



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: June 9, 2020

Effective Date: July 1, 2020

Expiration Date: June 30, 2025

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

State Only Permit No: 36-05165

Synthetic Minor

Federal Tax Id - Plant Code: 36-3582485-1

Owner Information

Name: JL CLARK LLC  
Mailing Address: 303 N PLUM ST  
LANCASTER, PA 17602-2401

Plant Information

Plant: JL CLARK LLC/LANCASTER  
Location: 36 Lancaster County 36001 Lancaster City  
SIC Code: 3411 Manufacturing - Metal Cans

Responsible Official

Name: NATHAN KOCH  
Title: PLANT MGR  
Phone: (717) 381 - 3606

Permit Contact Person

Name: MIKE SCHMERSE  
Title: EHS SPECIALIST  
Phone: (717) 381 - 3630

[Signature] \_\_\_\_\_  
WILLIAM R. WEAVER, SOUTH CENTRAL REGION AIR PROGRAM MANAGER



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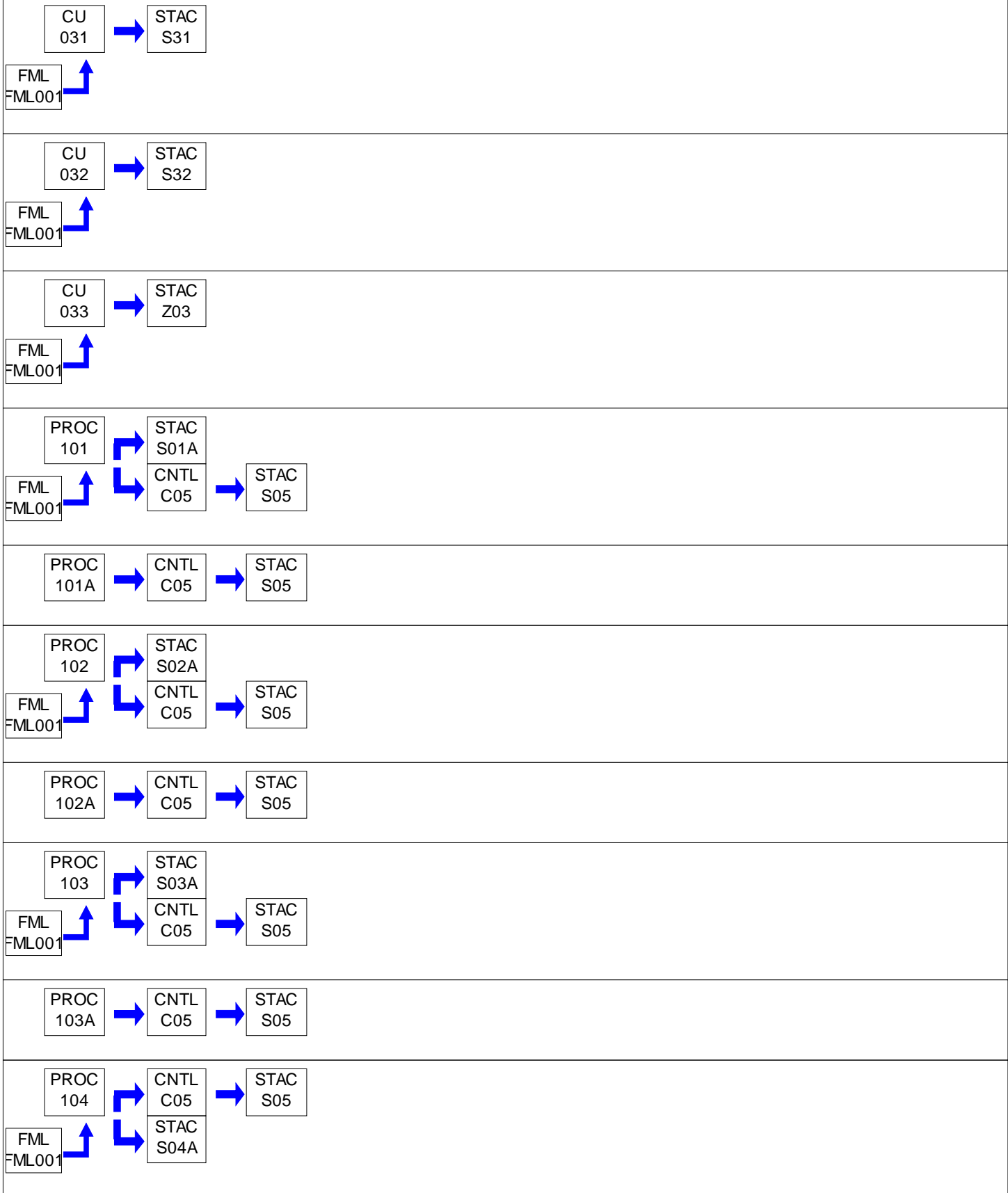
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	BOILER 1, B01	6.300 MMBTU/HR	
		7.286 MCF/HR	Natural Gas
032	BOILER 2, B02	6.300 MMBTU/HR	
		7.286 MCF/HR	Natural Gas
033	SPACE HEATERS, B03	6.000 MMBTU/HR	
		5,714.000 CF/HR	Natural Gas
101	C-1 COATER & OVEN	105.000 Lbs/HR	SOLVENT
101A	C-1 CLEANUP SOLVENT	100.000 Lbs/HR	CLEANUP SOLVENT
102	C-2 COATER & OVEN	87.000 Lbs/HR	SOLVENT
102A	C-2 CLEANUP SOLVENT	100.000 Lbs/HR	CLEANUP SOLVENT
103	C-4 COATER & OVEN	85.000 Lbs/HR	SOLVENT
103A	C-4 CLEANUP SOLVENT	100.000 Lbs/HR	CLEANUP SOLVENT
104	TPC-3 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)	71.000 Lbs/HR	SOLVENT
104A	TPC-3 CLEANUP SOLVENT	100.000 Lbs/HR	CLEANUP SOLVENT
105	TPC-5 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)	52.000 Lbs/HR	SOLVENT
105A	TPC-5 CLEANUP SOLVENT	100.000 Lbs/HR	CLEANUP SOLVENT
106	PC-6 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)	54.000 Lbs/HR	SOLVENT
106A	PC-6 CLEANUP SOLVENT	100.000 Lbs/HR	CLEANUP SOLVENT
107	UV-7 OFFSET LITHOGRAPHIC PRINTING PRESS (UV CURED)		
108	UV-8 OFFSET LITHOGRAPHIC PRINTING PRESS (UV CURED)		
109	PARTS WASHER		
C05	REGENERATIVE THERMAL OXIDIZER (RTO)		
FML001	NATURAL GAS		
S01A	COATER BYPASS STACK		
S02A	COATER BYPASS STACK		
S03A	COATER BYPASS STACK		
S04A	PRESS LINE BYPASS STACK		
S05	RTO STACK		
S05A	PRESS LINE BYPASS STACK		
S06A	PRESS LINE BYPASS STACK		
S31	BOILER 1 STACK		
S32	BOILER 2 STACK		
Z03	FUGITIVE EMISSIONS - SPACE HEATERS		
Z107	FUGITIVE EMISSIONS (UV-7)		
Z108	FUGITIVE EMISSIONS (UV-8)		
Z109	FUGITIVE EMISSIONS-PARTS WASHER		

**PERMIT MAPS**

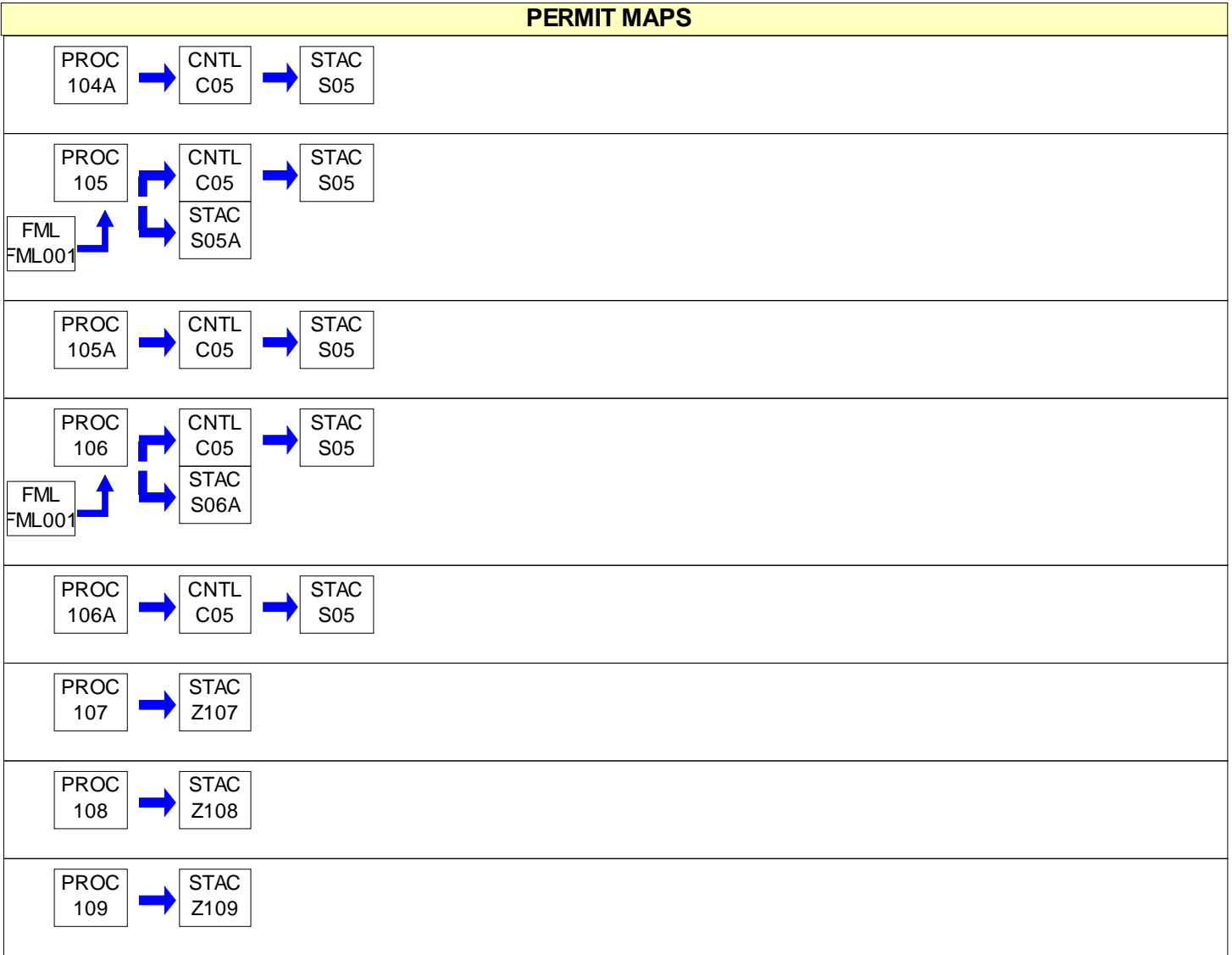


PERMIT MAPS





### PERMIT MAPS



**SECTION B. General State Only Requirements****#001 [25 Pa. Code § 121.1]****Definitions.**

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1.

**#002 [25 Pa. Code § 127.446]****Operating Permit Duration.**

(a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.

(b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

**#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)]****Permit Renewal.**

(a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.

(b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

(c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).

(1) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

(d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.

(e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).

(f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

**#004 [25 Pa. Code § 127.703]****Operating Permit Fees under Subchapter I.**

(a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):

(1) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,

**SECTION B. General State Only Requirements**

modification, revision, renewal, and re-issuance of each operating permit or part thereof.

(b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).

(1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.

(2) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.

(c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund".

**#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]****Transfer of Operating Permits.**

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

**#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]****Inspection and Entry.**

(a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:

(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

**#007 [25 Pa. Code §§ 127.441 & 127.444]****Compliance Requirements.**

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes



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a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

**#008 [25 Pa. Code § 127.441]****Need to Halt or Reduce Activity Not a Defense.**

It shall not be a defense for the permittee in an enforcement action that it was necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**#009 [25 Pa. Code §§ 127.442(a) & 127.461]****Duty to Provide Information.**

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

**#010 [25 Pa. Code § 127.461]****Revising an Operating Permit for Cause.**

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

**#011 [25 Pa. Code §§ 127.450 & 127.462]****Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and

**SECTION B. General State Only Requirements**

significant operating permit modifications, under this permit, as outlined below:

(b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

**#012 [25 Pa. Code § 127.441]****Severability Clause.**

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

**#013 [25 Pa. Code § 127.449]****De Minimis Emission Increases.**

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

(b) The Department may disapprove or condition de minimis emission increases at any time.

(c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NO<sub>x</sub> from a single source during the term of the permit and 5 tons of NO<sub>x</sub> at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM<sub>10</sub> from a single source during the term of the permit and 3.0 tons of PM<sub>10</sub> at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:

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(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

**#014 [25 Pa. Code § 127.3]****Operational Flexibility.**

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

(1) Section 127.14 (relating to exemptions)

(2) Section 127.447 (relating to alternative operating scenarios)

(3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)

(4) Section 127.449 (relating to de minimis emission increases)

(5) Section 127.450 (relating to administrative operating permit amendments)

**SECTION B. General State Only Requirements**

(6) Section 127.462 (relating to minor operating permit modifications)

(7) Subchapter H (relating to general plan approvals and general operating permits)

**#015 [25 Pa. Code § 127.11]****Reactivation**

(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

**#016 [25 Pa. Code § 127.36]****Health Risk-based Emission Standards and Operating Practice Requirements.**

(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].

(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

**#017 [25 Pa. Code § 121.9]****Circumvention.**

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

**#018 [25 Pa. Code §§ 127.402(d) & 127.442]****Reporting Requirements.**

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

(c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager  
PA Department of Environmental Protection  
(At the address given in the permit transmittal letter, or otherwise notified)

(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

(e) Any records, reports or information submitted to the Department shall be available to the public except for such

**SECTION B. General State Only Requirements**

records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

**#019 [25 Pa. Code §§ 127.441(c) & 135.5]****Sampling, Testing and Monitoring Procedures.**

(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.

(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

**#020 [25 Pa. Code §§ 127.441(c) and 135.5]****Recordkeeping.**

(a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

**#021 [25 Pa. Code § 127.441(a)]****Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privileges.

**#022 [25 Pa. Code § 127.447]****Alternative Operating Scenarios.**

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.

**SECTION B. General State Only Requirements****#023 [25 Pa. Code §135.3]****Reporting**

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

**#024 [25 Pa. Code §135.4]****Report Format**

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

No person shall permit the emission into the outdoor atmosphere of a fugitive air contaminant from a source other than the following:

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Sources and classes of sources other than those identified above, for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
  - (1) The emissions are of minor significance with respect to causing air pollution; and
  - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

**# 002 [25 Pa. Code §123.2]****Fugitive particulate matter**

No person shall permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in condition #001 above, if such emissions are visible at the point the emissions pass outside the person's property.

**# 003 [25 Pa. Code §123.31]****Limitations**

No person shall permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

**# 004 [25 Pa. Code §123.41]****Limitations**

No person shall permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.

**# 005 [25 Pa. Code §123.42]****Exceptions**

The emission limitations of site condition # 004 shall not apply when:

- (a) The presence of uncombined water is the only reason for failure of the emission to meet the limitations.

**SECTION C. Site Level Requirements**

(b) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

(c) The emission results from sources specified in site condition #001.

**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit emissions from the facility to less than the following during any consecutive 12-month period:

- a. PM-10 - 100 tons
- b. PM-2.5 - 100 tons
- c. Sulfur Dioxide - 100 tons
- d. Nitrogen Oxides - 100 tons
- e. Carbon Monoxide - 100 tons
- f. Volatile Organic Compounds (VOC) - 50 tons
- g. Hazardous Air Pollutants (HAP)
  - 1. 10 tons of any individual
  - 2. 25 tons total of all

**# 007 [25 Pa. Code §129.14]****Open burning operations**

(a) No person shall permit the open burning of material at the facility, except where the open burning operations result from:

- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (2) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) A fire set solely for recreational or ceremonial purposes.
- (5) A fire set solely for cooking food.

(b) This permit condition does not constitute authorization to burn solid waste in violation of Section 610(3) of the Solid Waste Management Act (SWMA), contained at 35 P.S. Section 6018.610(3), or any other provisions of the SWMA.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**III. MONITORING REQUIREMENTS.****# 008 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured by using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.



**SECTION C. Site Level Requirements****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall conduct a monthly inspection around the plant periphery during daylight hours when the plant is in production to detect visible emissions, fugitive visible emissions, and malodorous emissions as follows:

(a) Visible emissions in excess of the limits stated in Section C, condition #004. Visible emissions may be measured according to the methods specified in Section C, condition #008, or as an alternative, plant personnel who observe such emissions may report the incident of visible emissions to the Department within two (2) hours of each incident and make arrangements for a certified observer to verify the visible emissions.

(b) The presence of fugitive emissions visible beyond the plant boundaries as stated in Section C, condition # 002.

(c) The presence of malodorous air emissions beyond the plant boundaries as stated in Section C, condition #003.

**IV. RECORDKEEPING REQUIREMENTS.****# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall calculate and maintain a 12-month rolling total of the following facility emissions:

- a) Particulate Matter (PM-10)
- b) Particulate Matter (PM-2.5)
- c) Sulfur Dioxide (SO<sub>x</sub>)
- d) Nitrogen Oxides (NO<sub>x</sub>)
- e) Carbon Monoxide (CO)
- f) Volatile Organic Compounds (VOCs)
- g) Hazardous Air Pollutants (HAPs)

**# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

a) The permittee shall maintain a logbook for recording the status of malodorous air contaminants, visible emissions, and fugitive emission exceedances. The logbook, at a minimum, shall include the name of the company representative, the date and time the monitoring was conducted, wind direction, and actions taken to correct the problem.

Note: a log entry is required for each inspection regardless whether or not any odors, visible, or fugitive emissions are encountered.

b) The permittee shall maintain manufacturer supplied VOC data sheets and Material Safety Data Sheets for each coating and solvent used at this facility within the most recent five years, shall be maintained and made available to the Department representative upon request.

**V. REPORTING REQUIREMENTS.****# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this condition is derived from RACT operating permit number 36-02009]

An annual report containing the following data for all surface coating wastes shall be submitted to the Reading District Supervisor:

- a) gallons per quarter of waste solvents shipped from the facility
- b) waste profile or sampling data for each shipment
- c) identification of the waste disposal company for each shipment

**SECTION C. Site Level Requirements**

These reports shall be submitted for the reporting period between January 1 through December 31 and are due by March 1 of the following year.

**# 013 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall report malfunctions which occur at the facility to the Department. As defined in 40 CFR Sc 60.2 and incorporated by reference in 25 Pa. Code Chapter 122, a malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

(a) Malfunctions which occur at the facility which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two (2) hours after the incident. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.

(b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirements of Condition (#012)(a), shall be reported to the Department, in writing, within five (5) days of discovery of the malfunction.

(c) Malfunctions shall be reported to the Department at the following address:

PA DEP, Reading District Office  
Air Quality Program  
1005 Crossroads Blvd.  
Reading, PA 19605

Telephone reports can be made to the Reading District Office at (610) 916-0100 during normal business hours or to the Department's Emergency Hotline at any time. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at <https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx>.

**# 014 [25 Pa. Code §135.3]****Reporting**

(a) An annual report containing, but not limited to, the following data for each surface coating shall be submitted to the Reading District Supervisor:

- (1) Coating identification
- (2) Coating use (e.g., extreme performance coating)
- (3) Pounds of VOC per gallon coating solids
- (4) Weight percent of VOC (Wv-Ww-Wex)
- (5) Weight percent of total volatiles (100% - weight percent solids)
- (6) Weight percent of water
- (7) Weight percent of exempt solvents
- (8) Density of coating, lb/gal, at 25°C
- (9) Volume percent of solids of the as applied coating
- (10) Gallons per quarter of coating used
- (11) Identification of cleaning solvent, solvent density, and usage per quarter of each cleaning solvent.

(b) The permittee shall submit an annual Air Information System (AIMS) report to the Department. The AIMS report for a given calendar year is due no later than March 1 of the following year, and shall be submitted to the Reading District Supervisor unless otherwise specified. Also, reference Section B, Conditions 023 & 024.

(c) The permittee may request an extension of time from the Department for filing of the AIMS report specified in part (a), above, and the Department may grant the extension for reasonable cause.



## **SECTION C. Site Level Requirements**

### **VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

### **VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

### **VIII. COMPLIANCE CERTIFICATION.**

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to State Only General Requirements).

### **IX. COMPLIANCE SCHEDULE.**

No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: BOILER 1, B01

Source Capacity/Throughput: 6.300 MMBTU/HR

7.286 MCF/HR Natural Gas

Conditions for this source occur in the following groups: GROUP 004

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 032

Source Name: BOILER 2, B02

Source Capacity/Throughput: 6.300 MMBTU/HR

7.286 MCF/HR Natural Gas

Conditions for this source occur in the following groups: GROUP 004

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 033

Source Name: SPACE HEATERS, B03

Source Capacity/Throughput: 6.000 MMBTU/HR

5,714.000 CF/HR

Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §123.13]

**Processes**

No person may permit particulate matter emissions from the above space heaters, into the outdoor atmosphere, in excess of 0.04 grains per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

**General**

No person shall permit the emission into the outdoor atmosphere of sulfur oxides from the space heaters in a manner that the concentration of the sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The VOC RACT for the three (3) natural gas fired space heaters is that the sources shall remain below 2.7 tons per year in total VOC emissions.

(b) The space heaters shall be operated on natural gas only.

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: C-1 COATER &amp; OVEN

Source Capacity/Throughput: 105.000 Lbs/HR SOLVENT

Conditions for this source occur in the following groups: GROUP 001  
GROUP 003**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).



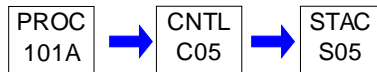
**SECTION D. Source Level Requirements**

Source ID: 101A

Source Name: C-1 CLEANUP SOLVENT

Source Capacity/Throughput: 100.000 Lbs/HR CLEANUP SOLVENT

Conditions for this source occur in the following groups: GROUP 002  
 GROUP 003  
 GROUP 006

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: C-2 COATER &amp; OVEN

Source Capacity/Throughput:

87.000 Lbs/HR

SOLVENT

Conditions for this source occur in the following groups: GROUP 001  
GROUP 003

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

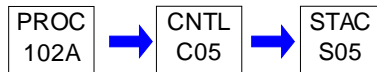
**SECTION D. Source Level Requirements**

Source ID: 102A

Source Name: C-2 CLEANUP SOLVENT

Source Capacity/Throughput: 100.000 Lbs/HR CLEANUP SOLVENT

Conditions for this source occur in the following groups: GROUP 002  
 GROUP 003  
 GROUP 006

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 103

Source Name: C-4 COATER &amp; OVEN

Source Capacity/Throughput:

85.000 Lbs/HR

SOLVENT

Conditions for this source occur in the following groups: GROUP 001  
GROUP 003

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

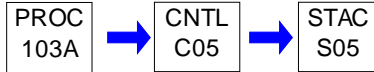
**SECTION D. Source Level Requirements**

Source ID: 103A

Source Name: C-4 CLEANUP SOLVENT

Source Capacity/Throughput: 100.000 Lbs/HR CLEANUP SOLVENT

Conditions for this source occur in the following groups: GROUP 002  
 GROUP 003  
 GROUP 006

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 104

Source Name: TPC-3 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)

Source Capacity/Throughput:

71.000 Lbs/HR

SOLVENT

Conditions for this source occur in the following groups: GROUP 003  
GROUP 005

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

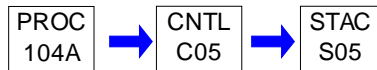
**SECTION D. Source Level Requirements**

Source ID: 104A

Source Name: TPC-3 CLEANUP SOLVENT

Source Capacity/Throughput: 100.000 Lbs/HR CLEANUP SOLVENT

Conditions for this source occur in the following groups: GROUP 002  
 GROUP 003  
 GROUP 005

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 105

Source Name: TPC-5 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)

Source Capacity/Throughput:

52.000 Lbs/HR

SOLVENT

Conditions for this source occur in the following groups: GROUP 003  
GROUP 005

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).



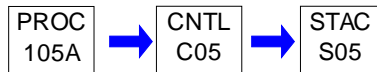
**SECTION D. Source Level Requirements**

Source ID: 105A

Source Name: TPC-5 CLEANUP SOLVENT

Source Capacity/Throughput: 100.000 Lbs/HR CLEANUP SOLVENT

Conditions for this source occur in the following groups: GROUP 002  
 GROUP 003  
 GROUP 005

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 106

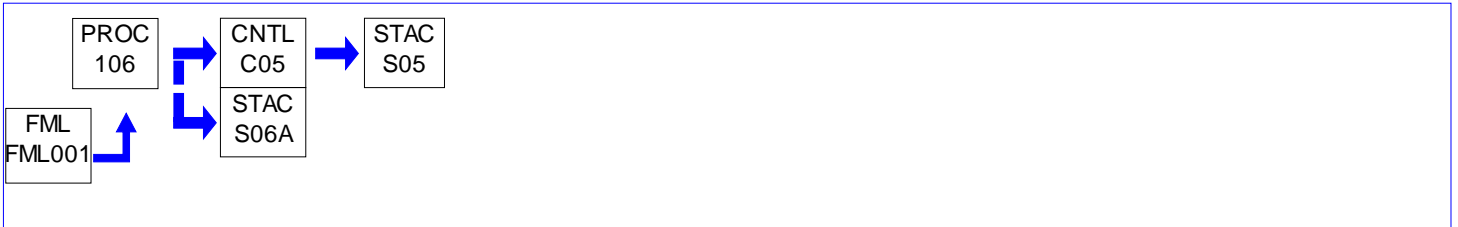
Source Name: PC-6 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)

Source Capacity/Throughput:

54.000 Lbs/HR

SOLVENT

Conditions for this source occur in the following groups: GROUP 003  
GROUP 005

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

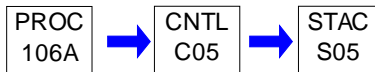
**SECTION D. Source Level Requirements**

Source ID: 106A

Source Name: PC-6 CLEANUP SOLVENT

Source Capacity/Throughput: 100.000 Lbs/HR CLEANUP SOLVENT

Conditions for this source occur in the following groups: GROUP 002  
 GROUP 003  
 GROUP 005

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).



**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: UV-7 OFFSET LITHOGRAPHIC PRINTING PRESS (UV CURED)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 005



**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).



**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: UV-8 OFFSET LITHOGRAPHIC PRINTING PRESS (UV CURED)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 005



**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

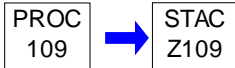
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 109

Source Name: PARTS WASHER

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §129.63]****Degreasing operations**

The permittee may not use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs. This condition does not apply to the following Cold Cleaning Machines:

- (1) Machines used in extreme cleaning service.
- (2) Machines, in which the Department approves in writing, that compliance with this condition will result in unsafe operating conditions.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.****# 002 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall maintain for at least two (2) years and shall provide to the Department, on request, the following information:

- (1) The name and address of the solvent supplier.
- (2) The type of solvent including the product or vendor identification number.
- (3) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).

An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 003 [25 Pa. Code §129.63]****Degreasing operations**

(a) The cold cleaning machine shall have a permanent, conspicuous label summarizing the operating requirements in Section D, Condition #004. In addition, the label shall include the following discretionary good operating practices:

(1) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.

(2) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.

(3) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.

(b) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than six inches shall constitute an acceptable cover.

**# 004 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall operate the cold cleaning machine in accordance with the following procedures:

(1) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

(2) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.

(3) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.

(4) Air agitated solvent baths may not be used.

(5) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 001

Group Description: Coater Requirements

Sources included in this group

ID	Name
101	C-1 COATER & OVEN
102	C-2 COATER & OVEN
103	C-4 COATER & OVEN

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §129.52]****Surface coating processes**

a) In accordance with the surface coating process category of Table 1 No. 1 (a) & (b), all solvent-based coatings from the coaters, as applied, shall not exceed 4.62 lbs of VOCs per gallon of coating solids. The VOC content of the as applied coating shall be calculated as follows:

$$\text{VOC} = (\text{Wo})(\text{Dc})/\text{Vn}$$

Where:

VOC = VOC content in lb of VOC/gal of coating solids.

Wo = Weight percent of VOC (Wv-Ww-Wex)

Wv = Weight percent of total volatiles (100% - weight percent solids)

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

Dc = Density of coating, lb/gal, at 25 degrees Celsius

Vn = Volume percent of solids of the as applied coating

(b) If the applied coating exceeds the limit as expressed in paragraph (a) above, the permittee shall be required to reduce the overall weight of VOCs emitted to the atmosphere through the use of the thermal oxidizer by a specific percentage determined by the following:

$$\text{O} = (1 - \text{E}/\text{V}) \times 100$$

where:

O = Overall control efficiency.

E = The limit of 4.62 lbs of VOCs per gallon of coating solids

V = The VOC content of the as applied coating, in lbs of VOCs per gallon of coating solids.

c) The percent reduction in emissions shall be in conformance with the requirements of 25 Pa. Code Section 129.52(b)(2), with incineration occurring at a minimum operating temperature of 1577 degrees Fahrenheit with a retention time of at least 0.3 seconds.

d) The VOC standard in paragraph (a) above, does not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

(1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.

(2) The permittee requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.



**SECTION E. Source Group Restrictions.****II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**III. MONITORING REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall demonstrate the VOC/HAP content of each surface coating by one of the following methods:

(a) For surface coatings applied as they are received from the manufacturer, the permittee may demonstrate compliance with the applicable standard by obtaining EPA Method 24 certification testing from the manufacturer, or by maintaining VOC/HAP data sheets from the manufacturer.

(b) In the absence of EPA Method 24 certification testing from the manufacturer, or VOC/HAP data sheets from the manufacturer, allowed under part (a), above, the permittee shall perform EPA Method 24 certification testing on all surface coatings applied as received from the manufacturer.

(c) The permittee may use calculated VOC content values in lieu of EPA Method 24 certification testing for multi-part surface coatings where the permittee maintains VOC/HAP data sheets for all surface coating constituents (i.e. coatings, pigments, thinners/cutting solvents), and also maintains documentation from the manufacturer as to the recommended mix ratio of the parts. In the event of any inconsistency between the calculated VOC content and data obtained from EPA Method 24 certification testing, the latter shall take precedence.

**IV. RECORDKEEPING REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this condition is derived from 25 Pa. Code § 129.51(d)]

(a) The permittee shall keep detailed records of all EPA Method 24 certification testing that has been done for all solvent-borne compliant coatings.

(b) The permittee shall also keep detailed records of all EPA Method 24 certification testing provided by the manufacturer for all solvent-borne compliant coatings.

(c) The permittee shall keep detailed records of all Certified Product Data Sheets provided from the manufacturer for all solvent-borne compliant coatings.

**# 004 [25 Pa. Code §129.52]****Surface coating processes**

The permittee shall maintain daily records of the following parameters for each coating, thinner, and other components as supplied:

- a) The coating, thinner or component(s) name and identification.
- b) The volume used.
- c) The density or specific gravity.
- d) The weight percent of total volatiles, water, solids, and exempt solvents.
- e) The volume percent of solids.
- f) The VOC content of each coating, thinner, and other component(s) as supplied.
- g) The VOC content of each as applied coating.
- h) Pounds per year of VOC emissions from the surface coating operations.

These reports shall be submitted to the Reading District Supervisor for the reporting period between January 1 through December 31 and are due by March 1 of the following year.

**SECTION E. Source Group Restrictions.****V. REPORTING REQUIREMENTS.****# 005 [25 Pa. Code §129.52]****Surface coating processes**

[Additional authority for this condition is derived from RACT operating permit number 36-02009]

a) Any new coating or any compositional change to an existing coating that is not processed by means of incineration shall be reported to the Reading District Supervisor prior to its use. The information to be reported shall include items a. through h. of condition # 004 above.

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 002

Group Description: Clean-up Processes

**Sources included in this group**

ID	Name
101A	C-1 CLEANUP SOLVENT
102A	C-2 CLEANUP SOLVENT
103A	C-4 CLEANUP SOLVENT
104A	TPC-3 CLEANUP SOLVENT
105A	TPC-5 CLEANUP SOLVENT
106A	PC-6 CLEANUP SOLVENT

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain records of the use of clean-up solvents at the facility. At a minimum the permittee shall maintain daily records of the type of clean-up solvents used, the amount of gallons used, the density of the solvent, and the percent by weight of volatile organic compounds.

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for the following conditions is derived from RACT operating permit number 36-02009]

In order to minimize solvent waste, evaporative losses, and wet rag cleaning, the permittee, as a minimum, shall implement and carry out the following:

- a) Schedule the use of coating materials in sequential order of the lightest to darkest color.
- b) Use solvent dispensers in the dampening of cleaning rags.
- c) Cover all soiled towels or rags in containers until sent for laundering.
- d) Store and transport solvents in sealed containers until needed.
- e) Utilize solvent baths in the cleaning of the surface coater rolls.
- f) Use wash tanks for the cleaning of the coating applicator rolls.

**SECTION E. Source Group Restrictions.****VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 003

Group Description: Sources controlled by the RTO

Sources included in this group

ID	Name
101	C-1 COATER & OVEN
101A	C-1 CLEANUP SOLVENT
102	C-2 COATER & OVEN
102A	C-2 CLEANUP SOLVENT
103	C-4 COATER & OVEN
103A	C-4 CLEANUP SOLVENT
104	TPC-3 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)
104A	TPC-3 CLEANUP SOLVENT
105	TPC-5 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)
105A	TPC-5 CLEANUP SOLVENT
106	PC-6 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)
106A	PC-6 CLEANUP SOLVENT

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person shall permit the emission to the outdoor atmosphere of particulate matter from the RTO, at any time, in such a manner that the particulate matter concentration in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

**# 002 [25 Pa. Code §123.21]****General**

No person shall permit the emission into the outdoor atmosphere of sulfur oxides from the RTO in a manner that the concentration of the sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall operate and maintain a device to continuously monitor the combustion chamber temperature of the RTO during production.

**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) All VOC emissions captured from the coaters, printers, and ovens shall be routed to the RTO and reduced at a minimum destruction efficiency of 98%.

(b) The captured VOC emissions shall be incinerated at a minimum temperature of 1577 degrees Fahrenheit for at least 0.3 seconds prior to their emission into the outdoor atmosphere. This minimum temperature requirement shall not apply during stack test events.

(c) The RTO shall achieve and maintain the above minimum operating temperature before any process gases are allowed to enter the combustion chamber.

(d) The RTO shall be operated and maintained in accordance with the manufacturer's specifications.

**SECTION E. Source Group Restrictions.****II. TESTING REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) Unless otherwise approved in writing by the Department, the permittee shall perform the required testing as defined in paragraph (a)(1) below, every 5-years from the date of the initial compliance test [October 26, 2006].

(1) A performance test to determine the destruction efficiency (DE) of the RTO in accordance with the Department's Source Testing Manual and 25 Pa. Code Chapter 139.

Note: The testing shall be conducted at or near the normal maximum production rates unless otherwise approved in writing by DEP.

(b) Pursuant to 25 Pa. Code § 139.3 at least 90 calendar days prior to commencing an emissions testing program, the permittee shall submit a test protocol to the Department for review and approval. The permittee shall not conduct the test that is the subject of the protocol until the protocol has been approved in writing by DEP.

(c) Pursuant to 25 Pa. Code § 139.3 at least 15 calendar days prior to commencing an emission testing program, the permittee shall notify the appropriate Regional Office and the Division of Source Testing and Monitoring of the the date and time of the performance test. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.

(d) Pursuant to 25 Pa. Code Section 139.53(a)(3) within 15 calendar days after completion of the on-site testing portion of an emission test program, if a complete test report has not yet been submitted, an electronic mail notification shall be sent to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office indicating the completion date of the on-site testing.

(e) Pursuant to 40 CFR Part 60.8(a), 40 CFR Part 61.13(f), and 40 CFR Part 63.7(g), the permittee shall submit copies of the completed test reports to the Department no later than 60 calendar days after completion of the on-site testing portion of the emission test program. For those tests being conducted pursuant to 40 CFR Part 61, the permittee shall submit copies of the completed test report to the Department within 31 days after completion of the test.

(f) Pursuant to 25 Pa. Code Section 139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:

1. A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
2. Permit number(s) and condition(s) which are the basis for the evaluation.
3. Summary of results with respect to each applicable permit condition.
4. Statement of compliance or non-compliance with each applicable permit condition.

(g) Pursuant to 25 Pa. Code § 139.3 all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

(h) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.

(i) Pursuant to 25 Pa. Code Section 139.53(a)(1) and 139.53(a)(3) all submittals, besides notifications, shall be accomplished through PSIMS\*Online available through <https://www.depgreenport.state.pa.us/ecommm/Login.jsp> when it becomes available. If internet submittal cannot be accomplished, one digital copy of each submittal shall be made to each of the following:

Regional Office:

Digital copy: RA-epsctesttesting@pa.gov

Bureau of Air Quality:

Digital copy: RA-epstacktesting@pa.gov

**SECTION E. Source Group Restrictions.**

(i)(1) A complete paper copy of each submittal shall be made to PA DEP, Bureau of Air Quality, Division of Source Testing and Monitoring, 400 Market Street, 12th Floor Rachael Carson State Office Building, Harrisburg, PA 17105-8468

(i)(2) A paper copy of (only) the cover letter/page (for both protocols and reports) and summary table (for reports only), of each submittal shall be made to Program Manager, Air Quality Program, PA DEP Southcentral Regional Office, 909 Elmerton Avenue, Harrisburg, PA 17110

(j) The permittee shall insure all federal reporting requirements contained in the applicable subpart of 40 CFR are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between state and the federal, the most stringent provision, term, condition, method or rule shall be used by default.

**III. MONITORING REQUIREMENTS.**

**# 006 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The recorded data for the combustion chamber temperatures of the RTO shall be maintained at the facility for a period of five (5) years and be made available to the Department upon request.

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

**# 007 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall maintain and implement an inspection and maintenance (I&M) plan for the RTO. The I&M plan and inspection and maintenance records shall be kept at the facility for a period of 5-years and be made available to the Department upon request.

**# 008 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall operate the RTO whenever any of the sources in this group are operating.

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 004

Group Description: Combustion Sources

Sources included in this group

ID	Name
031	BOILER 1, B01
032	BOILER 2, B02

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.11]****Combustion units**

No person shall permit the emissions into the outdoor atmosphere of particulate matter from each of the boilers in excess of 0.4 lb./mmbtu of heat input.

**# 002 [25 Pa. Code §123.22]****Combustion units**

No person shall permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO<sub>2</sub>, from each of the above boilers in excess of the rate of 4.0 lbs./mmBtu of heat input over any 1-hour period.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**VII. ADDITIONAL REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The VOC RACT for the two (2) natural gas fired boilers is that the sources shall remain below 2.7 tons per year in total VOC emissions.

(b) The boilers shall be operated on natural gas only.



**SECTION E. Source Group Restrictions.**

Group Name: GROUP 005

Group Description: Offset Lithographic Printing Presses

Sources included in this group

ID	Name
104	TPC-3 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)
104A	TPC-3 CLEANUP SOLVENT
105	TPC-5 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)
105A	TPC-5 CLEANUP SOLVENT
106	PC-6 OFFSET LITHOGRAPHIC PRINTING PRESS (HEATSET OVEN)
106A	PC-6 CLEANUP SOLVENT
107	UV-7 OFFSET LITHOGRAPHIC PRINTING PRESS (UV CURED)
108	UV-8 OFFSET LITHOGRAPHIC PRINTING PRESS (UV CURED)

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §129.67]****Graphic arts systems**

§ 129.67b. Control of VOC emissions from offset lithographic printing presses and letterpress printing presses. [NOTE: COMPLIANCE WITH THIS SECTION IS REQUIRED BY JANUARY 1, 2015]

(a) Applicability.

(1) Except as specified in paragraph (3), this section applies to the owner and operator of an offset lithographic printing press or a letterpress printing press, or both, if the press meets one or a combination of the following:

(i) Add-on air pollution control device. A single heatset web offset lithographic printing press or heatset web letterpress printing press that has potential emissions from the dryer, before consideration of add-on controls, of at least 25 tpy of VOCs from all heatset inks (including varnishes), coatings and adhesives combined.

(ii) [NA - FACILITY DOES NOT MAKE USE OF LETTERPRESS PRINTING]

(iii) Offset lithographic printing. One or more offset lithographic printing presses if the total actual VOC emissions from all inks (including varnishes), coatings, adhesives and fountain solutions combined from all offset lithographic printing presses and all VOC emissions from related cleaning activities at the facility are equal to or greater than 450 pounds (204.1 kilograms) per month or 2.7 tons (2,455 kilograms) per 12-month rolling period, before consideration of add-on controls.

(iv) Offset lithographic printing and letterpress printing. One or more offset lithographic printing presses and one or more letterpress printing presses if the total actual VOC emissions from all inks (including varnishes), coatings, adhesives and fountain solutions combined and all VOC emissions from related cleaning activities at the facility are equal to or greater than 450 pounds (204.1 kilograms) per month or 2.7 tons (2,455 kilograms) per 12-month rolling period, before consideration of add-on controls.

(v) Emissions below 450 pounds per month and 2.7 tons per 12-month rolling period. The total actual VOC emissions from all inks (including varnishes), coatings, adhesives and fountain solutions combined from all offset lithographic printing presses, all letterpress printing presses and all VOC emissions from related cleaning activities at the facility are less than 450 pounds (204.1 kilograms) per month and 2.7 tons (2,455 kilograms) per 12-month rolling period, before consideration of add-on controls.

(2) The owner or operator of an offset lithographic printing press subject to paragraph (1) may use the VOC emission retention factors and capture efficiency factors specified in subsection (l) to determine the amount of potential or actual VOC emissions that is available for capture and control from the inks (including varnishes), fountain solutions and cleaning solutions used on the offset lithographic printing press.

(3) VOCs from adhesives used at a facility that are not used or applied on or with an offset lithographic printing press or a

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letterpress printing press are not subject to this section and may be regulated under § 129.77 or Chapter 130, Subchapter D (relating to control of emissions from the use or application of adhesives, sealants, primers and solvents; and adhesives, sealants, primers and solvents).

(b) Existing RACT permit. This section supersedes the requirements of a RACT permit issued to the owner or operator of a source subject to subsection (a) prior to January 1, 2015, under §§ 129.91—129.95 (relating to stationary sources of NOx and VOCs) to control, reduce or minimize VOCs from an offset lithographic printing press or a letterpress printing press, or both, except to the extent the RACT permit contains more stringent requirements. [NOTE: PROVISIONS FROM EXISTING RACT PERMIT ARE INCLUDED ELSEWHERE IN THIS PERMIT]

(c) Emission limits for cleaning solutions and fountain solutions used in or on printing presses subject to this section.

(1) Cleaning solutions. Beginning January 1, 2015, a person subject to subsection (a)(1)(i), (ii), (iii) or (iv) may not cause or permit the emission into the outdoor atmosphere of VOCs from cleaning solutions used in or on an offset lithographic printing press or a letterpress printing press unless the following conditions are met:

(i) The cleaning solutions used must meet one or both of the following VOC limits:

(A) A VOC composite partial vapor pressure less than 10 millimeters of mercury at 68°F (20°C).

(B) A VOC content less than 70% by weight.

(ii) The use of one or more cleaning solutions with a higher VOC composite partial vapor pressure or higher VOC content, or both, than is listed in subparagraph (i) is limited to 110 gallons per year, combined, of all cleaning solutions that exceed the limits in subparagraph (i).

(2) Fountain solutions. Except as specified in paragraph (3), beginning January 1, 2015, a person subject to subsection (a)(1)(i), (iii) or (iv) may not cause or permit the emission into the outdoor atmosphere of VOCs from a fountain solution used in an offset lithographic printing press unless the fountain solution meets one or more of the following VOC limits.

(i) For each heatset web offset lithographic printing press, the press-ready (as applied) fountain solution must meet one of the following limits:

(A) A VOC content of 1.6% or less by weight.

(B) A VOC content of 3% or less by weight if the fountain solution is refrigerated below 60°F (15.5°C).

(C) A VOC content of 5% or less by weight and no alcohol in the fountain solution.

(D) Another method that achieves a level of control of VOC emissions from the press-ready (as applied) fountain solution equal to or better than the methods listed in clauses (A)—(C).

(ii) For each sheet-fed offset lithographic printing press, the press-ready (as applied) fountain solution must meet one of the following limits:

(A) A VOC content of 5% or less by weight.

(B) A VOC content of 8.5% or less by weight if the fountain solution is refrigerated below 60°F (15.5°C).

(C) A VOC content of 5% or less by weight and no alcohol in the fountain solution.

(D) Another method that achieves a level of control of VOC emissions from the press-ready (as applied) fountain solution equal to or better than the methods listed in clauses (A)—(C).

(iii) For each non-heatset web offset lithographic printing press, the press-ready (as applied) fountain solution shall contain a VOC content of 5% or less by weight and no alcohol in the fountain solution.

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(3) Fountain solution exceptions. The control requirements under paragraph (2) for a fountain solution do not apply to the owner or operator of either of the following:

- (i) A sheet-fed offset lithographic printing press with maximum sheet size 11 x 17 inches or smaller.
- (ii) An offset lithographic printing press with total fountain solution reservoir of less than 1 gallon.
- (d) Emission limits for heatset web offset lithographic printing presses and heatset web letterpress printing presses.

(1) Except as specified in paragraph (2) or (3), beginning January 1, 2015, a person subject to subsection (a)(1)(i) may not cause or permit the emission into the outdoor atmosphere of VOCs from a heatset web offset lithographic printing press or a heatset web letterpress printing press, or both, unless the overall weight of VOCs emitted to the atmosphere from the heatset dryer is reduced through the use of vapor recovery or oxidation or another method that is authorized under § 129.51(a) (relating to general). The heatset dryer pressure must be maintained lower than the press room area pressure so that air flows into the heatset dryer at all times when the press is operating. [NOTE: THE EMISSION LIMITS OF THIS SECTION DO NOT APPLY TO SOURCE ID #107 & #108 - PRESSES USING UV CURED MATERIALS]

(i) The VOC control efficiency of an add-on air pollution control device for a heatset dryer, determined in accordance with subsection (h), must meet either of the following:

- (A) At least 90% for an add-on air pollution control device whose first installation date was prior to January 1, 2015.
- (B) At least 95% for an add-on air pollution control device whose first installation date is on or after January 1, 2015.

(ii) The first installation date is the first date of operation for a source or a control device. This date will not change if the source or control device is moved to a new location or if the control device is later used to control a new source.

(iii) The owner or operator of the printing press may request the Department's approval for an alternative limitation if the following requirements are met:

(A) The request is submitted to the Department in writing.

(B) The request demonstrates one of the following:

(I) The inlet VOC concentration to the control device is so low that compliance with the 90% or 95% overall efficiency in subparagraph (i) is not achievable.

(II) The press is using a combination dryer and oxidizer or other control equipment configuration that does not have an inlet that meets the requirement for testing specified in subsection (h).

(C) The request demonstrates the minimum outlet VOC concentration that the unit can achieve, not to exceed 20 ppm as hexane (40 ppm as propane) on a dry basis.

(iv) The alternative limitation requested under subparagraph (iii) must be approved by the Department in a plan approval, operating permit or Title V permit.

(2) This subsection does not apply for one or a combination of the following circumstances:

(i) The press is used for book printing.

(ii) The press has a maximum web width of 22 inches or less.

(iii) The press is operated with one or a combination of the following inks, coatings or varnishes:

(A) Waterborne coatings.

(B) Ultra-violet light or electron beam radiation cured

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materials.

(C) Sheet-fed or non-heatset web inks.

(D) Sheet-fed or non-heatset web varnishes.

(3) This subsection does not apply to the owner or operator of the press if the Department has issued a plan approval, operating permit or Title V permit to the owner or operator prior to January 1, 2015, establishing a Federally-enforceable limitation to limit the potential emissions of VOC from the offset lithographic printing press or the letterpress printing press below 25 tpy, before consideration of add-on controls.

(e) Compliance and monitoring requirements.

(1) Add-on air pollution control device. The owner or operator of a heatset web offset lithographic printing press or heatset web letterpress printing press subject to this section using an add-on air pollution control device in accordance with subsection (d) shall comply with the following requirements:

(i) The add-on air pollution control device shall be equipped with the applicable monitoring equipment and the monitoring equipment shall be installed, calibrated, operated and maintained according to manufacturer's specifications at all times the add-on air pollution control device is in use. If the add-on air pollution control device is a:

(A) Noncatalytic thermal oxidizer, the minimum combustion or operating temperature must be continuously monitored. The temperature reading shall be recorded in accordance with Subsection (f)(1) at least once every 15 minutes while the noncatalytic thermal oxidizer is operating.

(B) [NA - FACILITY DOES NOT USE A CATALYTIC THERMAL OXIDIZER]

(C) [NA- FACILITY COMPLIES WITH CLAUSE(A) ABOVE]

(ii) The add-on air pollution control device specified in subparagraph (i) must be operated at a 3-hour average temperature not lower than 50°F below the average temperature demonstrated during the most recent compliant source test approved by the Department. [NOTE: THE AVERAGE TEMPERATURE OF THE RTO DURING THE 4/19/18 SOURCE TEST WAS 1660 F]

(iii) The add-on air pollution control device specified in subparagraph (i) must be in operation at all times that the source is operating.

(iv) The negative dryer pressure shall be established during the initial test using an air flow direction indicator, such as a smoke stick or aluminum ribbons, or a differential pressure gauge. Capture efficiency testing and continuous dryer air flow monitoring are not required.

(v) The add-on air pollution control device shall be approved, in writing, by the Department in a plan approval, operating permit or Title V permit prior to use.

(2) Fountain solution. The owner or operator of an offset lithographic printing press subject to this section that is required to meet one of the fountain solution VOC limits of subsection (c)(2) shall demonstrate compliance by using one or more of the following methods:

(i) Analysis of a sample of the press-ready (as applied) fountain solution for VOC content using EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, codified in 40 CFR Part 60, Appendix A, including updates and revisions.

(ii) Maintenance onsite of MSDS, CPDS or other data provided by the manufacturer of the fountain solution that indicates the VOC content of the press-ready (as applied) fountain solution.

(iii) Calculation of the VOC content of the press-ready (as applied) fountain solution that combines the EPA Reference Method 24 analytical VOC content data for each of the concentrated components or additives used to prepare the press-

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ready fountain solution.

(A) The VOC content data for each of the concentrated components or additives shall be combined in the proportions in which the concentrated components or additives are mixed to make the batch of press-ready (as applied) fountain solution.

(B) The VOC content shall be calculated one time for each recipe of press-ready (as applied) fountain solution. The recipe name, VOC content for each concentrated component or additive and fountain solution mix ratio shall be recorded in a logbook.

(C) The EPA Reference Method 24 analysis of the concentrated components or additives used to prepare the press-ready (as applied) fountain solution may be performed by the supplier of the components or additives and these results provided to the owner or operator of the affected press.

(iv) Measurement of the recirculating reservoir temperature of a refrigerated press-ready (as applied) fountain solution specified in subsection (c)(2)(i)(B) or (ii)(B) with a thermometer or other temperature detection device capable of reading to 0.5°F (0.28°C) to ensure that the temperature of the refrigerated fountain solution containing alcohol is maintained below 60°F (15.5°C) at all times. The temperature on the thermometer or other Temperature detection device shall be continuously monitored. The temperature reading shall be recorded at least once per operating day to verify that the refrigeration system is operating properly.

(v) Monitoring of the press-ready (as applied) fountain solution for alcohol concentration or VOC content with one or more of the following instruments:

(A) A refractometer or a hydrometer to monitor the fountain solution alcohol concentration. The instrument must:

(I) Be corrected for temperature one time per 8-hour shift.

(II) Have a visual, analog or digital readout with an accuracy of 0.5%.

(III) Be calibrated with a standard solution for the type of alcohol used in the fountain solution.

(B) A conductivity meter to determine the fountain solution VOC content. Reading for the fountain solution must be referenced to the conductivity of the incoming water.

(vi) Another method to determine compliance with the VOC content limits for fountain solutions in subsection (c)(2) if the following requirements are met:

(A) The facility owner or operator submits a request, in writing, to the appropriate regional office of the Department for approval of the alternative method.

(B) The request demonstrates that the alternative method provides results that accurately determine the fountain solution VOC content.

(C) The Department provides prior written approval of the alternative method.

(3) Cleaning solution. The owner or operator of an offset lithographic printing press or a letterpress printing press subject to this section shall demonstrate compliance with the VOC content limit or VOC composite partial vapor pressure limit for cleaning solutions in subsection (c)(1) by one or more of the following methods:

(i) Analysis of a sample of press-ready (as applied) cleaning solution for VOC content using EPA Reference Method 24.

(ii) Use of the equation in subsection (j) to calculate the composite partial vapor pressure of the press-ready (as applied) cleaning solution.

(iii) Use of the methods in subsection (k) to determine the VOC composite partial vapor pressure of a single concentrated component or additive used to prepare the press-ready (as applied) cleaning solution.

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- (iv) Maintenance onsite of MSDS, CPDS or other data provided by the manufacturer of the press-ready (as applied) cleaning solution that indicates the VOC content or the VOC composite partial vapor pressure, or both, of the press-ready (as applied) cleaning solution.
- (v) Calculation of the VOC content or the VOC composite partial vapor pressure, or both, of the press-ready (as applied) cleaning solution that combines the EPA Reference Method 24 analytical VOC content data or analytical VOC composite partial vapor pressure data for each of the concentrated components or additives used to prepare the press-ready (as applied) cleaning solution.
- (A) The VOC content data or VOC composite partial vapor pressure data for each of the concentrated components or additives shall be combined in the proportions in which the concentrated components or additives are mixed to make the batch of press-ready (as applied) cleaning solution.
- (B) The VOC content or VOC composite partial vapor pressure shall be calculated one time for each recipe of press-ready (as applied) cleaning solution. The recipe name, VOC content or VOC composite partial vapor pressure for each concentrated component or additive and cleaning solution mix ratio shall be recorded in a log book.
- (C) The EPA Reference Method 24 analysis of the concentrated components or additives used to prepare the press-ready (as applied) cleaning solution may be performed or the VOC composite partial vapor pressure data may be determined by the supplier of the components or additives and these results provided to the owner or operator of the affected press.
- (vi) Another method to determine compliance with the VOC content limits for cleaning solutions in subsection (c)(1) if the following requirements are met:
- (A) The facility owner or operator submits a request, in writing, to the appropriate regional office of the Department for approval of the alternative method.
- (B) The request demonstrates that the alternative method provides results that accurately determine the cleaning solution VOC content or VOC composite partial vapor pressure.
- (C) The Department provides prior written approval of the alternative method.
- (f) Recordkeeping requirements. Beginning January 1, 2015, the owner or operator of a printing press subject to this section shall maintain records sufficient to demonstrate compliance with this section. Records maintained for compliance demonstrations may include purchase, use, production and other records.
- (1) An owner or operator using an add-on air pollution control device shall maintain records sufficient to demonstrate compliance with subsection (e), including the following:
- (i) Temperature reading of the add-on air pollution control device.
- (ii) Maintenance performed on the add-on air pollution control device and monitoring equipment, including the date and type of maintenance.
- (iii) Catalyst activity test performed, if applicable.
- (2) An owner or operator subject to subsection (a)(1)(i), (ii), (iii) or (iv) shall maintain records of cleaning solutions and fountain solutions used at the facility, including:
- (i) The following parameters for each press ready blanket, roller or other cleaning solution:
- (A) The name and identification number for the blanket, roller or other cleaning solution.
- (B) The VOC content (weight %) or VOC composite partial vapor pressure of each cleaning solution as applied.
- (C) The volume used of each cleaning solution as applied, if the owner or operator is using cleaning solutions which exceed the limits in subsection (c)(1)(i).

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(D) Records of cleaning solution monitoring as required under subsection (e)(3).

(ii) The following parameters for each press-ready (as applied) fountain solution:

(A) The VOC content (weight %).

(B) Records of fountain solution monitoring as required under subsection (e)(2).

(3) An owner or operator claiming exemption from a VOC control provision of this section based on potential or actual VOC emissions, as applicable, shall maintain records that demonstrate to the Department that the press or facility is exempt.

(4) The owner or operator may group materials into classes using the highest VOC content in any material in a class to represent that class of material.

(g) Reporting requirements. Beginning January 1, 2015, the owner or operator of an offset lithographic printing press or a letterpress printing press subject to this section shall meet the following reporting requirements:

(1) The records required under subsection (f) shall be maintained onsite for 2 years unless a longer period is required by a plan approval or operating permit issued under Chapter 127 (relating to construction, modification, reactivation and operation of sources). The records shall be submitted to the Department in an acceptable format upon receipt of a written request.

(2) The owner or operator of an offset lithographic printing press or letterpress printing press required to demonstrate VOC control efficiency in accordance with subsection (d) shall submit reports to the Department in accordance with Chapter 139 (relating to sampling and testing).

(h) Sampling and testing.

(1) Sampling and testing shall be performed as follows:

(i) Sampling of an ink, varnish, coating, fountain solution or cleaning solution and testing for the VOC content of the ink, varnish, coating, fountain solution or cleaning solution shall be performed in accordance with the procedures and test methods specified in Chapter 139.

(ii) Sampling and testing of an add-on air pollution control device shall be performed in accordance with the procedures and test methods specified in Chapter 139 and meet one of the following:

(A) Sampling and testing shall be performed no later than 180 days after the compliance date of the press.

(B) Sampling and testing shall have been performed within 5 years prior to January 1, 2015, and previously approved by the Department.

(2) The control efficiency shall be determined using one or more of the following methods, as applicable, subject to prior written approval by the Department. The method used to measure the inlet concentration of VOC may be the same method used to determine the outlet concentration of VOC unless use of the same method is determined to be technically infeasible.

(i) EPA Reference Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon, codified in 40 CFR Part 60, Appendix A, including updates and revisions. EPA Reference Method 25 may be used if the total gaseous nonmethane organic compound concentration is equal to or greater than 50 parts per million by volume, measured as carbon.

(ii) EPA Reference Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer, codified in 40 CFR Part 60, Appendix A, including updates and revisions. EPA Reference Method 25A may not be used if the total gaseous nonmethane organic compound concentration at the outlet of the add-on air pollution control device is equal to or greater than 50 parts per million by volume, measured as carbon.

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(iii) EPA Reference Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography, codified in 40 CFR Part 60, Appendix A, including updates and revisions. EPA Reference Method 18 may be used if the total gaseous nonmethane organic compound concentration is equal to or greater than 50 parts per million by volume, measured as carbon. EPA Reference Method 18 may be used in conjunction with EPA Reference Method 25A to subtract emissions of exempt VOCs.

(3) Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with this section may be used if prior approval is obtained in writing from the Department and the EPA.

(i) Work practice requirements for cleaning activities.

(1) Except as specified in paragraph (3), beginning January 1, 2015, the owner or operator of an offset lithographic printing press or a letterpress printing press subject to subsection (a)(1)(i), (ii), (iii) or (iv) shall comply with the following work practices for cleaning activities at the facility:

(i) Store all VOC-containing cleaning solutions, waste cleaning solutions and used shop towels in closed containers.

(ii) Ensure that mixing vessels and storage containers used for VOC-containing cleaning solutions, waste cleaning solutions and used shop towels are kept closed at all times, except when depositing or removing these solutions or shop towels.

(iii) Minimize spills of VOC-containing cleaning solutions and waste cleaning solutions and clean up spills immediately.

(iv) Convey VOC-containing cleaning solutions, waste cleaning solutions and used shop towels from one location to another in closed containers or pipes.

(2) The requirements in paragraph (1) apply to the following activities:

(i) Cleaning of a press, including blanket washing, roller washing, plate cleaners, metering roller cleaners, impression cylinder cleaners and rubber rejuvenators.

(ii) Cleaning of press parts, including press parts that have been removed from the press for cleaning.

(iii) Cleaning of ink, coating or adhesive from areas around a press.

(3) The requirements in paragraph (1) do not apply to the following activities:

(i) Cleaning electronic components of a press.

(ii) Cleaning in pre-press (for example, platemaking) operations.

(iii) Cleaning in post-press (for example, binding) operations.

(iv) Using janitorial supplies (for example, detergents or floor cleaners) for general cleaning around a press.

(v) The use of parts washers or cold cleaners at an offset lithographic printing or a letterpress printing facility. The use of parts washers and cold cleaners is regulated under § 129.63 (relating to degreasing operations).

(j) Composite partial vapor pressure. The composite partial vapor pressure of organic compounds in cleaning solutions shall be determined by one of the following procedures:

(1) Quantifying the amount of each compound in the blend using gas chromatographic analysis, using an appropriate and current ASTM test method with prior written approval by the Department.

(2) Calculating the composite partial vapor pressure using the following equation: [SEE REGULATION FOR EQUATION]

Where:



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PPc = VOC composite partial vapor pressure at 20°C, in mm mercury

Wi = Weight of the "i"th VOC compound, in grams

Ww = Weight of water, in grams

We = Weight of the "e"th exempt compound, in grams

MWi = Molecular weight of the "i"th VOC compound, in grams per g-mole, as given in chemical reference literature

MWw = Molecular weight of water, in grams per g-mole (18 grams per g-mole)

MWe = Molecular weight of the "e"th exempt compound, in grams per g-mole, as given in chemical reference literature

VPI = Vapor pressure of the "i"th VOC compound at 20°C, in mm mercury, as determined by subsection (k).

(k) Determination of vapor pressure of single organic compounds in cleaning solutions. The vapor pressure of each single component compound shall be determined from one or more of the following:

(1) An appropriate and current ASTM test method with prior written approval by the Department.

(2) The most recent edition of one or more of the following sources:

(i) Vapour Pressures of Pure Substances, Boublik, Elsevier Scientific Publishing Company, New York.

(ii) Perry's Chemical Engineers' Handbook, Green and Perry, McGraw-Hill Book Company.

(iii) CRC Handbook of Chemistry and Physics, CRC Press.

(iv) Lange's Handbook of Chemistry, McGraw-Hill Book Company.

(v) Additional sources approved by the Department.

(l) VOC retention factors and capture efficiency factors. As specified in subsection (a)(2), if:

(1) A portion of the VOCs contained in the ink or cleaning solution, or both, is retained in the printed web substrate or in the shop towels used for cleaning, the following VOC emission retention factors shall be used, as applicable:

(i) A 20% VOC emission retention factor for a petroleum ink oil-based heatset ink printed on an absorptive substrate, meaning 80% of the petroleum ink oil content is emitted as VOC during the printing process and is available for capture and control by an add-on air pollution control device. The petroleum ink oil content of a heatset ink may be determined from formulation data included on a CPDS or MSDS.

(ii) A 95% VOC emission retention factor for a petroleum ink oil-based non-heatset web or non-heatset sheetfed ink, meaning 5% of the petroleum ink oil content is emitted as VOC during the printing process and is available for capture and control by an add-on air pollution control device. The petroleum ink oil content of a non-heatset web or non-heatset sheetfed ink may be determined from formulation data included on a CPDS or MSDS.

(iii) A 100% VOC emission retention factor for vegetable ink oil-based heatset and non-heatset inks.

(iv) A 50% VOC emission retention factor for low VOC composite vapor pressure cleaning solutions in shop towels if both of the following conditions are met:

(A) The VOC composite vapor pressure of the cleaning solution is less than 10mm Hg at 20°C (68°F).

(B) The cleaning solutions and used shop towels are kept in closed containers.

(2) A portion of the VOCs contained in one or more of the ink, fountain solution or automatic blanket wash materials is captured in the press dryer for control by the add-on air pollution control device, the following capture efficiency factors shall be used, as applicable:

(i) A 100% VOC emission capture efficiency for volatilized ink oils for oil-based heatset paste inks and varnishes as specified in paragraph (1) if both of the following conditions are met:

**SECTION E. Source Group Restrictions.**

- (A) The press dryer is operating at negative pressure relative to the surrounding pressroom.
- (B) The air flow is into the press dryer.
- (ii) A 70% VOC emission capture efficiency for a fountain solution that contains an alcohol substitute.
- (iii) A 40% VOC emission capture efficiency for an automatic blanket wash if the VOC composite vapor pressure of the cleaning solution is less than 10mm Hg at 20°C (68°F).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 006

Group Description: 129.96-129.100 RACT II Requirements

Sources included in this group

ID	Name
101A	C-1 CLEANUP SOLVENT
102A	C-2 CLEANUP SOLVENT
103A	C-4 CLEANUP SOLVENT
C05	REGENERATIVE THERMAL OXIDIZER (RTO)

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §129.97]****Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.**

The permittee shall limit the Source IDs 101A, 102A and 103A emission of VOCs to less than 2.7 tpy, each, during any consecutive 12-month period.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.****# 002 [25 Pa. Code §129.100]****Compliance demonstration and recordkeeping requirements.**

For Source IDs 101A, 102A and 103A:

(a) The permittee shall calculate the monthly VOC emissions from each source using AP-42 emission factors, manufacturer supplied emission factors, mass material balance, performance (stack) test data, or other method(s) acceptable to the Department. The permittee shall maintain records of the monthly VOC emissions and calculations.

(b) The permittee shall calculate the cumulative VOC emissions for each consecutive 12-month period for each source. The permittee shall maintain records of the cumulative VOC emissions for each consecutive 12-month period for each source in order to demonstrate compliance with Condition #001.

(c) The permittee shall retain these records for a minimum of five (5) years. The records shall be made available to the Department upon its request.

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.****# 003 [25 Pa. Code §129.97]****Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.**

For Control C05 the permittee shall install, maintain, and operate the control in accordance with the manufacturer's specifications and with good operating practices.

**SECTION E. Source Group Restrictions.****VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).



**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this permit.



**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

This permit incorporates the conditions of operating permit No. 36-05009 issued on December 12, 2014, and supersedes that permit. The Title V permit was replaced with a Synthetic Minor permit.

Other sources of insignificant emissions include:

- (1) 55 gallon hydraulic drum crusher
- (1) 300 gallon diesel fuel tank
- (1) roll grinder
- (1) down draft welding station
- (1) electrostatic wax coater

Note: Under approval from the Department, the facility is authorized to use the By-Pass stacks during the start-up of the natural gas-fired coater ovens.



\*\*\*\*\* End of Report \*\*\*\*\*

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