

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
FIELD OPERATIONS - BUREAU OF AIR QUALITY

RACT

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-46-0046A	Source(s)	Facility VOC Sources
Owner	Uniform Tubes Inc.	Air	
Address	200 W. 7 <sup>th</sup> Avenue	Cleaning	
	Trapper, PA 19426	Device	
Attention	Mr. Nicholas R. Sapone	Location	Trappe Borough
			Montgomery County

This permit is subject to the following conditions:

- That the source(s) and any associated air cleaning devices are to be:
  - operated in such a manner as not to cause air pollution;
  - operated and maintained in a manner consistent with good operating and maintenance practices.
- 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.

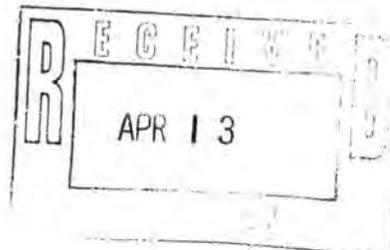
Issued 03/26/1998

~~Expires~~ 03/26/2003

cc: Division of Permits, RCSOB  
Administration  
SEFO  
Re (RN)9840-6a

*Francine Carlini*

Francine Carlini  
Regional Manager  
Air Quality



**OPERATING PERMIT CONDITION**  
**PERMIT NO. OP-46-0046A**  
**UNIFORM TUBES INC.**

**CONDITIONS (continued):**

3. This RACT 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:
  - (a) Methanol Dewatering
  - (b) Benchtop Lubrication
  - (c) ID Plastic Coating, TCE
  - (d) OD Plastic Coating, Toluene
  - (e) Two (2) Natural Gas fired Boilers rated at 2.9 and 1.4 MMBtu/hr.
  - (f) A boiler rated at 2.9 MMBtu/hr.
  - (g) Fifty one (51) natural gas fired space heaters.
  - (h) Cold Degreaser, Napthol in Department 1600 (opening 7 sq. Ft )
  - (i) ID Flushing/Degreasing, Stoddard Solvent

4. The following sources are also covered by this permit:

- (a) Plant #1 Vapor Degreaser, TCA, or TCE Formulation ( opening 96 sq. Ft)
- (b) Plant #2 Vapor Degreaser, TCE Formulation ( opening 103 sq. Ft)
- (c) Fabrication Department Vapor Degreaser, TCE Formulation ( opening 15 sq. Ft)
- (d) Cold Degreaser, Napthol, in Department 1200 ( opening 30 sq. Ft )

5. The total volatile organic compound (VOC) emissions from the facility shall not exceed 94 tons per year on 12 month rolling basis.

6. The following table shows the unit-specific VOC emissions that shall not be exceeded:

Source Description	VOC emission on 12 month rolling sum basis
Methanol Dewatering	7.8 tons
Benchtop Lubrication	14.4 tons
ID Flushing/Degreasing, Stoddard Solvent	6.0 tons

7. The sources 3(e), 3(f), and 3 (g) shall be operated with VOC emission rates of no greater than 3 pounds per hour, 15 pounds per day or 2.7 tons per year on 12 month rolling average sum.
8. VOC RACT for the sources identified in Condition 3 is maintenance and operation in accordance with manufacturer's specifications and good air pollution control practices.
9. VOC RACT for vapor degreasers identified in Condition 4 shall be operation in compliance with 25 PA Code § 129.63.
10. The company shall return methanol/water solution to the process vessel prior to a final vapor degreasing step.

**OPERATING PERMIT CONDITIONS**  
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**UNIFORM TUBES INC.**

**CONDITIONS (continued):**

11. The company shall lubricate tubing bundles with naphthol on an as needed basis.
12. All lids from drums and containers containing volatile organic compounds shall be kept closed except when the contents are being transferred.
13. Any spills of solvents shall be cleaned up as soon as possible.
14. Uniform Tube shall implement an employee training program for all new and existing personnel involved in parts cleaning operations by November 30, 1997. This training shall address steps to reducing 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:
  - a) A list of all personnel by name and job description that are required to be trained; An outline of the subjects to be covered in the initial and refresher training for each person, or group of personnel.
  - b) Lesson plans for courses to be given at the initial and the annual refresher training that include appropriate application techniques, and minimize cleaning solvent usage.
  - c) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
15. Company shall maintain records in accordance with the minimum recordkeeping requirements of 25 PA Code § 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, 6, 7, 8, and 9 are met.
  - b. Data or information required to determine compliance with Conditions 5, 6, and 7 shall be recorded and maintained in a time frame consistent with the averaging period of the requirements.
  - c. Records shall be retained for at least two years and be made available to the Department upon request.
- ~~16. The operation of the facility shall not at any time result in the emission 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.~~

**OPERATING PERMIT CONDITION**  
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**UNIFORM TUBES INC.**

**CONDITIONS (continued):**

- ~~17.~~ The company shall within an hour of occurrence notify the Department of any malfunction of the source(s) of when the company knew or should have known of the occurrence, if the occurrence 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.
18. The expiration date shown on this RACT Operating Permit is for State purposes. For Federal Enforcement purposes the RACT provisions of this Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR Part 51 and approved by the US Environmental Protection Agency (EPA).
- ~~19.~~ 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).
- ~~20.~~ 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.
- ~~21.~~ 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 of Article III of the Rules and Regulations of the Department of Environmental Protection, and 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.
- ~~22.~~ 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

**OPERATING PERMIT CONDITIONS  
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UNIFORM TUBES INC.**

**CONDITIONS (continued):**

with any restrictions or limitations established by the Department at such time as it notifies the company that testing required.

- ~~23.~~ 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 30 days prior to the expiration date of this permit.

All necessary forms can be obtained from the Department upon request.

- ~~24.~~ Any notification required as a result of any condition herein should be directed to:

Lee Park-Suite 6010  
555 North Lane  
Conshohocken, PA 19428  
Telephone: 610-832-6241

Re 30 (RN)9840-6b

