

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

In the Matter of Determining Reasonably Available
Control Technology for Ink Manufacturing operations
at Flint Ink as Required Under Section 182(b)(2)(C)
of the Clean Air Act.

CONSENT ORDER NO: AM-00-01

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND CONSENT ORDER

FINDINGS OF FACT

The Department of Natural Resources, hereinafter Department, finds that:

1. Flint Ink is located at 3901 W. Rohr Ave. in the City of Milwaukee, County of Milwaukee, Wisconsin.
2. Flint Ink owns and operates equipment used to mix, transfer and store ink and ink ingredients containing volatile organic compounds (VOC).
3. Milwaukee County has been designated by the U.S. Environmental Protection Agency as a Severe Area for ozone nonattainment under Section 107(d)(4)(A) of the Clean Air Act.
4. Potential emissions of VOC for Flint Ink's operations have exceeded 25 tons per year, and therefore Flint Ink constitutes a major VOC emissions source.
5. Under Section 182(b)(2)(C) of the Clean Air Act, the Department is required to apply reasonably available control technology (RACT) to major stationary sources of VOC located in moderate or worse ozone nonattainment areas.
6. The Department has reviewed operations at Flint Ink and has determined that the conditions of this Order constitute RACT for manufacturing operations at Flint Ink.

CONCLUSIONS OF LAW

The Department concludes that:

1. Under 42USC 7511a (b)(2)(C), Wisconsin is required to implement RACT for major sources of VOCs in ozone nonattainment areas.
2. The Department is required under s. 285.11 (6), Wis. Stats., to prepare and develop one or more comprehensive plans for the prevention, abatement and control of air pollution. The department thereafter shall be responsible for the revision and implementation of the plans. The rules or control strategies submitted to the U.S. Environmental Protection Agency under the Clean Air Act for control of atmospheric ozone shall conform with the Clean Air Act.
3. The Department has the authority under s. 285.13(2), Stats. to issue this administrative consent order.
4. The issuance of this consent order is reasonable and necessary to accomplish the purposes of ss. 285.01 to 285.87, Stats. This order is enforceable under ss. 285.83 and 285.87, Stats. and ch. NR 494, Wis Adm. Code.

CONSENT ORDER

The Department hereby orders and Flint Ink agrees to meet the following conditions, which constitute Reasonably Available Control Technology (RACT), for VOC emissions from Flint Ink's manufacturing operations.

1. All equipment used for mixing ink and ink ingredients shall be kept covered, except when adding ingredients or taking samples, with lids meeting all the following requirements:
 - (a) The lids shall extend at least ½ inch beyond the outer rim of the mixing equipment or be attached to the rim of the mixing equipment.
 - (b) The lids shall be maintained in good condition such that, when in place, they maintain contact with the rim for at least 90 percent of the circumference of the mixing equipment's rim.
 - (c) The lids may not have any holes, tears, or openings, except that the lids may have a slit to allow clearance for insertion of a mixer shaft. The slit shall be covered after insertion of the mixer, except to allow safe clearance for the mixer shaft. The difference between the diameter of the mixer shaft and the diameter of the opening in the lid for the mixer shaft shall be no greater than two inches.
2. The requirements of condition 1 shall not apply to any equipment while it is being used in the manufacture of paste inks. For purposes of this order, paste inks are defined as printing ink consisting of primarily, Magie oil, glycol, or diethylene glycol.
3. Grinding mills installed after the effective date of this order shall be equipped with fully enclosed screens.
4. Flint Ink shall monitor each valve, pump, sealed agitator, compressor, flange, and relief valve used with a process stream which contains at least 10% VOC by weight using Method 21 of Appendix A, 40 CFR part 60. For purposes of this consent order, the process stream begins at the outlet piping of the storage tanks. VOC emission leaks are fugitive releases of VOC from any valve, pump, sealed agitator, compressor, flange or relief valve for which the fugitive VOC concentration is measured to exceed 10,000 ppm when tested according to the method cited above. The monitoring schedule shall be as follows:
 - (a). Monitor all valves, pumps, sealed agitators, compressors and relief valves located within 2.0 meters (6.6 feet) of a permanent support surface once during each calendar quarter, beginning with the quarter following the quarter in which this order becomes effective.
 - (b). Monitor all other valves, pumps, sealed agitators, compressors and relief valves, and all flanges, annually, beginning with the year in which this order becomes effective.
 - (c). If 2% or fewer of the valves monitored pursuant to condition 4(a) are found to have a VOC emission leak for 5 consecutive quarters, monitoring of valves will not be required for the following 3 consecutive quarters. Monitoring shall be conducted during the next quarter and every fourth quarter thereafter. If during this annual monitoring, more than 2% of the valves monitored are found to have a VOC emission leak, quarterly monitoring shall be reinstated in the next quarter.
5. Check bimonthly by visual inspection each valve, pump, sealed agitator, compressor, flange, and relief valve for indication of dripping liquid. The visual inspections shall begin the month following the month in which this order becomes effective.
6. Flint Ink shall repair all VOC emission leaks as soon as practicable, but no later than 15 calendar days after the breach is detected, unless the repair is technically infeasible without a process unit shutdown. In the case of such infeasibility, the repair shall occur before the end of the next process unit shutdown.
7. Flint Ink shall record the monitoring and visual inspection done under conditions 4 and 5. This documentation shall include a description of the equipment monitored, meter readings of all detectable VOC emissions, and the monitoring date. If a VOC emission leak is detected, Flint Ink shall also

document the date of repair, date of follow-up inspection and an explanation of what caused the VOC emission leak.

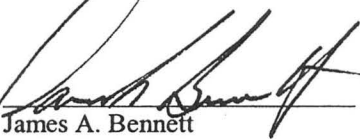
8. Solvent used for cleaning ink manufacturing equipment shall:
 - (a) Contain less than or equal to 7.5 pounds of VOC per gallon of solvent; and
 - (b) Be kept in closed containers except while used for cleaning.
9. Records shall be kept of the pounds of VOC per gallon of each solvent used for cleaning.
10. Records required under conditions 7 and 9 shall be retained a minimum of 5 years and made available to the Department upon request.
11. Flint Ink shall notify the Department prior to adding devices, processes, or activities that will result in an increase in VOC emissions.

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
For the Secretary


Lloyd Eagan, Director
Bureau of Air Management

Dated: 9/7/2000

For Flint Ink


James A. Bennett
Vice President of Manufacturing Services

Dated: 8/31/2000

WAIVER OF APPEAL OF RIGHTS

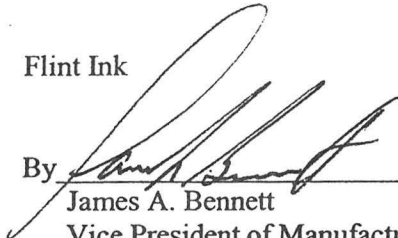
Flint Ink hereby waives any right to seek a hearing before the Department or to seek judicial review on the foregoing Findings of Fact, Conclusions of Law and Consent Order under ss. 285.81, 227.42, 227.52 and 227.53, Stats., or any other provision of law.

Flint Ink agrees that the Consent Order is effective and enforceable in accordance with ss. 285.83 and 285.87, Stats. and ch. 494, Wis. Adm. Code.

The undersigned certifies that Flint Ink has authorized the undersigned to execute this Consent Order and Waiver.

Flint Ink

By



James A. Bennett
Vice President of Manufacturing Services

Dated:

8/31/2000