

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOUTHCENTRAL REGION - FIELD OPERATIONS  
AIR QUALITY 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 Protection, the Department hereby issues this permit for the operation of the air contamination source described below.

Permit No: 36-02009 Source & Air  
Cleaning Device: Surface Coating & Printing Operations

Owner: J. L. Clark, Inc. (See Attached)

Address: 303 North Plum Street  
Lancaster, PA 17604

Attention: Mr. George Mastromatteo Location: \_\_\_\_\_  
Environmental Manager City of Lancaster, Lancaster County

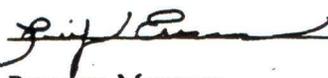
This permit is subject to the following conditions:

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 \_\_\_\_\_.
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 Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: APR 16 1999

~~Expires: November 30, 2003~~

  
Program Manager

Southcentral Region 36-02009 - B5  
Lancaster District  
Permits

OPERATING PERMIT  
PERMIT NO. 36-02009

L.L. CLARK, INC.

Sources, Continued

The following sources are covered by this RACT operating permit

<u>Source</u>	<u>Manufacturer</u>
C-1 Coater	Wagner
C-2 Coater	Wagner
C-4 Coater	Wagner
TPC-3 Print/Coat Line	J. L. Clark
TPC-5 Print/Coat Line	J. L. Clark
PC-6 Printing Line	J. L. Clark
(2) Natural Gas Boilers	
(3) Space Heaters	

Conditions, Continued

4. The VOC RACT for the two (2) natural gas fired boilers and the three (3) natural gas fired space heaters is that the sources shall remain below 2.7 tons per year in total VOC emissions.
5. This operating permit constitutes a RACT determination for volatile organic compound (VOC) emissions as per 25 Pa. Code Sections 129.91 and 129.92.
6. All solvent-based coatings from the coaters, as applied, shall comply with the requirements of Item #10 under Table I of 25 Pa. Code Section 129.52, or the overall weight of VOCs emitted to the atmosphere shall be reduced through the use of incineration. The percent reduction in emissions shall be in conformance with the requirements of 25 Pa. Code Section 129.52(2), with incineration occurring at a minimum operating temperature of 1,400°F with a retention time of at least 0.3 seconds.
7. When the ink coverage on the sheet is 50% or greater, and/or a varnish is being applied, the VOC emissions from the printing lines shall be controlled through the use of incineration at a minimum operating temperature of 1,200°F with a retention time of at least 0.3 seconds.
8. An annual report containing, but not limited to, the following data for each surface coating shall be submitted to the Lancaster District Supervisor:
  - a. identification of each coating
  - b. coating density
  - c. lbs of VOC per gallon of coating (minus water)
  - d. solvent density
  - e.  $\frac{1}{2}$  solvents by volume (minus EPA-exempted solvents)
  - f.  $\frac{1}{2}$  solids by volume
  - g.  $\frac{1}{2}$  water by volume
  - h. gallons per quarter of coating used (including water)
  - i. gallons per quarter of coating used (minus water)
  - j. lbs per year of VOC emissions from surface coating
  - k. identification of cleaning solvent, solvent density, and usage per quarter of each cleaning solvent

OPERATING PERMITPERMIT NO. 36-02009J. L. CLARK, INC.Conditions, Continued

9. An annual report containing the following data for all surface coating wastes shall be submitted to the Lancaster District Supervisor:
- a. gallons per quarter of waste solvents shipped from the facility
  - b. waste profile or sampling data for each shipment
  - c. identification of the waste disposal company for each shipment

The reports required under condition Nos. 7 and 8 shall be submitted for the reporting period between January 1 through December 31 and are due by March 1 of the following year.

10. The permittee, as a minimum, shall implement and carry out the following "work practice standards" in the use of clean up solvents:
- a. scheduling the use of coating materials in sequential order of the lightest to darkest color to minimize clean up operations
  - b. using solvent dispensers in the dampening of cleaning rags to minimize evaporations
  - c. covering soiled towels or rags in containers until sent for laundering
  - d. storing and transporting the solvents in sealed containers until needed
  - e. cleaning surface coater rolls in solvent baths to minimize solvent waste and usage of wet rag cleaning
  - f. using wash tanks for the cleaning of coating applicator rolls to minimize solvent waste, evaporative emissions, and wet rag cleaning
11. Any new coating or any compositional change to an existing coating or clean-up solvent that is not processed by means of incineration shall be reported to the Lancaster District Supervisor prior to its use. The information to be reported shall include items a. through g. of condition 7.
12. Material Safety Data Sheets and/or manufacturer's data for each coating and solvent used at the facility shall be maintained at the facility for the most recent two-year period; this information shall be made available to the Department upon request.
13. The permittee shall operate and maintain a continuous strip chart for recording incinerator chamber temperature, daily. The calibration of the strip chart recorder and the thermocouple shall be performed annually.

