

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - BUREAU OF AIR QUALITY **APR 13 1999**

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(s) described below:

Permit No.	<u>OP-46-0156</u>	Source(s)	<u>Facility VOC Sources</u>
Owner	<u>Universal Packaging Corporation</u>	Air	<u></u>
Address	<u>1196 Easton Road</u>	Cleaning	<u></u>
	<u>Horsham, PA 19044</u>	Device	<u></u>
Attention	<u>William P. Ciorletti</u>	Location	<u>1196 Easton Road</u>
	<u>President</u>		<u>Horsham Township</u>
			<u>Montgomery County</u>

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 any plan approval 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.

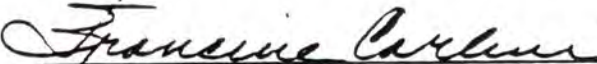
(SEE ADDITIONAL CONDITIONS ATTACHED)

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 4/8/1999

Expires 4/8/2004

cc: ~~Division of Permitting, P.C.S.O.~~
Administration
SEFO
Re (jd98)219-1


Francine Carlini
Regional Manager
Air Quality

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0156
UNIVERSAL PACKAGING CORPORATION

CONDITIONS (continued):

3. Operating Permit No. OP-46-0156 is issued to Universal Packaging Corp. (Universal) for the following volatile organic compound (VOC) sources/activities located at its facility in Horsham Township, Montgomery County.
 - A. FMC NO. 706 Wide-Web Flexographic Printing Press
 - B. 3 - Narrow-Web Flexographic Printing Presses manufactured by Mark Andy, Model Nos. 810, 2100, and 2200
 - C. 4 - Space Heaters (two rated 0.25 MMBtu/hr and two rated at 0.3 MMBtu/hr)
 - D. Hazardous Waste Storage and Transfer Area
 - E. Parts Cleaning Station (1.67 ft. X 7 ft.)
 - F. Cleanup Operations
4. This Operating Permit supersedes and ~~incorporates~~ the requirements of Operating Permit Nos. OP-46-0063A and 46-320-031.
5. 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 affect as part of the State Implementation Plan (SIP), until replaced pursuant to 40 CFR 51, and approved by the U. S. Environmental Agency (EPA).

Reasonably Available Control Technology (RACT) Requirements

6. The VOC emissions from the Wide-web Flexographic Printing Press, Space Heaters, Hazardous Waste Storage and Transfer Area, and Parts Cleaning Station shall not exceed 24.9 tons per year as a 12-month rolling sum.
7. The total VOC emissions from the three Narrow-web Flexographic Printing Presses, including cleanup operations, shall not exceed to 9.0 TPY as a 12 month rolling sum.
8. The space heaters, the hazardous waste storage and transfer area, and the cleanup operations shall comply with the following:
 - A. The sources shall be operated and maintained in accordance with manufacturers specifications and good air pollution practices.

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CONDITIONS (continued):

- B. Each source category shall be operated with VOC emission rates not to exceed 3 lbs/hr, 15 lbs/day, or 2.7 TPY on a 12-month rolling average.
9. The parts cleaning station is subject to and shall comply with the requirements established in 25 Pa. Code Section 129.63.
10. The company shall maintain records required to conform with the minimum recordkeeping requirements of 25 Pa. Code Section 129.95. At a minimum this shall include:
- A. Records to provide sufficient data and calculations to clearly demonstrate that the requirements of Condition Nos. 6, 7 and 8 are met.
- B. Records shall be maintained for at least five years and shall be made available to the Department upon request.
- C. Monthly records shall be maintained as described below. Quantities used daily shall be calculated from the monthly records.
- (1) Quantity in gallons and pounds of ink as applied
- (2) Composition of ink:
- (a) Percent solids by volume
- (b) Percent solvent by volume
- (c) Percent water by volume
- (d) Pounds of VOCs per gallon minus water
- (e) Solvent density
- (d) Composition and usage of cleaning solvents and diluents used by the facility.

11. General Conditions

- A. ~~If, at any time, the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Protection) of the aforementioned air contamination source(s), the operation and use of which is authorized by this permit, or causes, permits or allows any modifications, malfunction or removal of any air pollution control device required as a condition of this permit, then and in that event, 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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CONDITIONS (continued):

- B. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated cleaning device(s) and shall allow the Department to have access at any time to said source(s) with such measuring and recording equipment, including equipment for recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
- C. If, at any time, the Department has cause to believe that air contaminant emissions from the aforementioned source 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 Protection, 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 the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.
- D. This operating permit is valid for a limited period of time and may be renewed before its expiration. Request for an operating permit renewal must be in writing and must be accompanied by the appropriate permit application processing and annual permit administration fees as specified in Section 127.703 of the Rules and Regulations of the Department of Environmental Protection. These fees shall be paid in the form of a check payable to the "Commonwealth of Pennsylvania - Clean Air Fund". The request should be made using the appropriate application form and must be received by the Department along with a completed Air Pollution Control Act Compliance Review form no later than 60 days prior to the expiration date of this permit. All necessary forms can be obtained from the Department upon request.
- E. Any notification required as a result of any condition herein should be directed to:
Regional Air Quality Manager, DEP, Lee Park Suite 6010, 555 North Lane,
Conshohocken, PA 19428.

Re 30 (jd98)219-1a