



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

**TITLE V/STATE OPERATING PERMIT**

Issue Date: June 8, 2018

Effective Date: January 14, 2020

Revision Date: January 14, 2020

Expiration Date: [REDACTED]

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: 49-00020**

Federal Tax Id - Plant Code: 13-3420235-1

Owner Information

Name: TRUCK ACCESSORIES GROUP LLC

Mailing Address: 3560 HOUSELS RUN RD  
MILTON, PA 17847-9006

Plant Information

Plant: TRUCK ACCESSORIES GROUP/MILTON PLT

Location: 49 Northumberland County 49805 Milton Borough

SIC Code: 3792 Manufacturing - Travel Trailers And Campers

Responsible Official

Name: JACQUES KLOPPER

Title: SENIOR VP

Phone: (570) 742 - 2647

Permit Contact Person

Name: TERRY KEHRES

Title: PLT MGR - FIBERGLASS PLT

Phone: (570) 742 - 2647

[Signature]

MUHAMMAD Q. ZAMAN, ENVIRONMENTAL PROGRAM MANAGER, NORTHCENTRAL REGION



Pages 2-3, 7-29, 31, 36-49, 61-81, and 87-94 are redacted entirely.

**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
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P101	FIBERGLASS REINFORCED & CLEANUP		
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P201	PAINTING & CLEANUP OPERATIONS		
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C107A	TRUCK CAP SPRAY BOOTH FILTERS		
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C107B	TONNEAU COVER SPRAY BOOTH FILTERS		
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CD106	VARIOUS BOOTH FILTERS		
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S107A	TRUCK CAP SPRAY BOOTH EXHAUST		
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S107B	TONNEAU COVER SPRAY BOOTH EXHAUST		
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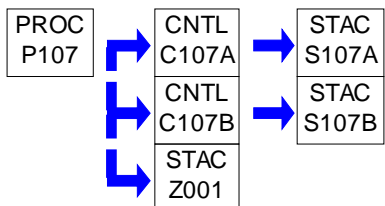
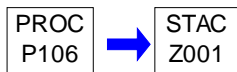
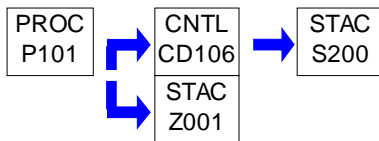
S200	SPRAY BOOTH STACKS		
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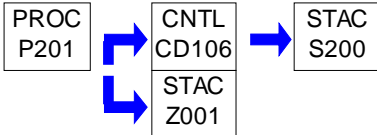
Z001	FUGITIVE EMISSIONS		
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**PERMIT MAPS**



## PERMIT MAPS



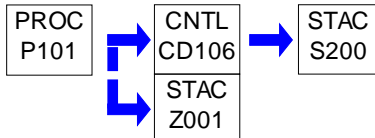
**PERMIT MAPS**

**SECTION D. Source Level Requirements**

Source ID: P101

Source Name: FIBERGLASS REINFORCED &amp; CLEANUP

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).**

# 002

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

The total combined volatile organic compound emissions from Source ID P101 shall not exceed 52.75 tons in any 12 consecutive month period.

# 003

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.99(d)]

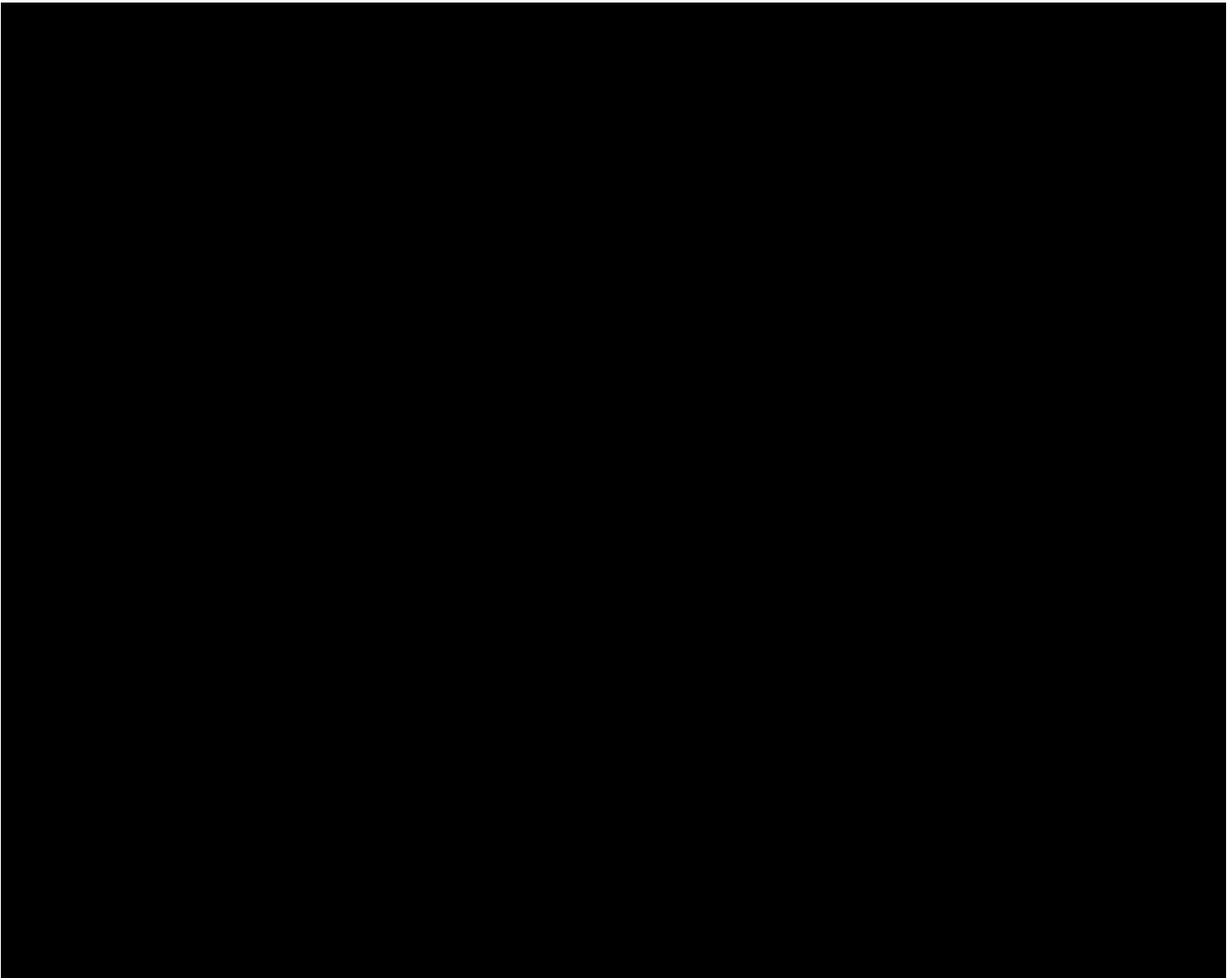
The permittee shall only use gel coat and lamination resins in Source ID P101 that contain no more than 35% styrene by weight, and additionally, all gel coats and resins shall contain vapor-suppression agents.

# 005

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 129.99(d)]

The only cleaning solvents or solutions which may be used in the gel coat and resin spray equipment/roll up equipment cleanup activities associated with Source ID P101 are acetone and ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) with a volatile organic compound content no greater than 8.92 pounds per gallon of solvent provided that it has a vapor pressure no greater than 0.29 mm Hg at 68°F and a volatile hazardous air pollutant content no greater than zero pounds per gallon.

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.**

# 009

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.100 and 40 CFR Section 63.5895]

(a) The permittee shall maintain the following records:

- (1) records of the monthly calculations that demonstrate compliance with volatile organic compound emissions limitations;
- (2) the identity, styrene content (% by weight) and amount of each gel coat used during each individual month in the fiberglass reinforced plastics manufacturing operation;
- (3) the identity, styrene content (% by weight) and amount of each lamination resin used during each individual month in the fiberglass reinforced plastics manufacturing operation;
- (4) the maximum amount of filled resin delivered in a single pump stroke for the primary lamination area pump

**SECTION D. Source Level Requirements**

incorporated in Source ID P101;

(5) the number of pump strokes occurring in Source ID P101 each month;

(6) the total amount of neat resin, in gallons, used at the facility each month;

(7) the volume percent of resin contained in the filled resin used each month; and

(8) the amount of filled resin, in gallons, used in Source ID P101 each month as well as the amount of neat resin, in gallons, used in Source P101 each month.

(b) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

# 012

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.100]

(a) The permittee shall maintain comprehensive accurate records of the ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) used in Source IDs P101, P106 and P109 which shall be adequate to allow compliance to be determined with the requirements contained in any applicable condition contained herein. At a minimum, these records shall contain:

(1) the total combined amount, vapor pressure, volatile organic compound content and total volatile hazardous air pollutant content of the Shipshape (or alternate cleanup solvent) used in Source IDs P101, P106 and P109 during each month;

(2) the total combined amount of volatile organic compounds emitted from the use of Shipshape (or alternate cleanup solvent) in Source IDs P101, P106 and P109 during each month, all calculations performed in determining these monthly values and all supporting data;

(3) the amount of 100% Shipshape (or alternate cleanup solvent) removed from Source IDs P101, P106 and P109 and shipped off site in liquid form each month if determining compliance by using mass balance calculations; and, if the



**SECTION D. Source Level Requirements**

permittee elects to exclude or subtract from the usage values any Shipshape (or alternate cleanup solvent) which is contained in mixtures of Shipshape and sludge, etc. removed from the site,

(4) the amount of 100% Shipshape (or alternate cleanup solvent) in each container of such Shipshape, sludge, etc. mixture and a description of the analytical method by which the acetone content was determined.

(b) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 017 [REDACTED]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

All containers of ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) shall be kept closed except when material is being removed from or introduced into the container. All rags contaminated with Shipshape shall be kept in closed containers when not in use. If Shipshape is applied to a surface for cleaning purposes, it shall not be allowed to remain on the surface and unnecessarily evaporate to the atmosphere. To minimize evaporation, Shipshape shall be removed from all surfaces as soon as possible after application to the surfaces.

**# 020 [REDACTED]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.99(d) and 40 CFR Section 63.5805]

All solvents or solutions used for gel coat and resin spray line cleaning shall be flushed into closed containers and shall be done under the minimum pressure possible. Under no circumstances shall cleanup solvent or solution be removed from gel coat and resin spray lines by spraying through a spray gun into the air. Under no circumstances shall cleanup solvent or solution be removed from gel coat and resin spray lines by spraying through a spray gun at a pressure which would unnecessarily promote atomization of the solvent or solution.

**# 021 [REDACTED]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.99(d)]

**SECTION D. Source Level Requirements**

All gel coats and resins sprayed in Source ID P101 shall be applied using airless or air-assisted airless spray systems (or equivalent or better, as determined by the Department).

**# 022** [REDACTED]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 129.99(d), 127.1 and 127.12 and 40 CFR 63.5805]

The permittee shall, wherever and whenever possible, utilize cleanup solvent handling practices designed to minimize the evaporation of cleanup solvent into the atmosphere. Under no circumstances shall cleanup solvent be stored in uncovered containers or be disposed of by allowing it to evaporate into the atmosphere.

**# 023** [REDACTED]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 129.99(d)]

The ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) which is used as a cleanup solvent in the gel coat and resin spray equipment/roll up equipment cleanup activities associated with Source ID P101 shall be applied by hand.

**VII. ADDITIONAL REQUIREMENTS.**

**# 024** [REDACTED]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

(a) The maximum combined usage of ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) in Source IDs P101, P106 and P109 shall not exceed 1,000 gallons in any 12 consecutive month period or result in a total combined emission of more than 26 pounds of volatile organic compounds in any 12 consecutive month period, except that, in cases where a material substitution has been made and an alternate material is employed which has a lower air contaminant emission potential than Shipshape, as determined by the Department of Environmental Protection, the permittee may use more of the respective material in a 12 consecutive month period than they may be limited to pursuant to the material usage limitation contained herein provided the resultant emissions of volatile organic compounds does not exceed 26 pounds in any 12 consecutive month period.

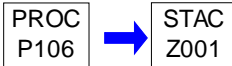
(b) In determining compliance with the volatile organic compound emission limitation, the permittee may use evaporative loss emission calculations instead of mass balance calculations unless the Department of Environmental Protection notifies the permittee that the use of the evaporative loss emission calculations is resulting in erroneous emission values. If determining compliance with the volatile organic compound emission limitation by using mass balance calculations, any Shipshape removed from Source IDs P101, P106 and P109 and shipped off site in liquid form need not be counted provided it is 100% Shipshape. Mixtures of Shipshape, sludge, etc. may not be excluded or subtracted unless the Shipshape content of each container of such mixture removed from Source IDs P101, P106 and P109 has been determined by analysis and then only the Shipshape portion of the mixture may be excluded.

**SECTION D. Source Level Requirements**

Source ID: P106

Source Name: WETOUT REINFORCEMENT, SECONDARY &amp; BASE RAIL LAMINATION AREAS

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).**

# 001

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

The total combined emissions from Source P106 shall not at any time exceed any of the following limitations:

(1) 26.2 tons of volatile organic compounds in any 12 consecutive month period. This volatile organic compound emission limitation excludes the volatile organic compound emissions from the use of ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) but includes the volatile organic compound emissions from the use of Axel Plastics Research Laboratories, Inc. Xtend 19SAM (or alternate material determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) in the base rail lamination area incorporated in Source ID P106.

(2) 24.31 tons of all volatile hazardous air pollutants in any 12 consecutive month period.

**Throughput Restriction(s).**

# 003

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

(a) The volatile organic compound content of the Axel Plastics Research Laboratories, Inc., Xtend 19SAM (or alternate material determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) applied in the base rail lamination area incorporated in Source ID P106 shall not exceed 5.71 pounds per gallon.

(b) No other volatile organic compound-containing materials shall be used in Source ID P106 other than neat resin and ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential).

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.**

# 006

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.100]

(a) The permittee shall maintain comprehensive accurate records for Source ID P106 which shall be adequate to allow compliance to be determined with the requirements contained in any applicable condition contained herein. At a minimum, these records shall contain:

- (1) the identity, volatile organic compound content, total volatile hazardous air pollutant content, styrene content and methyl methacrylate content of the neat resin used in Source ID P106 during each month;
- (2) the total combined amount of neat resin used in Source ID P106 during each month;
- (3) the identity, amount, volatile organic compound content and total volatile hazardous air pollutant content of the Axel Plastics Research Laboratories, Inc. Xtend 19SAM (or alternate material) used in the base rail lamination area incorporated in Source ID P106 during each month;
- (4) the identity, amount, volatile organic compound content, total volatile hazardous air pollutant content and styrene content of any other volatile organic compound-containing material, volatile hazardous air pollutant-containing material or styrene-containing material used in Source ID P106 during each month other than Shipshape - resin cleaner (or alternate cleanup solvents determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential);
- (5) the weighted average combined styrene and methyl methacrylate content (% by weight) of the neat resin used in Source ID P106 during the prior 12 consecutive months (to be updated on a monthly basis), all calculations performed in determining these weighted average 12 month values and all supporting data;
- (6) the total amount of volatile organic compounds emitted from Source ID P106 during each month (excluding the volatile

**SECTION D. Source Level Requirements**

organic compound emissions from the use of ISP Technologies Shipshape - resin cleaner or alternate cleanup solvent), all calculations performed in determining these monthly values and all supporting data; and

(7) the total amount of volatile hazardous air pollutants emitted from Source ID P106 each month, all calculations performed in determining these monthly values and all supporting data.

(b) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

**# 007** [REDACTED]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.100]

(a) The permittee shall maintain comprehensive accurate records for the purposes of determining compliance with the respective resin usage and emission limitations contained herein for Source P106. At a minimum, these records shall contain:

(1) the maximum amount of filled resin delivered in a single pump stroke for the primary lamination area pump incorporated in Source ID P101;

(2) the number of pump strokes occurring in Source ID P101 each month;

(3) the total amount of neat resin, in gallons, used at the facility each month;

(4) the volume percent of resin contained in the filled resin used each month;

(5) the amount of filled resin, in gallons, used in Source ID P101 each month as well as the amount of neat resin, in gallons, used in Source ID P101 each month; and

(6) the total combined amount of neat resin, in gallons, used in Source ID P106 each month, all calculations performed in determining these monthly values and all supporting data.

(b) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

**# 009** [REDACTED]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.100]

The total combined monthly neat resin usage in Source ID P106 may be determined by subtracting the amount of neat resin used in Source P101 each month from the total amount of neat resin used at the facility each month.

**# 010** [REDACTED]

**Operating permit terms and conditions.**

(a) The permittee shall maintain comprehensive accurate records of the total combined amount of acetone used in Source

**SECTION D. Source Level Requirements**

IDs P101, P105, P106 and P109 each month as well as the amount of 100% acetone removed from Source IDs P101, P105, P106 and P109 and shipped off site in liquid form each month.

(b) If the permittee excludes or subtracts from the usage total any acetone which is contained in a mixture of acetone and sludge, etc. removed from Source IDs P101, P105, P106 and P109, records must also be maintained of the amount of acetone in each container of such material removed and a description of the analytical method by which this was determined.

(c) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

**# 011**

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.100]

(a) The permittee shall maintain comprehensive accurate records of the ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) used in Source IDs P101, P106 and P109 which shall be adequate to allow compliance to be determined with the requirements contained in any applicable condition contained herein. At a minimum, these records shall contain:

(1) the total combined amount, vapor pressure, volatile organic compound content and total volatile hazardous air pollutant content of the Shipshape (or alternate cleanup solvent) used in Source IDs P101, P106 and P109 during each month;

(2) the total combined amount of volatile organic compounds emitted from the use of Shipshape (or alternate cleanup solvent) in Source IDs P101, P106 and P109 during each month, all calculations performed in determining these monthly values and all supporting data;

(3) the amount of 100% Shipshape (or alternate cleanup solvent) removed from Source IDs P101, P106 and P109 and shipped off site in liquid form each month if determining compliance by using mass balance calculations; and, if the permittee elects to exclude or subtract from the usage values any Shipshape (or alternate cleanup solvent) which is contained in mixtures of Shipshape and sludge, etc. removed from the site,

(4) the amount of 100% Shipshape (or alternate cleanup solvent) in each container of such Shipshape, sludge, etc. mixture and a description of the analytical method by which the acetone content was determined.

(b) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.**

# 015 [REDACTED]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

All containers of ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) shall be kept closed except when material is being removed from or introduced into the container. All rags contaminated with Shipshape shall be kept in closed containers when not in use. If Shipshape is applied to a surface for cleaning purposes, it shall not be allowed to remain on the surface and unnecessarily evaporate to the atmosphere. To minimize evaporation, Shipshape shall be removed from all surfaces as soon as possible after application to the surfaces.

# 017 [REDACTED]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12, and 129.99(d)]

The ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of



**SECTION D. Source Level Requirements**

Environmental Protection to have an equivalent, or lower, air contaminant emission potential) which is used as a cleanup solvent in Source ID P106 shall be applied by hand.

**# 018** [REDACTED]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

(a) The neat resin used in Source ID P106 shall be applied using nonatomized resin application technology.

(b) "Nonatomized resin application technology" is defined as a resin application system in which resin flows from the applicator in a steady and observable coherent flow without visible droplets for a minimum distance of three inches from the application orifices and which results in a volatile organic hazardous air pollutant emission rate which is no greater than that predicted by the use of the applicable nonatomized application equations contained in Table 1 of Subpart WWWW of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.5780 through 63.5935.

(c) In order to demonstrate compliance with this condition, the permittee must demonstrate to the satisfaction of the Department of Environmental Protection that resin application systems in use in Source P106 meet these requirements. As part of this demonstration, the permittee must provide to the Department of Environmental Protection documentation (from the system vendor, etc.), which attests that the specific design incorporated in the resin application systems in use in Source ID P106 have been tested and found to generate volatile organic hazardous air pollutants at no greater a rate than that predicted by equation (1)(c)(ii) contained in Table 1 of Subpart WWWW of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.5780 through 63.5935, which is for use with open molding operations using nonatomized mechanical resin application equipment and vapor-suppressed resin containing less than 33% by weight organic hazardous air pollutants.

**# 019** [REDACTED]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

The Axel Plastics Research Laboratories, Inc., Xtend 19SAM (or alternate material determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) applied in the base rail lamination area incorporated in Source ID P106 shall be applied by hand only.

**VII. ADDITIONAL REQUIREMENTS.**

**# 020** [REDACTED]

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

(a) The maximum combined usage of ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) in Source IDs P101, P106 and P109 shall not exceed 1,000 gallons in any 12 consecutive month period or result in a total combined emission of more than 26 pounds of volatile organic compounds in any 12 consecutive month period, except that, in cases where a material substitution has been made and an alternate material is employed which has a lower air contaminant emission potential than Shipshape, as determined by the Department of Environmental Protection, the permittee may use more of the respective material in a 12 consecutive month period than they may be limited to pursuant to the material usage limitation contained herein provided the resultant emissions of volatile organic compounds does not exceed 26 pounds in any 12 consecutive month period.

(b) In determining compliance with the volatile organic compound emission limitation, the permittee may use evaporative loss emission calculations instead of mass balance calculations unless the Department of Environmental Protection notifies the permittee that the use of the evaporative loss emission calculations is resulting in erroneous emission values. If determining compliance with the volatile organic compound emission limitation by using mass balance calculations, any Shipshape removed from Source IDs P101, P106 and P109 and shipped off site in liquid form need not be counted provided it is 100% Shipshape. Mixtures of Shipshape, sludge, etc. may not be excluded or subtracted unless the

**SECTION D. Source Level Requirements**

Shipshape content of each container of such mixture removed from Source IDs P101, P106 and P109 has been determined by analysis and then only the Shipshape portion of the mixture may be excluded.

**# 022** [REDACTED]  
**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12, and 129.99(d)]

The only cleanup solvents that may be used in Source ID P106 are acetone and ISP Technologies, Inc. Shipshape - resin cleaner (or alternate material determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential).

**# 023** [REDACTED]  
**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

The ISP Technologies, Inc. Shipshape - resin cleaner (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) which is used as a cleanup solvent in Source ID P106 shall have a vapor pressure no greater than 0.29 mm Hg at 68°F, a volatile organic compound content no greater than 8.92 pounds per gallon of solvent and a volatile hazardous air pollutant content no greater than zero pounds per gallon of solvent.

**SECTION D. Source Level Requirements**

# 026

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

(a) The neat resin used in Source ID P106 shall have a combined styrene and methyl methacrylate content of no more than 32% by weight (weighted average over any 12 consecutive month period with a maximum of 35% by weight for any single shipment received) as well as a vapor suppressant factor of at least 0.05.

(b) No volatile hazardous air pollutant-containing material other than neat resin shall be used in Source ID P106.

# 027

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

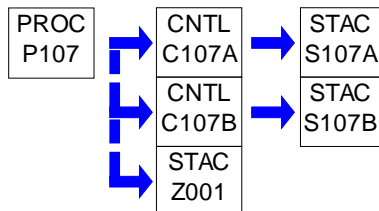
The total combined amount of neat resin used in Source ID P106 shall not exceed 158,199 gallons in any 12 consecutive month period, except that, in cases where a material substitution has been made and an alternate material is employed which has a lower air contaminant emission potential than neat resin, as determined by the Department of Environmental Protection, the permittee may use more of the respective material in a 12 consecutive month period than they may be limited to pursuant to the material usage limitation contained herein provided the resultant emissions of volatile organic compounds, volatile hazardous air pollutants, styrene and any other air contaminants do not exceed any applicable annual (12 consecutive month) emission limitation contained herein.

**SECTION D. Source Level Requirements**

Source ID: P107

Source Name: TRUCK CAP &amp; TONNEAU COVER HEADLINER ADHESIVE PROCESS

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).**

# 002

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

The total combined emission of volatile organic compounds from Source ID P107 shall not exceed 3.52 tons in any 12 consecutive month period.

**Throughput Restriction(s).**

# 004

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12, and 129.99(d)]

No more than 12,000 gallons of CASA 246-DB (or alternate adhesive determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential), 27 gallons of Quick Clean #6 (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential), and 30 gallons of Dupont 99K black paint (or alternate material determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) shall be used in Source ID P107 in any 12 consecutive month period, except that, in cases where a material substitution has been made and an alternate material is employed which has a lower air contaminant emission potential than the original material, as determined by the Department of Environmental Protection, the permittee may use more of the respective material in a 12 consecutive month period than they may be limited to pursuant to the material usage limitation contained herein provided the resultant emissions of volatile organic compounds, volatile hazardous air pollutants, styrene and any other air contaminants do not exceed any applicable annual (12 consecutive month) emission limitation contained herein.

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.**

# 006

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.100]

(a) The permittee shall maintain comprehensive accurate records for Source ID P107 which shall be adequate to allow compliance to be determined with the requirements contained in any applicable condition contained herein. At a minimum, these records shall contain:

(1) the amount, volatile organic compound content, total volatile hazardous air pollutant content and ammonia content of the CASA 246-DB (or alternate adhesive) used during each month;

(2) the amount, volatile organic compound content and total volatile hazardous air pollutant content of the Quick Clean #6 (or alternate cleanup solvent) used during each month;

(3) the amount, volatile organic compound content and total volatile hazardous air pollutant content of the Dupont 99K black paint (or alternate material) used during each month;

(4) the identity, amount, volatile organic compound content and total volatile hazardous air pollutant content of any other volatile organic compound-containing material or volatile hazardous air pollutant-containing material used in Source ID P107 during each month;

(5) the total amount of volatile organic compounds emitted from Source ID P107 during each month, all calculations performed in determining these monthly values and all supporting data; and

(6) the total amount of volatile hazardous air pollutants emitted from Source ID P107 during each month, all calculations performed in determining these monthly values and all supporting data.

(b) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.**

# 008

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

The CASA 246-DB (or alternate adhesive determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) and Dupont 99K black paint (or alternate material determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) used in Source ID P107 shall only be applied in either the truck cap headliner adhesive spray booth incorporated in Source ID P107 or the tonneau cover headliner adhesive spray booth incorporated in Source ID P107 and shall be applied only with high volume low pressure spray equipment (or alternate spray application technology determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential).

# 009

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

(a) All containers of CASA 246-DB (or alternate material determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential), Quick Clean #6 (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) and Dupont 99K black paint (or alternate material determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) used in Source ID P107 shall be kept closed except when material is being removed from or introduced into the container.

(b) All rags contaminated with Quick Clean #6 shall be kept in closed containers when not in use.

**VII. ADDITIONAL REQUIREMENTS.**

# 010

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

(a) The only adhesive used in Source ID P107 shall be CASA 246-DB (or alternate adhesive determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) with a volatile organic compound content no greater than 0.57 pounds per gallon.

(b) The only cleanup solvent used in Source ID P107 shall be Quick Clean #6 (or alternate cleanup solvent determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) with a volatile organic compound content no greater than 1.32 pounds per gallon prior to being mixed with water.

(c) The only paint used in Source ID P107 shall be Dupont 99K black paint (or alternate material determined by the Department of Environmental Protection to have an equivalent, or lower, air contaminant emission potential) with a volatile organic compound content no greater than 5.3 pounds per gallon.

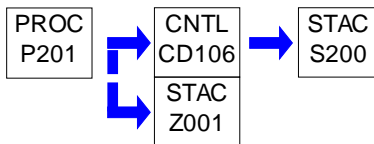
(d) No other volatile organic compound-containing material shall be used in Source ID P107 than those specified in (a), (b) and (c) above.

**SECTION D. Source Level Requirements**

Source ID: P201

Source Name: PAINTING &amp; CLEANUP OPERATIONS

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).**

# 003

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.99(d)]

{Compliance with this limitation will assure compliance with the Best Available Technology limitation of 93.90 tons in any 12 consecutive month period pursuant to 25 Pa. Code Sections 127.1 and 127.12}

The total volatile organic compound emissions from the painting operations of Source ID P201, including the volatile organic compound emissions from all associated cleanup activities of Source P201, shall not exceed 81.11 tons in any 12 consecutive month period.

# 004

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

(a) None of the coatings applied in Source ID P201 shall be in excess of 6.28 pounds of volatile organic compounds per gallon of coating (minus water), as mixed for application.

(b) The solvent density adjustment specified in 25 Pa. Code Section 129.52 need not be applied in determining compliance with this limitation.

# 005

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.99(d)]

(a) All clear coatings (transparent top coats) used in Source ID P201 shall contain no more than 3.50 pounds of volatile organic compounds per gallon of coating, as applied.

(b) The solvent density adjustment specified in 25 Pa. Code Section 129.52 need not be applied in determining compliance with this limitation.

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.**

# 010

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Section 129.100]

(a) The permittee shall maintain the following records:

- (1) Records of the calculations that demonstrate compliance with the volatile organic compound emissions limitations.
- (2) The identity, quantity and volatile organic compound content of every individual volatile organic compound-containing component, cleanup solvent and other material used in Source ID P201 during each month.
- (3) The mix ratio the automatic clearcoat proportioner system was set at during the month as well as the identity and



**SECTION D. Source Level Requirements**

quantity of each component mixed in the proportioner during that month (Note: If the mix ratio is changed during the month, the quantity of each component used at each different mix ratio must be recorded).

(4) The actual mix ratio used for every batch of clearcoat mixed manually during the month (if any) as well as the identity and quantity of each component used for each individual manually-mixed batch of clearcoat.

(5) The identity and quantity of each component mixed together for each individual batch of every type of coating (primer, basecoat, clearcoat, etc.), other than clearcoat, mixed during each month.

(6) The quantity and volatile organic compound content of the waste coatings generated during the month.

(7) The identity and quantity of all cleanup solvents used during the month exclusively for cleanup activities associated with Source ID P201.

(8) The amount of spent cleanup solvent generated during the month exclusively by the cleanup activities associated with Source ID P201 which is shipped off-site in liquid form.

(9) All updated coating component, cleanup solvent, etc. composition data and/or waste coating/waste solvent volatile organic compound analyses as the Department may request.

(10) The amount of basecoat and clearcoat applied in Source P201 on a monthly basis to verify compliance with each respective throughput limitation.

(b) All records generated pursuant to this condition shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.**

# 015

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

All solvents used for spray line cleaning shall be flushed into closed containers and shall be done so under the minimum pressure possible. Under no circumstances shall cleanup solvent be removed from spray lines by spraying through a spray gun into the air. Under no circumstances shall cleanup solvent be removed from spray lines by spraying through a spray gun at a pressure which would unnecessarily promote atomization of the solvent. All containers of coating components and cleanup solvent shall be kept closed when not in actual use and solvent-wet rags, etc. shall be stored in closed containers when not in actual use. Under no circumstances shall waste coating components or waste solvent be

**SECTION D. Source Level Requirements**

disposed of via evaporation or solvent-wet rags, etc. be treated or pretreated prior to disposal or reuse by subjecting them to air drying or any other means of solvent removal which would cause solvent to unnecessarily be evaporated into the air.

**# 016**

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12 and 129.99(d)]

All coatings applied in Source ID P201 shall be applied using high volume low pressure (HVLP) spray systems (or spray systems having an equivalent, or better, transfer efficiency, as determined by the Department).