



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: March 13, 2019 Effective Date: August 20, 2020
Revision Date: August 20, 2020 Expiration Date: February 29, 2024

Revision Type: Amendment

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: 61-00191

Synthetic Minor

Federal Tax Id - Plant Code: 39-2007493-1

Owner Information

Name: WS PKG GROUP INC Mailing Address: 1642 DEBENCE DR

FRANKLIN, PA 16323-2050

Plant Information

Plant: WS PACKAGING GROUP/FRANKLIN

Location: 61 Venango County 61926 Sandycreek Township

SIC Code: 2759 Manufacturing - Commercial Printing, Nec

Responsible Official

Name: EDWARD SHADLE Title: PLANT MGR Phone: (814) 432 - 7890

Permit Contact Person

Name: EDWARD SHADLE Title: PLANT MGR Phone: (814) 432 - 7890

Signaturej	
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ERIC A. GUSTAFSON, NORTHWEST REGION AIR PROGRAMMANAGER



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents Site Inventory List

Section B. General State Only Requirements

4004	Dafinitions
#001	Definitions.

- #002 Operating Permit Duration.
- #003 Permit Renewal.
- #004 Operating Permit Fees under Subchapter I.
- #005 Transfer of Operating Permits.
- #006 Inspection and Entry.
- #007 Compliance Requirements.
- #008 Need to Halt or Reduce Activity Not a Defense.
- #009 Duty to Provide Information.
- #010 Revising an Operating Permit for Cause.
- #011 Operating Permit Modifications
- #012 Severability Clause.
- #013 De Minimis Emission Increases.
- #014 Operational Flexibility.
- #015 Reactivation
- #016 Health Risk-based Emission Standards and Operating Practice Requirements.
- #017 Circumvention.
- #018 Reporting Requirements.
- #019 Sampling, Testing and Monitoring Procedures.
- #020 Recordkeeping.
- #021 Property Rights.
- #022 Alternative Operating Scenarios.
- #023 Reporting
- #024 Report Format

Section C. Site Level State Only Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

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Section D. Source Level State Only Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

Section E. Source Group Restrictions

E-I: Restrictions





SECTION A. Table of Contents

E-II: Testing Requirements
E-III: Monitoring Requirements
E-IV: Recordkeeping Requirements
E-V: Reporting Requirements
E-VI: Work Practice Standards
E-VII: Additional Requirements

Section F. Alternative Operating Scenario(s)

F-I: Restrictions

F-II: Testing Requirements
F-III: Monitoring Requirements
F-IV: Recordkeeping Requirements
F-V: Reporting Requirements
F-VI: Work Practice Standards
F-VII: Additional Requirements

Section G. Emission Restriction Summary

Section H. Miscellaneous

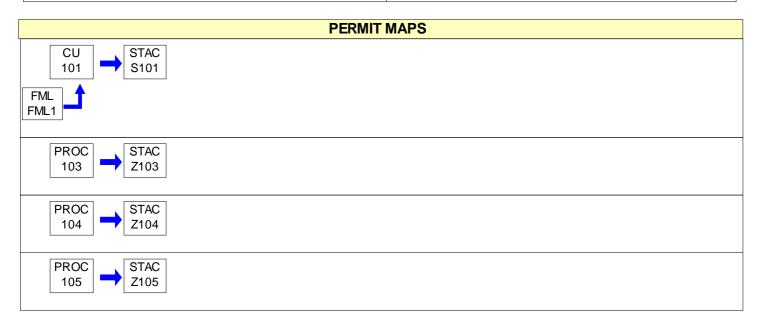






SECTION A. Site Inventory List

Source	ID Source Name	Capacity	Throughput	Fuel/Material
101 F	PLANT HEATING SYSTEM	1.300	MMBTU/HR	
		1.560	MCF/HR	NATURAL GAS
103	PRESSROOM (LITHOGRAPHIC PRESSES) (28 UNITS)	39.000	Lbs/HR	INK
104	MISCELLANEOUS FUGITIVE EMISSION SOURCE			
105	DEGREASER UNITS (3)			
FML1	NATURAL GAS PIPELINE			
S101	EXHAUST STACK			
Z103	FUGITIVE EMISSION			
Z104	FUGITIVE EMISSION			
Z105	FUGUTIVE EMISSION			





#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,



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



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





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 NOx from a single source during the term of the permit and 5 tons of NOx 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 PM10 from a single source during the term of the permit and 3.0 tons of PM10 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:





- (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)



- (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





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.



#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.





I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the act.

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

- (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:
 - (1) Construction or demolition of buildings or structures.
 - (2) Grading, paving and maintenance of roads and streets.
- (3) 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.
 - (4) Clearing of land.
 - (5) Stockpiling of materials.
 - (6) Open burning operations.
 - (7) Not applicable..
 - (8) Not applicable.
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.
- (b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.
 - (c) See work practice standard requirement.
 - (d) Not applicable.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.



004 [25 Pa. Code §123.31]

Limitations

- (a) Limitations are as follows:
- (1) If control of malodorous air contaminants is required under subsection (b), emissions shall be incinerated at a minimum of 1200F for at least 0.3 seconds prior to their emission into the outdoor atmosphere.
- (2) Techniques other than incineration may be used to control malodorous air contaminants if such techniques are equivalent to or better than the required incineration in terms of control of the odor emissions and are approved in writing by the Department.
- (b) A person may not 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.
- (c) The prohibition in subsection (b) does not apply to odor emissions arising from the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

005 [25 Pa. Code §123.41]

Limitations

A person may not 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.

006 [25 Pa. Code §123.42]

Exceptions

The limitations of 123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:

- (1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).
- (4) When arising from the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

007 Elective Restriction

Facility-wide VOC emissions shall not exceed 49.5 tons per year, calculated as a 12-month rolling total.

[From: Plan approval # 61-320-001, condition # 8]

II. TESTING REQUIREMENTS.

008 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured 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.

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.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the facility wide emissions based on the monthly usage of solvent in the process that contains VOC and the percentage of VOC content in the solvent.

010 [25 Pa. Code §135.5]

Recordkeeping

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with § § 135.3 and 135.21 (relating to reporting; and emission statements). These 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. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall report the VOC emission quarterly from all VOC emitting sources in the facility. Present month emission shall be added with previous 11 months emissions to get the 12 month rolling total for each month.

012 [25 Pa. Code §135.21]

Emission statements

- (a) Not applicable.
- (b) The owner or operator of each stationary source emitting oxides of nitrogen or VOC's shall provide the Department with a statement, in a form as the Department may prescribe, for classes or categories of sources, showing the actual emissions of oxides of nitrogen and VOCs from that source for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based. The statement shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.
- (c) Annual emission statements are due by March 1 for the preceding calendar year beginning with March 1, 1993, for calendar year 1992 and shall provide data consistent with requirements and guidance developed by the EPA. The guidance document is available from: United States Environmental Protection Agency, 401 M. Street, S.W., Washington, D.C. 20460. The Department may require more frequent submittals if the Department determines that one or more of the following applies:
 - (1) A more frequent submission is required by the EPA.
 - (2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the act.
 - (d) Not applicable.

013 [25 Pa. Code §135.3]

Reporting



- (a) The permittee shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the proceeding calendar year and sources modified during the same period which were not previously reported.
 - (b) Not applicable.
- (c) The source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

014 [25 Pa. Code §135.4]

Report format

All source reports shall contain sufficient information to enable the Department to complete its emission inventory. Source reports shall be made by the source owner or operator in a format specified by the Department.

VI. WORK PRACTICE REQUIREMENTS.

015 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in subsections (a)(1) -- (7) or (9) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
 - (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

[From: 25 Pa. Code §123.1 (c)]

016 [25 Pa. Code §129.14]

Open burning operations

- (a) Not applicable.
- (b) No person may permit the open burning of material in an area outside of air basins in a manner that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life or property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health.
 - (c) Exceptions: The requirements of subsections (a) and (b) do not apply 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) A 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) Not applicable.

61-00191

- (5) Not applicable.
- (6) A fire set solely for recreational or ceremonial purposes.
- (7) A fire set solely for cooking food.
- (d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:
 - (1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

- (2) Not applicable.
- (3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:
- (i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.
- (ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.
- (4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

[This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of Solid Waste Management Act.]

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.



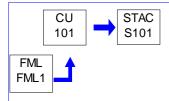




Source ID: 101 Source Name: PLANT HEATING SYSTEM

Source Capacity/Throughput: 1.300 MMBTU/HR

1.560 MCF/HR NATURAL GAS



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this process in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, 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).

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).



61-00191



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

61-00191



SECTION D. Source Level Requirements

Source ID: 103 Source Name: PRESSROOM (LITHOGRAPHIC PRESSES) (28 UNITS)

Source Capacity/Throughput: 39.000 Lbs/HR INK

PROC STAC Z103

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The printing presses VOC emissions shall not exceed 45 TPY based on 12 month rolling average.

[From: Plan Approval/Operating Permit # PA 61-320-001, Condition# 5]

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

This Sheet-fed Press General Permit shall also serve as a plan approval for sheet-fed offset lithographic printing press(es) that meet the requirements specified in (GP-7, Revision 2/2002 Conditions #17, #18, #19, and #20) Condition #009(1), (2), (3) and (4).

The installation or modification of sheet-fed offset lithographic printing press(es) that meet the following criteria are exempt from plan approval requirements:

- i. Emits volatile organic compounds (VOCs) at a rate less than 2.7 tons per year (tpy), and;
- ii. Emits a single hazardous air pollutant (HAP) at a rate less than 1 tpy, and;
- iii. Emits a combination of hazardous air pollutants (HAPs) rates less than 2.5 tons of all HAPs combined per year, or;
- iv. A cylinder width 17 inches or less.

Facilities claiming an exemption based on the emission based criteria (i) through (iii) must provide a 15-day prior written notification to the Department committing to limit VOC/HAP(s) emission increases to less that the specified levels.

The modification of a sheet-fed offset lithographic printing press would include the addition of a printing unit, coating unit, or other changes that would increase the facility's emission of VOCs or HAPs above the exemption levels stated in criteria (i) through (iii).

[From: General permit #GP-7, condition # 2]

[This condition is applicable to:(a) one- 8 color press with final coat and cut press, (b) one-8 color press with final aqueous coat, (c) two - 6 color press with final aqueous & (d) one-new 6 color press with final aqueous coat and cut press model #CD 102-6LX under GP-7].

003 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

- (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.
- (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.

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall, upon the request of the Department, provide input material analyses, or input material samples used in any sheet-fed offset lithographic printing press(es) permitted under this general permit.

[From: General Permit GP-7, condition #7]



[This condition is applicable to:(a) one- 8 color press with final coat and cut press, (b) one-8 color press with final aqueous coat, (c) two - 6 color press with final aqueous & (d) one-new 6 color press with final aqueous coat and cut press model #CD 102-6LX under GP-7].

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

1. Testing of Fountain Solutions:

Any owner/operator of a sheet-fed offset lithographic printing press(es) subject to this Sheet-fed Press General Permit shall determine the VOC content of fountain solution by one of the following procedures:

- a. Analysis by USEPA Method 24 of a fountain solution sample, or
- b. Calculation which combines USEPA Method 24 analytical VOC content data for the concentrated materials used to prepare the press ready fountain solution and records of the proportions in which they are mixed. The calculation shall only be performed once for each press ready fountain solution and kept in the form of a batch log, an example of which is attached. The analysis of the concentrated fountain solution may be performed by the supplier(s) of those materials.
- 2. Testing of Blanket and Roller Cleaning Solutions

Any owner/operator of a sheet-fed offset lithographic printing press(es) subject to this Sheet-fed Press General Permit shall determine the VOC content or VOC composite partial vapor pressure of cleaning solutions shall be determined by one of the following procedures:

- a. Analysis by USEPA Method 24 of a cleaning solution sample for VOC content or by an appropriate method for composite partial vapor pressure, or;
- b. Calculation which combines USEPA Method 24 analytical VOC content data for the concentrated materials used to prepare the press ready cleaning solution and records of the proportions in which they are mixed. The calculation shall only be performed once for each press ready cleaning solution and kept in the form of a batch log, an example of which is attached. The analysis of the concentrated cleaning solution may be performed by the supplier(s) of those materials, or;
- c. Calculation for VOC composite partial vapor pressure which combines analytical VOC vapor pressure data for the concentrated materials used to prepare the press ready cleaning solution and records of the proportions in which they are mixed. The analysis and vapor pressure determinations of the concentrated material(s) may be performed by the suppliers(s) of the material(s).

[From: General Permit GP-7, conditions #21 & #22]

[This condition is applicable to:(a) one- 8 color press with final coat and cut press, (b) one-8 color press with final aqueous coat, (c) two - 6 color press with final aqueous & (d) one-new 6 color press with final aqueous coat and cut press model #CD 102-6LX under GP-7].

006 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

- (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) Not applicable.
 - (2) Not applicable.
- (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.





III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Monitoring Requirements for Automatic Blanket Wash Systems:

Any owner/operator of a sheet-fed offset lithographic printing press(es) subject to this Sheet-fed Press General Permit using an automatic blanket wash system that mixes cleaning solution at the point of application must demonstrate compliance with the VOC limitation in Condition 18(a) or (b), shall document that flow meters or fixed volume spray systems result in the VOC content of the mixed solution complies with (GP-7 Condition 18(a) or (b)) #009 (1) or (2).

[From:General Permit GP-7, condition # 23]

[This condition is applicable to:(a) one- 8 color press with final coat and cut press, (b) one-8 color press with final aqueous coat, (c) two - 6 color press with final aqueous & (d) one-new 6 color press with final aqueous coat and cut press model #CD 102-6LX under GP-7].

008 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

- (e) Compliance and monitoring requirements.
- (1) Not applicable.
- (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-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.
- (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 pressready (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 pressready (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.

61-00191

- (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

IV. RECORDKEEPING REQUIREMENTS.

009 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Monthly recordkeeping of the amount of inks and solvents used shall be kept at the facility for five (5) years and be made available to the Department upon request.

[From Plan Approval & Operating Permit # PA-60-320-001, Condition #7]

010 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Recordkeeping Requirements:

Any owner/operator of a sheet-fed offset lithographic printing press(es) subject to this Sheet-fed Press General Permit shall collect and record the applicable information specified in this Condition. The information shall be maintained at the facility for a minimum of 5 years and shall be made available to an authorized Department representative at any time during normal working hours. The information required is:

- (a) For each sheet-fed offset lithographic ink or conventional varnish used: the monthly consumption in pounds or gallons; the percent by weight VOC and HAP content, as applied; and, an estimate of VOC and HAP emissions. Alternately, the ink with the highest VOC and HAP content may be used to represent all inks used by all sheet-fed offset lithographic printing presses.
- (b) For each fountain solution and additive: the monthly consumption in pounds or gallons; the percent by weight or weight to volume ratio (lbs/gal) VOC and HAP content, and, an estimate of VOC and HAP emissions.
- (c) For each blanket and roller cleaning solution used: the monthly consumption in pounds or gallons; the percent by weight or weight to volume ratio (lbs/gal) VOC and HAP content, and, an estimate of VOC and HAP emissions.
- (d) For each month of operation, the volume of all cleaning solution used which does not meet (GP-7 Condition 18(a) or (b)) Condition #009 (1) and (2).
- (e) For each month of operation, an estimate of VOC and HAP emissions during the latest 12 months.

[From:General Permit GP-7, condition # 24]

[This condition is applicable to:(a) one- 8 color press with final coat and cut press, (b) one-8 color press with final aqueous coat, (c) two - 6 color press with final aqueous & (d) one-new 6 color press with final aqueous coat and cut press model #CD 102-6LX under GP-7].

011 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.





- (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) Not 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).
 - (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) Not applicable.
 - (4) Not applicable.

V. REPORTING REQUIREMENTS.

012 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The company shall submit quarterly reports indicating facility VOC emissions. This report should include VOC emissions from the printing presses and from other VOC sources located at the facility.

[From Plan Approval & Operating Permit # PA-61-320-001, Condition #9]

013 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

- (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 two (2) year recordkeeping requirement has been streamlined out due to the five (5) year requirement, referenced in condition #010]
 - (2) Not applicable.

VI. WORK PRACTICE REQUIREMENTS.

014 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(1) Equipment standards for fountain solutions:



Any sheet-fed offset lithographic printing press(es) subject to this Sheet-fed Press General Permit shall meet one of the following requirements for the fountain solution used on that press:

- a. Maintain the as applied VOC content of the fountain solution at or below 5.0 percent by weight, or;
- b. Maintain the as applied VOC content of the fountain solution at or below 8.5 percent, by weight, and refrigerate the fountain solution to 60°F or less.
- (2) Equipment Standards for Blanket and Roller Cleaning Solutions:

Any blanket and roller cleaning solution used on a sheet-fed offset lithographic printing press subject to this Sheet-fed Press General Permit shall meet one of the following requirements:

- a. VOC content, as applied, is less than or equal to 30 percent by weight, or;
- b. VOC composite partial vapor pressure, as used, is less than or equal to 10 mm Hg at 20°C (68°F).
- c. The use of cleaning solutions not meeting Conditions 18(a) or (b) is permitted provided that the quantity used does not exceed 55 gallons over any twelve consecutive months.
- (3) Equipment Standards for Solvent Containers:

Any owner/operator of a sheet-fed offset lithographic printing press(es) subject to this Sheet-fed Press General Permit shall keep all solvent containers closed at all times unless filling, draining, or performing cleanup operations.

(4) Equipment Standards for Solvent Laden Shop Towels:

Any owner/operator of a sheet-fed offset lithographic printing press(es) subject to this Sheet-fed Press General Permit shall keep all solvent laden shop towels in a closed container when not being used.

[From: General Permit GP-7, condition # 17, #18, #19 and #20]

[This condition is applicable to:(a) one- 8 color press with final coat and cut press, (b) one-8 color press with final aqueous coat, (c) two - 6 color press with final aqueous & (d) one-new 6 color press with final aqueous coat and cut press model #CD 102-6LX under GP-7].

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall operate the source in a manner as not to cause air pollution.
- (b) The permittee shall operate and maintained the source in a manner consistent with good operating and maintenance practices.

016 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

- (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).

VII. ADDITIONAL REQUIREMENTS.

017 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

- (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) Not applicable.
- (ii) Letterpress printing. One or more letterpress printing presses if the total actual VOC emissions from all inks (including varnishes), coatings and adhesives combined from all letterpress 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.
- (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) Not applicable.
 - (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 (I) 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 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).

018 [25 Pa. Code §129.67b]

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

- (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:

n

(Wi)(VPi)/MWi

i=1

PPc =

kn

Ww/MWw + We/MWe + Wi/MWi

e=1i=1

Where:

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.
- (I) 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 sheet-fed 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 sheet-fed 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:
 - (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).





Source ID: 104 Source Name: MISCELLANEOUS FUGITIVE EMISSION SOURCE

Source Capacity/Throughput:



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.

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.

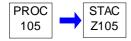
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).





Source ID: 105 Source Name: DEGREASER UNITS (3)

Source Capacity/Throughput:



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.

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.

001 [25 Pa. Code §129.63]

Degreasing operations

- (a) Cold cleaning machines. Except for those subject to the Federal National emissions standards for hazardous air pollutants (NESHAP) for halogenated solvent cleaners under 40 CFR Part 63 (relating to National emission standards for hazardous air pollutants for source categories), this subsection applies to cold cleaning machines that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.
 - (1) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.
 - (2) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:
- (i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (3). In addition, the label shall include the following discretionary good operating practices:
- (A) 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.
 - (B) Not applicable
 - (C) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.





- (ii) 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 6 inches shall constitute an acceptable cover.
 - (3) Cold cleaning machines shall be operated in accordance with the following procedures:
- (i) 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.
- (ii) 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.
- (iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
 - (iv) Air agitated solvent baths may not be used.
 - (v) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.
- (4) After December 22, 2002, a person may not use, sell or offer for sale for 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.
- (5) On and after December 22, 2002, a person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:
 - (i) The name and address of the solvent supplier.
 - (ii) The type of solvent including the product or vendor identification number.
- (iii) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).
- (6) A person who operates a cold cleaning machine shall maintain for at least 2 years and shall provide to the Department, on request, the information specified in paragraph (5). 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.
 - (7) Paragraph (4) does not apply:
 - (i) To cold cleaning machines used in extreme cleaning service.
- (ii) If the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with paragraph (4) will result in unsafe operating conditions.
 - (iii) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.
- (b) (e) Not applicable.

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.

No Source Groups exist for this permit.





SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this permit.







SECTION G. Emission Restriction Summary.

Source Id	Source Description			
101	PLANT HEATING SYSTEM			
Emission Limit			Pollutant	
500.000	PPMV	Dry basis	SOX	
0.040	gr/DRY FT3		TSP	
103	PRESSROOM (LITH	OGRAPHIC PRESSES) (28 UNITS)		
Emission Limit			Pollutant	
45.000	Tons/Yr		VOC	

Site Emission Restriction Summary

Emission Limit		Pollutant	
49.500 Tons/Yr	Facility wide limit, 12-month rolling total	VOC	



61-00191



SECTION H. Miscellaneous.

- (a) For the purpose of this permit, Source 104 (Miscellaneous Fugitive Emission) comprised of the following:
- (1) Bindery & Labeling (Adhesive Used)
- (2) Solvent Storage Area.
- (3) Roads & Parking Lot.
- (4) All Other Plant Surface.
- (b) The following sources are considered insignificant activities, and there are no applicable requirements for these sources
- (1) Electric Oven (Blumer 1) 25,600 Btu
- (2) Electric Oven (Blumer 3) 40,000 Btu
- (3) Electric Oven (Cutter 28) 25,600 Btu
- (4) Electric Oven (Cutter 30) 43,000 Btu
- (5) Corona Treater, 3 KW Trivial activity as per RFD # 4093, Approved on 11/07/2014 and list #33.
- (c) Source ID # 103 consists of twenty eight Pressroom lithographic presses as follows:
- (i) one 8 color press with final coat and cut press
- (ii) one 8 color press with final aqueous coat
- (iii) one 6 color press with final aqueous coat
- (iv) one 6 color press with final aqueous coat and cut press
- (d) Source ID # 101: Plant Heating System consists of the following space heaters:

Location Model Input BTU/HR

YORK

Receiving South side DM240N32N4ATJ1D 400000 Receiving North side DM240N32N4ATJ1D 400000 Pressroom South side DM240N32N4ATJ1D 400000 Pressroom North side DM240N32N4ATJ1D 400000 Finishing South side DM240N32A4ATJ1 400000

Finishing North side 2J180S32A4BZZ30001A 400000 Shipping South side DF120N20N4ATJ2C 240000 Shipping North side DF120N20N4ATJ2C 240000

Weather-Rite

Warehouse East side IDF-125VTL 702000 Warehouse West side IDF-125VTL 702000

REZNOR

Office east side HSC200-5-2 200000
Office west side HSC200-5-2 200000
Press Room east side SC-200 200000
Press Room west side HSC200-52 200000

Total Heat input 5.084 MMBTU/hr





SECTION H. Miscellaneous.

- (e) The facility has three Doyle Sheet Cleaners (to remove paper dust) mounted on the feeder end of the presses which exhaust indoors. These sources are insignificant and there are no additional applicable requirements for these sources. The Sources are 1) JE Doyle 40 hbspeedmaster, SN#46832, 670 CFM, 2) JE Doyle, 40 hbdrupa, SN#45163, 670 CFM and 3) JE Doyle, 40 hbspeedmaster, SN#48748, 670 CFM.
- (f) This permit was reissued on 02/10/2009.
- (g) Plan approval 61-191B included the installation of plate processing equipment associated with 5 printing presses. The facility shall maintain records of VOC emissions from the plate processing, based on the square feet of plates produced and vendor emission factors provided of 0.0088 lbs VOC / sq. ft. plate. These VOC emissions will be counted towards the facility wide VOC limit.
- (h) This permit was administratively amended on September 3, 2010 to incorporate the requirements of plan approval 61-191B.
- (i) This permit was administratively amended on January 6, 2012 to incorporate the change in responsible official (now Art Hammond GM) and permit contact (now Edward Shadle Plant Manager).
- (j) This permit was renewed on March 18, 2014.
- (k) During the term of the state only operating permit expiring February 28, 2019, an additional degreasing unit was added to source 105. This unit will not cause the emissions from this source to be greater than 2.7 tons of VOC per year.
- (I) This permit was renewed on March 13, 2019, and expires on Feburary 29, 2024.
- (m) This permit was adminstratively amended on August 20, 2020 to correct the tax ID.





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