

A. Keystone Carbon Company

Keystone Carbon Company operates a powder metal parts and self-lube bearings manufacturing facility located in Elk County, Pennsylvania and is considered a major source of VOC. In this instance, RACT has been established and imposed by PADEP in an operating permit. On February 4, 2003, PADEP submitted operating permit No. OP 24-016 to EPA as a SIP revision. The permit lists the following sources and their respective control devices: (1) Powder blending process—methanol condensation system, (2) sintering ovens—pilot light (flare), (3) primary processing (hot forming)—0.08 pounds methanol/pound hot formed product, (4) heat treating (three tempering furnaces)—thermal oxidizers, (5) heat treating (two draw furnaces)—electrostatic precipitator, (6) heat treating (two induction hardening machines)—electrostatic precipitator, and (7) miscellaneous plant heating units. The permit contains a requirement for the facility to implement the RACT plan as defined in 25 Pa. Code Chapter 129 section 129.91. The permit also contains a requirement to maintain and operate facility degreasers (sealing and parts cleaning) in accordance with 25 Pa. Code Chapter 129 section 129.63. In addition, the permit contains the primary processing methanol (MeOH) emission limit of 0.08 pounds per pound of hot formed part produced. Records shall be maintained for the methanol usage and hot formed parts produced. Records shall also be maintained in accordance with 25 Pa. Code Chapter 129 section 129.95 and shall be made available to PADEP upon request.

B. Mack Trucks, Inc.

Mack Trucks, Inc., Macungie Assembly facility is located in Lower Macungie Township, Northampton County, Pennsylvania. Heavy duty trucks are assembled at the facility and it is considered a major source of VOC and NO_x. In this instance, RACT has been established and imposed by PADEP in an operating permit. On February 4, 2003, PADEP submitted operating permit No. 39-0004 to EPA as a SIP revision. This permit requires Mack Trucks, Inc. and any associated air cleaning devices to be operated and maintained in a manner consistent with good operating and maintenance practices. The permit lists the following sources that are regulated under the Commonwealth's presumptive RACT requirements: (a) Four (4) 6-cylinder engines, two (2) Cummin series NT-85-5-f2, one (1) Caterpillar series 3304 and

one (1) Detroit series 92 engine which are limited to an annual capacity factor of less than five percent, or (b) an emergency standby engine operating less than 500 hours in a consecutive 12-month period. These sources shall be operated and maintained in accordance with good air pollution control practices. The permit contains a NO_x RACT emission limit of 441 gallons fuel oil/hour/boiler for the three (3) 67.1 MMBTU/hour cleaner Brooks boilers. The permit also contains a VOC RACT emission limit for clean-up solvent usage, 91.0 tons per year, for the entire facility. All cleaning operations are required to store new and used cleaning solvents in closed containers. A record of the quantity and identity of all VOC solvents used in clean-up operations for the entire facility are required to be recorded on an annual basis. These records shall be submitted to PADEP, in an approved format, within 90 days after the end of the year.

The VOC RACT for the facility is regulated by source and listed below:

1. Small Parts/Oven (39-318-088)

(a) The operation of this source is limited to 12,500 trucks per year.

(b) The maximum VOC emissions limit from this source is 175.0 pounds per day and 21.9 tons per year based on coating usage.

(c) The maximum coating usage for this source is 50 gallons per day and 12,500 gallons per year.

(d) The limit for all coatings used in this source shall not exceed an in-line average of 3.5 pounds per gallon minus water for any 24-hour period.

(e) The facility is required to keep on hand chemical composition data for all coatings used by this source, and to record on a daily basis all coatings and any VOC solvent or thinner usage. These data are to be submitted to PADEP in an approved format on a quarterly basis within 30 days after the end of the quarter.

2. Cab Color Spray Paint Booth/Undercoat and Oven (39-318-090)

(a) The operation of this source is limited to 12,500 trucks per year.

(b) The maximum VOC emissions limit from the cab operation is 612.5 pounds per day and 76.6 tons per year based on coating usage.

(c) The maximum coating usage for the cab color operation is 175 gallons per day and 43,750 gallons per year.

(d) The limit for all coatings used in this source shall not exceed an in-line average of 3.5 pounds per gallon minus water for any 24-hour period.

(e) The facility is required to keep on hand chemical composition data for all

coatings used by the cab coating operation, and to record on a daily basis all coatings and any VOC solvent or thinner usage. These data are to be submitted to PADEP in an approved format on a quarterly basis within 30 days after the end of the quarter.

(f) The facility is required to record the quantity and identify all VOC solvents used for clean up purposes for the entire plant facility on an annual basis and submitted to PADEP in an approved format within 90 days after the end of the year.

(g) The maximum VOC emissions limit from the undercoat operation is 153.5 pounds per day and 19.2 tons per year based on coating usage.

(h) The maximum coating usage for the undercoat operation is 50 gallons per day and 12,500 gallons per year.

(i) The limit for all coatings for the undercoating operation is 3.07 pounds VOC per gallon.

(j) The facility is required to keep on hand chemical composition data for all coatings used by the undercoat operation, and to record on a daily basis all coatings and any VOC solvent or thinner usage. These data are to be submitted to PADEP in an approved format on a quarterly basis within 30 days after the end of the quarter.

3. Final Touch-Up Paint Spray Booth and Oven (39-318-091)

(a) The operation of this source is limited to 50 trucks per day, 250 trucks per week and 12,500 trucks per year.

(b) The maximum VOC emissions limit from this source is 87.5 pounds per day and 10.9 tons per year based on coating usage.

(c) The maximum coating usage from this source is 25 gallons per day and 6,250 gallons per year.

(d) The limit for all coatings used in this source shall not exceed an in-line average of 3.5 pounds per gallon minus water for any 24-hour period.

(e) The facility is required to keep on hand chemical composition data for all coatings used by this source, and to record on a daily basis all coatings and any VOC solvent or thinner usage. These data are to be submitted to PADEP in an approved format on a quarterly basis within 30 days after the end of the quarter.

4. "O" Line Chassis Paint Spray Booth (39-318-092)

(a) The operation of this source is limited to 50 trucks per day, 250 trucks per week and 12,500 trucks per year.

(b) The maximum VOC emissions limit from this source is 87.5 pounds per day and 10.9 tons per year based on coating usage.