

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
SOUTHCENTRAL REGION - FIELD OPERATIONS
AIR QUALITY CONTROL PROGRAM

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 Resources, the Department hereby issues this permit for the operation of the air contamination source described below.

Permit No: 67-2030 Source & Air
Cleaning Device: Flexographic Printing Operation

Owner: C-P Converters, Inc. (See Attached)

Address: 15 Grumbacher Road
York, PA 17402

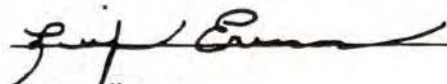
Attention: Mr. Mark Paules Location: Manchester Township
Vice President Manufacturing York County

This permit is subject to the following conditions:

1. That the source 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 Reasonably Available Control Technology (RACT) plan;
 - 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.
3. This operating permit is valid for a limited time only and may be renewed before its expiration. Requests for an operating permit renewal must be in writing and must be accompanied by a fee in the amount of \$600 payable to the "Commonwealth of Pennsylvania - Clean Air Fund." The request should be made on the attached Interim Application for Renewal of a Permit to Operate form and must be received by the Department along with a completed Compliance History form (attached) no later than FEB 29 2000.
4. See 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 Resources will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: AUG 30 1995
Expires: AUG 31 2000


Program Manager

Southcentral Region 67-2030
York District
EPA, Region III
Permits

PERMIT NO. 67-2030

C-P CONVERTERS, INC.

Sources, Continued

Sources and air pollution control equipment covered under this operating permit consist of the following equipment:

Sources and Cleaning DevicesManufacturers

Flexographic Press No. 2 (Model 649)	Kidder Stacy
Flexographic Press No. 5 (Model 649)	Kidder Stacy
Catalytic Incinerator (PAC108AACFI)	Kidder Stacy/Temprite
Flexographic Press No. 7 (Centraflex 660)	Kidder Stacy
Permanent Total Enclosure and Catalytic Incinerator (Torvex 53A)	Englehard Corp.
Flexographic Press No. 8 (Valve Flex 660)	Kidder Stacy
Flexographic Press No. 9 (Valve Flex 660)	Kidder Stacy
Permanent Total Enclosure and Catalytic Incinerator (PAC66AXLY4CF1)	Kidder Stacy/Temprite

Conditions, Continued

- The overall volatile organic compound (VOC) control efficiency for press Nos. 7, 8, and 9 shall be 95% or greater with the permanent total enclosure (PTE) having 100% capture and the catalytic incinerators having 95% destruction efficiency. *etc*
- The overall VOC control efficiency for Press Nos. 2 and 5 must be 71% or greater with the capture efficiency being 75% and the catalytic incinerator having 95% destruction efficiency.
- The catalytic incinerator (PAC66AXLY4CF1) controlling emission from the dryers on Press Nos. 8 and 9 shall have a catalyst preheat temperature of 750°F or greater.
- Annual VOC emissions from the facility must not exceed 90 tons based on a 12 month rolling total. *etc*
- The company shall comply with the requirements of 25 Pa. Code, §129.67 - Graphic arts systems.
- The company shall sample and analyze waste inks and solvents for VOCs in accordance with the sampling and testing procedures approved by the Department. The company shall document the results of testing and shall accurately document the quantity of VOCs disposed off-site.

Conditions, Continued

10. Quarterly reports containing, but not limited to, the following:

- a. Consumption of various inks on a press basis
- b. Consumption of diluent solvents on a press basis
- c. Consumption of cleaning solvents on a press basis and for other miscellaneous cleaning operations in the facility
- d. VOC content of inks, diluents, and cleaning solvents
- e. VOC content and quantity of waste ink and waste solvent disposed off-site
- f. Total quantity of VOCs emitted from the facility for each month and total for the previous 12 months

shall be submitted to the Air Quality Program Manager within thirty (30) days of the end of each quarter.

11. The company shall maintain records including purchase orders and/or invoices of solutions containing VOCs used in the facility and documentation of the VOCs content in the solutions obtained through EPA approved test methods or procedures.

12. The company shall maintain records at the facility for a period of two (2) years and make them available to the Department when requested.

13. Any natural draft opening (NDO) of the PTE listed above, defined as any opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed, shall be subjected to the following:

- a. The NDO shall be at least four equivalent opening diameters from each VOC emitting point.
- b. The total area of all NDOs shall not exceed 5% of the interior surface area of the enclosure. If flexible curtains are used at the openings the open area must be determined when air is flowing through the curtains and as the curtains are deflected.
- c. The average facial velocity of the air through all NDOs shall be at least 200 fpm.

*OK
checked w/
CE protocol
- ~~same~~ OK*

PERMIT NO. 67-2030

C-P CONVERTERS, INC.

Conditions, Continued

- d. The direction of air flow through all NDOs shall be into the enclosure.
 - e. All VOC emissions generated in the PTE must be captured and contained for discharge through the catalytic incinerators.
14. All access doors, vents, air intakes, and other openings which have not been evaluated to meet the requirements of condition 13 shall be kept closed during routine operation of the plant.
 15. After all sources within the PTE have stopped generating emissions, the PTE shall continue to be exhausted through the control devices for a period of time to ensure remaining fugitive emissions are captured and destroyed. The company shall exhaust the equivalent of at least four room air changes through the control device prior to bypassing or shutting down the incinerators.
 16. The company shall maintain, on site, a hand held anemometer accurate to within $\pm 5\%$ of full scale. The company shall use this instrument to measure the air velocities through the NDOs at least once per day when emissions are being generated within the enclosure. The company shall document the velocities and directions of air flow through the NDOs and make these records available to the Department when requested.
 17. The company shall keep all containers containing VOCs tightly closed when not in use. This includes containers containing cleaning solvents and use liquids containing VOCs. Solvent laden wipes shall be kept in closed containers when not in use.
 18. The sources listed above and any associated air cleaning devices are to be in compliance with the specifications in the applicable plan approval application submitted.
 19. This operating permit incorporates Plan Approval No. 67-320-021.
 20. This operating permit supersedes Operating Permit Nos. 67-320-010A, 67-320-015A, and 67-320-018A.