



**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM**

**STATE ONLY OPERATING PERMIT**

Issue Date: March 4, 2021

Effective Date: March 4, 2021

Expiration Date: March 3, 2026

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: 46-00287**

Synthetic Minor

Federal Tax Id - Plant Code: 13-2853382-1

**Owner Information**

Name: WALLQUEST INC  
Mailing Address: 465 DEVON PARK DR  
WAYNE, PA 19087-1815

**Plant Information**

Plant: WALLQUEST/KING OF PRUSSIA  
Location: 46 Montgomery County 46955 Upper Merion Township  
SIC Code: 2754 Manufacturing - Commercial Printing, Gravure

**Responsible Official**

Name: JACK COLLINS  
Title: VP  
Phone: (610) 293 - 1330 Ext.325

**Permit Contact Person**

Name: JACK COLLINS  
Title: VP  
Phone: (610) 293 - 1330 Ext.325

[Signature] \_\_\_\_\_

*JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER*



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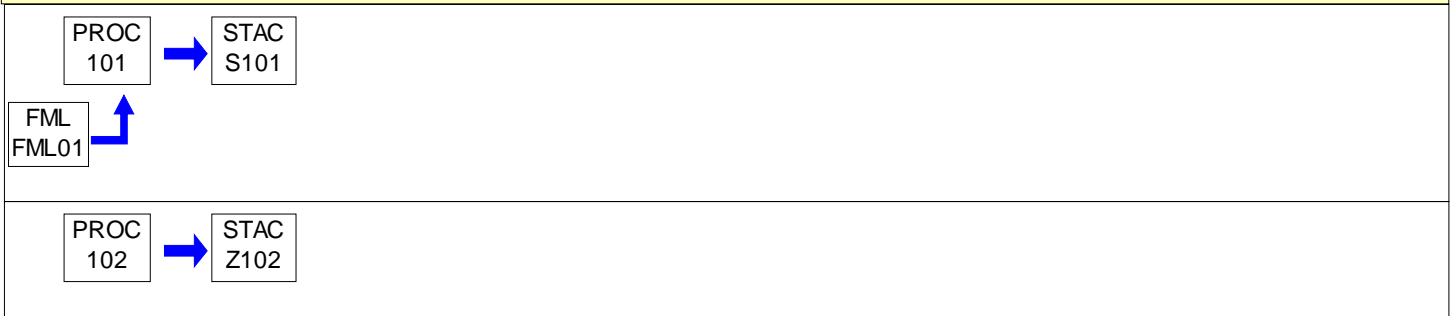
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	6-COLOR ROTOGRAVURE PRESS	3.500 MMBTU/HR	
		3.430 MCF/HR	Natural Gas
		N/A	WATER-BASED INKS
102	PROOF PRESSES (3)	N/A	WATER-BASED INKS
FML01	NATURAL GAS PIPELINE		
S101	6-COLOR ROTOGRAVURE PRESS STACK		
Z102	PROOF PRESSES FUGITIVE EMISSIONS		

**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)]****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 as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.

(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 the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.

(1) For a synthetic minor facility, a fee equal to:

(i) Four thousand dollars (\$4,000) for calendar years 2021—2025.

(ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.

(iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.

**SECTION B. General State Only Requirements**

(2) For a facility that is not a synthetic minor, a fee equal to:

- (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
- (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
- (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.

(b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

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

**SECTION B. General State Only Requirements**

- (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, 127.465 & 127.703]****Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:

**SECTION B. General State Only Requirements**

(b) Administrative Amendments. The permittee shall submit the application for 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 submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.

(e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

**#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:



**SECTION B. General State Only Requirements**

(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 §121.7]****Prohibition of air pollution.**

The permittee shall not cause or permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. § 4003).

**# 002 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee shall ensure that emission into the outdoor atmosphere of fugitive air contaminants does not occur from any source, except for 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) Open burning operations, as specified in 25 Pa. Code § 129.14 (see Condition # 009(a)–(g), Section C, of this permit).
- (g) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.
- (h) Coke oven batteries, provided that the fugitive air contaminant emissions from any coke oven battery comply with the standards for visible fugitive emissions in 25 Pa. Code §§ 123.44 and 129.15.
- (i) Sources and classes of sources other than those indicated in (a)–(h), above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1(b), that fugitive air contaminant emissions from the sources, after appropriate controls, meet the following requirements:
  - (1) The emissions are of minor significance with respect to causing air pollution.
  - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

**# 003 [25 Pa. Code §123.2]****Fugitive particulate matter**

The permittee shall ensure that emission into the outdoor atmosphere of fugitive particulate matter (PM) from a source(s) specified in 25 Pa. Code § 123.1 (see Condition # 002(a)–(i), Section C, of this permit) occurs in such a manner that the emission is not visible at the point it passes outside the person's property.

**# 004 [25 Pa. Code §123.31]****Limitations**

The permittee shall ensure that emission into the outdoor atmosphere of any malodorous air contaminants from any source occurs in such a manner that the malodors are not detectable outside the property of the person on whose land the source is being operated.

**# 005 [25 Pa. Code §123.41]****Limitations**

The permittee shall ensure that emission into the outdoor atmosphere of visible air contaminants from this facility occurs in such a manner that the opacity of the emission is neither of the following:

- (a) Equal to or greater than 20% for a period or periods aggregating more than 3 minutes in any 1 hour.
- (b) Equal to or greater than 60% at any time.

**SECTION C. Site Level Requirements****# 006 [25 Pa. Code §123.42]****Exceptions**

The emission restrictions specified in 25 Pa. Code § 123.41 (see Condition # 005(a)–(b), Section C, of this permit) shall not apply to a visible air contaminant emission in either of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the restrictions.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from a source(s) specified in 25 Pa. Code § 123.1 (see Condition # 002(a)–(i), Section C, of this permit).

**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that emission into the outdoor atmosphere of volatile organic compounds (VOCs) from this facility occurs in such a manner that the rate of the emission is less than 25 tons/yr, calculated monthly as a 12-month rolling sum.

**# 008 Elective Restriction**

[25 Pa. Code § 127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 40 CFR § 63.820(a)(2)(i)–(ii), and 25 Pa. Code §§ 127.35(b) and 127.443(b).]

The permittee shall ensure that emission into the outdoor atmosphere of hazardous air pollutants (HAPs) from this facility occurs in such a manner that the rate of the emission is both of the following:

- (a) Less than 10 tons/yr for any individual HAP, calculated monthly as a 12-month rolling sum.
- (b) Less than 25 tons/yr for total HAPs, calculated monthly as a 12-month rolling sum.

[Compliance with this permit condition assures that the permittee will not be subject to the provisions of 40 CFR Part 63, Subpart KK, except for those specified in 40 CFR § 63.829(d).]

**# 009 [25 Pa. Code §129.14]****Open burning operations**

The permittee shall not perform any open burning activities, except for the following:

- (a) 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.
- (b) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (c) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (d) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.
- (f) A fire set solely for recreational or ceremonial purposes.

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(g) A fire set solely for cooking food.

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

(a) If, at any time, the Department has cause to believe that air contaminant emissions from any source(s) listed in Sections A or H, of this permit, may be in excess of the restrictions specified in this permit or established pursuant to any applicable rule or regulation contained in 25 Pa. Code, Subpart C, Article III, the permittee shall be required to perform whatever test(s) is deemed necessary by the Department to determine the actual emission rate(s).

(b) The permittee shall perform any test(s) required in (a), above, in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

**III. MONITORING REQUIREMENTS.****# 011 [25 Pa. Code §123.43]****Measuring techniques**

The permittee may measure visible air contaminant emissions using either of the following:

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

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

(a) The permittee shall monitor this facility, at least once per operating day, for the following:

- (1) Odors, which may be objectionable (as per 25 Pa. Code § 123.31; see Condition # 004, Section C, of this permit).
- (2) Visible air contaminant emissions (as per 25 Pa. Code §§ 123.41 and 123.42; see Conditions # 005–006, Section C, of this permit, respectively).
- (3) Fugitive air contaminant emissions (as per 25 Pa. Code §§ 123.1 and 123.2; see Conditions # 002–003, Section C, of this permit, respectively).

(b) Objectionable odors, visible air contaminant emissions, and/or fugitive air contaminant emissions that are caused or may be caused by operations at the facility shall:

- (1) Be investigated.
- (2) Be reported to the facility management, or individual(s) designated by the permittee.
- (3) Have appropriate corrective action taken (for emissions that originate on-site).
- (4) Be recorded in a permanent written log.

(c) At the end of 6 months, upon the permittee's request, the Department will determine the feasibility of decreasing the

**SECTION C. Site Level Requirements**

frequency of monitoring to weekly for the next 6-month period.

(d) At the end of the second 6-month period, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

(e) The Department reserves the right to change the above monitoring requirements at any time, based on, but not limited to, the review of complaints, monitoring results, and/or Department findings.

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall monitor the amount of natural gas consumed at this facility on a monthly and 12-month rolling basis.

**# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall calculate the following emissions from this facility on a monthly and 12-month rolling basis, using a Department-approved method(s):

- (a) The total VOC emissions.
- (b) The total emissions of each individual HAP.
- (c) The total HAP emissions.

**IV. RECORDKEEPING REQUIREMENTS.****# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall maintain all records, reports, analysis results, monitoring data, and supporting information (including calibration data, maintenance records, and original strip-chart recordings for continuous monitoring instrumentation) generated in compliance with the requirements of any section of this permit in accordance with Condition # 020(b), Section B, of this permit, and shall make them available to the Department upon written or verbal request within a reasonable time.

**# 016 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

(a) The permittee shall maintain records of all monitoring of odors, visible air contaminant emissions, and fugitive air contaminant emissions, including deviations from the conditions found in Conditions # 002–005, Section C, of this permit. All records of deviations shall include, at a minimum, the following for each incident:

- (1) A description of the deviation.
- (2) The source(s) and/or associated air pollution control device(s) and location(s).
- (3) The duration (including the starting and ending date(s) and times).
- (4) The cause(s).
- (5) The corrective action(s) taken, if necessary to abate the situation and prevent future occurrences.



**SECTION C. Site Level Requirements**

(b) The monitoring shall be recorded and maintained in a Department-approved format and time frame.

**# 017 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall maintain records of all of this facility's emission increases, including the following types, in accordance with 25 Pa. Code § 127.449:

- (a) De minimis emission increases without notification to the Department.
- (b) De minimis emission increases with notification to the Department, via letter.
- (c) Emission increases resulting from a Request for Determination of Changes of Minor Significance and Exemption from Plan Approval/Operating Permit (RFD) to the Department.
- (d) Emission increases resulting from the issuance of a plan approval and subsequent operating permit.

**# 018 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall maintain records of the amount of natural gas consumed at this facility on a monthly and 12-month rolling basis.

**# 019 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 40 CFR § 63.829(d), and 25 Pa. Code §§ 127.35(b) and 127.443(b).]

The permittee shall maintain records of the following emissions from this facility on a monthly and 12-month rolling basis, calculated using a Department-approved method(s):

- (a) The total VOC emissions.
- (b) The total emissions of each individual HAP.
- (c) The total HAP emissions.

**V. REPORTING REQUIREMENTS.****# 020 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 40 CFR § 60.7(b), and 25 Pa. Code Chapter 122 and § 127.443(b).]

- (a) The permittee shall report malfunctions, emergencies, or incidents of excess emissions to the Department. 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. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility, which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly-designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department by telephone at 484-250-5920, as well as to the

**SECTION C. Site Level Requirements**

County Emergency Management Agency by telephone, within 1 hour after the discovery of the malfunction, emergency, or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies, or incidents of excess emissions to the Department within 3 business days of the telephone report.

(c) The report shall describe the following:

- (1) The name, permit or authorization number, and location of the facility.
- (2) The nature and cause of the malfunction, emergency, or incident.
- (3) The date and time when the malfunction, emergency, or incident was first observed.
- (4) The expected duration of excess emissions.
- (5) The estimated rate of emissions.
- (6) The corrective actions or preventative measures taken.

(d) Any malfunction, emergency, or incident of excess emissions that is not subject to the notice requirements specified in (b), above, shall be reported to the Department by telephone at 484-250-5920 within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within 5 business days of discovery. The report shall contain the information listed in (c)(1)–(6), above, and any permit-specific malfunction reporting requirements.

(e) During an emergency, an owner or operator may continue to operate the source at their discretion, provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements, in accordance with (b)–(d), above, as applicable, including any permit-specific malfunction reporting requirements.

(f) Reports regarding malfunctions, emergencies, or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.

(g) Any emissions resulting from a malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

**# 021 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 40 CFR Part 68.]

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with all applicable provisions of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions), and the Federal Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) that meets all applicable provisions of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and the Federal Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the threshold quantity at this facility. The permittee shall submit the RMP to the EPA according to the following schedule and requirements:

- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
  - (i) Three (3) years after the date on which a regulated substance is first listed in 40 CFR § 68.130.
  - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

**SECTION C. Site Level Requirements**

(2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with all applicable provisions of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d) If this facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall perform the following:

(1) Submit a compliance schedule for satisfying all applicable provisions of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a).

(2) Certify that the facility is in compliance with all applicable provisions of 40 CFR Part 68 including the registration and submission of the RMP.

(e) If the facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for 5 years in accordance with 40 CFR § 68.200.

(f) When the facility is subject to the accidental release program provisions of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

**VI. WORK PRACTICE REQUIREMENTS.****# 022 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code §§ 123.1(c) and 127.443(b).]

The permittee shall take all reasonable actions to prevent PM from a source(s) specified in 25 Pa. Code § 123.1 (see Condition # 002(a)–(i), Section C, of this permit), from becoming airborne. These actions shall include, but not be limited to, the following:

(a) Use, where possible, of water or suitable chemicals, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(b) Application of asphalt, oil, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces that may give rise to airborne dusts.

(c) Paving and maintenance of roadways.

(d) Prompt removal of earth or other material from paved roads onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

**# 023 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code §§ 127.443(b) and 127.444.]

The permittee shall ensure that the source(s) and associated air pollution control device(s) listed in Sections A and H, of this permit, are operated and maintained in a manner consistent with good safety, operating and maintenance, and air pollution control practices, as applicable, and in accordance with the manufacturers' specifications.

**SECTION C. Site Level Requirements****# 024 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall immediately, upon discovery, implement measures, which may include the application for the installation of an air pollution control device(s), if necessary, to reduce the air contaminant emissions to within applicable restrictions, if at any time the operation of a source(s) listed in Sections A or H, of this permit, is causing the emission of air contaminants in excess of the restrictions specified in this permit or established pursuant to any applicable rule or regulation contained in 25 Pa. Code, Subpart C, Article III.

**# 025 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee may not modify any air contaminant system identified in Sections A or H, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition # 013(g), Section B, of this permit.

**# 026 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that the VOC- and HAP-containing inks,<sup>1</sup> cleaning materials, and waste materials used at this facility are managed in accordance with the following good air pollution control practices:

- (a) Storing all VOC- and HAP-containing inks, cleaning materials, and waste materials, as well as used shop towels containing these same materials, in nonabsorbent, nonleaking containers. The containers shall be kept closed at all times except when VOC- and HAP-containing inks, cleaning materials, and waste materials are being added or removed.
- (b) Keeping all mixing vessels that contain VOC- and HAP-containing inks and other materials closed at all times, except when adding to, removing, or mixing the contents.
- (c) Minimizing spills of VOC- and HAP-containing inks, cleaning materials, and waste materials, and cleaning up spills promptly.
- (d) Conveying VOC- and HAP-containing inks, cleaning materials, and waste materials from one location to another in closed containers or pipes.
- (e) Minimizing VOC and HAP emissions from the cleaning of storage, mixing, and conveying equipment.

<sup>1</sup> As defined in 40 CFR § 60.581.

**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.**

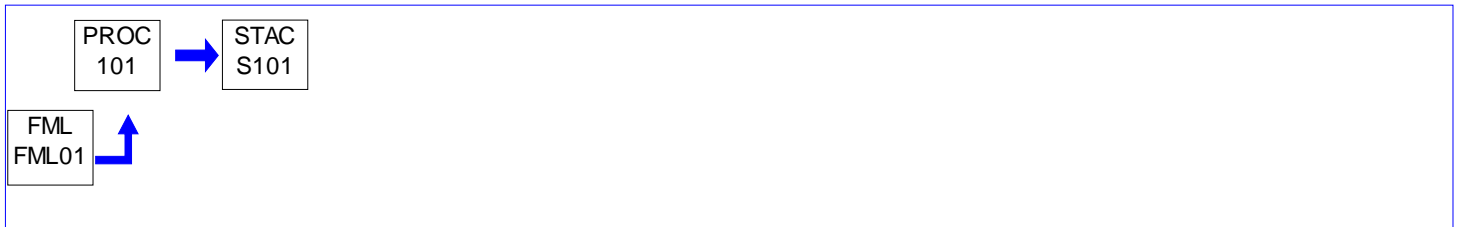
No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: 6-COLOR ROTOGRAVURE PRESS

Source Capacity/Throughput:	3.500	MMBTU/HR	
	3.430	MCF/HR	Natural Gas
	N/A		WATER-BASED INKS

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall monitor the amount of each ink and cleaning material purchased (pounds and gallons) for this rotogravure press and the proof presses (Source ID 102) (combined) on a monthly basis.

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall calculate the following emissions from this rotogravure press and the proof presses (Source ID 102) (combined) on a monthly and 12-month rolling basis, using a Department-approved method(s):

- (a) The total VOC emissions.
- (b) The total emissions of each individual HAP.
- (c) The total HAP emissions.

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

[Additional authority for this permit condition is derived from 40 CFR §§ 60.583(b)(5) and (c)(1) and (5), and § 63.829(d); and 25 Pa. Code Chapter 122 and §§ 127.35(b) and 127.443(b).]

The permittee shall maintain records of the following operating parameters for this rotogravure press and the proof presses (Source ID 102) (combined):<sup>2</sup>

<sup>2</sup> While the proof presses are not affected facilities under 40 CFR § 60.580(a), the provisions of 40 CFR Part 60, Subpart FFF, have been extended to them because their ink usage is collectively accounted for (on an as purchased basis) with that of the rotogravure press.

**SECTION D. Source Level Requirements**

- (a) The following for each ink:
- (1) The name and identification number.
  - (2) The amount purchased (pounds, gallons, weight percent of all inks, and volume percent of all inks) on a monthly basis.
  - (3) The density or specific gravity.
  - (4) The VOC content (weight percent, volume percent, and volume percent of total volatiles content), obtained from one of the following:
    - (i) A certified product data sheet (CPDS).
    - (ii) A safety data sheet (SDS). If the VOC content value is reported as a range, the upper bound of the range shall be considered the actual value.
    - (iii) Testing in accordance with EPA Method 24/24A, as specified in 40 CFR Part 60, Appendix A.
    - (iv) An alternative method, as approved by the Department.
  - (5) The HAP content (weight percent), calculated using a Department-approved method(s).
  - (6) The solids content (weight percent and volume percent).
  - (7) The water content (weight percent, volume percent, and volume percent of total volatiles content).
  - (8) The exempt solvents content (weight percent and volume percent).
  - (9) The total volatiles content (i.e., 100% minus solids content) (volume percent).
  - (10) The weighted VOC content (i.e., as a volume percent of total volatiles content multiplied by the volume percent of all inks purchased) (volume percent of total volatiles content), on a monthly basis.
  - (11) The weighted water content (volume percent of total volatiles content), on a monthly basis.
- (b) The following for each cleaning material:
- (1) The name and identification number.
  - (2) The amount purchased (pounds and gallons) on a monthly basis.
  - (3) The density or specific gravity.
  - (4) The VOC content (weight percent and grams per liter), obtained from one of the following:
    - (i) A CPDS.
    - (ii) A SDS. If the VOC content value is reported as a range, the upper bound of the range shall be considered the actual value.
    - (iii) Testing in accordance with EPA Method 24/24A, as specified in 40 CFR Part 60, Appendix A.
    - (iv) An alternative method, as approved by the Department.
  - (5) The HAP content (weight percent), calculated using a Department-approved method(s).

**SECTION D. Source Level Requirements**

- (6) The water content (weight percent).
- (7) The exempt solvents content (weight percent).
- (c) The following for all inks on a monthly basis:
  - (1) The total amount purchased (pounds and gallons).
  - (2) The average weighted VOC contents (volume percent of total volatiles content and kilograms per kilogram of solids).
  - (3) The average weighted water content (volume percent of total volatiles content).

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

[Additional authority for this permit condition is derived from 40 CFR § 63.829(d), and 25 Pa. Code §§ 127.35(b) and 127.443(b).]

The permittee shall maintain records of the following emissions from this rotogravure press and the proof presses (Source ID 102) (combined) on a monthly and 12-month rolling basis, calculated using a Department-approved method(s):

- (a) The total VOC emissions.
- (b) The total emissions of each individual HAP.
- (c) The total HAP emissions.

**V. REPORTING REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 40 CFR §§ 60.583(b)(4) and 60.585(b)(1) and (c), and 25 Pa. Code Chapter 122 and § 127.443(b).]

(a) The permittee shall submit, to the Department, a semi-annual report for this rotogravure press and the proof presses (Source ID 102) for each reporting period (i.e., the 6-month period covering January 1–June 30, or July 1–December 31, of a given year). The report shall include the following information:

- (1) The name and address of the permittee.
- (2) The date of the report.
- (3) The starting and ending dates of the reporting period.
- (4) The following for each calendar month within the reporting period in which an exceedance(s) of the average weighted VOC content restriction for the inks used in the rotogravure and proof presses, as specified in Condition # 006(b), Section D (under Source ID 101), of this permit, occurs:
  - (i) The average weighted VOC content calculated for the rotogravure and proof presses for the calendar month(s) (i.e., the results of the performance test(s)).
  - (ii) The cause.
- (5) If no exceedances occur during the reporting period, a statement that: "The 6-color rotogravure press (Source ID 101) and proof presses (Source ID 102) were in compliance the average weighted VOC content restriction in 40 CFR § 60.582(a)(1) (i.e., 1.0 kgs/kg solids) for each calendar month within the reporting period."

**SECTION D. Source Level Requirements**

(6) A statement by the responsible official certifying the truth, accuracy, and completeness of the content of the report (along with the name, title, and signature of the responsible official).

(b) The semi-annual report shall be postmarked within 30 days following the end of the reporting period.

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

[Additional authority for this permit condition is derived from 40 CFR §§ 60.582(a)(1) and 60.583(b)(3), and 25 Pa. Code Chapter 122 and §§ 127.1 and 127.443(b).]

(a) The permittee shall ensure that the weighted average VOC content of the inks used in this rotogravure press and the proof presses (Source ID 102) is both of the following:

(1) Equal to or less than 20% (by volume) of the total volatiles content, on a monthly basis.

(2) Less than 1.0 kgs VOC/kg solids (1.0 lbs VOC/lb solids), on a monthly basis.

(b) The permittee shall ensure that the weighted average water content of the inks used in the rotogravure and proof presses is greater than or equal to 80% (by volume) of the total volatiles content, on a monthly basis.

(c) The permittee shall ensure that the VOC content of any cleaning material used in the rotogravure and proof presses does not exceed 25 g/L (0.21 lbs/gal).

**VII. ADDITIONAL REQUIREMENTS.****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source consists of a 68-inch (wide) web width, six-color rotogravure printing press, model no. ES 168, manufactured by Giovanni Cerutti S.p.A. The rotogravure press is rated at 150 m/min line speed, and operates with a 54-inch web. The rotogravure press is equipped with seven natural gas-fired dryer burners (one at each color station, as well as at a pre-dryer), model type/series OVENPAK 400, manufactured by Maxon Corp. Each dryer burner is rated at 0.5 mmBtu/hr heat input (3.5 mmBtu/hr heat input total).

**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This rotogravure press is subject to, and shall comply with all applicable provisions of, 40 CFR Part 60, Subpart FFF. In accordance with 40 CFR § 60.4, copies of all requests, reports, applications, submittals, and other communications are required to be submitted to both the EPA and the Department. The EPA copies shall be forwarded to:

Associate Director  
Office of Air Enforcement and Compliance Assistance (3AP20)  
U.S. EPA, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029



**SECTION D. Source Level Requirements**

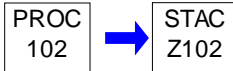
Source ID: 102

Source Name: PROOF PRESSES (3)

Source Capacity/Throughput:

N/A

WATER-BASED INKS

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall monitor the amount of each ink and cleaning material purchased (pounds and gallons) for these proof presses and the rotogravure press (Source ID 101) (combined) on a monthly basis.

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

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.443(b).]

The permittee shall calculate the following emissions from these proof presses and the rotogravure press (Source ID 101) (combined) on a monthly and 12-month rolling basis, using a Department-approved method(s):

- (a) The total VOC emissions.
- (b) The total emissions of each individual HAP.
- (c) The total HAP emissions.

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

[Additional authority for this permit condition is derived from 40 CFR §§ 60.583(b)(5) and (c)(1) and (5), and § 63.829(d); and 25 Pa. Code Chapter 122 and §§ 127.35(b) and 127.443(b).]

The permittee shall maintain records of the following operating parameters for these proof presses and the rotogravure press (Source ID 101) (combined):

- (a) The following for each ink:
  - (1) The name and identification number.
  - (2) The amount purchased (pounds, gallons, weight percent of all inks, and volume percent of all inks) on a monthly basis.

**SECTION D. Source Level Requirements**

- (3) The density or specific gravity.
  - (4) The VOC content (weight percent, volume percent, and volume percent of total volatiles content), obtained from one of the following:
    - (i) A CPDS.
    - (ii) A SDS. If the VOC content value is reported as a range, the upper bound of the range shall be considered the actual value.
    - (iii) Testing in accordance with EPA Method 24/24A, as specified in 40 CFR Part 60, Appendix A.
    - (iv) An alternative method, as approved by the Department.
  - (5) The HAP content (weight percent), calculated using a Department-approved method(s).
  - (6) The solids content (weight percent and volume percent).
  - (7) The water content (weight percent, volume percent, and volume percent of total volatiles content).
  - (8) The exempt solvents content (weight percent and volume percent).
  - (9) The total volatiles content (volume percent).
  - (10) The weighted VOC content (volume percent of total volatiles content), on a monthly basis.
  - (11) The weighted water content (volume percent of total volatiles content), on a monthly basis.
- (b) The following for each cleaning material:
- (1) The name and identification number.
  - (2) The amount purchased (pounds and gallons) on a monthly basis.
  - (3) The density or specific gravity.
  - (4) The VOC content (weight percent and grams per liter), obtained from one of the following:
    - (i) A CPDS.
    - (ii) A SDS. If the VOC content value is reported as a range, the upper bound of the range shall be considered the actual value.
    - (iii) Testing in accordance with EPA Method 24/24A, as specified in 40 CFR Part 60, Appendix A.
    - (iv) An alternative method, as approved by the Department.
  - (5) The HAP content (weight percent), calculated using a Department-approved method(s).
  - (6) The water content (weight percent).
  - (7) The exempt solvents content (weight percent).
- (c) The following for all inks on a monthly basis:
- (1) The total amount purchased (pounds and gallons).

**SECTION D. Source Level Requirements**

- (2) The average weighted VOC contents (volume percent of total volatiles content and kilograms per kilogram of solids).
- (3) The average weighted water content (volume percent of total volatiles content).

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

[Additional authority for this permit condition is derived from 40 CFR § 63.829(d), and 25 Pa. Code §§ 127.35(b) and 127.443(b).]

The permittee shall maintain records of the following emissions from these proof presses and the rotogravure press (Source ID 101) (combined) on a monthly and 12-month rolling basis, calculated using a Department-approved method(s):

- (a) The total VOC emissions.
- (b) The total emissions of each individual HAP.
- (c) The total HAP emissions.

**V. REPORTING REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 40 CFR §§ 60.583(b)(4) and 60.585(b)(1) and (c), and 25 Pa. Code Chapter 122 and § 127.443(b).]

(a) The permittee shall submit, to the Department, a semi-annual report for these proof presses and the rotogravure press (Source ID 101) for each reporting period. The report shall include the following information:

- (1) The name and address of the permittee.
- (2) The date of the report.
- (3) The starting and ending dates of the reporting period.

(4) The following for each calendar month within the reporting period in which an exceedance(s) of the average weighted VOC content restriction for the inks used in the proof and rotogravure presses, as specified in Condition # 006(b), Section D (under Source ID 102), of this permit, occurs:

- (i) The average weighted VOC content calculated for the proof and rotogravure presses for the calendar month(s).
- (ii) The cause.

(5) If no exceedances occur during the reporting period, a statement that: "The 6-color rotogravure press (Source ID 101) and proof presses (Source ID 102) were in compliance the average weighted VOC content restriction in 40 CFR § 60.582(a)(1) (i.e., 1.0 kgs/kg solids) for each calendar month within the reporting period."

(6) A statement by the responsible official certifying the truth, accuracy, and completeness of the content of the report (along with the name, title, and signature of the responsible official).

(b) The semi-annual report shall be postmarked within 30 days following the end of the reporting period.

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

[Additional authority for this permit condition is derived from 40 CFR §§ 60.582(a)(1) and 60.583(b)(3), and 25 Pa. Code

**SECTION D. Source Level Requirements**

Chapter 122 and §§ 127.1 and 127.443(b).]

(a) The permittee shall ensure that the weighted average VOC content of the inks used in these proof presses and the rotogravure press (Source ID 101) is both of the following:

- (1) Equal to or less than 20% (by volume) of the total volatiles content, on a monthly basis.
- (2) Less than 1.0 kgs VOC/kg solids (1.0 lbs VOC/lb solids), on a monthly basis.

(b) The permittee shall ensure that the weighted average water content of the inks used in the proof and rotogravure presses is greater than or equal to 80% (by volume) of the total volatiles content, on a monthly basis.

(c) The permittee shall ensure that the VOC content of any cleaning material used in the proof and rotogravure presses does not exceed 25 g/L (0.21 lbs/gal).

**VII. ADDITIONAL REQUIREMENTS.**

**# 007 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

This source grouping consists of three proof presses, as follows:

Designation	Manufacturer	Machine (Model) No.	Drum Circumference
A	George Moulton Successors, Ltd. (GMS)	7584	6 ft
B	J.M. Heaford, Ltd.	8132	12 ft
C	J.M. Heaford, Ltd.	2000155 (GMS 5000•1800)	15 ft



**SECTION E. Source Group Restrictions.**



**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description
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**Site Emission Restriction Summary**

Emission Limit		Pollutant
25.000 Tons/Yr	Less Than; 12-Month Rolling Sum, Calculated Monthly	VOC
25.000 Tons/Yr	Less Than; Combined HAPs; 12-Month Rolling Sum, Calculated Monthly	Hazardous Air Pollutants
10.000 Tons/Yr	Less Than; Any Individual HAP; 12-Month Rolling Sum, Calculated Monthly	Hazardous Air Pollutants



**SECTION H. Miscellaneous.**

(a) The plant address is: 741 First Avenue, King of Prussia, PA 19406-1401.

(b) The following previously-issued documents serve as the basis for certain terms and conditions set forth in this permit:

- (1) Plan Approval No. 46-0287.
- (2) RFD No. 4779.
- (3) RFD No. 5744.
- (4) RFD No. 8324.

(c) Pursuant to Condition # 012(c), Section C, of this permit, on April 10, 2017, the Department approved the permittee's request to reduce the frequency of monitoring the facility for objectionable odors, visible air contaminant emissions, and fugitive air contaminant emissions to weekly. The Department reserves the right to change this frequency of monitoring pursuant to Condition # 012(e), Section C, of this permit.

(d) The following sources have been determined by the Department to be insignificant sources of air contaminant emissions and, therefore, do not require additional restrictions, monitoring, or recordkeeping. They are still subject to any applicable federal, state, and local laws and regulations, including those indicated in Section C, of this permit:

(1) An embosser, serial no. 1999-01-11464-P, manufactured by Pyradia. The embosser is equipped with an electric thermic oil heater.

(2) Three digital (inkjet) printers, as follows:

Manufacturer	Model Type/No.	Quantity
Epson America, Inc.	Stylus Pro 9900	2
Hewlett-Packard Development Co., L.P.	Designjet L26500	1

(3) A latex printer, model type/no. HP Latex 360, manufactured by Hewlett-Packard Development Company, L.P.

(4) Sample bookmaking and book-covering operations, including the following equipment:

- (i) Two sheeters manufactured by Beck.
- (ii) Two gluing machines manufactured by Potdevin Machine Co.

(5) A natural gas-fired boiler, model no. J-6-B, manufactured by Weil-McLain Co., Inc. The boiler is rated at 0.825 mmBtu/hr heat input.

(6) Sixteen natural gas-fired space heaters, model no. B225A, manufactured by Modine Mfg. Co. Each space heater is rated 0.225 mmBtu/hr heat input (3.60 mmBtu/hr heat input total).

(e) This permit (APS ID 876376, Auth ID 1308507) is a renewal of State Only Operating Permit No. 46-00287, originally issued on January 21, 2016 (APS ID 876376, Auth ID 1082999). The following is a listing of the changes reflected in this permit:

(1) The permit contact person has been changed to Jack Collins, Vice President, (610) 293-1330, ext. 325.

(2) A source capacity (i.e., rated heat input) listing for the dryer burners of the six-color rotogravure press has been added to Sections A and D (under Source ID 101), of the original permit (same locations in this permit).

(3) The following for Condition # 003, Section B, of the original permit (same condition number in this permit):

- (i) The citation to 25 Pa. Code § 127.703(c) has been removed.
- (ii) The following for Sub-condition (c):



**SECTION H. Miscellaneous.**

- (A) References to an annual operating permit administrative fee and 25 Pa. Code § 127.703(c) have been removed.
- (B) The language of the second sentence has been changed to require the permittee to submit the application fee "with the fee form to the respective regional office."
- (C) The application and annual operating permit administrative fee schedule, as specified in Sub-condition (c)(1)–(2), has been removed.
- (4) The following for Condition # 004, Section B, of the original permit (same condition number in this permit):
- (i) The application and annual operating permit administrative fee schedules, as specified in Sub-conditions (a)–(b), respectively, have been removed.
  - (ii) The following for Sub-condition (c):
    - (A) It has been reorganized as Sub-condition (b).
    - (B) The phrase "with the permit number clearly indicated and submitted to the respective regional office" has been added to the end of the sub-condition.
    - (iii) An annual operating permit maintenance fee schedule for synthetic minor and non-synthetic minor facilities has been added as Sub-conditions (a)(1)–(2), respectively.
- (5) The following for Condition # 011, Section B, of the original permit (same condition number in this permit):
- (i) Citations to 25 Pa. Code §§ 127.465 and 127.703 have been added.
  - (ii) The following for Sub-condition (d):
    - (A) The references to 25 Pa. Code § 127.541 and "the public notification procedures in [25 Pa. Code] §§ 127.424 and 127.425" have been removed.
    - (B) A requirement to "submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465" has been added.
    - (iii) A statement that "applicable fees shall be made payable to 'The Commonwealth of Pennsylvania Clean Air Fund' with the permit number clearly indicated and submitted to the respective regional office" has been added as Sub-condition (e).
- (6) Requirements that "emissions reports ... contain sufficient information to enable the Department to complete its emission inventory," and "be made ... in a format specified by the Department," have been added as Condition # 024, Section B, of this permit.
- (7) An exception from the visible emission restrictions specified in 25 Pa. Code § 123.41 for the operation of equipment used solely to train and test persons in observing the opacity of visible emissions has been added to Condition # 006, Section C, of the original permit (same condition number in this permit), as Sub-condition (b).
- (8) Condition # 020, Section C, of the original permit (same condition number in this permit), has been updated to include additional requirements pertaining to malfunctions, as well as new requirements pertaining to emergencies and incidents of excess emissions.
- (9) Condition # 021, Section C, of the original permit, has been moved to Condition # 023, Section B, of this permit.
- (10) A requirement to develop and implement an accidental release program and RMP, as applicable, has been added as Condition # 021, Section C, of this permit.
- (11) A separate section for source group restrictions has been added as Section E, of this permit.



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

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