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

OPERATING PERMIT INCORPORATING REASONABLY AVAILABLE CONTROL
TECHNOLOGY (RACT) AND PLANTWIDE APPLICABILITY LIMIT (PAL)

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.	OP-09-0012	Source(s)	Facility VOC Sources
Owner	Klearfold, Inc.	Air	Silk Screen Presses, and Finishing
Address	364 Valley Road	Cleaning	
	Warrington, PA 18976	Device	Refrigeration System
Attention	Mr. Mike Rosica	Location	364 Valley Road
	Human Resources Manager		Warrington Township
			Bucks County

This permit is subject to the following conditions:

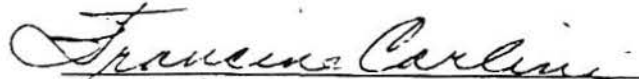
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of all applicable Plan Approvals issued;
 - c. operated and maintained in a manner consistent with good operating 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 4/15/1999

Expires ~~4/15/2004~~


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (RN99)75-16

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-09-0012
KLEARFOLD, INC.

CONDITIONS (continued):

3. The sources covered by this operating permit are:

<u>Source</u>	<u>Press Type</u>
Silk Screen Press No. 3 (S-3)	Sheet-Fed
Offset Press 6/C	Sheet-Fed, Non-Heatset
Offset Press 7/C	Sheet-Fed, Non-Heatset
Offset Press No. 8	Sheet-Fed, Non-Heatset
Silk Screen Press No. 2 (S-2)	Sheet-Fed
Silk Screen Press No. 1 (S-1)	Sheet-Fed
Offset Press No. 9	Sheet-Fed, Non-Heatset
Offset Press No. 10	Sheet-Fed, Non-Heatset
Finishing	
Storage and Mixing	
Preparation and Maintenance	

5. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the Clean Air Act Amendments, and 25 Pa. Code Section 129.91 through 129.95.

CONDITIONS (continued):

1. RACT/BAT Operating Requirements:

- A. The company shall operate all sources covered under this operating permit and listed in Condition 3, under the following conditions:

1. Klearfold shall maintain the as-applied VOC content of the fountain solution on the presses at or below 10.0 percent, by weight, and shall refrigerate the fountain solution to 55°F or less. The fountain solution circulator of each press shall be equipped with a refrigeration system to maintain the solution at 55°F or less. Each system shall be equipped with temperature monitoring instrumentation which continuously indicates the temperature.
2. The blanket and roller cleaning solutions used on the presses shall meet one of the following requirements:
 - a. VOC content, as applied, is less than or equal to 30 percent by weight, or;
 - b. VOC composite partial vapor pressure, as used, is less than or equal to 10 mm Hg at 20°C (68°F).
3. Silk Screen Presses shall be operated and maintained according to manufacturer specifications and good air pollution control practices. Silk Screen Presses shall use ultraviolet (UV) inks to the maximum extent feasible.

Gluers shall be operated and maintained with good operating and air pollution control practices.

- B. The VOC emitting sources covered under this operating permit shall be operated and maintained in a manner consistent with good operating and maintenance (O&M) practices such as:

1. Keep all solvent containers closed at all times unless filling or draining.
2. Keep all solvent laden shop towels in a closed container.

C. Testing Requirements

1. Klearfold shall determine the density and VOC content of ink or solvent by one of the following procedures:
 - a. Test each ink and/or solvent formulation applied on the presses for density and VOC content using USEPA Method 24A, as specified in 40 CFR Part 60, Appendix A. or;
 - b. Determine or calculate the VOC content and density of each ink or solvent, applied on the presses, using the analytical data from EPA Method 24A certification testing provided by the supplier of the materials used in the ink and solvent formulations. For materials that are assumed to be 100 percent VOC, Method 24A data is not required.
2. Klearfold shall determine the VOC content of fountain solution by using the calculation which combines USEPA Method 24A VOC content data for the concentrated materials and additives used to prepare the press ready fountain solution and records of the proportions in which they are mixed. The calculation shall be performed once for each fountain solution formulation. The Method 24A may be obtained from the suppliers of the concentrated materials and additives used in the fountain solution.

12. Federally Enforceable PAL Recordkeeping Requirements

- C. Klearfold shall record the following information for the offset printing presses covered under this operating permit to demonstrate compliance with the operating permit:
1. For each lithographic ink or conventional varnish used:
 - The monthly consumption by weight of material as applied per job
 - The percent by weight VOC and HAP content as applied
 - An estimate of VOC and HAP emissions
 2. For each fountain solution and additive:
 - The monthly consumption by weight of material
 - The percent by weight VOC and HAP content as applied
 - An estimate of VOC and HAP emissions
 3. For each blanket and roller cleaning solution used:
 - The monthly consumption by weight of material

- The percent by weight VOC and I-IAP content as applied, or, if complying with Condition 11.A.2.b, the composite partial vapor pressure of the VOC in the solution
 - An estimate of VOC and HAP emissions
- D. The company shall generate a summary of the actual VOC emissions to determine compliance with the PAL as specified in this operating permit. The emission summary shall be generated within 30 days of the end of each month based upon the prior 12 months of operations. The monthly emissions shall be calculated based on time/run averages.
- E. Records required under this operating permit shall be kept for a period of five (5) years and shall be made available to the Department upon request.