



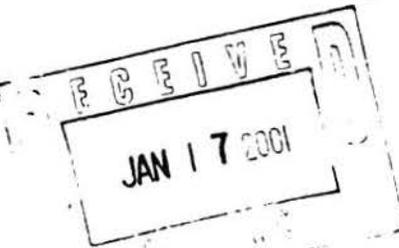
CITY OF PHILADELPHIA  
DEPARTMENT OF PUBLIC HEALTH  
AIR MANAGEMENT SERVICES

RACT PLAN APPROVAL

Effective Date: July 14, 2000

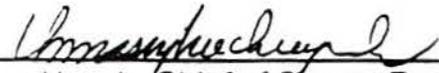
Expiration Date: None

Replaces Permit No. None



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 a Reasonably Available Control Technology (RACT) proposal received under the Pennsylvania Code, Title 25, Chapter 129.91 thru 129.95, of the rules and regulations of the Pennsylvania Department of Environmental Protection (PADEP), Air Management Services (AMS) approved the RACT proposal of the Facility below for the source(s) listed in section 1.A. Emission Sources of the attached RACT Plan Approval.

Facility: Smith-Edwards-Dunlap, Company  
Owner: Smith-Edwards-Dunlap, Company  
Location: 2867 East Allegheny Avenue, Philadelphia, PA 19134  
Mailing Address: 2867 East Allegheny Avenue, Philadelphia, PA 19134  
SIC Code(s): 2752  
Plant ID: 2255  
Facility Contact: Eileen Monahan  
Phone: (215) 425-8800  
Permit Contact: Eileen Monahan  
Phone: (215) 425-8800  
Responsible Official: Eileen Monahan  
Title: Purchasing Agent

  
Thomas Huynh, Chief of Source Registration

7/14/2000  
Date

The RACT plan approval is subject to the following conditions:

1. The purpose of this Plan Approval is to establish Volatile Organic Compound (VOC) Reasonably Available Control Technology (RACT) for Smith-Edwards-Dunlap, Company. This includes the following emission sources and control equipment:
  - A. Emission Sources
    - (1) Eleven (11) non-heatset sheetfed offset lithographic printing presses.
    - (2) Two (2) non-heatset web offset lithographic printing presses.
2. This approval requires and authorizes:
  - A. Material substitution as the most feasible means for achieving acceptable reductions in Volatile Organic Emissions (VOC's).
    - (1) For each ink:
      - a. The VOC fraction of the ink (minus water), as applied to the substrate, shall not exceed 25% by weight.
    - (2) For each fountain solution:
      - a. The VOC fraction of all fountain solutions shall not exceed 20% by volume.
    - (3) For each cleaning solution:
      - a. VOC content, as applied, less than or equal to 30 percent by weight, or;
      - b. VOC composite partial vapor pressure, as used, less than or equal to 10 mm Hg at 68 °F, or;
      - c. The use of cleaning solutions not meeting conditions 2.A.(3)a. or 2.A.(3)b. is permitted provided that the quantity used does not exceed 55 gallons over any 12-month rolling period.
3. RACT Implementation Schedule
  - A. Upon issuance of this approval, Smith-Edwards-Dunlap, Company shall begin immediate implementation of the measures necessary to comply with the approved RACT proposal.
4. Recordkeeping and Reporting Requirements
  - A. Smith-Edwards-Dunlap, Company shall maintain a file containing all the records and other data that are required to be collected to demonstrate compliance with the VOC RACT requirements of 25 PA Code 129.91- 129.94 and with the local recordkeeping regulations.
  - B. A record of the operating hours of each source maintained as monthly totals.
  - C. A record of the VOC containing material usage per press maintained as monthly totals including:
    - (1) For each ink:
      - a. Material identification and usage in pounds or gallons.
      - b. The percent by weight VOC as applied.
      - c. Alternatively, the ink with the highest VOC content may be used to represent all inks used by all offset lithographic printing presses.
    - (2) For each fountain solution:
      - a. Material identification and usage in gallons or pounds.
      - b. The percent by volume or weight to volume ratio (lbs/gal) VOC content.
    - (3) For each cleaning solution:
      - a. Material identification and usage in pounds or gallons.
      - b. The percent by weight or weight to volume ratio (lbs/gal) VOC content, or;

- c. Solutions complying with condition 2.A.(3)b., the VOC composite partial vapor pressure at 68° F, or;
    - d. The volume used which does not meet condition 2.A.(3)a. or 2.A.(3)b.
  - D. VOC material purchases and inventories shall be maintained and reconciled with actual usage.
  - E. A record of VOC emissions per press using a mass balance equation shall be maintained on a rolling 12-month basis.
  - F. Records shall be retained for at least five years and shall be made available to AMS on request.
5. The operation of the aforementioned sources shall not at any time result in the emission of visible air contaminants in excess of the limitations specified in Section 123.41, particulate matter in excess of the limitations specified in Section 123.11 or sulfur oxides in excess of the limitations specified in Section 123.22, all Sections of Chapter 123 of Article III of the Rules and Regulations of the Department of Environmental Resources, or in the emission of any of these or any other type of air contaminant in excess of the limitations specified in, or established pursuant to, any other applicable rule or regulation contained in Article III.
6. The permittee shall not impose conditions upon or otherwise restrict AMS's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the AMS to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the AMS deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
7. Revisions to any emission limitations incorporated in this RACT Approval shall require resubmission 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).

