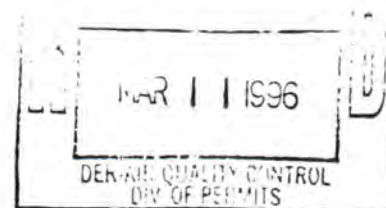


COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
FIELD OPERATIONS - BUREAU OF AIR QUALITY

COMPLIANCE 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 "Major VOC Emitting" Facility described below:

Permit No.

CP-15-0029

Major VOC Emitting Facility VOC RACT

Air Cleaning  
Device

Automatic Parts Washing System with  
Solvent Recycling

Related  
Plan

Approvals PA-15-0029

Owner

Dopaco, Inc.

RACT

Proposal

Control VOC from Solvent Clean-up

Address

479 Thomas Jones Way, Suite G

Location

241 Woodbine Road

Exton, PA 19341

Downingtown Borough

Attention

Ms. Phoebe C. Robb

Chester County

Corporate Environmental Engineer

This permit is subject to the following conditions:

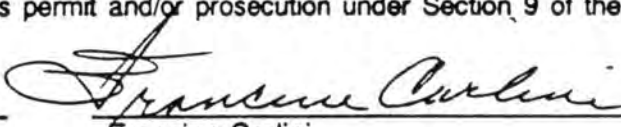
1. That the source(s) and any associated air cleaning devices are to be:
  - a. operated in such a manner as not to cause air pollution;
  - b. in compliance with the specifications and conditions of any applicable plan approvals and operating permits; and
  - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner described above. This permit is valid for a period of 5 years for all sources listed in this operating permit *except those sources listed in plan approval No. PA-15-0029. Upon completion and demonstration described in plan approval PA-15-0029, the company shall apply for a revised operating permit.*

**(SEE ADDITIONAL CONDITIONS ATTACHED)**

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 03/06/96

Expires 03/06/2001

  
Francine Carlini  
Regional Manager  
Air Quality

cc: Central Office  
Administration  
SEFO  
Re (KAL)317.6

**COMPLIANCE PERMIT**  
**PERMIT NO. CP-15-0029**  
**DOPACO, INC.**

**CONDITIONS (CONTINUED):**

3. The permittee shall complete implementation of RACT according to the following schedule:

**RACT Implementation Schedule**

- A. The company shall install the new automatic parts washing system with in-process recycling control no later than February 29, 1996, complying with the following schedule:
1. Start installation of the parts washing system with VOC control technology within 60 days of receipt of the Plan Approval.
  2. Complete equipment installation within 60 days after the installation is commenced.
  3. Start-up and shakedown of equipment complete within 60 days after installation.
- B. All proposed RACT monitoring recordkeeping and reporting measures shall be fully implemented upon issuance of this permit.
4. This permit is issued for the purpose of authorizing operation of the source(s) between May 31, 1995 and the date by which implementation and operation of RACT shall be completed under paragraph 3, above.
5. This permit does not authorize the construction or modification of any source. Construction or modification of a source is subject to the Plan Approval requirements of 25 Pa. Chapter 127 Subchapter B. Except as provided below, this permit does not modify in any way the terms and conditions of any existing or subsequent plan approval or operating permit issued for the sources that are the subject of this permit.
6. In the event that the permittee is prevented from complying in a timely manner with any interim time limit imposed in this permit solely because of a strike, fire, flood, act of God, or other circumstances entirely beyond the permittee's control and which permittee, by the exercise of all reasonable diligence, is unable to prevent, or mitigate, then the permittee may request an extension of time from the Department.

The permittee shall only be entitled to the benefits of this paragraph if it notifies the Department within five (5) days by telephone and within ten (10) days in writing of the date it becomes aware or reasonably should have become aware of the event impeding performance. The written submission shall include related documentation, as well as a notarized affidavit from a responsible corporate official specifying the reasons for the delay, and the efforts which have been made and are being made by the permittee to minimize the length of the delay. The

COMPLIANCE PERMIT  
PERMIT NO. CP-15-0029  
DOPACO, INC.

CONDITIONS (CONTINUED):

permittee's failure to comply with the requirements of this paragraphs specifically and in a timely fashion shall render this paragraph null and of no effect as the particular incident involved.

7. If the permittee fails to achieve compliance by the final compliance date described in paragraph 3 above, this permit shall be terminated for the source listed in paragraph 3 above.
8. The Compliance Permit No CP-15-0029 is issued to Dopaco, Inc. (Dopaco) for the operation of Volatile Organic Compound (VOC) emission sources regulated under 25 Pa. Code §§129.91-95. This permit specifies the company's Reasonably Available Control Technology (RACT) requirements for Sources of VOCs. Operating permit conditions for Nitrogen Oxides (NOx) emission sources are also specified in this permit.
9. The purpose of the permit is to establish VOC RACT for Dopaco's facility to reduce emissions of VOC. This permit covers the following sources located at the Downingtown plant, 241 Woodbine Road in Downingtown, Chester County:
  - An automatic parts washing system with in-process recycling control.
  - Safety Kleen Parts Washers with covered sinks.
  - Ink Mixing System
  - Die Preparation Process
  - Tank Farm

10. Automatic Parts Washing System

A. Source Description

The Automatic Parts Washing System is a VOC emission source covered under this permit. The system consists of the following units:

- PRI Automatic Parts Washer, SWS-400 (with a condenser) or equivalent as approved by the Department.
- Clean solvent tank
- Dirty solvent tank
- Distillation unit

B. Control Technology

VOC emissions from the source shall be controlled by in-process recycling system with a chiller to condense vaporized solvent. In-process recycling is a closed loop system where vaporized solvent is condensed and then returned to the holding tank for recycling.



COMPLIANCE PERMIT  
PERMIT NO. CP-15-0029  
DOPACO, INC.

CONDITIONS (CONTINUED):

C. Operational Limitations

The automatic parts washing system covered under this Plan Approval shall be limited to the following:

1. A maximum usage: 12 cycles/day and 4380 cycles/yr. Cycle is a maximum of one hour process time and shall not include loading and unloading time.
2. Maximum hours of operation: 4380 hrs/yr not including loading and unloading time.

D. Emission Limitations

1. The total VOC emissions from the source shall be limited to the maximum of 4.58 pounds per hour, 54.0 lbs per day and 10.0 tons per year.
2. The Department may establish more restrictive RACT emission limits after installation of the system through the source test result.

E. Operating Requirements

The automatic parts washing system covered under this permit shall be operated in accordance with the following requirements:

1. The washing machine shall be closed and locked during the entire cleaning and drying process.
2. Time and temperature of the drying cycle shall be set and maintained to minimize residual cleaning solvents in the parts after the drying cycle.
3. Vapor Recovery system:
  - a. Solvent vapors shall be directed through the condensing coil at 800 CFM for recycling.
  - b. Temperature of condenser coolant shall be maintained at a maximum of 45° F.
4. The washing machine shall use a non toxic cleaning solution with flash point of 180°F or an equivalent solution as approved by the Department.

COMPLIANCE PERMIT  
PERMIT NO. CP-15-0029  
DOPACO, INC.

CONDITIONS (CONTINUED):

F. Monitoring Requirements

Dopaco shall monitor the following parameters of the automatic parts washing system to ensure that the emissions from the source are effectively recycled:

1. Temperature of chilled water in the cooling coils. A temperature gauge shall be installed on the chilled water supply line at the inlet to the cooling coils to monitor coil water temperature to demonstrate compliance with condition 10 E 3 (b). Temperature shall be logged daily.
2. Emission monitoring:

Emissions shall be calculated monthly using mass balance.

G. Testing Requirements

1. The company shall perform VOC emission stack test on the source covered by this permit in accordance with the provisions of Chapter 139 to demonstrate compliance with RACT emission limit requirement of conditions 10 D 1. The stack test shall be performed within 60 days of the unit start-up while the aforementioned source is operating at the maximum rated capacity as stated on the application.
2. At least sixty (60) days prior to the test, the company shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure collection of representative samples.
3. At least thirty (30) days prior to the test, the Regional Air Pollution Control Engineer shall be informed of the date and time of the test.
4. Within thirty (30) days after the source test, two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Pollution Control Engineer for approval.

H. Recordkeeping and Reporting Requirements

1. The company shall generate and maintain the following daily records:
  - Number of cycles in each 24 hour period

COMPLIANCE PERMIT  
PERMIT NO. CP-15-0029  
DOPACO, INC.

CONDITIONS (CONTINUED):

- Temperature of chilled water to demonstrate compliance with condition 10 E 3 (b).
- 2. Dopaco shall maintain records of solvent inventories, as a mean of determination of compliance with conditions 10 D of the Plan Approval. The inventories shall include, but not be limited to the following:
  - Date and quantity of solvent additions
  - Date and quantity of waste removed
  - All yearly solvent inventories for this system

The inventory data shall be used for mass-balance emission calculations.

- 3. The company shall establish a VOC emission tracking system to document compliance with condition 10 D. The tracking system shall be approved by the Department.
- 4. The company shall generate a summary of the estimated actual VOC emissions on an hourly, daily and annual basis. Emissions shall be calculated monthly based on a one hour process time for each cycle and one-half hour loading and one-half hour unloading time between each cycle.
- 5. The company shall establish an inspection schedule to ensure that leaks are repaired immediately. Dopaco shall record date and description of maintenance performed on the system.
- 6. Records required under this permit shall be kept for a period of two (2) years and shall be made available to the Department upon request.

11. Safety Kleen Parts Washers

- A. This source consists of two 20 gallon drums with covered sinks for washing parts, one 30 gallon dip tank and one 40 gallon dip tank. These four parts cleaners are a de-minimis source and shall be operated with VOC emission rates of no greater than 3 pounds per hour, 15 pounds per day and 2.7 tons per year whichever is more stringent.
- B. The parts washers shall be closed when not actively used for washing.
- C. The company shall keep records to demonstrate compliance with condition 11.A of this section. The records shall be kept for a period of two years and shall be made available to the Department upon request.

**COMPLIANCE PERMIT**  
**PERMIT NO. CP-15-0029**  
**DOPACO, INC.**

**CONDITIONS (CONTINUED):**

**12.     Ink Mixing System**

- A.     The new ink mixing system used to mix finished water-based inks is a de-minimis source. The system shall be operated with VOC emission rates of no greater than 0.2 pounds per hour, 5 pounds per day and 0.8 tons per year whichever is more stringent.
- B.     The company shall keep records to demonstrate compliance with condition 12.A of this section. The records shall be kept for a period of two years and shall be made available to the Department upon request.

**13.     Die Preparation Process**

- A.     Organic solvent based glues and cleaners are used to prepare dies for the paperboard cutters on the presses. This process is a de-minimis source and shall be operated with VOC emission rates of no greater than 3 pounds per hour, 15 pounds per day and 2.7 tons per year whichever is more stringent.
- B.     The company shall keep records to demonstrate compliance with condition 13.A of this section. The records shall be kept for a period of two years and shall be made available to the Department upon request.

**14.     Tank Farm**

- A.     This source consists of two isopropyl acetate 5000 gallon tanks, two toluene 5000 gallon tanks, one 8000 gallon solvent blend tank and one 5000 gallon solvent waste tank. The tank farm is a de-minimis source and shall be operated with VOC emission rates of no greater than 3 pounds per hour, 15 pounds per day and 2.7 tons per year whichever is more stringent.
- B.     The company shall keep records to demonstrate compliance with condition 14.A of this section. The records shall be kept for a period of two years and shall be made available to the Department upon request.

**15.     Facility Nitrogen Oxides (NO<sub>x</sub>) emission sources**

- A.     The NO<sub>x</sub> potential to emit for the facility is less than major stationary source (MSS) threshold of 25 tons per year and does not required the RACT proposal.



COMPLIANCE PERMIT  
PERMIT NO. CP-15-0029  
DOPACO, INC.

CONDITIONS (CONTINUED):

- B. The NO<sub>x</sub> emissions from the following sources covered under this Permit shall be limited to the maximum of:

Source	NO <sub>x</sub> Emission Limitations TPY
Zeran Flexo Press	1.3
F & K Flexo Press	1.8
Cleaver Brook Boiler	
14 MMBTU/HR - Gas Fired	9.4

- C. The sources shall be operated and maintained in accordance with good air pollution control practices. Manufacturers specifications for maintenance and operation shall be made available to the Department upon request. Records of repair and maintenance shall be kept in a permanently bound logbook.
- D. The boiler shall be operated on either natural gas or propane. Upon Department's request, the company shall provide a fuel analysis, or fuel samples of the fuel used.

16. This RACT approval applies to VOC emission sources which are subject to 25 Pa. Code Sections 129.91-129.95 only. VOC emission sources which are not subject to this Sections shall be governed by existing Plan Approvals, Operating Permits, and the applicable requirements of Rules and Regulations of the Department. Such approvals and requirements are incorporated herein by reference and made part of this permit. All conditions from Plan Approvals and Operating Permits No 15-320-004 and 15-320-19 shall be incorporated in this permit.

17. General Requirements

- A. The expiration date shown on the permit is for State purposes. For Federal enforcement purposes, the permit shall remain in effect as part of the State Implementation Plan until replaced pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency.
- B. Revision to any emission limitations incorporated in this permit will require re-submission as revision to the PA State Implementation Plan. The applicant shall bear the cost of public hearing and notification required for EPA approval as stipulated in 25 Pa. Code §129.91 (h).



COMPLIANCE PERMIT  
PERMIT NO. CP-15-0029  
DOPACO, INC.

CONDITIONS (CONTINUED):

- C. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and prior for performing its duties and for the effective enforcement of the Air Pollution Control Act.

(KAL)317.7

