

**CITY OF PHILADELPHIA
Department of Public Health
Environmental Protection Division
Air Management Services**

InterOffice Memo

To: File
From: Rahel Gebrekidan
Date: 7/22/2015
Subject: 8-Hour RACT Analysis for Sun Chemical - (PLID # 02052)

Introduction:

The Clean Air Act (CAA) requires that moderate (or worse) ozone nonattainment areas implement reasonably available control technology (RACT) controls on all major sources of VOC and NOx. Philadelphia County is part of the Philadelphia-Wilmington-Atlantic City moderate ozone nonattainment area for the 1997 8-hour ozone NAAQS. This document presents the findings of a RACT evaluation for the 1997 8-hour ozone standard for this facility.

Company Description:

Sun Chemical manufactures and distributes commercial printing ink in Philadelphia, Pennsylvania. Specifically, the manufacturing process at the Philadelphia facility produces solvent-based and water-based printing ink for the packaging industry, and middle distillate oil-based printing ink for the web publication industry.

Applicability for NOx and VOC RACT:

Sun Chemical is not a major source for Nitrogen Oxides (NOx) emission having potential NOx emissions less than 100 tons per year, the major source threshold in Philadelphia County that is applicable to NOx RACT for the 1997 8-hour ozone NAAQS. Sun Chemical was a major Volatile Organic Compounds (VOC) at the time of the previous RACT determination in 1994.

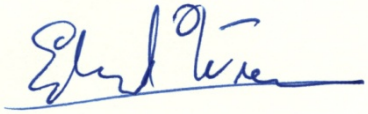
1-Hour Case-by-case RACT

AMS determined a case-by-case RACT analysis for the 1-hour ozone standard in June, 1994. As a result, AMS issued a RACT plan approval (PA-51-2052) on July 14, 2000, which was approved by EPA as a SIP revision on 10/30/2001 (66 FR 54710). VOC RACT was determined for INKMAKER computerized blending, conventional blending, rotor stator mixer, horizontal mill, ball mill, kady mill, varnish production, dye room mixer, transfers and storage tanks, as described below;

- 1. Lids will be placed on all mixing tanks; excluding water based and paste inks.*
- 2. Covers will be placed over all storage vessels, except during filling and removing the contents, excluding water based and paste inks.*
- 3. Monthly inspections of the facility will be made and recorded by plant personnel to ensure proper housekeeping practices.*
- 4. The vapor return lines on the storage tanks shall be used when a delivery tank truck is equipped with a vapor return line connection*

On 6/16/2015 the facility-submitted an Installation Permit Application No. 15173 to accept a facility-wide VOC emission limit of 49 tons per year. Once approved, the VOC limit will be incorporated into the facility's Title V operating permit V10-015. Based on this restriction, RACT would no longer be an applicable requirement for Sun

Chemical under the 1997 8-hour ozone NAAQS, and no RACT determination is needed. Thus, AMS requests to replace the RACT submission made to EPA for Sun Chemical on June 27, 2014 with this document. The facility must still comply with its original RACT plan approval requirements which were made part of the State Implementation Plan (SIP) to continue to satisfy RACT for the 1-hour ozone standard.



Edward Wiener, Chief of Source Registration

7/22/15

Date

