>Source ID</u>	<u>Source Description</u>
101	Electrostatic Paint Spray Booth with HVLP Guns
102	Electrostatic Paint Spray Booth with HVLP Guns
103	Manual Paint Spray Booth equipped with HVLP Guns
104	Manual Paint Spray Booth equipped with HVLP Guns
105	Manual Paint Spray Booth equipped with HVLP Guns
106	Manual Paint Spray Booth equipped with HVLP Guns
109	Glue Booth #1 with HVLP
110	Glue Booth #2 with HVLP
	One Baking Oven

5. The total Volatile Organic Compounds (VOC) emission from each of the Glue Booths ID # 109 and 110 shall not exceed 70 tons per year on a 12-consecutive month rolling basis.
6. The VOC content of the coatings used in the spray booths ID #101 through #106 shall be in accordance with 25 Pa. Code Section 129.52 (Table 1) (7).
7. All spray guns in Glue Spray Booths ID #109 & 110 shall be of the HVLP type.
8. All adhesives used in Glue Booths (ID 109 and 110) shall contain no less than 30% solids. The VOC content of all adhesives used in Glue Booths (ID 109 and 110) shall not exceed 4.3 pounds per gallon of adhesive.
9. In accordance with 25 Pa. Code Section 129.93(c), the Bake Oven shall be maintained and operated in accordance with manufacturers specifications and good air pollution control practices.
10. The expiration date shown on this RACT Operating Permit is for State purposes. For Federal enforcement purposes the RACT portion of this 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).
11. Transwall Corporation shall expeditiously implement an employee training program for all new and existing personnel involved in coating and cleaning operations. This training shall address how to reduce VOC usage, the requirements of this operating permit, as well as the requirements of all applicable State and Federal regulations. The training program will include the following:

**OPERATING PERMIT CONDITIONS
PERMIT NO. OP-15-0025
TRANSWALL CORPORATION**

CONDITIONS (continued):

1. A list of all personnel by name and job description that are required to be trained;
 2. An outline of the subjects to be covered in the initial and refresher training for each person, or group of personnel;
 3. Lesson plans for courses to be given at the initial and the annual refresher training that include appropriate application techniques for appropriate management of cleanup wastes;
 4. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
12. The company shall use normally closed containers for storing volatile compounds when the materials are not being transferred.
13. Any spills of the liquids used for metal furniture painting and gluing shall be cleaned up as soon as possible.
14. Monitoring and Recordkeeping

Transwall Corporation 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 which provide sufficient data and calculations to clearly demonstrate that the requirements of Conditions 5, 8, 9, and 11 are met.
- b. Records of cleaning solvent use each month shall be maintained.
- c. Transwall shall maintain records of the following:
 - identification and type (paint, glue, etc.) of each finishing material used.
 - pounds of VOC per gallon of coating (minus water) of each finishing material used.
 - for paints and glues, the pounds of VOC per pound of coating solids.
 - for glues only, the weight percent of solids.
 - finishing material density before and after the addition of diluents.
 - identification and density of diluents.
 - amount of each finishing material and diluent used.
 - hours of operation of each VOC-emitting source in the facility.

The records generated pursuant to this Condition for each calendar year shall be available to the Department at its request.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-15-0025
TRANSWALL CORPORATION

CONDITIONS (continued):

- d. Records shall be retained for at least five years and be made available to the Department upon request.
- ~~15.~~ Transwall 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.
16. Transwall shall at all times maintain copies of manufacturer's formulation or composition data sheets for all finishing materials used at the facility within the previous 5 years and shall make this information available to the Department at any time during normal business hours. These data sheets are to contain all of the information needed to determine compliance with applicable VOC requirements specified in Section 129.52 of the Department's Rules and Regulations. Transwall shall additionally maintain copies of Material Safety Data Sheets for all finishing materials used at the facility within the previous 5 years and shall also make this information available to the Department at any time during normal business hours. The content of the Material Safety Data Sheets does not, however, have to be modified in any way from that appearing on the sheets as received from the finishing material manufacturer or vendor.
17. 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 RACT application (as approved by the Department), and in accordance with any conditions set forth herein.
18. 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 and 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).
- ~~19.~~ 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 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.
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

~~OPERATING PERMIT CONDITION~~
~~PERMIT NO. OP-15-0025~~
~~TRANSWALL CORPORATION~~

CONDITIONS (continued):

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.

- ~~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 60 days prior to the expiration date of this permit.~~

~~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:

Regional Air Quality Manager
Pennsylvania Department of Environmental Protection
Suite 6010
Lee Park, 555 North Lane
Conshohocken, PA 19428

Re 30 (RN)253-17

