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

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.	OP-23-0013	Source(s) VOC RACT
Owner	J.B. Slevin Company, Inc.	Air One (1) Fume Incinerator
Address	300 E. Baltimore Avenue	Cleaning
	Lansdowne, PA 19050	Device
Attention	Leroy G. Gwin	Location 300 E. Baltimore Avenue
	V. P. Manufacturing	Upper Darby Township
		Delaware County

mis 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;
 - 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 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	09/03/1996	Francine Carlin
A		FRANCINE CARLINI
Expires _	09/03/2001	Regional Manager
		Air Quality

contral Office
Southeast Regional Office

OPERATING PERMIT CONDITIONS PERMIT NO. OP-23-0013 J.B. SLEVIN COMPANY, INC.

CONDITIONS (continued):

3. This Reasonably Available Control Technology (RACT) Operating Permit is issued to J.B. Slevin Company, Inc. (Slevin) for the operation of their sources located on Baltimore Pike in Lansdowne, Upper Darby Township, Delaware County. This Operating Permit is the Department's determination of RACT for the Volatile Organic Compound (VOC) emissions sources at this facility not previously regulated.

4. Emission Limitation

- A. Rotogravure presses (graphic arts systems) sources regulated under 25 Pa. Code §129.67:
 - Slevin shall be limited to VOC emissions from thermal oxidizer which control VOC from two (2) rotogravure presses to 65% efficiency or more as required by 25 Pa. Code §129.67(b)(3) and (c)(2).
 - The incinerator included under this Operating Permit must be maintained at a minimum temperature of 1400°F when either one of the two gravure presses are operating.
 - Slevin shall limit the VOCs emissions for the following sources:

Sources Name:	Allowable VOC Limitations: (tons/year)
Rotogravure Press No.1	75.00
Rotogravure Press No. 2	75.00

B. Sources regulated under 25 Pa. Code § 129.91-95. Slevin shall be limited to the VOC emissions from each of the below source categories to less than 3 pounds per hour, 15 pounds per day and 2.7 tons per year.

Sources Name:

Inks storage rooms Press cleanup operations

Reporting and Recordkeeping

- A. For rotogravure press sources:
 - Slevin shall record the following information for the sources covered under this
 Operating Permit:

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CONDITIONS (continued):

- The hours of operations of each individual source
- Daily coating quantity in gallons and pounds of coating as applied and,
- c. The coating composition:
 - percent solids by volume
 - percent solvent by volume
 - percent water by volume
 - 4. pounds of VOC per gallon minus water
 - solvent density
- 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.
- Slevin shall record on a daily basis the following:
 - 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
- 4. Slevin 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 4 of this Operating Permit and using methods described herein. The report shall list days of noncompliance and shall be in format approved by the Department.
- Slevin shall keep all records and test generated under this permit for a period of two (2) years and make them available to the Department at its request.
- B. For sources regulated under 25 Pa. Code § 129.91-95

Slevin 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 include, where appropriate, material throughputs, or numbers of batches. Chemical usage, inventory records, and material balances shall be used to calculate VOC emissions using methods approved by the Department. All recordkeeping requirements from existing permits shall continue to be met.

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CONDITIONS (continued):

Implementation Schedule

All proposed RACT monitoring and recordkeeping measures shall be fully implemented by May 31, 1995. All operating logs and records shall be kept on site for a minimum of two years and shall be made available to the Department upon request.

- 7. For cleaning operations, Slevin shall only use a non-VOC aqueous solution.
- 8. This RACT approval applies to the emissions of VOC pollutant only. Emissions of other pollutants, including criteria pollutants, shall be governed by existing Plan Approvals, Operating Permits, and 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. 23-320-001 shall be incorporated to this permit.
- 9. The expiration date shown on the Operating Permit OP-23-0013 is for State purposes only. For Federal enforcement purposes the Operating Permit shall remain in effect as part of the Pennsylvania Implementation Plan (SIP) until repealed pursuant to 40 C.F.R. 51 and approved by 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.
- This facility shall not emit Nitrogen Oxides (NOx) emissions unless all necessary approvals have been issued by the Department.

Re 30 (RN)190-18