



25-00035

MOLDED FIBER GLASS CO/UNION CITY



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: July 31, 2018

Effective Date: February 5, 2020

Revision Date: February 5, 2020

Expiration Date: [REDACTED]

Revision Type: Modification, Significant

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: 25-00035

Federal TaxId - Plant Code: 34-0684871-1

Owner Information

Name: MOLDED FIBER GLASS CO
Mailing Address: 55 4TH AVE
UNION CITY, PA 16438-1247

Plant Information

Plant: MOLDED FIBER GLASS CO/UNION CITY
Location: 25 Erie County 25807 Union City Borough
SIC Code: 3089 Manufacturing - Plastics Products, Nec

Responsible Official

Name: DENNIS J VORSE
Title: GENERAL MGR/SR. VICE PRES
Phone (814) 438 - 3841

Permit Contact Person

Name: KALA MCFARREN
Title: HR MANAGER
Phone: (814) 438 - 3841 Ext 6702

[Signature]

ERIC A. GUSTAFSON, NORTHWEST REGION AIR PROGRAM MANAGER



Pages 2-18, 20-76, 83-89, and 92-106 are redacted entirely.



SIB **ON** **SIRE** **With Red Elements**

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

006

Operating permit terms and conditions.

This facility's VOC emissions are limited to no more than 75 tons per year (TPY) on a 12-month rolling basis.

Compliance with this limit is to be demonstrated via emission factors for gelcoat and resins in the ANSI Standard "Estimating Emission Factors from Open Molding and Other Composite Processes," emission factors from suppliers for reactive adhesives using the test method described in Appendix A of the Miscellaneous Plastic Parts Coating MACT Standard (40 CFR 63 Subpart PPPP), and material balance for coatings and other VOC containing materials.

[Fulfills alternative RACT II requirements under 25 Pa. Code §§ 129.99 and 129.100]

[REDACTED]

[REDACTED]

SECRET

SECRET **NOFORN**

[REDACTED]

[REDACTED]

[REDACTED]



SECTION 5 - SOURCE INFORMATION

Source ID: 101

Source Name: GELCOAT OPERATION

Source Capacity/Throughput

12.000 Lbs/HR

CATALYST

400.000 Lbs/HR

GELCOAT



I. RESTRICTIONS.

Emission Restriction(s).

002

Operating permit terms and conditions.

Resins and gelcoats used in this process shall have no more than 45% VOC content, byweight, as applied, averaged monthly over all resins and gelcoats used.

[Authority for this condition is also derived from 25 Pa. Code 129.93.]

[This fulfills the alternative (case-by-case) RACT II requirements of 25 Pa. Code §129.99.]

IV. RECORDKEEPING REQUIREMENTS.

004

Operating permit terms and conditions.

Records shall be maintained of VOC content for the resins and gelcoats to ensure compliance with the VOC limit. These records shall be maintained for five (5) years and be made available to the Department upon request.

[This fulfills the alternative (case-by-case) RACT II requirements of 25 Pa. Code §129.100.]



SECTION D: Source Level Determinations

VI. WORK PRACTICE REQUIREMENTS.

006

Alternative RACT proposal and petition for alternative compliance schedule.

This source shall be operated according to good operating practices to minimize emissions of VOC. This shall, at a minimum, consist of the following:

- (a) The permittee shall comply with the applicable work practice standards of 40 CFR 63 Subpart WWWW, Table 4.
- (b) The permittee shall, to the extent practicable, use lower-VOC gelcoat materials.
- (c) The permittee shall minimize emissions from mixing and cleanup operations to the extent practicable; which shall include covering containers during mixing operations, and the use of lower-VOC cleanup solvents.



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MOLDED FIBER GLASS CO/UNION CITY



SECTION 5: SOURCE AND PROCESS INFORMATION

Source ID: 102A

Source Name: NON-ATOMIZED RESIN APPLICATION MECHANICAL

Source Capacity/Throughput

15.000 Lbs/HR

CATALYST

500.000 Lbs/HR

RESINS



I. RESTRICTIONS.

Emission Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Resins and gelcoats used in this process shall have no more than 45% VOC content, by weight, as applied, averaged monthly over all resins and gelcoats used.

[Authority for this condition is also derived from 25 Pa. Code 129.93.]

[This fulfills the alternative (case-by-case) RACT II requirements of 25 Pa. Code §129.99.]

IV. RECORDKEEPING REQUIREMENTS.

004

Operating permit terms and conditions.

Records shall be maintained of VOC content for the resins and gelcoats to ensure compliance with the VOC limit. These records shall be maintained for five (5) years and be made available to the Department upon request.

[This fulfills the alternative (case-by-case) RACT II requirements of 25 Pa. Code §129.100.]



SECTION 3. Source and Remedial Work

VI. WORK PRACTICE REQUIREMENTS.

006

Alternative RACT proposal and petition for alternative compliance schedule.

This source shall be operated according to good operating practices to minimize emissions of VOC. This shall, at a minimum, consist of the following:

- (a) The permittee shall comply with the applicable work practice standards of 40 CFR 63 Subpart VVVVV, Table 4.
- (b) The permittee shall, to the extent practicable, use lower-VOC resin materials.
- (c) The permittee shall, to the extent practicable, use non-atomizing mechanical resin application methods.
- (d) The permittee shall, to the extent practicable, use closed molding methods.
- (e) The permittee shall minimize emissions from mixing and cleanup operations to the extent practicable; which shall include covering containers during mixing operations, and the use of lower-VOC cleanup solvents.



SECTION 2. SOURCE INFORMATION

Source ID: 102B

Source Name: NON-ATOMIZED RESIN APPLICATION MECHANICAL & MANUAL

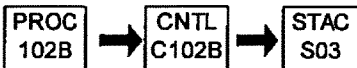
Source Capacity/Throughput

24.000 Lbs/HR

CATALYST

800.000 Lbs/HR

RESINS



I. RESTRICTIONS.

Emission Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Resins and gelcoats used in this process shall have no more than 45% VOC content, by weight, as applied, averaged monthly over all resins and gelcoats used.

[Authority for this condition is also derived from 25 Pa. Code 129.93.]

[This fulfills the alternative (case-by-case) RACT II requirements of 25 Pa. Code §129.99.]

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Records shall be maintained of VOC content for the resins and gelcoats to ensure compliance with the VOC limit. These records shall be maintained for five (5) years and be made available to the Department upon request.

[This fulfills the alternative (case-by-case) RACT II requirements of 25 Pa. Code §129.100.]



SECTION D SOURCE NAME REQUIREMENTS

VI. WORK PRACTICE REQUIREMENTS.

[REDACTED]

006 [25 Pa. Code §129.99]

Alternative RACT proposal and petition for alternative compliance schedule.

This source shall be operated according to good operating practices to minimize emissions of VOC. This shall, at a minimum, consist of the following:

- (a) The permittee shall comply with the applicable work practice standards of 40 CFR 63 Subpart WWWW, Table 4.
 - (b) The permittee shall, to the extent practicable, use lower-VOC resin materials.
 - (c) The permittee shall, to the extent practicable, use non-atomizing mechanical resin application methods.
 - (d) The permittee shall, to the extent practicable, use closed molding methods.
 - (e) The permittee shall minimize emissions from mixing and cleanup operations to the extent practicable; which shall include covering containers during mixing operations, and the use of lower-VOC cleanup solvents.
- [REDACTED]
- [REDACTED]
- [REDACTED]



Source Level Requirements

Source ID: 105

Source Name: PRIMER SPRAY OPERATION (3 BOOTHS & 1 FLASH AREA)

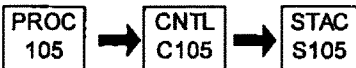
Source Capacity/Throughput

5.000 Lbs/HR

MEK

15.000 Lbs/HR

PAINT



I. RESTRICTIONS.

Emission Restriction(s).

Processes

002

Operating permit terms and conditions.

Resins and gelcoats used in this process shall have no more than 45% VOC content, byweight, as applied, averaged monthly over all resins and gelcoats used.

[Authority for this condition is also derived from 25 Pa. Code 129.93.]

[This fulfills the alternative (case-by-case) RACT II requirements of 25 Pa. Code §129.99.]

003

Operating permit terms and conditions.

a) The surface coatings used in this process shall contain no more than 4.0 pounds of VOCs per gallon, as applied, averaged monthly over all coatings used.

b) VOC emissions from the surface coating operations shall not exceed 40.0 tons per year, based on any consecutive 12 month rolling period.

[Authority for this condition is also derived from 25 Pa. Code 129.93.]

[This fulfills the alternative (case-by-case) RACT II requirements of 25 Pa. Code §129.99.]

IV. RECORDKEEPING REQUIREMENTS.

005

Operating permit terms and conditions.

Records shall be maintained of VOC content for the resins and gelcoats to ensure compliance with the VOC limit. These



SECTION 101 - SOURCE LEVEL REQUIREMENTS

records shall be maintained for five (5) years and be made available to the Department upon request.

[This fulfills the alternative (case-by-case) RACT II requirements of 25 Pa. Code §129.100.]

006 [REDACTED]

Operating permit terms and conditions.

Records shall be maintained of VOC content for the coating to ensure compliance with the VOC per gallon limit. Records shall also be maintained of total VOC emissions calculated on a 12-month rolling basis to ensure compliance with the 40.0 ton per year VOC limit. These records shall be maintained for five (5) years and be made available to the Department upon request.

[This fulfills the alternative (case-by-case) RACT II requirements of 25 Pa. Code §129.100.]

[REDACTED]

VI. WORK PRACTICE REQUIREMENTS.

[REDACTED]

009 [REDACTED]

Alternative RACT proposal and petition for alternative compliance schedule.

This source shall be operated according to good operating practices to minimize emissions of VOC. This shall, at a minimum, consist of the following:

- (a) The permittee shall, to the extent practicable, use lower-VOC coating materials.
- (b) The permittee shall use only HVLP paint application methods.
- (c) The permittee shall minimize emissions from mixing and cleanup operations to the extent practicable; which shall include covering containers during mixing operations, and the use of lower-VOC cleanup solvents.