

ALLEGHENY COUNTY HEALTH DEPARTMENT

IN RE:

IDL, Incorporated)	PLAN APPROVAL ORDER
535 Old Frankstown Road)	AND AGREEMENT NO.225
Allegheny County)	<u>UPON CONSENT</u>
Pittsburgh, PA 15239-1797)	

AND NOW, this 18th day of July, 1996,

WHEREAS, the Allegheny County Health Department, (hereafter referred to as "Department"), has determined that the IDL, Incorporated (hereafter referred to as "IDL"), 535 Old Frankstown Road, Allegheny County, Pittsburgh, PA 15239-1791, as the operator and the owner of a custom screen printing facility at 535 Old Frankstown Road, Plum Borough, Allegheny County, PA, (hereafter referred to as "the facility"), is currently a major stationary source of volatile organic compounds (hereafter referred to as "VOCs") as defined in Section 2101.20 of Article XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control (hereafter referred to as "Article XXI"), and

WHEREAS, the Department has determined that Section 2105.06.a. of Article XXI, entitled "Major Sources of Nitrogen Oxides & VOCs" is applicable to IDL's operations at this facility; and

WHEREAS, IDL has promptly submitted to the Department

all documents required by Section 2105.06.b of Article XXI (hereafter referred to as "the proposal"); and

WHEREAS, the Department, after a review of the submitted proposal, has determined it to be complete; and

WHEREAS, the Department has further determined, after review of the submitted proposal, that it constitutes Reasonably Available Control Technology (hereafter referred to as "RACT") for control of VOC emissions from the facility; and

WHEREAS, the parties have agreed that the most appropriate vehicle for both memorializing the submitted proposal and approving the submitted proposal by the Department for the purpose of submission of the same to the U.S. Environmental Protection Agency (hereafter referred to as "US EPA") as a revision to the Commonwealth of Pennsylvania State Implementation Plan (hereafter referred to as "SIP") is a Plan Approval Order and Agreement Upon Consent; and

WHEREAS, the Department and IDL desire to memorialize the details of the submitted proposal by entry of a Plan Approval Order and Agreement Upon Consent; and

WHEREAS, pursuant to Section 2109.03 of Article XXI, the Director of the Allegheny County Health Department or his

designated representative may take action in order to aid in the enforcement of the provisions of this Article; and

NOW, THEREFORE, this date first written above, the Department, pursuant to Section 2109.03 of Article XXI, and upon agreement of the parties as hereinafter set forth, hereby issues this Plan Approval Order and Agreement upon Consent:

I. ORDER

1.1. At no time shall IDL allow the daily-weighted, cross-line average VOC content of all inks, as applied, used in the Star 2, Star 3, SPS, Premiere, Frankenthal and Moffit/Sakuria screen presses, to exceed 3.3 pounds per gallon of ink, less water and exempt compounds with the exception of special purpose screen printing inks and coatings. The phrase "special purpose screen printing inks and coatings" is defined in paragraph 1.2. immediately below and the limitation for these inks and coatings is in paragraph 1.3. immediately below.

1.2 "Special purpose screen printing inks and coatings" means inks and coatings used in screen printing which are used to print ink transfers, or are designed to resist or withstand any of the

following:

- i.) more than two (2) years of outdoor exposure;
- ii.) exposure to chemicals, solvents, acids, detergents, oil products or cosmetics;
- iii.) exposure to temperatures in excess of one hundred and seventy (170) degrees fahrenheit;
- iv.) vacuum forming;
- v.) embossing or;
- vi.) molding.

1.3. At no time shall IDL allow the daily-weighted cross-line average VOC content of all special purpose screen printing inks and coatings used in the subject screen presses to exceed 6.7 pounds per gallon of ink, less water and exempt compounds.

1.4 The daily-weighted cross-line average VOC limitations, specified in paragraphs 1.1 and 1.3 above, shall be calculated using the following equation:

$$VOC_w = \sum_i v_i \times c_i / \sum_i v_i$$

where:

VOC_w = The daily-weighted cross-line average ink and coating VOC content , with units

of pounds of VOC per gallon of ink or coating, excluding water and exempt compounds;

- N = The number of different inks and coatings applied per day;
- V_i = The volume, excluding water and exempt compounds, of each different ink and coating applied per day, in units of gallons; and
- C_i = The as-applied VOC content of each ink and coating applied per day, in units of pounds of VOC per gallon of ink or coating, excluding water and exempt compounds.

- 1.5. IDL shall maintain all appropriate records to demonstrate compliance with the requirements of both Section 2105.06 of Article XXI and this Order. Such records shall provide sufficient data and calculations to demonstrate that all requirements of both Section 2105.06 of Article XXI and this Order are being met. Such records shall include, but not be limited to, the following:

the quantity, composition, and density of all inks, coatings and solvents, including solvents used for clean-up, used in each screen press.

- 1.6. IDL shall retain all records required by both Section 2105.06 of Article XXI and this Order for this facility for at least (2) years and shall make the same available to the Department upon request.

II. AGREEMENT

The foregoing Order shall be enforced in accordance with and is subject to the following agreement of the parties, to wit:

- 2.1. The contents of this Order shall be submitted to the US EPA as a revision to the Commonwealth of Pennsylvania's SIP.
- 2.2. Failure to comply with any portion of this Order or Agreement is a violation of Article XXI that may subject IDL to criminal and civil proceedings, including injunctive relief, by the Department.
- 2.3. This Order does not, in any way, preclude, limit or otherwise affect any other remedies available to the Department for violations of this Order or of Article XXI, including, but not limited to, actions to require the installation of additional pollution control equipment and the implementation of additional corrective operating practices.
- 2.4. IDL hereby consents to the foregoing Order and hereby knowingly waives all rights to appeal said Order, and the undersigned represents that he is authorized to consent to the Order and to enter

into this Agreement on behalf of IDL.

~~2.5. IDL acknowledges and understands that the purpose of this Agreement is to establish RACT for the control of emissions of VOCs from this facility. IDL further acknowledges and understands the possibility that the US EPA may decide to not accept the Agreement portion of the Enforcement Order and Agreement by Consent as a revision to the Commonwealth of Pennsylvania's SIP.~~

IN WITNESS WHEREOF, and intending to be legally bound, the parties hereby consent to all of the terms and conditions of the foregoing Order and Agreement as of the date of the above written.

IDL INCORPORATED

By: Ralph W Murray

(signature)

Print or type Name: Ralph W. Murray

Title: CEO

Date: 7-18-96

ALLEGHENY COUNTY HEALTH DEPARTMENT

By: Bruce W Dixon 8/17/96

Bruce W. Dixon, M.D., Director
Allegheny County Health Department

and By: Roger C Westman

Roger C. Westman, Manager
Air Quality