



39-00004

MACK TRUCKS INC/MACUNGIE



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: December 30, 2015

Effective Date: April 3, 2020

Revision Date: April 3, 2020

Expiration Date: ~~December 30, 2020~~

Revision Type: Amendment

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 39-00004

Federal Tax Id - Plant Code: 22-1582040-5

Owner Information

Name: MACK TRUCKS INC  
Mailing Address: 7000 ALBURTIS RD  
MACUNGIE, PA 18062-9632

Plant Information

Plant: MACK TRUCKS INC/MACUNGIE  
Location: 39 Lehigh County 39912 Lower Macungie Township  
SIC Code: 3711 Manufacturing - Motor Vehicles And Car Bodies

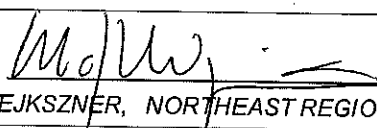
Responsible Official

Name: RICKARD LUNDBERG  
Title: VICE PRESIDENT & GEN MGR  
Phone: (610) 966 - 8777

Permit Contact Person

Name: TRAVIS ANDREWS  
Title: HS&E MGR  
Phone: (610) 966 - 8820

[Signature]

  
MARK J. WEJKSZNER, NORTHEAST REGION AIR PROGRAM MANAGER

Pages 2-3, 7-37, 39, 42-47, and 50-54 are redacted entirely.

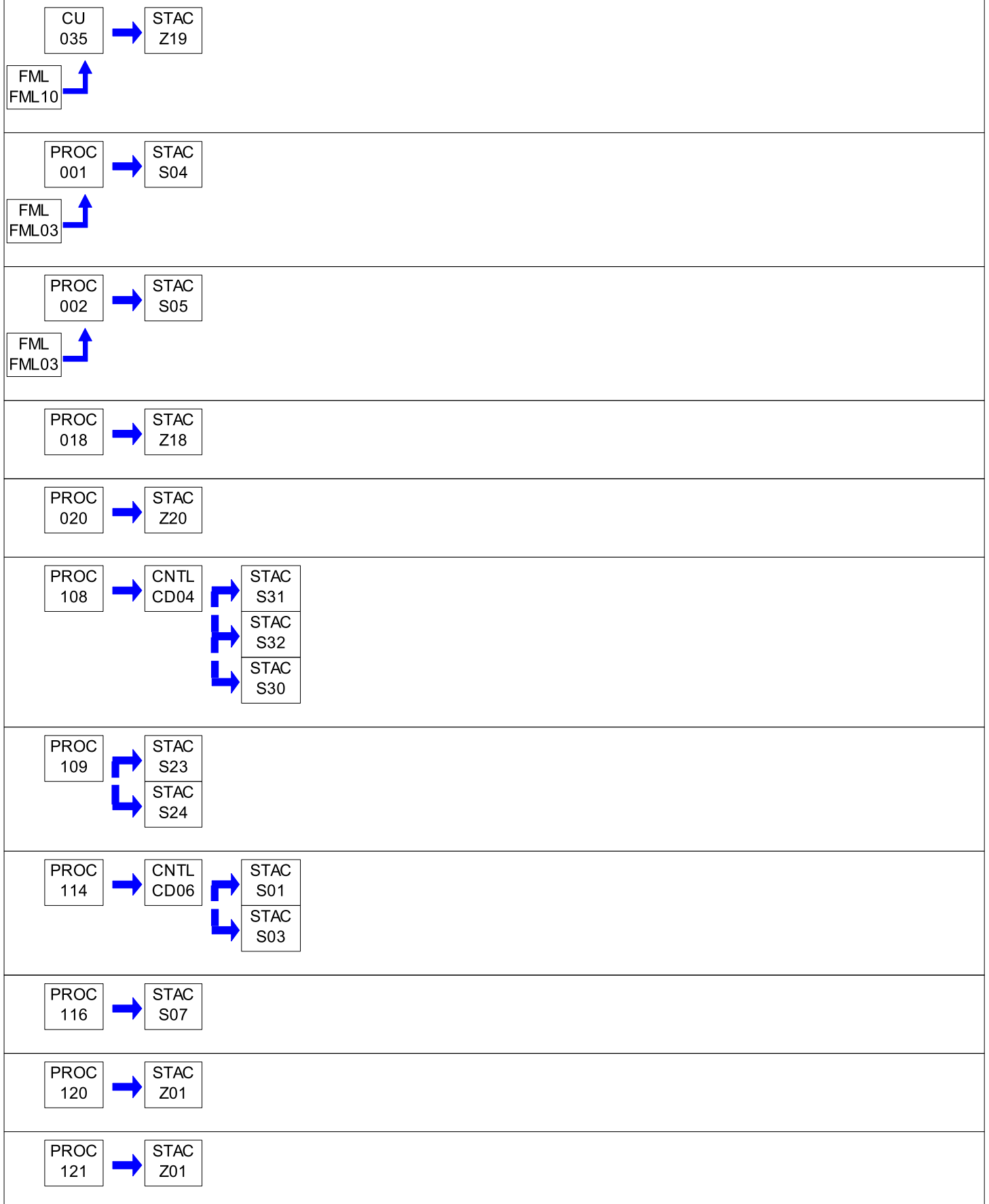
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
035	(122) IR HEATERS	17.080 MMBTU/HR	
001	CATERPILLAR EMER. GENERATOR		
002	DETROIT DIESEL GENERATOR		
018	ADHESIVE APPLICATION		
020	TOUCH-UP APPLICATION		
108	"G" LINE CHASSIS BOOTH		
109	"G" LINE CHASSIS OVEN		
114	FINAL SPRAY BOOTH		
116	FINAL BAKE OVEN		
120	GUN CLEANER		
121	MISCELLANEOUS SOLVENT OPERATIONS		
127	CHASSIS SPRAY BOOTH		
128	CURING OVEN		
201	SOLVENT STORAGE TANK		
CD04	WASH WATER (108)		
CD06	DRY BOOTH FILTER (114)		
CD09	PANEL FILTERS		
FML03	EMERGENCY GENERATOR TANK		
FML10	NATURAL GAS		
S01	FINAL BOOTH STACK		
S03	FINAL BOOTH STACK		
S04	EMERGENCY GENERATOR		
S05	DETROIT GENERATOR		
S07	FINAL OVEN STACK		
S23	"G" LINE OVEN STACK		
S24	"G" LINE OVEN STACK		
S30	"G" LINE STACK		
S31	"G" LINE STACK		
S32	"G" LINE STACK		
S78	STACK - SOURCE ID 127		
S79	STACK - SOURCE ID 128		
TS3	SOLVENT TANK		
Z01	CLEAN-UP FUGITIVE		
Z18	ADHESIVE EMISSION POINT		
Z19	IR HEATER FUGITIVES		
Z20	TOUCH-UP EMISSION POINT		

**PERMIT MAPS**



## PERMIT MAPS



**PERMIT MAPS**

PROC  
127 → CNTL  
CD09 → STAC  
S78

PROC  
128 → STAC  
S79

FML  
FML10 →

PROC  
201 → STAC  
TS3

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 03

Group Description: Final Spray Booth & Oven

Sources included in this group

ID	Name
114	FINAL SPRAY BOOTH
116	FINAL BAKE OVEN

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from any process not listed in subsection (b)(1) in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain per dry standard cubic foot.

**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Authority for this condition is from RACT 1 OP 39-0004 and 25 PA Code 129.99]

(1) The maximum Volatile Organic Compound (VOC) emission from this source shall not exceed 87.5 lbs/day and 10.9 tons per year based on coating usage.

(2) All coatings used for this source shall comply with 25 PA Code 129.52d Table 1. A VOC content limit for air dried extreme high-gloss of 3.5 lbs of VOC/gallon minus water shall apply.

**IV. RECORDKEEPING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The company shall keep the following records in order to show compliance with Condition #002 in accordance with 25 PA Code 129.100:

1. Keep on hand chemical composition data for all coatings used by this source
2. Record on a daily basis all Volatile Organic Compound (VOC) coatings and any VOC solvent or thinner usage for this source,

**V. REPORTING REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The company shall submit the information required by Group 3, Condition #003, to the Department, in an approved format, on a quarterly basis. The information shall be submitted within thirty (30) days after the end of each calendar quarter.

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 04

Group Description: G Line Chassis Booth &amp; Oven

Sources included in this group

ID	Name
108	"G" LINE CHASSIS BOOTH
109	"G" LINE CHASSIS OVEN

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from these sources in a manner that the concentration of particulate matter in the effluent gas exceeds .04 grain per dry standard cubic foot.

**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Compliance with this streamlined condition assures compliance with 25 PA Code 129.99]

In addition to compliance with Condition #004, no individual coatings used for this source shall exceed the limits (as applied) of 129.52d, Table 1. Extreme high-gloss air dried coating of 3.5 lbs of VOC per gallon of coating minus water and exempt compounds.

**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Compliance with this streamlined condition assures compliance with RACT I OP 39-0004 and RACT II 25 PA Code 129.99 VOC limits for this source]

The maximum Volatile Organic Compound (VOC) emissions from the chassis Paint Booth & Oven (ID 108, 109) shall not exceed 18.0 lbs/hour and 37.4 tons per year, based on coating usage.

**# 004 [25 Pa. Code §129.51]****General**

[Compliance with the following condition assures compliance with 25 PA Code 129.52d Table 1, extreme high gloss, baked coatings]

(a) Equivalency. Compliance with the requirements of 25 Pa Code 129.52d, Table 1 may be achieved by the following alternative methods:

(1) The resulting emissions for this source shall be equal to or less than the emissions that would have been discharged by complying with the applicable emission limitation of 129.52d, 3.0 lbs of VOC per gallon of coating, less water and exempt solvent, as applied.

(2) The permittee shall use low VOC coatings which meets the applicable emission limitation in 129.52d determined on the basis of equal volumes of solids.

(3) Record keeping and reporting shall be in accordance with 25 PA Code 129.52d(f).

**Throughput Restriction(s).****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source is limited to a maximum of 130 chassis to be painted per day (monthly average based on operating days/month).

**SECTION E. Source Group Restrictions.****IV. RECORDKEEPING REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

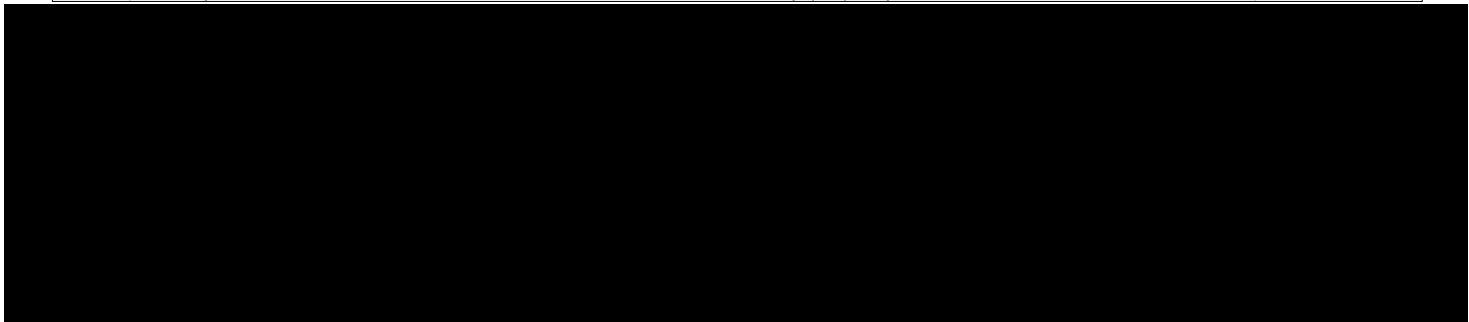
[Items 2,3, and 4 below shall be used to show compliance in accordance with 25 PA Code 129.100]

The company shall keep records of the following:

1. Chemical composition data for all coatings used by this source.
2. Daily Volatile Organic Compound (VOC) coatings and any VOC solvent or thinner usage for this source.
3. Number of chassis/day painted.
4. Keep records to show compliance with Condition #003

**V. REPORTING REQUIREMENTS.****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The company shall submit the information required by Group 4, Condition #006, to the Department, in an approved format, on a quarterly basis. The information shall be submitted within thirty (30) days after the end of each calendar quarter.





**SECTION E. Source Group Restrictions.**

Group Name: GROUP 11

Group Description: RACT II VOC Requirements

Sources included in this group

ID	Name
001	CATERPILLAR EMER. GENERATOR
002	DETROIT DIESEL GENERATOR
018	ADHESIVE APPLICATION
035	(122) IR HEATERS
120	GUN CLEANER
121	MISCELLANEOUS SOLVENT OPERATIONS
201	SOLVENT STORAGE TANK

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The following source ID's are limited to 2.7 TPY VOC.

ID 018

ID 201

Compliance with this limit ensures compliance with 25 PA Code 129.97 (c)(2).

**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Compliance with the following condition assures compliance with Section C, Condition #006]

The following source ID's are limited to a combined VOC limit of 20.0 Tons/year (12 month rolling sum).

ID 120

ID 121

**IV. RECORDKEEPING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor and record solvent usage and VOC emissions for each source in this group, with a yearly VOC limit, on a monthly and 12 month rolling sum basis.

**SECTION E. Source Group Restrictions.****VI. WORK PRACTICE REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

For source ID 018 and 201, the permittee shall comply with the following work practice standards for these sources:

- (a) Store all VOC-containing materials and used shop towels in closed containers.
- (b) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.
- (d) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- (e) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.
- (f) Provide operator training on the above work practice standards

**# 005 [25 Pa. Code §129.52d]****Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.**

Source ID 120 and 121 shall comply with the following:

The owner or operator of a miscellaneous metal part coating unit or miscellaneous plastic part coating unit subject to subsection (a)(1) shall comply with the following work practices for cleaning materials:

- (1) Store all VOC-containing cleaning materials and used shop towels in closed containers.
- (2) Ensure that mixing vessels and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.
- (4) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- (5) Minimize VOC emissions from cleaning of application, storage, mixing or conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.