

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-09-0037</u>	Source(s)	<u>Tecmo-8 Printer, 18 Seaming Machines and other sources described herein</u>
Owner	<u>CMS Gilbreth Packaging Systems</u>	Air	<u>One Regenerative Thermal Oxidizer</u>
Address	<u>3001 State Road</u>	Cleaning	<u></u>
	<u>Croydon, PA 19021</u>	Device	<u></u>
Attention	<u>Mr. James A. Jordan</u>	Location	<u>Bristol Township</u>
	<u>Plant Engineer</u>		<u>Bucks County</u>

This permit is subject to the following conditions:

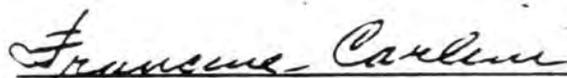
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of the plan approval issued under the same number;
 - c. operated and maintained in a manner consistent with 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 04/10/1997

Expires 04/10/2002


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (KAL)122.7

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-09-0037
CMS GILBRETH PACKAGING SYSTEMS

CONDITIONS (continued):

3. This 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 one Tecmo-8 printer, one paint booth, two parts cleaner and 18 seaming machines. This permit also incorporates operating permit 09-320-003A. The terms and conditions of 09-320-003A have been incorporated into this permit.
4. CMS shall limit their potential VOC emissions from the Bristol facility to ~~50 TPY during a calendar year (January 1 through December 31)~~ 1000 pounds/day and 58 pounds per hour. These emission limits are based on a control equipment capture efficiency of 90% and a minimum overall VOC control efficiency of 85.5%.
5. CMS shall maintain a minimum 90% VOC emission capture enclosure system for the Tecmo-8 printer and associated floor sweeps.
6. CMS shall not operate the Tecmo-8 printer if the air flow to the thermal oxidizer exceeds 22,000 SCFM.
7. CMS shall use a continuous emission air flow monitor to measure and record air flow of the source being ducted to the thermal oxidizer.
8. The burners associated with this thermal oxidizer are to be set so as to maintain a temperature setpoint of at least 1500°F. No solvent laden air shall be introduced into the thermal oxidizer until the temperature is at least 1480°F. The temperature of the thermal oxidizer shall not be allowed to drop below 1480°F at any time.
9. This thermal oxidizer shall be equipped with temperature monitoring instrumentation to demonstrate compliance with condition 8 above.
10. CMS shall record the operating hours by job of the Regenerative Thermal Oxidizer (RTO) and Tecmo-8 press ducted to the oxidizer.
11. The following de minimis source categories shall be operated with VOC emission rates of no greater than 3 pounds per hour, 15 pounds per day or 2.7 tons per year.

Press Parts Cleaner
Paint Booth
Safety Kleen Tank
12. Inks, varnishes and solvents shall be transferred from closed container to closed container.
13. Wet rags shall be stored in closed containers and disposed of according to Department approved procedures.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-09-0037
CMS GILBRETH PACKAGING SYSTEMS

CONDITIONS (continued):

14. The lid of drums and containers containing inks, varnishes and solvents shall be closed when not in use.
15. The press shall be maintained properly at all times.
16. Any spills of inks, solvents and varnishes shall be cleaned up as soon as possible.
17. The press parts cleaner, safety klean tank, paint booth and 18 seaming machines shall be maintained and operated according to manufacturers specification and good air pollution control practices.
18. The company shall train employees on the proper handling, use and storage of solvents. Such training shall be provided to employees on a regular basis and during the orientation of new personnel.
19. CMS shall record the following information per job on a daily basis:
 - A. coating quantity in gallons and pounds of coating as applied and,
 - B. the coating composition:
 1. percent solids by volume
 2. percent solvent by volume
 3. percent water by volume
 4. pounds of VOC per gallon minus water solvent density

for the sources covered under this permit.
20. The existing thermal oxidizer shall be equipped with temperature monitoring instrumentation which continuously indicates and records the combustion chamber exit gas temperature.
21. The company shall maintain records in accordance with the recordkeeping requirements of 25 PA Code Section 129.95. CMS shall maintain "hard" copies of the temperature records, air flow records, operating records and ink/coating application records for a period of two (2) years and shall make these records available to the Department upon request.
22. The operation of the printing operation 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.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-09-0037
CMS GILBRETH PACKAGING SYSTEMS

CONDITIONS (continued):

23. The company shall immediately 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.
24. The expiration date shown on this Operating Permit is for State purposes. For Federal Enforcement purposes the RACT portion 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). ~~The Operating Permit shall become enforceable by the US EPA upon its approval of the above as a revision to the SIP.~~
25. If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Protection) of the aforementioned air contamination source(s) and/or the aforementioned thermal oxidizer, the operation and use of which is authorized by this permit, or causes, permits and allows any modifications, malfunction or removal of any air pollution control device required as a condition of this permit, then and in that event, this permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).
26. 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.
27. 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 limitations specified in Section 123.31, or volatile organic compounds in excess of the limitation specified in Section 129.67 of Article III of the Rules and Regulations of the Department of Environmental Protection, 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.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-09-0037
CMS GILBRETH PACKAGING SYSTEMS

CONDITIONS (continued):

28. 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.
29. Any notification required as a result of any condition herein should be directed to:

Regional Air Quality Manager
DEP
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

(KAL)122.8

