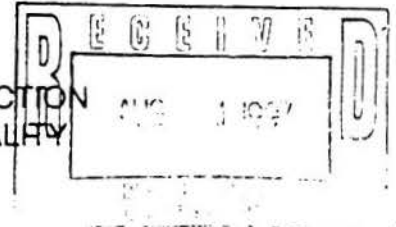


COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - BUREAU OF AIR QUALITY



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-15-0040</u>	Source(s)	<u>Flexographic Printing Facility</u>
Owner	<u>Beckett Corporation</u>	Air	<u></u>
Address	<u>219 Welsh Pool Road</u>	Cleaning	<u></u>
	<u>Lionville, PA 19341</u>	Device	<u></u>
Attention	<u>Mr. Thomas Kaufmann</u>	Location	<u>Uwchlan Township</u>
	<u>Executive Vice President</u>		<u>Chester County</u>

This permit is subject to the following conditions:

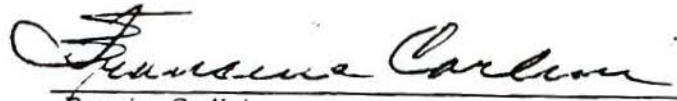
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location 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 07/08/1997

Expires ~~07/08/2002~~


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (GJC)135-12

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-15-0040
BECKETT CORPORATION

CONDITIONS (continued):

3. This RACT Operating Permit includes Reasonably Available Control Technology (RACT) determinations, as required by Title I provisions of the CAAA, and 25 PA Code Sections 129.91 through 129.95 for Nos. 101 and 102 Webtron presses, Nos. 103 and 104 Mark Andy presses, Nos. 105, 106, 107, and 108 Nilpeter presses.
4. The total volatile organic compound emission from the facility shall not exceed 81 tons per year, as a 12 month rolling sum the facility shall not exceed 81 tons per year.
5. Beckett shall implement an employee training program for all new and existing personnel involved in printing and cleaning operations. This training shall address steps to reducing VOC usage, the requirements of this operating permit, as well as the requirements of all applicable State, and Federal regulations. The training program will include the following:
 1. A list of all personnel by name and job description that are required to be trained;
 2. An outline of the subjects to be covered in the initial and refresher training for each person, or group of personnel;
 3. Lesson plans for courses to be given at the initial and the annual refresher training that include appropriate application techniques for appropriate management of cleanup wastes;
 4. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
6. The company shall discontinue the use of Daetwyler CR-1, and Glycol Ether PM/ Ammonia mixture.
7. The company shall implement the following work standards:
 - a. The 55 gallon storage drums shall be equipped with a double valve system.
 - b. Containers storing volatile substances shall be closed when not in use.
 - c. Solvent-laden rags shall be stored in closed containers and disposed of according to Department approved procedures.
 - d. The lid of drums and containers containing inks, and solvents shall be closed when the content is not being transferred.
 - e. Any spills of inks and solvents shall be cleaned up, as soon as possible.
8. Company shall maintain records, in accordance with the minimum recordkeeping requirements of 25 PA Code § 129.95. At a minimum, this shall include:
 - a. Records shall provide sufficient data and calculations to clearly demonstrate that the requirements of Conditions 4 and 5 are met.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-15-0040
BECKETT CORPORATION

CONDITIONS (continued):

- b. Data or information required to determine compliance with Condition 4 shall be recorded and maintained in a time frame, consistent with the averaging period of the requirement.
 - c. Records of cleaning solvent use, each month, shall be maintained.
 - d. Beckett must record, on a monthly basis, quantity of ink (in pounds), used in the flexographic presses.
 - e. Records shall be retained for at least two years and be made available to the Department upon request.
9. The operation of the flexible packaging facility shall not, at any time, result in the emission 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.
10. The company shall, within an hour of occurrence, notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of 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.
11. The expiration date shown on this RACT Operating Permit is for State purposes. For Federal Enforcement purposes, the RACT provisions of this Operating Permit shall remain in effect as part of the State Implementation Plan (SIP), until replaced pursuant to 40 CFR 51 and approved by the US Environmental Protection Agency (EPA).
13. The aforementioned source(s) may be operated and used only so long as any associated air pollution control devices are operated and maintained, in accordance with the specifications set forth in the respective plan approval(s) and the RACT application (as approved by the Department), and in accordance with any conditions set forth herein.

