

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

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 and 129 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-09-0027</u>	Source(s)	<u>VOC RACT</u>
Owner	<u>Fres-co System USA, Inc.</u>	Air	<u></u>
Address	<u>3005 State Road</u>	Cleaning	<u></u>
	<u>Telford, PA 18969-1033</u>	Device	<u>2 Thermal Oxidizers</u>
Attention	<u>Mr. Frank A. Losagio</u>	Location	<u>West Rockhill Township</u>
	<u>General Manager</u>		<u>Bucks County</u>

This permit is subject to the following conditions:

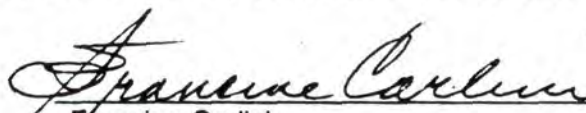
1. That the source(s) and any associated air cleaning devices are to be:
  - a. operated in such a manner as not to cause air pollution;
  - b. operated and maintained in a manner consistent with good operating and maintenance practices;
  - c. in compliance with the specifications and conditions of all applicable plan approvals issued.
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 03/05/1998

Expires 03/05/2003



Francine Carlini  
Regional Manager  
Air Quality

cc: Division of Permits, RCSOB  
Administration  
SEFO  
Re (GJC97)195-1

**OPERATING PERMIT CONDITIONS**  
**PERMIT NO. OP-09-0027**  
**FRES-CO SYSTEM USA, INC.**

**CONDITIONS (continued):**

3. This Operating Permit incorporates Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the Clean Air Act Amendments and 25 Pa. Code Sections 129.91 through 129.95 for:
  - Cerutti R-248 Rotogravure Press No. 201
  - Cerutti R-248 Rotogravure Press No. 202
  - Cerutti R-248 Rotogravure Press No. 203
  - Cylinder Cleanup Operations
  - 2 Soak Tanks
  - 6 Pump Operated Pot Washers
  - Parts Washer
  - 5 Solvent Reclaim Tanks
  - Ink Mixing Area
  - Solvent Dispensing Operation
  - 3 Extrusion Lines
  - 4 Bag Machines
  - Miscellaneous Cleaning Operations
  
4. This RACT Operating Permit supersedes the Plan Approval No. 09-320-028 with respect to three rotogravure presses for the incorporation of VOC RACT requirements of 25 Pa. Code Sections 129.91-95. The terms and conditions of Plan Approval No. 09-320-028 are incorporated in this RACT Operating Permit.
  
5. The expiration date shown on this RACT Operating Permit is for State purposes. For Federal Enforcement purposes the RACT portion of this RACT Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51 and approved by the US Environmental Protection Agency (EPA).
  
6. The total VOC emissions from Ink mixing operations shall not exceed more than 5 tons per year or less on a twelve month rolling average sum.
  
7. The total VOC emissions from four (4) bag machines shall not exceed more than 11 tons per year or less on a twelve month rolling average sum.

**OPERATING PERMIT CONDITION 3**  
**PERMIT NO. OP-09-0027**  
**FRES-CO SYSTEM USA, INC.**

**CONDITIONS (continued):**

8. The potential to emit volatile organic compounds from each of the following sources or source categories shall never exceed 3 pounds per hour, 15 pounds per day or 2.7 tons per year. Should any of these limitations ever be exceeded for any of the source categories listed below, a detailed RACT analysis which meets the criteria specified in Section 129.92 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection must be submitted to the Department for each source contained in the respective source category.
- Cylinder Cleanup Operations
  - 5 Solvent Reclaim Tanks
  - Solvent Dispensing Operation
  - 3 Extrusion Lines
  - Miscellaneous Cleaning Operations
9. Three (3) Rotogravure Presses (No.201, 202, and 203) shall comply with the provisions established in 25 Pa. Code § 129.67.
10. Two (2) Soak Tanks, Six (6) pump operated Pot Washers, and Parts Washer shall comply with the provisions established in 25 Pa. Code § 129.63(a).
11. The company shall comply with the RACT requirements within 90 days of issuance of this RACT operating permit.
12. The company shall keep records of the applicable information specified below. The information shall be maintained at the facility for a minimum of 2 years and shall be made available to an authorized Department representative, at any time.
- a. Fres-co shall maintain an emission tracking system for all sources as approved by the Pennsylvania Department of Environmental Protection (PADEP) for VOC and ink oil as applied. The information maintained under this system includes:
1. Hours of operation of all sources and control equipment.  
  
The company shall record the hours of operation by number of production runs per day (runs/day) and duration of each run (time/run).
  2. Coating quantity in gallons and pounds of coating as applied, per job, per source on daily basis.

**OPERATING PERMIT CONDITIONS**  
**PERMIT NO. OP-09-0027**  
**FRES-CO SYSTEM USA, INC.**

**CONDITIONS (continued):**

3. Composition of coatings used on the sources covered by this Operating Permit as applied per job on an hourly basis in a method approved by the Department.
  - a. Percent solids by volume.
  - b. Percent solvent by volume.
  - c. Percent water by volume.
  - d. Pounds of VOC per gallon minus water.
  - e. Solvent density.
4. Composition and usage of cleaning solvents and diluents used at the facility, on per hour and day basis using methods approved by the Department. These records shall be submitted in conjunction with the Department's "AIMS" reporting schedule.
5. Air flows of all sources being ducted to the control equipment, on a daily basis, using methods approved by the Department.
6. Combustion chamber exit gas temperature of the thermal oxidizers (T01 and T02) on a continuous basis, as required by condition 15 below.
7. Total hydrocarbon emission reduction from T01 and T02 on a continuous basis.
- b. Fres-co shall not bypass the control equipment when using solvent base coatings and clean-up solvents. Fres-co may bypass the control equipment when using Department approved water base solvents and coatings.
- c. The company shall maintain comprehensive, accurate records of any additional data in accordance with 25 Pa. Code Section 129.95.
- d. Fres-co shall maintain on hand a copy of all records required by this Operating Permit for a period of five (5) years and shall make these records available to the Department upon request.

*Conditions 13 through 20 herein pertain to three rotogravure presses (201, 202, and 203) operated pursuant to Plan Approval No. 09-320-028.*

**OPERATING PERMIT CONDT. NS  
 PERMIT NO. OP-09-0027  
 FRES-CO SYSTEM USA, INC.**

**CONDITIONS (continued):**

13. This Operating Permit is issued for the following graphic arts sources:

<u>Source</u>	<u>Control Equipment</u>
Rotogravure Press No. 201 Cerutti R-248 (7 Stations)	HES Thermal Oxidizer (T01)
Rotogravure Press #202 Cerutti R-248 (8 Stations)	REECO Thermal Oxidizer (T02)
Rotogravure Press #203 Cerutti R-248 (10 Stations)	HES Thermal Oxidizer (T01)

14. Fres-co shall operate and maintain a 100% Volatile Organic Compound (VOC) emission capture enclosure system for Press No. 202 and 203. The enclosure shall comply with the techniques and constraints outlined in the U.S. EPA New Source Performance Standards Subpart SSS, 40 CFR 60.712 (b) (5) (i).

15. Emission Limitations:

a. The VOC emissions from the above presses (No. 201, 202, and 203), their fugitive emissions, and the cleanup solvent emissions associated with the source(s) shall not exceed the limits indicated below:

<u>Source</u>	<u>Hourly (pounds)</u>	<u>Daily (pounds)</u>	<u>Annual (tons) *</u>
Press 201	69	209	85
Press 202	36.1	564	32
Press 203	16.8	403	17

\* Calculated as a 12 month rolling sum.

b. The emission limits in Condition 15a above are based on a control equipment destruction efficiency of 98% for HES Thermal Oxidizer (T01) and 95% for REECO Thermal Oxidizer (T02); and a 100% capture efficiency for Press No. 203 and Press No. 202 and a 90% capture efficiency of press 201.

**OPERATING PERMIT CONDITIONS**  
**PERMIT NO. OP-09-0027**  
**FRES-CO SYSTEM USA, INC.**

**CONDITIONS (continued):**

- c. Fres-co shall comply with the more restrictive of the emission limits indicated in Condition 15a above.
16. **Operating Conditions:**
- a. The control equipment T01 and T02 shall operate so as to maintain the exhaust from the sources at a minimum combustion exit gas temperature of 1500 degrees Fahrenheit for one second.
  - b. Fres-co shall, if determined by the Department, increase the operating temperature of T01 and T02 stipulated in Condition 13 above to a temperature necessary to maintain a VOC destruction efficiency of 98% on T01 and 95% on T02. The above will be determined based on stack tests as required by the Department.
  - c. The control equipment shall not be bypassed when running low solvent content coatings without prior approval of the Department.
  - d. The control equipment T01 and T02 shall be operated at a minimum of one (1) hour before coatings are placed in the presses and one (1) hour after the coatings are removed from the presses after the final run and after the presses have been cleaned. The Department may amend this condition if Fres-co receives Department approval of non VOC cleaning solutions.
17. **Monitoring Requirements:**
- a. The control equipment, T01 and T02, shall each be equipped with temperature monitoring instrumentation, approved by the Department, which continuously indicates and records the combustion chamber exit gas temperatures.
  - b. Fres-co shall install, operate and maintain instrumentation which continuously monitors and records the total hydrocarbon emission reduction from the thermal oxidizers T01 and T02.

**OPERATING PERMIT CONDIT NS**  
**PERMIT NO. OP-09-0027**  
**FRES-CO SYSTEM USA, INC.**

**CONDITIONS (continued):**

18. 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.
19. If, 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, the permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).
20. The company, within one hour of occurrence, shall notify the Department of Environmental Protection, at 610-832-6241, of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants 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. A written report shall be submitted to the Department within two working days following the incident describing the malfunctions and corrective actions taken.

**OPERATING PERMIT CONDITIONS**  
**PERMIT NO. OP-09-0027**  
**FRES-CO SYSTEM USA, INC.**

**CONDITIONS (continued):**

21. 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 any condition contained herein or 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.
22. ~~This Operating Permit is valid for a limited period of time and may be renewed before its expiration. Requests 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 30 days prior to the expiration date of this permit.~~

All necessary forms can be obtained from the Department upon request.

23. Any notification required as a result of any condition herein should be directed to:

Regional Air Quality Manager  
Lee Park - Suite 6010  
555 North Lane  
Conshohocken, PA 19428  
Telephone: 610-832-6241