

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

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.	<u>OP-15-0026A</u>	Source(s)	<u>Facility VOC RACT</u>
Owner	<u>American Inks and Coatings Corporation</u>	<u>Air</u>	<u>Two-Roll Mill Nos. 1-4, three Ball Mills, four Sand Mills & other sources described herein.</u>
Address	<u>P.O. Box 803</u>	Cleaning	<u></u>
	<u>Valley Forge, PA 19482</u>	Device	<u></u>
Attention	<u>Mr. Jay Morrow</u>	Location	<u>Schuylkill Township</u>
	<u></u>		<u>Chester County</u>
	<u></u>		<u></u>

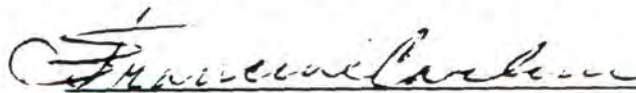
This permit is subject to the following conditions:

1. That the source(s) and any associated air cleaning device(s) are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of the applicable plan approval(s) issued;
 - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. 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 01/10/1997
Expires 01/10/2002


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Harrisburg, Central Office
RACT Binder
Re (GJC)142-16

Operating Permit Conditions
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CONDITIONS (continued):

<u>Building</u>	<u>Source</u>	<u>Allowable Emissions TPY</u>
5	2 stationary mixing vessels	3.39
5	2 stationary mixing vessels	4.84
6	2 stationary mixing vessels	4.85
6	10 stationary mixing vessels	6.07
6	5 stationary mixing vessels	6.07
6	3 stationary mixing vessels	4.37
8	1 portable mixing vessel	1.58
8	1 portable mixing vessel	1.31
8	1 portable mixing vessel	0.79
8	7 portable mixing vessels	3.69
8	4 portable mixing vessels	4.22
8	3 portable mixing vessels	0.93
8	2 portable mixing vessels	0.23
 <u>Milling Equipment:</u>		
5	Netzsch LMJ	0.062
5	Steel Shot	0.148
5	Netzsch Molinex	0.049
5	Sand	0.148
5	Ball	1.179
5	Ball	2.823
5	Ball	0.148
6	Sand	0.148
6	Sand	0.295
6	Sand	0.443
12	Two-Roll Mill No. 1	6.64
11	Two-Roll Mill No. 2	7.50
11	Two-Roll Mill No. 3	8.12
11	Two-Roll Mill No. 4	7.64
Storage Tanks	Eleven Aboveground Solvent Storage Tanks	0.72
Boilers	Three Facility Boilers	0.344
Laboratory		2.60
Total:		94.757

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CONDITIONS (continued):

3. This Operating Permit includes Reasonably Available Control Technology (RACT) determinations and revises the previously issued RACT Permit No. OP-15-0026 as required by Title I provisions of the CAAA, and, 25 PA Code Sections 129.91 through 129.95 for the sources listed in Condition No. 7.
4. Total volatile organic compounds emissions from this facility shall not exceed 95 tons/year (as calculated by the Department) on a 12 months rolling average basis.
5. VOC RACT for all sources mentioned in Condition 3 shall be the operation and maintenance of the sources in accordance with manufacturer's specifications and good air pollution control practices.
6. American Inks shall operate this facility in accordance with the following requirements:
 - A. All mills (except roll mills), tanks, vats, or vessels shall be equipped with a cover which completely covers the mill, tank, vat, or vessel, except for an opening no longer than necessary to allow for safe clearance of any mixer shaft. Such a cover shall extend at least 1/2" beyond the outer rim of the opening or be attached at the rim.
 - B. All covers shall remain closed, except when production, sampling, maintenance, or inspection procedures require access.
 - C. All covers shall be maintained in good condition, such that when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim.

7. **Emission Limitation**

- A. ~~American Inks shall not exceed the VOCs emissions limitations for the following sources:~~

Mixing vessels:

<u>Building</u>	<u>Source</u>	<u>Allowable Emissions TPY</u>
5	8 stationary mixing vessels	4.84
5	7 stationary mixing vessels	8.47

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CONDITIONS (continued):

- B. American Inks shall limit the hours of operation of sources in Building 5, 6, 8, 11 and 12 to 4992 hours per year for each source.
8. **Monitoring, Recordkeeping and Reporting Procedures:**
- A. American Inks shall record the Hours of Operation for each individual source covered under this Operating Permit.
- B. American Inks shall inspect lids and covers of sources specified in Condition 7 on a weekly basis.
- C. American Inks shall keep records to demonstrate compliance with §129.91-129.94 of Pennsylvania RACT regulations. All records shall be maintained at the facility for at least two (2) years and will be made available to the Department upon request. Recordkeeping shall be conducted for major VOC sources that are identified in the RACT proposal and shall include, where appropriate, material throughputs, or number of batches. Chemical usage, inventory records, and material balances shall be used to calculate VOC emissions using Department's approval.
9. The expiration date shown on the Operating Permit OP-15-0026A is for State purposes only. For Federal enforcement purposes the RACT portion of this Operating Permit shall remain in effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed pursuant to 40 CFR 51 and approved by United States Environmental Protection Agency (EPA). ~~The Operating Permit shall become enforceable by EPA upon its approval of the above as a revision to the SIP.~~
10. Company shall provide a training program to educate the employees on the proper handling of solvents and the effects of VOCs on the environment and human health.
11. American Inks shall not at any time allow emissions 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.

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CONDITIONS (continued):

12. 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 limitation specified in Section 123.31 and condition (4) above or 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.
13. 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 with any restrictions or limitations established by the Department at such time as it notifies the company that testing required.
14. Any notification required as a result of any condition herein should be directed to:

~~Regional Air Quality Manager
Department of Environmental Protection
Suite 6010, Lee Park
555 North Lane
Conshohocken, PA 19428~~

Re 30 (GJC)142-17

