

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

OPERATING PERMIT
(Revised 12/9/99)

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-46-0049</u>	Source(s)	<u>Graphic Arts Facility with Nine (9) Non-Heatset Web Offset Lithographic Presses and Other Sources as Described Herein</u>
Owner	<u>International Business Systems, Inc.</u>	Air	<u></u>
Address	<u>431 Yerkes Road</u>	Cleaning	<u></u>
	<u>King of Prussia, PA 19406</u>	Device	<u></u>
Attention	<u>Mr. Rick Fritz</u>	Location	<u>431 Yerkes Road</u>
	<u>Director of Purchasing and Office Operations</u>		<u>Upper Merion Township</u>
			<u>Montgomery County</u>

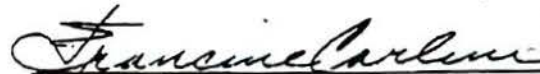
This permit is subject to the following conditions:

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 all 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 10/29/98



Francine Carlini
Regional Manager
Air Quality

Expires 10/29/2003

cc: Division of Permits, RCSOB
Administration
SEFO
Re (GJC98)238-7

**OPERATING PERMIT CONDITIONS
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INTERNATIONAL BUSINESS SYSTEMS, INC.**

CONDITIONS (continued):

3. This Operating Permit incorporates Reasonably Available Control Technology (RACT) determinations, as required by Title I provisions of the CAAA, and 25 Pa. Code §§ 129.91 through 129.95 for the following sources:

A. Ten (10) Non-Heatset Web Offset Lithographic Printing Presses:

Press No.	Description	Press Speed (fpm)	Manufacturer/Model No.
No. 2	4 color 22"	860	Didde/205-767
No. 4	5 color 17"	860	Didde/205-716
No. 6	9 color variable	800	VIP
No. 7	4 color variable	800	VIP
No. 8	6 color	1,000	Didde/Iv11, 1000
No. 9	6 color	860	Didde/205-767
No. 10	6 color 22"	1,000	Didde/ML 1000
No. (I	8 color	800	Didde/VIP
No. 12	6 color 17"	860	Didde/205-767
No. 13	6 color 14"	860	Didde/Unknown

B. Eight (8) Tinting Units
C. VOC emitting sources and source categories:

- One Film and Two (2) Plate Processors
- Seven (7) Collating Machines
- Alcohol Storage Tank ~~to remove~~
- Four (4) Parts Washers'
- Space Heaters
- NO fired Emergency Electric Generator

4. VOC RACT for the non-heatset offset lithographic printing presses specified in Condition 3.A are as follows:

a. Emissions Limitations:

The owner and operator shall limit the total VOC emissions from the ten printing presses to 18.0 tons per year on a twelve (12) month rolling sum basis. The VOC emissions shall include, but not be limited to, any inks, wetting/fountain solutions, and blanket wash/cleaning operations used at the facility.

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CONDITIONS (continued):

The owner and operator shall limit the VOC emissions due to any clean up solvents to 16.0 tons per year on a twelve (12) month rolling sum basis.

b. Operating Requirements:

- i. The owner and operator shall use non-heatset inks (containing less than 35 percent by weight VOC).
- iii. The owner and operator shall limit the VOC content of the wetting/fountain solutions when using UV cured inks to 8% or less by weight as applied.
- iv. The owner and operator must notify the Department of the non availability of compliance wetting/fountain solutions and the efforts undertaken to locate an "alternative" fountain solution. The VOC content of the "alternative" fountain solution must not exceed 10% by weight until an appropriate lower VOC fountain solution is available.
- v. The operation and maintenance of the VOC emitting sources shall be in accordance with manufacturer's specifications and good air pollution control practices, which include but are not limited to:
 - A. All solvent containers shall be closed at all times unless filling or draining.
 - B. All solvents laden towels shall be placed in closed containers immediately after use and disposed of by acceptable means.

c. Recordkeeping requirements:

The owner and operator shall record, on a twelve month rolling sum calculated monthly, the applicable information specified below for these sources:

- i. Monthly ink usage in pounds, and the percent VOC content by weight, as applied.
- ii. For each fountain/wetting solution used, and additives, the total consumed in gallons; and its percent VOC content by weight, as applied.
- iii. Cleanup solvent in gallons, and its percent VOC content by weight, as applied.
- iv. For each coating used on a web offset lithographic printing press, the company shall record 1) the percent by weight VOC content, as applied, and 2) the total VOC in all coating consumed.
- v. The company shall, on a monthly basis, record the emissions of VOCs in order to demonstrate compliance with Conditions 4.a. and 5.a.

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CONDITIONS (continued):

5. VOC RACT for the eight (8) Tinting Units specified in Condition 33. are as follows:
 - a. The owner and operator shall limit the tinting units total emission to 30.0 tons per year on a twelve (12) month rolling sum basis.
 - b. The operation and maintenance of the units shall be in accordance with manufacturer's specifications and good air pollution control practices.

6. VOC RACT for the source groups specified in Condition 3.C. are as follows:
 - a. VOC emissions from the source groups shall be less than three pounds per hour, 15 pounds per day, or 2.7 ton per year.
 - b. The operation and maintenance of the units shall be in accordance with manufacturer's specifications and good air pollution control practices

7. IBS shall maintain records in accordance with the minimum recordkeeping requirements of 25 Pa. Code § 129.95. At a minimum, this shall include:
 - a. Recordkeeping shall include, but not limited to, material throughputs, or number of batches (where appropriate), and chemical usage, inventory records, and material balances shall be used to calculate VOC emissions using the Department approved methods.
 - b. Records shall provide sufficient data and calculations to clearly demonstrate that the requirements of Condition No. 4, through Condition No. 6 are met.
 - c. Data or information required to determine compliance with Condition No. 4, through Condition No. 6 shall be determined and recorded in a time frame consistent with the averaging period of the requirement.
 - d. Records shall be retained for at least two years and be made available to the Department upon request.

8. **General Conditions:**
 - d. The expiration 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 repealed pursuant to 40 C.F.R. 51 and approved by the U.S. Environmental Protection Agency, (EPA).