

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. 2419, 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-46-0026</u>	Source(s)	<u>VOC RACT</u>
Owner	<u>BG Packaging Corporation</u>	Air	<u></u>
Address	<u>Brower and Montgomery Avenues</u>	Cleaning	<u>Water-Based Inks on Faustel Press</u>
	<u>Oaks, PA 19456</u>	Device	<u></u>
Attention	<u>Mr. Gerald Lawrence</u>	Location	<u>Brower and Montgomery Avenues</u>
	<u>President</u>		<u>Upper Providence Township</u>
			<u>Montgomery 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.
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 08/30/1996

Francine Carlini
Regional Manager
Air Quality

Expires 08/30/2001

cc: Central Office
Administration
SEFO
Re 30 (RN)26-1

Operating Permit Conditions
PERMIT NO. OP-46-0026
GLOBAL Packaging Inc.
(Revised 12/24/97)

CONDITIONS (continued):

3. This Operating Permit is issued to denote a change of ownership from BG Packaging to Global Packaging, Inc.
4. This Reasonably Available Control Technology (RACT) Operating Permit is issued to Global Packaging Corporation for the operation of their sources located at Brower and Montgomery Avenues, Upper Providence Township, Montgomery County. This Operating permit is the Department's determination of RACT for Volatile Organic Compound (VOC) emission sources. Global is a minor source for Nitrogen Oxides (NOx). This Operating Permit also creates Emission Reduction Credits ("ERC") for VOC emissions from the Global facility.

5. Emission Limitation

- A. For the purpose of creating ERCs pursuant to 25 Pa. Code section 127.207 and in accordance with the Department of Environmental Protection Rules and Regulations, 25 Pa. Code § 129.92, Global's VOC emissions from the following sources shall never exceed the following:

<u>Source Name</u>	<u>Allowable Emissions (tpy)</u>
Wolverine No. 2	13.40
Kidder	46.20
Faustel Press No. 1	2.40

Emissions shall be calculated on a 12 month rolling basis.

- B. De-minimis sources categories: Global shall limit the VOC emission from cleanup operations and from all miscellaneous sources to less than 3 pounds per hour, 15 pounds per day and 2.7 tons per year for each of the two stated source groups.
6. Wolverine No. 1 was shutdown on April 18, 1995 and the RACT allowable of VOC emissions from this source was 17.40 tons/year. Global is entitled to an Emission Reduction Credit (ERC) of 12.20 tons of VOC per year for the permanent shutdown of Wolverine Press No. 1. The ERC shall be available upon issuance of this permit under the terms of 25 Pa. Code § 127.207. Global may use the ERC of 12.20 tons of VOC for banking, trading or selling purposes. Global shall not reconstruct nor operate the press unless Global obtains a valid Department air quality plan approval.

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GLOBAL Packaging Inc.
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CONDITIONS (continued):

7. Additionally, the following requirements are only applied to Faustel press No. 1 and are as follows:
- A. The Company shall only use water based inks and coatings on the Faustel Press No. 1. The water-based inks and coatings shall be limited to a Volatile Organic Compound (VOC) content of 5% by weight or less. The VOC content of the volatile fraction of any ink or coating shall be 25% or less by volume.
 - B. The air contaminant discharge from the flexographic printing press shall be limited to a maximum rate of 0.75 pounds VOC per hour. ~~Nitrogen oxide emissions shall be limited to 1.12 tons per year or less.~~
 - C. The total VOC emissions from Faustel Press No. 1 ~~and the natural gas combustion from the printing press dryer shall be limited to 2.4 tons per year.~~ All press cleanup operations for ~~Faustel Press No. 1~~ shall be done using VOC free solutions.
 - D. Operation of the Faustel Press No. 1 shall be limited to 6240 hours or less per year of actual printing. Company shall develop a recordkeeping system approved by the Department to verify the above emissions and schedule of operations.
8. Reporting and Recordkeeping
- A. For sources regulated under 25 Pa. Code § 129.92, Global shall record the following information for the sources covered under this Operating Permit:
 - 1. The hours of operation of each individual source.
 - 2. Daily coating quantity in gallons and pounds of coating as applied and,
 - 3. The coating composition:
 - 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

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CONDITIONS (continued):

4. An updated listing of the types and compositions of the coatings and diluents used in the aforementioned sources shall be submitted to the Department upon request.
 5. Global shall record on a daily basis the following:
 - a. coating density before and after additional diluents
 - b. gallons of diluents used
 - c. density of the diluents used
 - d. weight percent of the organic volatiles in each coating
 6. Global shall submit a report to the Department on a quarterly basis summarizing the actual and allowable daily VOC emissions (minus water) from each source indicated in Condition 5A of this Operating Permit and using methods described herein.
 7. Global shall keep all records and test generated under this Operating permit for a period of two (2) years and make them available to the Department at its request.
- B. For De-Minimis Sources Categories Listed in Condition 5B. Global shall keep records to demonstrate compliance with § 129.95 of Pennsylvania's RACT regulations. All records shall be maintained at the facility for at least two (2) years and will be made available to the Department upon request. Recordkeeping shall be conducted for VOC sources that are identified in the RACT proposal and shall include, where appropriate, material throughputs, or number of batches.
9. Global shall implement recordkeeping and reporting procedures of this RACT proposal upon issuance of this permit.
 10. This RACT permit applies to the emissions of VOC pollutants. Emissions shall also be governed by existing Plan Approvals, Operating Permits and the applicable requirements of the Rules and Regulations of the Department. Such plan approvals, permits and requirements are incorporated herein by reference and made part of this permit. All conditions from plan approval No. 46-399-102 shall be incorporated in this permit. In the event of any conflicting conditions in the above plan approvals, this permit shall supersede all those conditions which are less stringent than this permit.

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CONDITIONS (continued):

11. The expiration date shown on the Operating Permit OP-46-0026 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 C.F.R. Part 51 and approved by the United States Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by EPA upon its approval of the above as a revision to the SIP.

Re 30 (RN)55-17

