

DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - AIR QUALITY CONTROL

Amendment

OPERATING PERMIT

V-71
DL
#468
SIP

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-09-0008</u>	Source(s) Facility	<u>VOC RACT</u>
Owner	<u>Mead Packaging Company</u>	Air	<u>Minor NOx Facility</u>
Address	<u>Penn-Warner Industrial Park</u>	Cleaning	<u></u>
	<u>Fairless Hills, PA 19030</u>	Device	<u></u>
Attention	<u>Ms. Leslie Hurland</u>	Location	<u>2 Canal Street</u>
	<u>Environmental Engineer</u>		

Fairless Hills RECEIVED
Ozone/Co & Mobile Sources
Bucks County Section (2A/FM)

V-71
#468
M

APR 19 1996

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 THE ATTACHED ADDITIONAL CONDITIONS)

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 11/08/95
Expires 11/08/2000

Richard L. Ruhl
RICHARD L. RUHL
Acting Air Pollution Control Manager

cc: Central Office
Southeast Regional Office

G. RATING PERMIT CONDITIONS
PERMIT NO. OP-09-0008
TAVO PACKAGING, INC.
(REVISED)
(01/22/98)

CONDITIONS (continued):

3. This Operating Permit is issued to Tavo Packaging, Inc. for the operation of the sources as shown in Condition No. 5 and to specify Reasonably Available Control Technology (RACT) for Volatile Organic Compounds (VOCs) and Nitrogen Oxide (NOx) emissions under 25 PA Code §129.91 through 129.95. Tavo Packaging, Inc. is a major VOC facility and minor NOx facility. The major sources of VOC emissions at the facility are the printing presses, which use water based ink in compliance with 25 PA Code §129.67 for graphic arts. This operating permit denotes a change of ownership for Mead Packaging Division of Mead Corporation.
4. The expiration date shown on the operating permit OP-09-0008 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.
5. The following operations shall not emit air contaminants into the atmosphere in excess as follows:

Material	Maximum VOC Content (wt%)	Maximum Potential VOC Emissions (lbs/yr)
Packaging Operations		
Adhesive	10	4995
Ink	10	5
Press Cleanup		
Magnus Cleaning Solution	10	525
Ultrasonic Cleaning Solution	10	3150
Primary Hand Cleaning	10	900
Secondary Hand Cleaning	100	425
Die Making		
Adhesive	100	55
Adhesive Removers	100	4860
Film Cleaners	100	285
Plate Preparation		
Cyrel Rubber	100	1079
Adhesive Remover	100	4121
Maintenance Operations		
Parts Cleaners	100	650
Miscellaneous Material	100	350
Raw Material Storage	10	0.1 tons/yr

Emission limit must be calculated on a twelve month rolling average sum.

OPERATING PERMIT CONDITIONS

PERMIT NO. OP-09-0008

TAVO PACKAGING, INC.

(REVISED)
(01/22/98)

CONDITIONS (continued):

6. Tavo Packaging, Inc. shall limit the total facility VOC emissions from all the press cleanup operation to 2.5 tons or less per year. Except for secondary cleaning operations all cleanup solutions shall contain 10 percent or less VOC by weight. A secondary hand cleaning operation is the use of high solvent cleaners necessary to remove ink/coating residue which cannot be removed using a 10% or less VOC cleaning solution.

~~7. Emission Limits~~

~~A. Visible air contaminants from the source shall not be emitted in such a manner that the opacity of the emissions is equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in and one (1) hour or equal to or greater than 30% at any time.~~

~~B. There shall be no malodorous emissions emitted from the source that are detectable outside the source owner's property line.~~

8. All combustion sources shall be maintained and operated in accordance with manufacturers specifications. The sources shall also be operated and maintained in accordance with good air pollution control practices.

9. Tavo Packaging, Inc. shall maintain comprehensive records for all de-minimus sources, in a Department approved format, to demonstrate compliance with the de-minimus limits.

10. Recordkeeping Requirements

A. The owner and operator of a major NOx or VOCs emitting facility shall keep records of all necessary information to demonstrate compliance with permit condition No. 5.

B. The owner or operator claiming that a facility is exempt from the RACT requirements of §§129.91-129.94, based on the facility's potential to emit, shall maintain records that clearly demonstrate to the Department that the facility or source is not subject to §§129.91-129.94.

C. Records required under this operating permit shall be kept for a period of two years and shall be made available to the Department upon its request.

D. The company shall record the quantity and identity of all VOC solvents used for cleanup purposes on a monthly basis. These records shall be maintained for a period of two years and shall be made available to the Department upon request.

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-09-0008
TAVO PACKAGING, INC.
(REVISED)
(01/22/98)

CONDITIONS (continued):

11. General Requirements

- A. 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.

- B. 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.

Re 30 (KAL)219.8