

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

JUN 22 1998

QUALITY
AITS

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-09-0038</u>	Source(s)	<u>Facility VOC RACT</u>
Owner	<u>H & N Packaging, Inc.</u>	Air	<u></u>
Address	<u>P.O. Box 188</u>	Cleaning	<u></u>
	<u>Chalfont, PA 18914</u>	Device	<u></u>
Attention	<u>Mr. Richard Kleckner</u>	Location	<u>Chalfont Township</u>
	<u>General Manager</u>		<u>Bucks County</u>

This permit is subject to the following conditions:

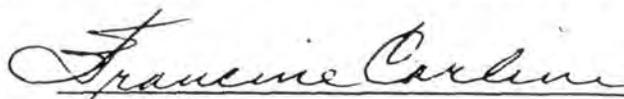
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of any plan approval issued;
 - c. operated and maintained in a manner consistent with good operating and 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 06/08/1998

Expires 06/07/2003


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (JCD)248

CONDITIONS (continued):

3. This Operating Permit is for H & N Packaging, Inc., which previously operated as Paramount Packaging corporation, and it 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:
 - P131 - One Eight-Color Champlain Roto Gravure Printing Press
 - L2 - Techno Roto Gravure Laminator
 - L5 - Techno Water base Roto Gravure Laminator
 - Ink Room 1 - Ink Storage and Mixing Area
 - Wash Room 1 - Parts Washing Area
 - Wash Room 2 - Parts Washing Area
- ~~4. This RACT Operating Permit supersedes the Operating Permit No. 09-318-062 with respect to one L5 Techno water based Roto Gravure Laminator for the incorporation of VOC RACT requirements of 25 Pa. Code Sections 129.91-95.~~
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 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.
 - Ink Room 1 - Ink Storage and Mixing Area
 - Wash Room 1 - Parts Washing Area
 - Wash Room 2 - Parts Washing Area
- ~~7. All graphic arts sources including the eight-color Champlain Roto Gravure Printing Press (P131) shall comply with the provisions established in 25 Pa. Code Section 129.67.~~

CONDITIONS (continued):

~~8.~~ All surface coating sources, including Techno Roto Gravure Laminator (L2) and Techno Water based Roto Gravure Laminator (L5), shall comply with the provisions established in ~~25 Pa. Code Section 129.52.~~

9. The sources described in Condition 3 shall be maintained and operated in accordance with manufacturers' specifications as well as in accordance with good air pollution control practices.

10. The company shall comply with the RACT requirements within 90 days of issuance of this RACT operating permit.

Conditions 11 through 13 herein pertain to one water based roto gravure laminator L5 TECMO VA 24/1403 operated pursuant to operating permit No. 09-318-062.

~~11.~~ The operating hours of the source L5 shall not exceed more than 4300 hours per year.

~~12.~~ The VOC emissions from the source L5 shall not exceed more than 0.25 pounds per hour and 0.5 tons per year.

~~13.~~ The company shall keep on hand chemical composition data for all of the coatings applied in the operation of the source and shall record on a job basis all coatings and any volatile organic compound (VOC) solvent or thinner usage in the operation of the source L5. These records shall be maintained for a period of five years and shall be made available to the Department upon request.

~~14.~~ Facility Rule Effectiveness Requirements

~~(a)~~ The company shall provide at least 41 hours of introductory training to new employees and 25 hours per year of refresher training on the proper operation and maintenance of the source/control device. The company shall keep records of the type and amount of training provided to each operator. The records shall be kept for a minimum of 5 years and be made available to the Department upon request.

~~(b)~~ The source(s) and air pollution control device(s) shall be operated and maintained in a manner consistent with the Master Operations and Maintenance Instructions (O&M) supplied by the manufacturer. A copy of the O&M instructions shall be kept at the site and be made available to the Department upon request. An outline of the O&M instructions is attached to this operating permit as an appendix. Operators must follow the O&M instructions and/or checklists and sign off daily. The records shall be kept for a minimum of 5 years and be made available to the Department upon request.

OPERATING PERMIT CONDITIONS
PERMIT NO OP-09-0038
H & N PACKAGING, INC.

CONDITIONS (continued):

- ~~(c) The company shall conduct a stack test once every 5 years to determine the overall control efficiency of the control device for VOC emissions. The company shall use the test methods and procedures approved by the Department's Source Testing and Monitoring Section. The test shall be conducted within the final year before the operating permit expires. Results shall be submitted to the Department for review at least 60 days prior to the expiration of the operating permit.~~
- ~~(d) Coating composition and usage records (RACT calculations) required in condition No. 16 are required for the Rule Effectiveness Program. These records shall be submitted to the Department once every 6 months.~~
- ~~15. 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).~~
16. Recordkeeping Requirements:
- A. A VOC computer tracking system shall be used to document compliance with conditions of this operating permit. The system shall quantify emissions from the source by accounting for the amount, in pounds, of inks used for each job, and the total quantity of any VOC solvents used.
 - B. The company shall record daily coating quantity in gallons and pounds of coating applied per job.
 - C. The company shall record the coating compositions as below:
 - 1. Percent solids by volume
 - 2. Percent solvent by volume
 - 3. Percent water by volume
 - 4. Pounds of VOC per gallon minus water
 - 5. Solvent density

OPERATING PERMIT CONDITIONS
PERMIT NO OP-09-0038
H & N PACKAGING, INC.

CONDITIONS (continued):

- ~~D.~~ ~~The company shall record the hours of operation by number of production runs per day (runs/day) and duration of each run (time/run).~~
- ✓ E. The company shall maintain comprehensive, accurate records of any additional data in accordance with 25 Pa. Code Section 129.95.
- ~~F.~~ ~~The records shall be retained for at least 5 years and shall be made available to the Department upon request.~~
- ~~17.~~ 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.
- ~~18.~~ 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.
- ~~19.~~ 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 60 days prior to the expiration date of this permit.

OPERATING PERMIT CONDITIONS
PERMIT NO OP-09-0038
H & N PACKAGING, INC.

CONDITIONS (continued):

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

~~20.~~ 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

Re 30 (jcd)248-3