

Attachment #1
AIR PERMIT
FOLDER LEVEL

AIR PA #: BG0572W 055926

File Type: PERMITS

Volume: 001

Inclusive Dates: 1/1/2003 - 12/31/2004

Media Code/ Form

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Box Barcode:

AIR DB/NO ACCT# RN100690258/21237/PA

Kathleen Hartnett White, *Chairman*
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Margaret Hoffman, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 31, 2003

CERTIFIED MAIL

Mr. Morgan Ebin, Plant Manager
Arlon Signtech, LTD
4669 Highway 90 West
San Antonio, Texas 78237

Re: October 2004, Permit Renewal Notification

Dear Mr. Ebin:

Section 382.055 of the Texas Clean Air Act, Texas Health and Safety Code, Chapter 382, and Title 30 Texas Administrative Code (30 TAC) § 116.315(b), require all permits issued by the Texas Commission on Environmental Quality to be reviewed for renewal every 15 or 10 years depending if it was issued before or after December 1, 1991. This letter is to notify you that the referenced permit is scheduled for review. Please apply for review of your permit no later than 180 days prior to the expiration date of October 25, 2004 using the enclosed application form. Failure to apply will result in automatic expiration of this permit on the anniversary of its issuance.

Company Name - Arlon Signtech, LTD
Customer Reference No. CN600399620
Regulated Entity No. RN100693258
County - Bexar
Permit No. 21237

Please furnish all information indicated on the enclosed forms. A fee based on the schedule indicated in 30 TAC § 116.313 must be submitted with this application. Upon receipt of your application, a determination will be made based on the number and type of emission points, emission rate and type of air contaminant, as to the need for you to furnish atmospheric dispersion modeling to determine the impact of emissions on the surrounding area. After receipt of a completed application, you will be notified of the requirements and procedures for public notification.

Page 2
October 31, 2003

Re: October 2004, Permit Renewal Notification

If we may be of any assistance to you in this matter, you may contact the staff of the Air and Waste Applications Team or you may contact me at (512) 239-5160.

Sincerely,

A handwritten signature in black ink, appearing to read "D.L. Howell". The signature is fluid and cursive, with the first name "D.L." and the last name "Howell" clearly distinguishable.

David L. Howell, P.E., Manager
Permits Administration Review Section
Registration, Review and Reporting Division

DLH/lb

Enclosures

cc: TCEQ Regional Air Quality Manager, Region 13
TCEQ File Room (MC-198)

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Received by (Please Print Clearly) 104 NOV 1999 B. Date of Delivery	
1. Article Addressed to: Permit No. 21237 MC 161 lb Mr. Morgan Ebin Plant Manager Arlon Signtech, LTD 4669 Highway 90 West San Antonio, Texas 78237		C. Signature X Joe Salazar <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number (Copy from		7003 0500 0003 1989 1642	
PS Form 3811, July 1999		Domestic Return Receipt	
		102595-00-M-0952	

U.S. Postal Service™		CERTIFIED MAIL™ RECEIPT		(Domestic Mail Only; No Insurance Coverage Provided)		For delivery information visit our website at www.usps.com®		OFFICIAL USE	
Postmark Here		Postage \$		Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)	
		Total Postage & Fees \$							
Sent To		Street, Apt. No., or PO Box No.		City, State, ZIP+4		PS Form 3800, June 2002		See Reverse for Instructions	

7003 0500 0003 1989 1642

SA

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Kathleen Hartnett White, *Commissioner*
Margaret Hoffman, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 16, 2003

Mr. Morgan Ebin
Plant Manager
Arlon Signtech, Ltd.
4669 US Highway 90 West
San Antonio, Texas 78237

Re: Standard Permit Number: 55926
Replacement of Thermal Oxidizer
San Antonio, Bexar County
Regulated Entity Number: RN102606175

Dear Mr. Ebin:

This is in response to your Form PI-1S entitled "Standard Permit Registration" concerning the proposed project which involves replacing the current thermal oxidizer with an oxidizer that is more efficient and economical to operate. This project will be authorized under the Pollution Control Project Standard Permit.

After evaluation of the information which you have furnished, we have determined that your proposed project meets the requirements for a standard permit if constructed and operated as described in your registration. This standard permit was authorized by the Commissioners pursuant to Title 30 Texas Administrative Code § 116.617 (30 TAC § 116.617). A copy of the standard permit rule in effect at the time of this registration is enclosed. You must operate in accordance with all requirements of the enclosed standard permit rule.

You are reminded that these facilities must be in compliance with all rules and regulations of the Texas Commission on Environmental Quality and of the U.S. Environmental Protection Agency at all times. Also, be advised that 30 TAC § 116.615(3) requires that "all changes authorized by standard permit to a facility permitted pursuant to §116.110....shall be administratively incorporated into that facility's permit at such time as the permit is amended or renewed."

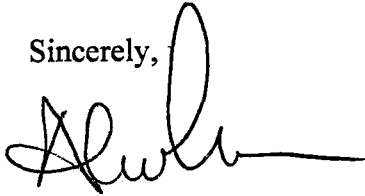
Please reference the regulated entity number and permit number noted in this letter in all your future correspondence pertaining to this permit.

Mr. Morgan Ebin
Page 2
September 16, 2003

Re: Standard Permit Number: 55926

Your cooperation in this matter is appreciated. If you have any questions, please contact Mr. Samuel Arguez at (512) 239-5567 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-163), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,



Anne M. Inman, Manager
General/Standard/Rule Permits Section
Air Permits Division
Texas Commission on Environmental Quality

AMI/SA/mfs

Enclosure

cc: Mr. John R. Dickson, Vice President, Dickson Consulting Group, LLC, San Antonio
Mr. Sam Sanchez, Environmental Health Administrator, Environmental Health Administration,
San Antonio Metropolitan Health District, San Antonio
Mr. Rick Hite, Air Section Manager, Region 13 - San Antonio

Project Number: 99791

STANDARD PERMIT
TECHNICAL REVIEW

Standard Permit No: 55926	Company: Arlon Signtech Ltd
Standard Permit Type: Pollution Control Project	Facility Name: Arlon Signtech
Record No: 99791	City: San Antonio
Regulated Entity No: RN102606175	County: Bexar
Permit Reviewer: Mr. Samuel Arguez	

Review Summary:

Compliance with all 30 TAC § 116.610 or 116.617 requirements? **Yes**

Project Overview

Arlon SignTech currently operates a vinyl and paper sheet coating plant in San Antonio, TX. The plant currently operates under Air Permit 21237. The plant consists of six web printing lines and a vinyl coating line. Most of the pollutants created by the operation have been vented through a Thermal Oxidizer that was rated to destroy at least 95% of the VOCs created. SignTech wishes to replace the existing oxidizer with a similar unit that is more efficient, reliable, and economical to operated that the current equipment. SignTech plans to remove the current thermal oxidizer and install a MEGTEC CLEANSWITCH regenerative thermal oxidizer (RTO) that has a VOC destruction rate of 99+%. This will increase efficiency which meets the conditions for a pollution control project. Issuance of this permit is recommenced.

Notification:

Copy of P11-S sent to:
Region: **13**

Permit Fee


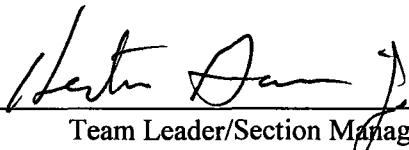
Fee paid? **Yes**

IMS and File Entries

IMS entries updated? **Yes**

Copy of cover letter and tech review made for the appropriate permit files? **Yes**

Permit No.(s) **21237**

	9-16-03		9/16/03
Permit Reviewer	Date	Team Leader/Section Manager/Backup	Date
Project Reviewer:	<u>2</u>		
Team Leader:	<u>1.5</u>		
Section Head:	<u>1.5</u>		



DICKSON CONSULTING GROUP, LLC

July 22, 2003

Ms. Louise Ngo
Air Permits Division
Registration, Review and Reporting Division, MC 161
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

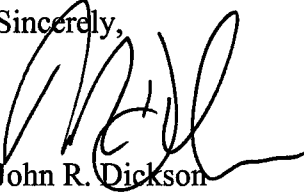
Reference:

- a. TCEQ Account Number BG-0527-W: Arlon SignTech, Ltd.
- b. TCEQ Permit Number 21237

Attached you will find a Standard Permit application under the provisions Title 30 TAC § 116.617 for Arlon SignTech, Ltd. Arlon needs to replace their existing thermal oxidizer with an oxidizer that is more efficient and economical to operate. Supporting documents with the application shows that the application meets the requirements for a Standard Permit.

Please call if you have any questions regarding this submission.

Sincerely,



John R. Dickson
Vice President

AUG 04 2003

Air & Waste Applications Group



Texas Commission on Environmental Quality
Form PI-1-S
Standard Permit Registration (Air Quality Standard Permit)

I. GENERAL			
A. Is CONFIDENTIAL information part of this registration?		YES	<input checked="" type="checkbox"/> NO
If "YES", is each "confidential" page marked in big red letters?		YES	<input checked="" type="checkbox"/> NO
B. Is this registration in response, or related in any way, to a Notice of Violation at this location?		YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/>
If "YES", date of Notice of Violation:		and the specific TNRCC rule(s) violated:	
C. Are the new facilities or changes to existing facilities represented in this registration required to be permitted as a disposal facility under the Texas Solid Waste Disposal Act?		YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/>
D. Does the company (including subsidiaries and parent companies) employ 100 or fewer persons?		YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/>
If using Title 30 Texas Administrative Code § 116.620 (30 TAC § 116.620) or 30 TAC § 116.621 does this action result in the permitting of any grandfathered facilities?		NA	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
II. REGISTRANT INFORMATION			
A. Permittee: Arlon SignTech, LTD			
<i>[Entity Legally Responsible for Permit, i.e., Owner or Operator of the Facility]</i>			
1. Permittee's Texas State Comptroller's Tax ID No.:		13303110004	
2. Permittee's Address (Person, Title, Address):		Morgan Ebin, Plant Manager 4669 Highway 90 West San Antonio, TX 78237	
3. Telephone: (210) 438-2006		4. Fax: (210) 436-5711	
5. Permittee's Technical Contact (Person, Title, Address):		John R. Dickson 19103 Harvest Glen San Antonio, TX 78258	
5. Telephone: (210) 495-9237		6. Fax: (210) 495-1791	
B. Owner of Facility: ARLON INC, 300 Primera Blvd. Ste 432, Lake Mary, FL 32746-2140			
<i>[If Different from Applicant; Include Names of Proprietor/General Partner(s), If Applicable]</i>			
1. Owner's Texas State Comptroller's Tax ID No.:		13303110004	
2. Owner's Address (Person, Title, Address):		ARLON INC, 300 Primera Blvd. Ste 432, Lake Mary, FL 32746-2140	
C. Principal Company Product or Business:		Printing signs, awnings, and exterior decorations onto flexible vinyl sheet and treated paper	
1. Plant Standard Industrial Classification Code:		3999	

AUG 04 2003

Texas Commission on Environmental Quality
Form PI-1-S
Standard Permit Registration (Air Quality Standard Permit)

III. PROJECT CLASSIFICATION (CHECK ALL APPLICABLE BLOCKS):				
A. Title 30 TAC § 116.617 - Standard Permit List	YES	NO	X	
B. Title 30 TAC § 116.620 - Installation/Modification of Oil and Gas Facilities	YES	NO	X	
C. Title 30 TAC § 116.621 - Municipal Solid Waste Landfills	YES	NO	X	
D. List Permit Numbers for All Existing Related and/or Affected Air Quality Permits:	YES	X	NO	
Air Permit Number 21237				
IV. FACILITY PHYSICAL LOCATION				
A. Name of Plant or Site: Arlon-SignTech, LTD				
B. Street Address: 4669 Highway 90 West,				
C.	1. Nearest City: San Antonio	2. County: Bexar	3. Site Zip Code: 78237	
D.	Plant Site TNRCC Air Quality Account Number: BG0572W			
V. FACILITY TYPE AND OPERATING SCHEDULE				
A. Name of Facility to be Permitted: Oxidizer-1				
B. Facility Type (Check One):	1. Permanent	YES	X	NO
	2. Portable	YES		NO X
C.	1. Facility Operating Schedule:	2. Hours/Day; 24	3. Days/Week; 7	4. Weeks/Year 52
4. Seasonal - Explain:				
VI. SUBMIT THE FOLLOWING GENERAL INFORMATION:				
A. Submit a current area map containing a true north arrow, the entire plant property, and the location of the property relative to prominent geographical features, such as highways, roads, streams, and/or significant landmarks such as buildings, residences, and schools. All areas within one mile of any plant boundary must appear on this map.				
B. Submit a plot plan of the plant property which clearly shows all property lines, affected emission points, buildings, tanks, process vessels, and/or other process equipment. The plot plan must be, scaled, indicate a true north arrow, reference a plant bench mark (located by latitude/longitude or Universal Transverse Mercator coordinates), and be dated.				
C. Submit a process description and process flow diagram.				
D. Submit a Table 1(a), the basis of emissions estimates (including fugitive emissions), quantification of all emission increases and decreases associated with the project being registered, information that describes efforts to be taken to minimize any collateral emissions increases that will result from the project, a description of the project and related processes, and a description of any equipment being installed.				

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Texas Commission on Environmental Quality
Form PI-1-S
Standard Permit Registration (Air Quality Standard Permit)

VII. VERY IMPORTANT

- A. **Franchise Tax:** Submit a copy of a Certificate of Good Standing from the State Comptroller's Office with each registration if the permittee is a corporation.
- B. **Permit Fee:** A permit fee is required by 30 TAC § 116.614. Please forward the fee only to TNRCC, Financial Administration Division, MC-214, P.O. Box 13088, Austin, TX 78711-3088.

VIII. GENERAL REQUIREMENTS

Submit itemized information and/or analysis demonstrating that all applicable general requirements as specified in 30 TAC §§ 116.610, 116.617, 116.620, and 116.621 are met. **Each paragraph of the applicable sections must be addressed in this registration.** Atmospheric dispersion modeling may be required as part of the air quality impact analysis.

IX. A COPY OF THIS REGISTRATION and all attachments must be sent by the registrant to (A) the Air Program of the appropriate TNRCC Regional Office, and (B) to any local air pollution control program having jurisdiction. Copies of the registration were sent to:

A. TNRCC Regional Office sent to (city): **Region 13, San Antonio**

B. Copies sent to these local programs: YES **X** NO

1. **City of San Antonio Health Dept**

2.

X. PROFESSIONAL ENGINEER (P.E.) SEAL

A. Is the estimated capital cost of the project for which application is made greater than two million dollars?

YES

NO

X

B. If "YES", the application must be submitted under seal of a Texas registered P.E., unless exemption is claimed pursuant to the Texas Engineering Practice Act (TEPA) in accordance with 30 TAC § 116.110(e).

1. Exemption is claimed pursuant to Section

of the TEPA.

XI. OFFICIAL SIGNATURE

I, **Morgan Ebin, Plant Manager**

[Name - Please Print or Type] [Title: Owner, Plant Manager, President, Environmental Director, Etc.]

state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Natural Resource Conservation Commission or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I have read and understand TWC §§ 7.177-7.183, which defines **CRIMINAL OFFENSES** for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §§ 7.187, pertaining to **CRIMINAL PENALTIES**.

DATE:

7/3/03

SIGNATURE:

NOTE - ORIGINAL SIGNATURE IN INK IS REQUIRED.

AUG 04 2003

08/06/2003 ----- NSR PERMITS IMS- PROJECT RECORD -----

PROJECT#: 99791 PERMIT#: 55926 STATUS: P DISP CODE: _____
RECEIVED: 08/04/2003 PROJTYPE: JRVW RENEWAL: ISSUED DATE: _____
FEE DATE: 07/25/2003 FEE AMT: \$ 900 STDY1/SP: 6001 SUP-DISP DATE: _____

GROUP: PAR

PARSTAFF1: TAYLOR, PAM &

PARSTAFF2: STEGER, JULIE

GROUP: ART

TEAMLDR : GARCIA, HECTOR

ADMIN REVIEW

A - PAR RECEIVED : 08/04/2003 A - PAR TRANSFER TO 08/07/2003
APD :

ISSUED TO: ARLON SIGNTECH LTD
COMPANY NAME: ARLON SIGNTECH LTD
CUSTOMER REGISTRY ID: CN600399620

PRIMARY CONTACT INFORMATION

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR MORGAN EBIN

TITLE: PLANT MANAGER

PHONE: 210-438-2006 ext

FAX: 210-436-5711 ext

STREET: 4669 US HWY 90 W

CITY/STATE, ZIP: SAN ANTONIO, TX , 78237-

PROJECT INFORMATION

UNIT: REPLACE THERMAL OXIDIZER

SIC: 7389 REGION: 13 ACCOUNT: BG0572W REG ENTITY ID: RN102606175

SITE NAME: ARLON SIGNTECH

COUNTY: BEXAR

CAPUNITS:

UNITTYPE:

CAPACITY:

CITY: SAN ANTONIO

LOCATION: 4669 HIGHWAY 90 WEST

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: PN1 ALT LANGUAGE: NO PN2 ALT LANGUAGE: NO

**EMISSION
RATES**

TONS/YR REDUCTION	NOX	CO	VOC	PM	SO2	OTHER	TOTAL
-------------------	-----	----	-----	----	-----	-------	-------

RECEIVED

AUG 08 2003

PROJECT NOTES

ADMINISTRATIVE: SOS 13082310

AIR PERMITS DIVISION**TECHNICAL ACTIVITY HISTORY**

TR - ENGINEER RECEIVE PROJECT: 8/14

→ Sup for Approval

~~TR - DFT PERMIT REC
SENT:~~

FA - PROJECT ISSUED :

~~TR - PROJECT RECEIVED :~~SUP - RECEIVED FROM 8/14
PAR :TR - PROJ TECH
COMPLETE :~~TR - CONTROLS REVIEW :~~~~TR - CALCULATION
REVIEW :~~~~TR - IMPACTS REVIEW :~~~~TR - PN VERIFICATION :~~~~TR - RESPONSE TO TECH
DEF REC :~~~~TR - APPL RESPONSE TO
PMT :~~

TR - EFFECT/ISSUE
PMT/AUTH :

PROJECT ATTRIBUTES

FEE RECEIPT NUMBER : E339117

PROJECT LINK

PROJECTS/PERMITS VOIDANCE

TNRCC Core Data Form

SECTION I: General Information

1. Reason for Submission *Example: new wastewater permit; IHW registration; change in customer information; etc.*

Standard Permit Application

2. Attachments

☒ Yes ☐ No

Describe Any Attachments: (ex: Title V Application, Waste Transporter Application, etc.)
PI-1-S and documents to support application

3. Customer Reference Number-if issued

CN

(9 digits)

4. Regulated Entity Reference Number-if issued

RN

(9 digits)

SECTION II: Customer Information

5. Customer Role (Proposed or Actual) -- As It Relates to the Regulated Entity Listed on This Form

Please check one of the following: ☐ Owner ☐ Operator ☒ Owner and Operator

☐ Occupational Licensee ☐ Volunteer Cleanup Applicant ☐ Other: _____

TNRCC Use Only

☐ Superfund

☐ PST

☐ Respondent

6. General Customer Information

☒ New Customer ☐ Change to Customer Information ☐ Change in Regulated Entity Ownership ☐ No Change*

*If "No Change" and Section I is complete, skip to Section III - Regulated Entity Information.

7. Type of Customer:

☐ Individual

☐ Sole Proprietorship - D.B.A.

☐ Partnership

☒ Corporation

☐ Federal Government

☐ State Government

☐ County Government

☐ City Government

☐ Other Government _____

☐ Other _____

8. Customer Name (If an individual, please print last name first)

Arlon Adhesives & Films, Inc

9. Mailing Address: **300 Primera Blvd, Suite 432**

City

Lake Mary

State

FL

ZIP

32746

ZIP + 4

2140

10. Country Mailing Information if outside USA

11. E-Mail Address if applicable

12. Telephone Number

(407)875-2222

13. Extension or Code

14. Fax Number if applicable

(407)875-3398

15. Federal Tax ID (9 digits)

16. State Franchise Tax ID Number if applicable

17429438975

17. DUNS Number if applicable (9 digits)

144791787

18. Number of Employees

☐ 0-20

☐ 21-100

☒ 101-250

☒ 251-500

☐ 501 and higher

19. Independently Owned and Operated?

☒ YES

☐ NO

SECTION III: Regulated Entity Information

20. General Regulated Entity Information

☒ New Regulated Entity ☐ Change to Regulated Entity Information ☐ No Change*

*If "No Change" and Section I is complete, skip to Section IV - Preparer Information.

21. Regulated Entity Name (If an individual, please print last name first)

Arlon SignTech, LTD

AUG 04 2003

22. Street Address: <u>(210) 436-5711 4669 Highway 90 West</u>					
(No P.O. Boxes)					
City San Antonio			State TX	ZIP 78237	ZIP + 4 4035
23. Mailing Address <u>4669 Highway 90 West</u>					
City San Antonio			State TX	ZIP 78237	ZIP + 4 4035
24. E-Mail Address:					
25. Telephone Number (210)438-2006		26. Extension or Code		27. Fax Number if applicable (210)436-5711	
28. Primary SIC Code (4 digits) 3089	29. Secondary SIC Code (4 digits)	30. Primary NAICS Code (5 or 6 digits) 326199		31. Secondary NAICS Code (5 or 6 digits)	
32. What is the Primary Business of this entity? (Please do not repeat the SIC or NAICS description.) Printing signs, awnings, and exterior decorations onto flexible vinyl sheet and treated paper.					
<i>Questions 33 - 37 address geographic location. Please refer to the instructions for applicability.</i>					
33. County: Bexar					
34. Description of Physical Location US Highway 90 West about 6 miles west of downtown San Antonio					
35. Nearest City San Antonio			State TX	Nearest ZIP 78218	
36. Latitude (N)			37. Longitude (W)		
Degrees 29	Minutes 24	Seconds 29	Degrees 98	Minutes 34	Seconds 54
38. TNRCC Programs In Which This Regulated Entity Participates <i>Not all programs have been listed. Please add to this list as needed. If you don't know or are unsure, please mark "unknown."</i>					
<input type="checkbox"/> Animal Feeding Operation		<input type="checkbox"/> Petroleum Storage Tank		<input type="checkbox"/> Water Rights	
<input type="checkbox"/> Title V – Air		<input type="checkbox"/> Wastewater Permit		<input type="checkbox"/> _____	
<input checked="" type="checkbox"/> Industrial & Hazardous Waste		<input type="checkbox"/> Water Districts		<input type="checkbox"/> _____	
<input type="checkbox"/> Municipal Solid Waste		<input type="checkbox"/> Water Utilities		<input type="checkbox"/> Unknown	
<input checked="" type="checkbox"/> New Source Review - Air		<input type="checkbox"/> Licensing - TYPE(s) _____			

SECTION IV: Preparer Information

39. Name John Dickson		40. Title Consultant	
41. Telephone Number (210)495-9237	42. Extension or Code	43. Fax Number if applicable (210)495-1791	
44. E-Mail Address: jdickson@satx.rr.com			

CONTAINS **CONFIDENTIAL** INFORMATION

**AIR QUALITY
STANDARD PERMIT APPLICATION**

Arlon SignTech
4669 Highway 90 West
San Antonio, TX 78237

TCEQ Account Number BG-0527-W
TCEQ Air Permit Number 21237

July 22, 2003

AUG 04 2003

Permit Application

CONTAINS **CONFIDENTIAL** INFORMATION

Prepared by

DICKSON CONSULTING GROUP, INC.

AIR QUALITY STANDARD PERMIT APPLICATION

Arlon SignTech, Ltd.

TABLE OF CONTENTS

Section

- 1 Introduction
- 2 TCEQ Form PI-1-S
- 3 Maps, Plot Plan, and Diagrams
- 4 Emission Calculations
- 5 Franchise Tax Certificate and Permit Fee
- 6 Process Description
- 7 Applicability Review

AUG 04 2003

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Section 1

Introduction

AUG 04 2003

Permit Application Form

Section 1

INTRODUCTION

Arlon SignTech, Ltd. proposes to replace the existing thermal oxidizer at their 4669 Highway 90 West, San Antonio, Texas facility. SignTech is located in Bexar County (an attainment area), about eight miles west of downtown San Antonio just north of Lackland Air Force Base and KellyUSA. See Figures 1 and 2, Section 3, for the location and configuration of the facility.

The Operation

SignTech has operated a vinyl and paper sheet coating plant at this location for many years. The plant currently operates under TCEQ Air Permit 21237. The plant consists of six web printing lines and a vinyl coating line. Most of the pollutants created by the operation have been vented through a Thermal Oxidizer that was rated to destroy at least 95% of the volatile organic compounds (VOC) created.

Permit Objective

SignTech wishes to replace the existing oxidizer with a similar unit that is more efficient, reliable, and economical to operate than the current equipment.

Description of New Equipment

SignTech plans to remove the current thermal oxidizer and install a MEGTEC CLEANSWITCH™ regenerative thermal oxidizer (RTO) with the following characteristics:

- **Model Number:** CS-300-95
- **Capacity:** 30,000 scfm
- **Manufacturer listed VOC destruction rate:** 99+%

Conversion Strategy

AUG 04 2003

To accomplish this, SignTech proposes to:

1. Reduce production operations so that uncontrolled emissions do not exceed

the Maximum Allowable Emission Rates as stated in their current permit.

2. Remove the old oxidizer and install the new RTO.
3. Commission the new RTO using the manufacturer's instructions.
4. Resume normal operations only after the new equipment is functioning to specifications.

The Applicability Review for this project, as shown in Section 7, indicates that it qualifies under the provisions for a Standard Permit as described in Title 30 TAC § 116.617 - Standard Permit List.

AUG 04 2003

RECEIVED

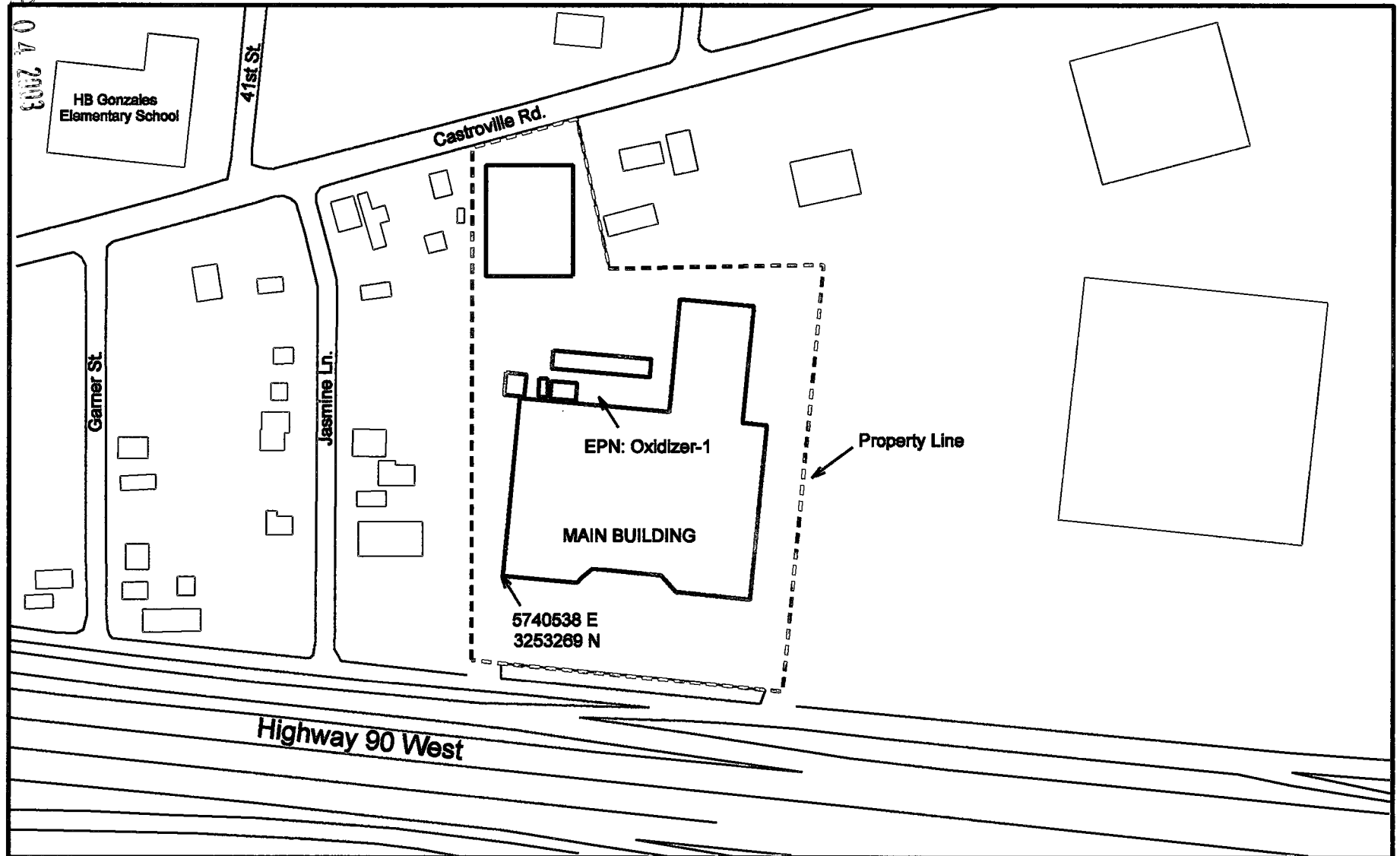
Section 2

TCEQ Form PI-1-S

AUG 04 2003

Permit & Waste Applications Team

Aug 04 2003
...\\graphics\\signtech



Arlon SignTech
Standard Permit Application

Table 1
Plant-Wide Emissions Summary

Plant Summary

CNTM code	CAS Number	POINT NAME Contaminat Name	Plant-Wide Emissions	
			Permitted (ton/yr)	Calculated (ton/yr)
19999	n/a	Total Suspended Particulates (TSP)	0.8590	0.8587
70510	7446095	Sulfur Dioxide	0.0430	0.0425
70400	n/a	Nitrogen Oxides	7.0900	7.0875
90300	630080	Carbon Monoxide	5.9550	5.9535
59999	n/a	Total VOC	14.6700	14.6700

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Arlon SignTech
Standard Permit Application

Table 2
Gas-Fired Oven Emissions

Boiler Type	Emission Factor (lb/ 10 ⁶ ft ³)				
	TSP	SO ₂	CO	NO _x	VOC
Small (<100 MMBtu/hr)	7.60	0.60	84.00	100.00	5.50

Permit Gas Consumption (10 ⁶ ft ³)
141.7500

Boiler Type	Emission Rates (lb/yr)				
	TSP	SO ₂	CO	NO _x	NMOC
Small (<100 MMBtu/hr)	1,077.30	85.05	11,907.00	14,175.00	779.63
Total Emissions (ton/yr)	0.5387	0.0425	5.9535	7.0875	0.3898

Vinyl Line Oven Emissions (ton/yr)	0.011	0.001	0.123	0.147	0.008
Web and Screen Line Oven Emissions (ton/yr)	0.5277	0.0415	5.8305	6.9405	0.3818

AUG 04 2003

Permit No. 00000

Section 5

Franchise Tax Certificate

and

Permit Fee

AUG 04 2003

FILED IN Austin, Texas

Section 5

Franchise Tax Certification and Permit Fee

Franchise Tax Certification

Texas Comptroller of Public Accounts Franchise Tax Certification is attached.

Permit Fee

Per 30 TAC 116.614, a check for \$900.00 is forwarded under separate cover to TCEQ.

AUG 04 2014



TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

CAROLE KEETON STRAYHORN • COMPTROLLER • AUSTIN, TEXAS 78774

July 1, 2003

CERTIFICATE OF ACCOUNT STATUS

THE STATE OF TEXAS
COUNTY OF TRAVIS

I, Carole Keeton Strayhorn, Comptroller of Public Accounts of the State of Texas, DO HEREBY CERTIFY that according to the records of this office

ARLON INC

is, as of this date, in good standing with this office having no franchise tax reports or payments due at this time. This certificate is valid through the date that the next franchise tax report will be due November 17, 2003.

This certificate does not make a representation as to the status of the corporation's Certificate of Authority, if any, with the Texas Secretary of State.

This certificate is valid for the purpose of conversion when the converted entity is subject to franchise tax as required by law. This certificate is not valid for the purpose of dissolution, merger, or withdrawal.

GIVEN UNDER MY HAND AND
SEAL OF OFFICE in the City of
Austin, this 1st day of
July, 2003 A.D.

Carole Keeton Strayhorn

Carole Keeton Strayhorn
Texas Comptroller

AUG 04 2003

Taxpayer number: 13303110004
File number: 0000531980

Section 6

Process Description

AUG 04 2003

Waste Applications Team

Section 7

Applicability Review

AUG 04 2013
P.A. Wicks Application

Section 7

APPLICABILITY REVIEW

This project meets the requirements of 30 TAC §116.617 - Standard Permits for Pollution Control Projects - for the following reasons:

1. **Requirement:** 30 TAC §116.617 (4) (A) "The replacement emissions control equipment or control technique must be at least as effective an air pollution control method as the emissions control equipment or control technique being replaced."

Response: The original thermal oxidizer had a rated VOC destruction rate of 95% rated. The replacement RTO is manufacturer rated to destroy VOCs at a rate of 99+ %. The emission calculations shown in Section 4 of this report do not show an increase in emission rates even though they are based on a conservative 95% VOC destruction rate.

2. **Requirement:** 30 TAC §116.617 (4) (B) "The replacement of emissions control equipment or control technique under this section is not limited to the method of control currently in place. Any type of control equipment or control technique may be replaced with any other type of control equipment or control technique as long as all other requirements of this standard permit are met."

Response: The replacement emissions control equipment uses a method and technology that is similar to the system currently used; however, the technology, performance, and efficiency are greatly improved.

3. **Requirement:** 30 TAC §116.617 (4) (C) "If the replacement project does not result in an increase in emissions of any air contaminant, the owner or operator of the facility shall submit registration notice not later than 30 days after the operation of the replacement project begins. If the replacement project will result in an increase of any air contaminant, the registration time period requirements of paragraph (2) of this section are applicable."

Response: The replacement project does not result in an increase in emissions of any air contaminant. The replacement TO is expected to be online by July 31, 2003. This application meets the requirement for submission no later than 30 days after operation.

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4. Requirement: 30 TAC §116.617 (5) "Installation of the control equipment or implementation of the control technique must not result in an increase in the facility's production capacity unless the capacity increase occurs solely as a result of the installation of control equipment or the implementation of control techniques on existing units."

Response: SignTech's production capacity will not change when this equipment is installed.

5. Requirement: 30 TAC §116.617 (5) (A) "The owner or operator shall obtain or qualify for any necessary authorization under §116.110 of this title (relating to Applicability) or §116.116 of this title (relating to Changes to Facilities) prior to utilizing any production capacity increase from a pollution control project required by any governmental standard that:

(i) Results in the exceedance of any emission limit in an existing permit, other authorization, or grandfathered baseline; or

(ii) Results in an emissions increase which exceeds the emission reduction due to the installation of control equipment or implementation of control techniques."

Response: This project does not result in the exceedance of any emission limit in the existing permit and does not result in any emissions increases.

6. Requirement: 30 TAC §116.617 (5) (B) "Any production capacity increase resulting from the voluntary installation of controls or the implementation of control techniques may not be utilized until the owner or operator obtains or qualifies for any necessary authorization under §116.110 or §116.116 of this title."

Response: SignTech's production capacity will not change when this equipment is installed.

7. Requirement: 30 TAC §116.617 (6) "Any emission increase of an air contaminant must occur solely as a result of the installation of control equipment or implementation of a control technique authorized by this section. Emissions increases associated with recovering a derate resulting from the installation of control equipment or the implementation of a control technique are not prohibited by this paragraph.

Response: This project does not in any emissions increases.

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8. Requirement: 30 TAC §116.617 (7) "Installation of emission control equipment or implementation of a control technique may not include the installation of a new production facility, reconstruction of a production facility as defined in 40 Code of Federal Regulations (CFR) §60.15(b)(1) and (c), or complete replacement of an existing production facility.

Response: This project does not involve the installation of a new production facility, reconstruction of a production facility, or replacement of an existing production facility.

9. Requirement: 30 TAC §116.617 (8) If the project, without consideration of any other increases or decreases not related to the project, will result in a significant net increase in emissions of any criteria pollutant, a person claiming this standard permit shall submit, with the registration, information sufficient to demonstrate that the increase will meet the conditions of subparagraph (A) of this paragraph.

Response: This project does not result in an increase in emissions of any criteria pollutant.

10. Requirement: 30 TAC §116.617 (9) For purposes of compliance with the PSD and nonattainment new source review provisions of the FCAA, Parts C and D and regulations promulgated there under, any increase that is less than significant, or satisfies the requirements of paragraph (8) of this section does not constitute a physical change or a change in the method of operation. For purposes of compliance with the Standards of Performance for New Stationary Sources regulations promulgated by the EPA at 40 CFR §60.14 (effective December 16, 1975), an increase that satisfies the requirements of paragraph (8) of this section also satisfies the requirements of 40 CFR §60.14(e) (5).

Response: PSD and nonattainment new source review provisions of the FCAA do not apply to this operation.

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