



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: SUN CHEMICAL - General Printing Ink Division  
Owner: SUN CHEMICAL  
Location: 3301 Hunting Park Avenue, Philadelphia, PA 19132  
Mailing Address: 135 West Lake Street, Northlake, IL 60164  
SIC Code(s): 2893  
Plant ID: 2052  
Facility Contact: Tony Ameo  
Phone: (215) 223-8220  
Permit Contact: Carl Raycroft  
Phone: (708) 562-0550  
Responsible Official: Michael S. Murphy  
Title: Corp. V.P., U.S. Operations

  
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 Compounds (VOC) Reasonably Available Control Technology (RACT) for Sun Chemical (Sun). This includes the following emission sources and control equipment:
  - A. Emission Sources
    - (1) INKMAKER
    - (2) Conventional Blends Mixing
    - (3) Rotor Stator Mixing
    - (4) Horizontal Mill Station
    - (4) Ball Mill Production
    - (5) Kady Mill Production
    - (6) Varnish Production
    - (7) Transfers
    - (8) Paste Ink Roll Mill & Intaglio Ink Roll Mill
    - (9) All Other Paste Ink Processes
    - (10) Raw Material Storage Tank Fugitive Emissions
    - (11) Dye Room Mixing
    - (12) Intermediate Material Storage Tank Fugitive Emissions
2. This approval authorizes:
  - A. The facility will implement a RACT program consisting of improved operating standards to reduce VOC emissions. These include the following:
    - 1) Lids will be placed on all mixing tanks, excluding water based and paste inks.
    - 2) Covers will be placed over all storage vessels, except during filling and removing the contents, excluding water based and paste inks.
    - 3) Monthly inspections of the facility will be made and recorded by plant personnel to ensure proper housekeeping practices.
    - 4) The vapor return lines on the storage tanks shall be used when a delivery tank truck is equipped with a vapor return line connection.
3. RACT Implementation Schedule
  - A. Upon issuance of this approval, Sun shall begin immediate implementation of the measures necessary to comply with the approved RACT proposal.
4. Recordkeeping and Reporting Requirements
  - A. Sun shall maintain a file containing all the records and other data that are required to be collected to demonstrate compliance with RACT requirements of 25 PA Code §129.91-129.94. These records shall include solvent usages and fuel consumption.
  - B. The records shall provide sufficient data and calculations to clearly demonstrate that the requirements of §129.91-129.94 are met.
  - C. Records shall be retained for at least five years and shall be made available to Air Management Services 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 company shall not impose conditions upon or otherwise restrict Air Management Services' access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow Air Management Services 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 Air Management Services 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 will 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).

