

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHCENTRAL REGION - FIELD OPERATIONS
AIR QUALITY PROGRAM

COPY

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.

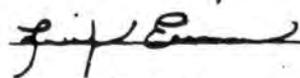
Permit No: <u>67-2023</u>	Source & Air Cleaning Device: <u>Five Heatset Web Offset Lithographic</u>
Owner: <u>Sullivan Graphics, Inc.</u>	<u>Printing Presses with Dryers (See Attached)</u>
Address: <u>215 Zarfoss Drive</u> <u>York, PA 17404</u>	<u>Controlled by a Regenerative Thermal Oxidizer (Smith) with a Thermal Oxidizer (Katec/TEC 7,800) as a standby backup</u>
Attention: <u>Mr. Paul Heroman</u> <u>Plant Manager</u>	Location: _____ <u>West Manchester Township</u> <u>York County</u>

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 MAR - 1 2000.
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: AUG 2 1995
Expires: August 31, 2000



Program Manager

Southcentral Region 67-2023
York District
EPA, Region III
Permits

SULLIVAN GRAPHICS, INC.

Source, Continued

<u>Source</u>	<u>Manufacturer</u>
1. Four-Unit Double Web Press - 4665 Two Dryers	Harris TEC Systems
2. Five-Unit Double Web Press - 5663 Two Dryers	Harris TEC Systems
3. Eight-Unit Double Web Press - 8661 Two Dryers	Toshiba TEC Systems
4. Five-Unit Double Web Press - 5584 Two Dryers	Toshiba TEC Systems
5. Four-Unit Double Web Press - 4463 Two Dryers	Harris TEC Systems

Conditions, Continued

- This operating permit covers equipment constructed, installed, and/or modified under Plan Approval Nos. 67-320-011 and 67-320-011A.
- The company shall keep volatile organic compound (VOC) emissions emitted to the atmosphere from the operation and cleanup of each of the following presses to less than or equal to the ton/yr based on a twelve month rolling total and lb/hr based on a 24 hour daily average as indicated below.

<u>Press No.</u>	<u>Manufacturer</u>	<u>VOC Emissions</u>	
		<u>lb/hr</u>	<u>ton/yr</u>
4665	Harris 1700	7.0	26
5663	Harris 1700	7.0	26
4463	Harris M-9000	4.5	15
8661	Toshiba	10.0	37
5584	Toshiba	7.0	26

- The company shall comply with the applicable recordkeeping and reporting requirements addressed in 25 Pa. Code, Chapter 129.95.

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SULLIVAN GRAPHICS, INC.

Conditions, Continued

7. The company shall maintain records, at the facility, including purchase orders and/or invoices of solutions containing VOCs and Hazardous Air Pollutants (HAPs) used in the facility and documentation of the VOC content and HAPs, type and content, in the materials obtained through EPA approved test methods or procedures.
8. Records shall be maintained for a period of five years at the facility and made available to the Department when requested.
9. The following data shall be collected and recorded at least on a monthly basis and included in annual reports that are to be submitted to the Department on or before March 1 of each year:
 - a. Press Run Time (hours or impressions for each press)
 - b. Materials Containing VOCs and HAPs (for each press)
 - (1) Manufacturer
 - (2) Product Number and Type
 - (3) Usage (by weight and volume)
 - (4) Density (s.g. or lb/gal)
 - (5) VOC Content (% by weight) as applied
 - (6) Vapor Pressure (mm Hg)
 - (7) Hazardous Air Pollutants (type and % by weight)
 - c. VOC Emissions (for each press)
 - (1) The Highest lb/hr Based on a 24 Hour Daily Average
 - (2) Ton/yr Based on a Twelve Month Rolling Total
 - d. For VOC emission calculation purposes, the total quantities of VOCs used shall be determined from the actual VOCs in each material and the quantities of each of those materials used rather than using overall averages.
 - e. Supporting documentation including supporting calculations, emission estimation factors and assumptions with supporting documentation, and any other information required for determining compliance, when requested by the Department.
10. Emission statements addressed in §135.21 shall be calculated on a month by month basis.

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SULLIVAN GRAPHICS, INC.

Conditions, Continued

11. The destruction removal efficiency of the regenerative thermal oxidizer (Smith) shall be at least 95% for VOCs as demonstrated through Department approved testing procedures in accordance with 25 Pa. Code, Chapter 139 and the testing conditions of Plan Approval No. 67-320-011A issued on October 24, 1994.
12. The temperature of the combustion chamber on the regenerative thermal oxidizer (RTO) shall be maintained at least at 1,500°F when controlling VOCs from the press heatset dryers when presses are operating. Fluctuations below 1,500°F which occur at press startups and shutdowns shall not be lower than 1,450°F and below 1,500°F for more than five minutes.

The following parameters shall be used to estimate VOC emissions from the listed sources:
 - a. Printing Ink - 80% capture - 20% retained in the substrate.
 - b. Automatic Blanket Wash - 40% capture - 60% fugitive emissions.
 - c. Fountain Solution - 70% capture - 30% fugitive emissions.
 - d. Dryers - 100% capture efficiency - 100% ducted to the thermal oxidizer.
13. The company shall collect and record information necessary for determining compliance with the requirements of Condition 12 at least once every shift while presses are operating.
14. The weighted average VOC content of all heatset inks used for the heatset lithographic printing process shall not exceed 45% by weight.
15. The fountain solution VOC content shall not exceed 3% by weight as applied.
16. The cleaning solutions used for both automatic and manual cleaning shall have a VOC composite partial vapor pressure of less than or equal to 10 mm Hg at 20°C or containing less than 30% by weight VOC. The company shall limit the use of higher vapor pressure cleaning solutions to less than 5% by weight of the total manual cleaning solutions used.
17. The company shall collect and record information necessary to verify compliance with the requirements of Conditions 14, 15, and 16. The records shall be kept in a manner which allows verification of compliance without additional calculations.
18. The company shall keep all containers containing VOC's and HAP's tightly closed when not in use. This includes containers containing cleanup solvents and used liquids containing VOC's and HAP's. Solvent laden wipes shall be kept in closed containers when not in use.

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SULLIVAN GRAPHICS, INC.

Conditions, Continued

19. If the company wants credit for VOCs from cleanup solvents that are retained in wipes and sent off site, or for other materials containing VOCs as liquid wastes, the company will need to submit a protocol, for Department approval, including the testing and recordkeeping procedures.
20. The company shall contact the York District Supervisor prior to providing scheduled maintenance to the RTO if the standby backup control system is used. During periods of unscheduled maintenance or malfunction to the RTO, the company shall notify the York District Supervisor as early as possible but not later than 4 p.m. of first working day if the standby backup control system is used. This will enable the Department to inspect the standby backup control system while it is in use.
21. The standby backup thermal oxidizer (KATEC 7800) will be operationally checked out at least once a year from the date of issuance of the operating permit. A report including operating condition of burners, heat exchangers, fan, stack, operating temperatures, and maintenance provided to the oxidizer, if any, should be submitted to the York District Supervisor within thirty (30) days from the operational check.
22. The standby backup Thermal Oxidizer shall be used only during periods of maintenance to the RTO. During operation of the standby control system, no more than six dryers shall be in use and the design inlet flow to the oxidizer shall not be exceeded.
23. The standby backup Thermal Oxidizer's combustion chamber shall be maintained at least at 1,375°F when in use.
24. ~~The expiration date shown on this RACT operating permit is for State purposes only. For Federal Enforcement purposes this operating permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced and approved by the U.S. Environmental Protection Agency (EPA). The operating permit shall become enforceable by EPA upon its approval as a revision to the SIP.~~

