### PERIOD OPERATIONS - AIR QUALITY CONIRCL

#### OPERATING PERMIT

In accordance with the second of the Air Pollution Control Act, the Act of January 8, 1965.
P.L. 2119, as amended the 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.	OP-46-0023	Source(s) Facility VOC RACT
Owner	Forms, Inc., Spectra Graphics	_ Air
Address	P.O. Box F	Cleaning
	Willow Grove, PA 19090	Device
Attention	Mr. Richard Jasper	Location Upper Moreland Township
		Montgomery County
		Ozore/Co & Month Sources

3 permit is subject to the following conditions:

JAN 1 2 1996

- 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; EPAI REGION III
  - operated and maintained in a manner consistent with good operating and maintenance practices.
- 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 conditions of Article III of the rules and regulations of the Department of Environment of Environment

Issued 11/09/9

Expires 11/09/2900

RICHARD L. RUHL

Acting Air Pollution Control Manage

c: Central Office Southeast Regional Office



## OPERATING PERMIT CONDITIONS PERMIT NO. OP-46-0023 FORMS, INC., SPECTRA GRAPHICS (REVISED)

March 25, 1998

### CONDITIONS (continued):

- 3. This Operating Permit is issued for the following sources:
  - Five (5) heatset web offset lithographic presses
  - b. Three (3) non-heatset web offset lithographic presses
- 4. The expiration date shown on the Operating Permit OP-46-0023 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purposes, the Operating Permit shall remain in effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed, pursuant to 40 CFR Part 51 and approved by the United States Environmental Protection Agency (EPA).
- 5. The operation of the sources stated in Condition 3 above, shall not use materials listed below at rates and contents above the limits indicated:

	HEATSET			NON-HEATSET				
Material	lbs/hr	% VOC	VOC Used lbs/hr	VOC Limit	lbs/hr	% VOC	VOC Used lbs/hr	VOC Limit
Ink	1.56	27.5	0.43	0.34	1.43	40	0.57	0.03
PES 120	0.45	27	0.12	0.12	0.26	27	0.07	0.07
Chrome Roller	0.03	2	0.00	0.00	0.02	0	0.00	0.00
2351 T	0.20	87	0.17	0.17	0.30	87	0.26	0.26
Alkaless P	OH	65	0.07	0.07	0.17	65	0.11	0.11
Total Per Press	2.35		0.79	0.70	2.18		1.01	0.47

- Weight Basis
- 6. This RACT approval applies to the emissions of VOC pollutants only. Emissions of other pollutants, including criteria pollutants, shall be governed by existing Plan Approvals, Operating Permits, and the applicable requirements of the Rules and Regulations of the Department. Such approvals, permits and requirements are incorporated, herein, by reference and made part of this permit. All conditions from Plan Approval and Operating Permit No. 46-320-002B shall be incorporated into this permit.
- Additional Emission Limits
  - a. The particulate emission rate, from the source, resulting from the ink-oil emissions shall not exceed 1.0 pounds/hour.



## OPERATING PERMIT CONDITIONS PERMIT NO. OP-46-0023 FORMS, INC., SPECTRA GRAPHICS (REVISED)

MARCH 25, 1998

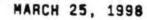
#### CONDITIONS (continued):

- b. 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 any one (1) hour or equal to or greater than 30%, at any time.
- c. There shall be no malodorous emissions emitted from the source that are detectable outside the source owner's property line.
- 8. 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. Forms, Inc. 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:
    - Operating hours for each source.
    - Job numbers of all production runs.
    - Quality of ink used for each job.
    - 4. Quantity of clean-up solvent used.

All data shall be recorded at the end of each 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.
- 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 PADEP.

# OPERATING PERMIT CONDITIONS PERMIT NO. OP-46-0023 FORMS, INC., SPECTRA GRAPHICS (REVISED)



### CONDITIONS (Contract):

- Forms, Inc. shall limit the total facility VOC emissions from all the presses operations to 22 tons/yr or less per year on a twelve month rolling average sum.
- All proposed RACT material substitutions to reduce VOC emissions shall be monitored and records shall be kept on a daily basis starting by March 31, 1996.
- 11. An 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.

### 12. General Requirements

- a. 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.
- b. 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 terminated required.

Re 30 (GJC)270-3