

COMPLIANCE PERMIT CONDITION
PERMIT NO. OP-09-0021
MIKE-RICH, INC.

CONDITIONS (CONTINUED):

3. This operating permit is issued to Mike-Rich, Inc. for the operation of the following VOC emitting sources and a total enclosure capture system in conjunction with a catalytic oxidizer (Wolverine (Mass) Corporation, Model No. C-8000):
 - A. Kidder 660 flexographic printing press (No. 3);
 - B. Soloflex 6 color flexographic printing press (No. 4);
 - C. Press cleanup operations;
 - D. One (1) ink dispenser;
 - E. One (1) plate processor;
4. The expiration date shown on the Operating Permit is for state purposes. ~~For Federal enforcement purposes the RACT provisions of the Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by the U.S. EPA upon its approval of the above as a revision to the SIP.~~
5. This operating permit supersedes all previously issued Plan Approvals bearing the number(s) 09-320-035, and 09-320-036.
6. Operating Requirements:
 - A. MRI shall operate the presses listed above and the catalytic oxidizer in accordance with 25 PA Code §129.67(b).
 - B. MRI shall maintain and operate the total enclosure capture system and the catalytic oxidizer to control the VOC emissions from the sources listed in Condition 3 A to 3C above. The New Source Performance Standard Subpart SSS, 40 CFR 60.713(b)(5)(i) shall be used to demonstrate 100% capture efficiency.
 - C. The company shall conduct the cleanup operations under the total enclosure capture system and the emissions shall be ventilated to the operating catalytic oxidizer.
 - D. A minimum catalytic bed exit gas temperature of 625°F and a minimum of 95% destruction efficiency shall be maintained.
 - E. MRI shall not bypass the oxidizer when the presses apply solvent based inks or when cleanup solvents are used on the presses.

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- F. The volatile fraction of the water-based inks, as applied to the substrate, shall contain 25% or less by volume of VOC and 75% or more by volume of water.
- G. MRI shall not start the first production run before the catalytic bed's temperature reaches 625°F. The total enclosure system and the catalytic oxidizer shall be in operation with the catalytic bed's temperature at 625°F for at least one hour after the last production run and/or cleanup operation.
- H. RACT for the sources listed in Condition 3 D to 3E above is recordkeeping. The ink mixing tank shall be covered at all times when it is not in use.

7. Emission Limitations

- A. The VOC emissions from press Nos. 3 and 4 and the associated cleanup operations shall not exceed 24.9 tons per year.
- B. The VOC emissions from the ink dispenser and the plate processor shall not exceed 3 pounds per hour, 15 pounds per day and 2.7 tons per year respectively.

8. Recordkeeping:

- A. The company shall record the following information for the sources covered under this operating permit:
 - (1) Daily coating quantity in gallons or pounds of coating as applied,
 - (2) the coating composition:
 - a. Percent solids by volume or weight
 - b. Percent solvent by volume or weight
 - c. Percent water by volume or weight
 - d. Pounds of VOC per gallon minus water
 - e. Solvent density
 - (3) The quantity of VOC solvents used for cleanup purposes in the facility on a daily basis.
- B. Records of data required under condition A above shall be kept in a format approved by the Department.
- C. MRI shall record all oxidizer bypass causes and duration of such bypasses.

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- D. The company shall maintain a temperature measuring and recording device on the catalytic oxidizer that shows the temperature of the gases exiting the catalytic bed.
 - E. Records required under this operating permit shall be kept for a period of two (2) years and shall be made available to the Department upon its request.
8. General Conditions:
- A. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the rules and regulations of the Department of Environmental Resources, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with any restrictions or limitations established by the department at such time as it notifies the company that testing is required.
 - B. The company, within one hour of occurrence, shall notify the Department of any malfunction of the source(s) or associated air cleaning device(s) with results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the rules and regulations of the Department of Environmental Resources. A written report shall be submitted to the Department within two working days following the incident describing the malfunctions and corrective actions taken.
 - C. If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of the Title 25, the Rules and Regulations of the of the Department of Environmental Resources) of the aforementioned air contamination source(s), the operation and use of which is authorized by the permit, this permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).

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