

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - AIR QUALITY CONTROL

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-09-0009</u>	Source(s)	<u>Facility Major VOC & Synthetic Minor NOx RACT</u>
Owner	<u>Webcraft Technologies, Inc.</u>	Air	<u></u>
Address	<u>4371 County Line Road</u>	Cleaning	<u></u>
	<u>Chalfont, PA 18914</u>	Device	<u></u>
Attention	<u>Mr. Manuel Caballero</u>	Location	<u>4371 County Line Road</u>
	<u>Process Engineer</u>		<u>Chalfont Borough</u>
			<u>Bucks 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. 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 04/18/96 Revised 10/15/98

~~Expires~~ 04/18/2001


Francine Carlini
Regional Manager
Air Quality

cc: Central Office
Re (KAL)194

OPERATING PERMIT CONDITIONS
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WEBCRAFT TECHNOLOGIES, INC.
REVISED 10/15/1998

CONDITIONS (continued):

3. This Operating Permit is issued for the following sources:

- A. Seven (7) heatseat web offset lithographic presses including Press No. 18 and a dryer.
- B. Two (2) electropresses (electroweb)
- C. Synthetic Minor NO_x Sources:

<u>Emission Sources</u>	<u>Rated Capacity</u>	<u>Fuel Used</u>
Combustion Engineering Boiler	49 MMBtu/hr	Natural Gas/No. 2 Fuel Oil/Exxprint Solvents 588D & 283D
Johnston Boiler	11.2 MMBtu/hr	Natural Gas/No. 2 Fuel Oil
Brian Water Tube Boiler	0.72 MMBtu/hr	Natural Gas
Space Heaters (3)	0.85 MMBtu/hr	Natural Gas
Noven Ovens (6)	2.5 MMBtu/hr	Natural Gas
Backup Generator	55kW	No. 2 Fuel Oil

4. General Requirements

- A. The expiration date shown on the operating permit OP-09-0009 is for state purposes only. For Federal enforcement purposes the operating permit shall remain in effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed pursuant to 40 CFR 51 and approved by the United States Environmental Protection Agency (EPA). The operating permit shall become enforceable by the EPA upon its approval of the above as a revision to the SIP.

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CONDITIONS (continued):

- B. This Operating Permit applies to the emissions of NO_x and VOC pollutants only. Emissions of other pollutants, including criteria pollutants, shall be governed by existing plan approval, operating permit, and the applicable requirements of the Rules and Regulations of the Department such approval, permit and requirements are incorporated herein by reference and made part of this permit. All conditions from plan approval and operating permit No. 09-320-005, 09-320-008, 09-320-025A, and 09-320-026A, shall be incorporated to this permit.
 - C. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department 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 Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
 - D. 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 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.
5. Emission Limits
- A. Webcraft Technologies, Inc. shall limit the total facility VOC emissions from all the sources (excluding Press No. 18) to 40.5 tons/yr or less in a 12 month rolling period.
 - B. Webcraft Technologies, Inc. shall limit the total facility NO_x emissions from all combustion sources (excluding dryer of Press No. 18) to 24.23 TPY or less.
 - C. Webcraft Technologies, Inc. shall use a fountain solution with 3% or less VOC on its 6 heatset web offset presses. Refrigeration with a maximum temperature of 60°F shall be used unless the fountain solution contains less than 3% VOC.

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CONDITIONS (continued):

6.
 - A. Webcraft Technologies, Inc. shall keep on hand the chemical composition data for all the inks, cleaners and fountain solutions applied to all the presses and shall record on a monthly basis for all inks, cleaners and fountain solutions and volatile organic compound (VOC) solvent or thinner usage in all the presses. These records shall be maintained for a period of two years and shall be made available to the Department upon request. All data shall be recorded at the end of shift by the operator.
 - B. Records shall be kept as to the chemical composition of the fountain solutions, inks and clean-up solvents applied or used at the facility.
 - C. Fountain solution purchases and inventories shall be kept and reconciled with actual usages for each press.
 - D. Records of the tracking system shall be maintained for a period of two years and shall be available to the Pennsylvania Department of Environmental Protection.
7. Company shall maintain comprehensive records of VOCs on a 12 month rolling basis for all de-minimus sources like plate making equipments two spray booths, two oil dispensing stations, and waste pumping stations in a Department approved format, to demonstrate compliance with the de-minimus limits.
8. Webcraft shall identify, install, calibrate, and operate an outlet gas temperature monitoring system for cooler/condenser filtration units by May 31, 1996. The accompany shall monitor and record the outlet gas temperature at least once per shift.
9. All proposed RACT to reduce VOC emissions shall be fully monitored and records shall be kept starting May 31, 1996.
10. Operating Limitations
 - A. The hours of operation of the Combustion Engineering boiler shall be limited to 2880 hr./yr and 99,360 gallons of fuel based on a 12 month rolling average.
 - B. The following conditions apply only to the Johnston boiler.
 1. The Johnston boiler shall not be limited in its hours of operation.
 2. The primary fuel for the Johnston boiler shall be natural gas with No. 2 fuel oil as the backup fuel.

CONDITIONS (continued):

- C. The following conditions apply only to the Brian Water Tube boiler.
 - 1. The hours of operation of the Brian Water Tube boiler shall be limited to 4368 hrs/yr based on a 12 month rolling average.
 - 2. The Brian Water Tube boiler shall only fire natural gas.
 - D. Each Backup Generator shall limit their hours of operation to 500 hours in a 12 month rolling period.
 - E. The three (3) space heaters shall not be limited in their hours of operation.
 - F. The six (6) Noven Ovens shall not be limited in their hours of operation.
11. Recordkeeping Requirements
- A. A bound logbook for the Combustion Engineering boiler, Johnston Boiler, Brian Water Tube boiler, all three (3) Space Heaters, six (6) Noven Ovens, and Backup Generator shall be kept and sufficient data kept so that compliance with Condition (1) can be determined. Records shall be kept for a minimum of two (2) years and shall be made available to the Department upon request.
 - B. The bound logbook for the Backup Generator shall contain, at a minimum, the following information:
 - 1. the amount of time the Backup Generator has run for the month
 - C. The bound logbook for the Combustion Engineering boiler shall contain, at a minimum, the following information:
 - 1. the number of days or hours the Combustion Engineering boiler has operated;
 - 2. the amount of No. 2 fuel oil/Exxprint Solvents 588D and 283D combusted in the Combustion Engineering boiler.

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CONDITIONS (continued):

12. The following conditions apply to the new Press No. 18 constructed under Plan Approval PA-09-0009:
- A. Press No. 18 is a seven color, blanket to blanket press that is manufactured by Harris, Model No. M1000. The maximum width of the web is 38 inches, and the maximum press speed is 1450 feet per minute (fpm). The press shall be connected to an existing catalytic oxidizer.
 - B. The hot air dryer associated with this press is manufactured by MEGTEC Systems, Model No. Phazer 11, 1-P 11-98-1066. It is a single pass dryer with multiple hot air blower nozzles. The hot air is produced by two natural gas fired burners with combustion air. The burners are rated at 1.65 million Btu/hr each. There is also a conditioning burner rated at 400,000 Btu/hr.
 - C. The twelve month rolling average VOC content of the inks shall not exceed 42% by weight and the maximum VOC content of the inks shall not exceed 55%. The VOC emission from this press due to the usage of ink shall be limited to 5.15 tons per year. This shall be calculated using 20% VOC being retained on the paper and 95% of the VOC leaving the press being destroyed by the catalytic oxidizer.
 - D. The wetting/fountain solution as applied shall have VOC content of 0.69% or less by volume. The VOC density of the wetting/fountain solution as applied shall not exceed 8.9 lb/gallon. Emission from the use of wetting/fountain solution shall be calculated using 100% of the VOC in the solution being emitted.
 - E. Blanket wash and cleanup solvent shall be estimated to have VOC content of 100%. The vapor pressure of the cleanup solvent shall not exceed 10 mm of mercury (Hg) at 68°F. The density of the cleanup solvent shall be limited to 6.8 lb/gallon. Emission from the use of blanket wash/cleanup solvent shall be calculated using 35% of the VOC in the solvent being emitted.
 - F. The combined emission of VOC from the use of inks, wetting/fountain solution and blanket wash/cleanup solvent shall be limited to 7.40 tons/year.

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CONDITIONS (continued):

- G. The net emission increases since 1991 for this facility is 20.35 tons per year of VOC. The following table lists the incremental sources since 1991:

Source	Plan Approval Issuance Date	VOC Emission in (TPY)
Electropress Printer (PA No. 09-320-025A)	December 1, 1991	3.1
Electropress Printer (PA No. 09-320-026A)	December 1, 1991	3.1
This New Press No. 16 (PA No. 09-320-037)	August 15, 1995	6.75
This New Press No. 18	July 10, 1997	7.40
Total Emission Increases Since 1991 =		20.35

- H. The rags or towels used with the cleanup solvent shall be stored in a closed container to await removal by the cleaning company.
- I. Press No. 18 shall be operated in the printing mode only when the catalytic oxidizer and the dryer are operational. The press shall never be operated with the catalytic oxidizer and the dryer being in the bypass mode. An interlock system shall prevent operation of either Press No. 16 or 18 when the catalytic oxidizer is not operated.
- J. The minimum inlet temperature to the catalytic oxidizer shall be 550°F. Temperature recorders shall be provided to indicate both inlet and outlet temperatures of the oxidizer. The minimum destruction efficiency of the oxidizer shall be 95%.

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CONDITIONS (continued):

K. The emissions from the dryer shall be limited to the following:

<u>Pollutant</u>	<u>lb/hr</u>	<u>ton/yr</u>
Oxides of Nitrogen (NO _x)	0.53	2.32
Carbon Monoxide (CO)	0.11	0.49
Oxides of Sulfur (SO _x)	Negligible	Negligible
Particulate Matter (PM)	0.06	0.28
Non Methane Total Organic Compound (NMTOC)	Negligible	Negligible

L. Press No. 16 and Press No. 18 shall be connected to the same catalytic oxidizer with one single stack.

M. The company must record on a twelve month rolling average the following:

1. Ink usage in pounds; its percent VOC content by weight.
2. Fountain and wetting solution as applied in gallons; its percent VOC content by volume as applied and solvent density.
3. Cleanup solvent in gallons and pounds, its percent VOC content and its vapor pressure at 68°F. The Department assumes that 35% of the VOC used is emitted into the atmosphere.

Re 30 (SM97)279-7