

11/21/95 ND

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
DIVISION OF AIR RESOURCES

In Re:

CRANSTON PRINT WORKS COMPANY
1381 CRANSTON STREET
CRANSTON, RI 02920

In Reference to A.H. File No. 95-30-AP

CONSENT AGREEMENT

This Consent Agreement is entered by and between the Rhode Island Department of Environmental Management, Division of Air Resources (hereinafter "the Division"), and Cranston Print Works Company (hereinafter "CPW"), pursuant to the Rhode Island Clean Air Act, Title 23, Chapter 23 of the General Laws of Rhode Island, as amended, and the Air Pollution Control Regulations adopted in accordance therewith, and the Department of Environmental Management Act, R.I.G.L. 42-17.1-2 et seq., and constitutes a RACT determination pursuant to Subsection 15.3.4 of Air Pollution Control Regulation No. 15, entitled "Control of Organic Solvent Emissions," effective 21 August 1975, last amended 21 November 1994.

CPW is regulated under Air Pollution Control Regulation No. 15. In order to assure that CPW complies and/or continues to comply with the provisions of Air Pollution Control Regulation No. 15, the Division and CPW hereby agree as follows:

1. That the Division has jurisdiction over the subject matter of this Consent Agreement and over the parties consenting to this Consent Agreement.

2. That CPW is subject to the provisions of Title 23, Chapter 23 of the Rhode Island General Law, as amended, and the Air Pollution Control Regulations adopted in accordance therewith.
3. That the provisions of this Consent Agreement shall apply to, and be binding upon CPW, its officers, directors, agents, servants, employees, operators, successors and assignees and persons, firms and corporations acting under, through and for it.
4. That CPW has the potential to emit Volatile Organic Compounds (hereinafter "VOC's") in excess of fifty (50) tons per year and is, therefore, subject to Air Pollution Control Regulation No. 15.
5. That VOC's are emitted from the following equipment that operates at the CPW facility; three (3) rotary screen print machines, one (1) acid production ager, one (1) acid patch ager, two (2) tenter finishing frames, one (1) roller cure box and one (1) loop dryer.
6. That aggregate VOC emissions from all sources shall not exceed 39.6 tons during any consecutive twelve month period.
7. That total VOC emissions from the CPW facility shall not exceed 9.8 tons,

between 16 May and 15 September, inclusive.

8. That all color print paste and finish formulations used at CPW shall not have VOC content exceeding .5 pounds of VOC per pound of solids as applied.
9. That should CPW choose to operate the acid production ager, the acid production ager scrubber shall be operated and maintained as follows:
 - A. The acid production ager scrubber shall provide a minimum capture efficiency of 99 percent and a minimum destruction efficiency of 99 percent;
 - B. The acid production ager shall not be operated during any period that the scrubber is out of service or is operating below the required control efficiency;
 - C. The pressure drop across the acid production ager scrubber shall be checked once per shift and the date, time and measurement shall be recorded;
 - D. The outlet temperature for the acid production ager scrubber shall be continuously monitored and recorded;
 - E. The water flow rate for the acid production ager scrubber shall be continuously monitored and recorded.

10. That CPW has submitted a minor source permit application, including permit fees, required pursuant to Air Pollution Control Regulation No. 9, "Air Pollution Control Permits," for the installation of a scrubber on the acid patch ager.
11. That CPW shall install a scrubber on the uncontrolled acid patch ager prior to operation of the acid patch ager. The scrubber shall be installed as it has been described to the Division in the written submittal, dated 5 July 1995, from CPW and will achieve a minimum capture efficiency of 100 percent and a minimum destruction efficiency of 99 percent.
12. That CPW shall perform a capture efficiency test and VOC destruction efficiency test for each of the scrubbers, to ensure that the required capture and destruction efficiencies are achieved. The emissions tests for the acid production ager scrubber, described in item 9 above, shall be performed as required in Subsection 15.3.5 of Air Pollution Control Regulation No. 15, and the emissions tests for the acid patch ager, described in items 10 and 11 above, shall be performed as required by the permit approval. A protocol describing the testing procedures must be submitted to the Division, in writing, for review and approval sixty (60) days prior to actual testing. Emissions testing shall be conducted within ninety (90) days of start-up for both the acid production scrubber and the acid patch scrubber. A final report of the emissions testing shall be submitted, in writing, to

the Division, no later than sixty (60) days following the completion of the testing.

13. That CPW will demonstrate compliance with the terms of this Consent Agreement by maintaining the following records:
 - a. On a daily basis, CPW shall determine the facility-wide VOC emissions, with the exception of VOC emissions from the finishing operations and shall record the information as indicated in Table 1.
 - b. After 1 January 1996, CPW shall, on a daily basis, determine the facility-wide VOC emissions, including VOC emissions from the finishing operations, and shall record the information as indicated in Table 1.
 - c. By 1 October of each year, CPW shall submit a written report to the Division which documents total facility VOC emissions for 16 May through 15 September, inclusive.
 - d. By 6 June of each year, CPW shall submit a written report to the Division which documents total facility VOC emissions for 16 September through 15 May, inclusive.

14. That CPW shall notify the Division, in writing, of any violation of this Consent Agreement within 10 days of the violation. Violation of any of the conditions established in this Consent Agreement may result in enforcement actions, including monetary penalties, being initiated against CPW.

15. That all records required by this Consent Agreement must be maintained by CPW at the 1381 Cranston Street facility for a period of five years, and made available to representatives of the Division and the United States Environmental Protection Agency upon request. Failure to maintain or produce the required records is a violation of this Consent Agreement.
16. That CPW shall reevaluate VOC emissions from the facility and shall submit a RACT proposal that complies with Section 15.3.8 of Air Pollution Control Regulation No. 15, to the Division within two years of the execution of this Consent Agreement. The Division, at its discretion, may also request CPW to undergo RACT review every two years following the first reevaluation.
17. That it is hereby agreed and understood by the parties that the implementation of the requirements of this Consent Agreement does not relieve CPW from compliance with any and all requirements of the Rhode Island Clean Air Act and applicable Air Pollution Control Regulations, or with any applicable Air Pollution Control Regulations that become effective and/or amended subsequent to the execution of this Consent Agreement.
18. That this Consent Agreement shall be deemed entered as of the date of execution by the parties hereto. The Director of the Department of Environmental

Management may, however, for good cause shown, defer any of the compliance dates as prescribed herein upon a timely request to do so.

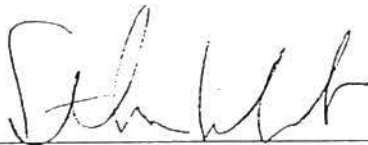
Consented to in Substance and in Form:

State of Rhode Island and Providence Plantations

Department of Environmental Management

For the Director:

19 DEC 95
Date




Stephen Majkut, Chief

Division of Air Resources

Cranston Print Works Company hereby agrees to the above Consent Agreement, which becomes effective immediately upon being entered and issued.

Authorized Representative:

12/14/95
Date



Signature
Plant Manager
Title

TABLE 1
 Cranston Print Works, Daily VOC Emissions

Date	Color Group	Type of Process	Total Lbs. VOC Applied	Total Lbs. Solids Applied	Total Lbs. VOC/lbs. Solids Applied	Total Lbs. VOC Manifested or Controlled	Total Lbs. VOC Emitted
<i>example:</i> 1/5/96	<i>repelogen</i>	<i>printing</i>	20	40	.5 (20 ÷ 40)	10	10 (20 - 10)
MONTHLY TOTAL			20			10	10

Signature of Person Completing this Form _____

Title _____ Date _____