





COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: April 6, 2021 Effective Date: April 6, 2021

Expiration Date: April 5, 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: 09-00159

Federal Tax Id - Plant Code: 23-2249139-2

O	wner Information	
Name: COLORCON INC		
Mailing Address: 171 NEW BRITAIN BLVD		
CHALFONT, PA 18914-1833		
_		
F	lant Information	
Plant: COLORCON INC NO TOX PROD DIV/NEW B	RITAIN	
Location: 09 Bucks County	09932 New Britain Township	
SIC Code: 2893 Manufacturing - Printing Ink		
Re	sponsible Official	
Name: CATHERINE SORACE		
Title: EHS MGR		
Phone: (215) 616 - 6275		
Permit Contact Person		
Fei	THE CONTROL PERSON	
Name: MICHAEL GILBERT		
Title: GENERAL MGR		
Phone: (267) 695 - 7721		
[Signature]		
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER		





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

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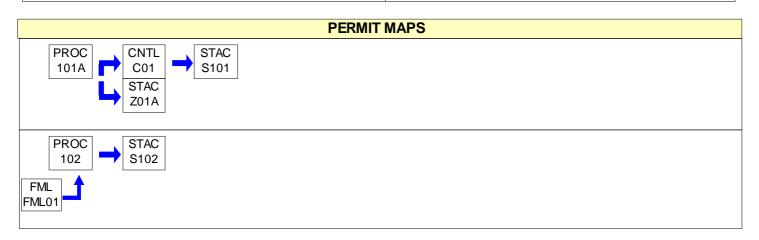
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SECTION A. Site Inventory List

Source	ID Source Name	Capacity/Throughput	Fuel/Material
101A	NO-TOX PRODUCTION AREA	N/A	SOLVENT
102	EMERGENCY GENERATOR SET (102 BHP)	5.200 Gal/HR	DIESEL FUEL
C01	NO-TOX PRODUCTION AREA DUST COLLECTOR		
FML01	DIESEL FUEL TANK		
S101	NO-TOX PRODUCTION AREA DUST COLLECTOR STACK		
S102	EMERGENCY GENERATOR SET STACK		
Z01A	NO-TOX PRODUCTION AREA FUGITIVE EMISSIONS		







#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.

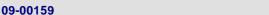
- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date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







- (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]

SECTION B. General State Only Requirements

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, 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:







- (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 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:



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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)







- (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.

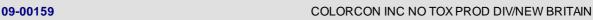
This permit does not convey any property rights of any sort, or any exclusive privileges.

#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).

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001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

- (a) construction or demolition of buildings or structures;
- (b) grading, paving and maintenance of roads and streets;
- (c) use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets;
- (d) clearing of land;
- (e) stockpiling of materials;
- (f) open burning operations, as specified in 25 Pa. Code § 129.14;
- (g) blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting;
- (h) coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in 25 Pa. Code §§ 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations); and
- (i) sources and classes of sources other than those identified in (a)-(h), above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) the emissions are of minor significance with respect to causing air pollution; and
- (2) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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 25 Pa. Code § 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

No person may 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.

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:

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

006 [25 Pa. Code §123.42]

Exceptions

The opacity limitations as per 25 Pa. Code § 123.41 shall not apply to a visible emission in either of the following instances:

- (a) When the presence of uncombined water is the only reason for failure to meet the limitations.
- (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 the sources specified in 25 Pa. Code § 123.1(a)(1)-(9) (relating to prohibition of certain fugitive emissions).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.443(b) and 127.449(a) and (d)(5).]

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 does not exceed 14.1 tons/yr, calculated monthly as a 12-month rolling sum.

008 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material in the Southeast Air Basin except where the open burning operations result from:

- (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) any 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; or
- (g) a fire set solely for cooking food.

II. TESTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139 and the most current version of the DEP Source Testing Manual, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §123.43]

Measuring techniques

Visible air contaminant emissions may be measured 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.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall monitor the facility, once per operating day, for the following:
- (1) odors which may be objectionable (as per 25 Pa. Code §123.31);



- (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
- (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).
- (b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site 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); and
 - (4) be recorded in a permanent written log.
- (c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next six month period.
- (d) After six (6) months of weekly monitoring, and 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 the compliance certification, complaints, monitoring results, and/or Department findings, as applicable.

IV. RECORDKEEPING REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

- (a) date, time, and location of the incident(s);
- (b) the cause of the event; and
- (c) the corrective action taken, if necessary, to abate the situation and prevent future occurrences.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

- (a) emissions increase of minor significance without notification to the Department.
- (b) de minimis increases with notification to the Department, via letter.
- (c) increases resulting from a Request for Determination (RFD) to the Department.
- (d) increases resulting from the issuance of a plan approval and subsequent operating permit.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the total VOC emissions from this facility on a monthly and 12-month rolling basis, calculated using Department-approved methods.

V. REPORTING REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. 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 preventive 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 and the County Emergency Management Agency by telephone within one (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 three (3) business days of the telephone report.
- (c) The report shall describe the following:
- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.
- (d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone 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 five (5) business days of discovery. The report shall contain the same information required by paragraph (c), 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 paragraphs (b)-(d), 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 resulted from 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.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also 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 requirements 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) which meets the requirements 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 a facility. The permittee shall submit the RMP to the federal Environmental Protection Agency 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 years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or,
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (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.



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SECTION C. **Site Level Requirements**

- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements 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:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If this facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When this facility is subject to the accidental release program requirements 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.

[25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that paste, solvent-based, and water-based inks are the only products manufactured at this facility.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the source(s) and air pollution control device(s), listed in this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturer's specifications.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall immediately, upon discovery, implement measures which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in this permit, is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to 25 Pa. Code Article III or any other applicable rule promulgated under the Clean Air Act.

[25 Pa. Code §127.441]

Operating permit terms and conditions.

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

021 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter 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, water, or other suitable chemicals, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts;
- (c) paving and maintenance of roadways; and
- (d) 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 by other means.

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.

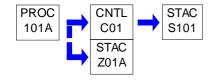




SECTION D. Source Level Requirements

Source ID: 101A Source Name: NO-TOX PRODUCTION AREA

Source Capacity/Throughput: N/A SOLVENT



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that emission into the outdoor atmosphere of PM from this No-Tox production area occurs in such a manner that the concentration of PM in the exhaust gas, as measured at the outlet of the associated dust collector (Source ID C01) using EPA Method 5, does not exceed 0.02 grains per dry standard cubic foot (gr/dscf).

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 123.13(b)]

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that emission into the outdoor atmosphere of PM from this No-Tox production area occurs in such a manner that the rate of the emission, as measured at the outlet of the associated dust collector (Source ID C01), does not exceed either 0.021 lbs/hr or 0.092 tons/yr, calculated monthly as a 12-month rolling sum.

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.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this No-Tox production area on a monthly basis:

- (a) The hours of operation.
- (b) The following for each type of ink (i.e., paste, solvent-based, and water-based):
 - (1) The number of batches produced.
 - (2) The amount produced (pounds or tons).
- (c) The amount of each VOC-containing cleanup solvent used (pounds or tons).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the differential pressure across the dust collector (Source ID C01) associated with this No-Tox production area on a continuous basis.







SECTION D. **Source Level Requirements**

RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for this No-Tox production area on a monthly and 12-month rolling basis:

- (a) The hours of operation.
- (b) The following for each type of ink:
 - (1) The number of batches produced.
 - (2) The amount produced (pounds or tons).
- (c) The amount of each VOC-containing cleanup solvent used (pounds or tons)

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the differential pressure across the dust collector (Source ID C01) associated with this No-Tox production area at least once per operating day.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following emissions from this No-Tox production area on a monthly and 12-month rolling basis, calculated using Department-approved methods:

- (a) The total PM emissions (pounds and tons).
- (b) The VOC emissions (pounds or tons) from ink production.
- (c) The VOC emissions (pounds or tons) from cleanup solvent usage.
- (d) The total VOC emissions (pounds and tons).

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.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall ensure that each mixing vessel associated with certain equipment of this No-Tox production area, as indicated in Condition # 013(a), Section D (under Source ID 101A), of this permit, is equipped with a cover that complies with the following requirements:
- (1) Completely covers the mixing vessel, except for an opening no larger than necessary to allow for safe clearance.
- (2) Is either of the following:
 - (i) Attached to the rim of the mixing vessel.
- (ii) Extends at least 0.5 inches beyond, and maintains contact with at least 90% of the circumference of, the rim of the mixing vessel.
- (b) The permittee shall ensure that the cover remains closed for any mixing vessel in use, except as necessary for







SECTION D. **Source Level Requirements**

production, sampling, maintenance, or inspection purposes.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the dust collector (Source ID C01) associated with this No-Tox production area is operating whenever ink materials are being processed in/by any weighing area or equipment of the No-Tox production area routed to it, as indicated in Condition # 013(b), Section D (under Source ID 101A), of this permit.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain a differential pressure gauge to indicate the differential pressure across the dust collector (Source ID C01) associated with this No-Tox production area. The dust collector shall operate within the differential pressure range of 1.5 - 3.5 inches of water.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the filter cartridges of the dust collector (Source ID C01) associated with this No-Tox production area are replaced as needed. A sufficient quantity of spare filter cartridges shall be kept on hand for replacement of any deteriorated filter cartridges.

[25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the following emissions from this No-Tox production area on a monthly and 12-month rolling basis:

- (a) The total PM emissions (pounds and tons), using a Department-approved method(s).
- (b) The VOC emissions indicated in Condition # 007(b) (d), Section D (under Source ID 101A), of this permit, using the following emission factors1:
 - (1) Production losses (lbs/100 lbs ink):

Type of lnk	VOCs	Source of Facto
Paste	0.156	NAPIM
Solvent-based	2.085	IES
Water-based	0.110	IES

(2) Cleaning losses (lbs/batch):

Type of Ink	Mixers/Mixing Vessels	Source of Factor	Mills	Source of Factor
Paste	1.378	IES/All4	3.077	IES
Solvent-based	1.378	IES/All4	1.433	Colorcon

NAPIM = National Association of Printing Ink Manufacturers Guide to Estimating VOC Emissions from Printing Ink Manufacturing, June 1996.

¹ Revised emission factors may be used instead, provided they are approved by the Department in advance.

IES = IES Engineers, Inc., Report, January 1995.

All4 = All4 Inc. Report, January 2011.

Colorcon = Colorcon, Inc.--No-Tox Products Division.





SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) This No-Tox production area source grouping consists of two weighing areas and the following equipment:

Equipment Type	Manufacturer	Quantity	Associated Mixing Vessel(s)	Associated Ink Type(s)
Dissolver/Mixer	Cowles Dissolver Co.	4	Yes	SB,WB
Dyno Mill	Willy A. Bachofen AG Maschinenfabrik	8	Yes	SB, WB
Mixer	Hockmeyer Equipment Corp.	5	Yes	Paste, SB, WB
Mixer	Myers Engineering, Inc.	1	Yes	Paste, SB, WB
Three-Roll Mill	J.H. Day Co.	3	No	Paste
Air-powered mixer	Indco (Vertical Tank)	1	Yes	Paste

WB = Water-based ink. SB = Solvent-based ink.

(b) PM emissions (generated during the hand-loading, mixing, and milling of ink materials) from all weighing areas and equipment of the No-Tox production area, except for the three-roll mills and one of three bench-scale Dyno mills, are individually picked up (via the use of a dedicated Nederman extractor arm²) and ducted to an associated reverse jet dust collector (Source ID C01), model no. TK 16DMK4, manufactured by Farr Air Pollution Control, Inc., before exhausting into the outdoor atmosphere. The dust collector is rated at 8,950 acfm exhaust gas flow and uses 16 cylindrical, pleated filter cartridges.

² Except for the other two bench-scale Dyno mills, which share a Nederman extractor arm.

DEP Auth ID: 1326113



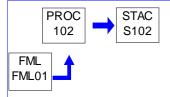




SECTION D. Source Level Requirements

Source ID: 102 Source Name: EMERGENCY GENERATOR SET (102 BHP)

Source Capacity/Throughput: 5.200 Gal/HR DIESEL FUEL



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

The permittee shall ensure that emission into the outdoor atmosphere of PM from the engine of this emergency generator set occurs in such a manner that the concentration of PM in the exhaust gas does not exceed 0.04 gr/dscf.

Fuel Restriction(s).

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6604]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

What fuel requirements must I meet if I own or operate an existing stationary CI RICE?

The permittee shall use only diesel fuel that meets the requirements of 40 CFR §80.510(b):

- i. A sulfur content of 15 ppm maximum, and
- ii. A minimum cetane index of 40; or maximum aromatic content of 35% volume.

[Compliance with this condition assures compliance with 25 Pa. Code §123.21.]

Operation Hours Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Total operating hours, including maintenance checks and readiness testing, shall not exceed 500 hours per year, calculated as a 12-month rolling sum.

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirement

Pursuant to 40 CFR 63.6640(f),

- (a) maintenance checks and readiness testing for this source shall not exceed 100 hours per calendar year.
- (b) non-emergency operation hours shall not exceed 50 hours per year, and are counted as part of the 100 hr/yr for maintenance and testing hours.







SECTION D. **Source Level Requirements**

TESTING REQUIREMENTS.

005 [25 Pa. Code §139.16]

Sulfur in fuel oil.

- (a) The following are applicable to tests for the analysis of fuel for sulfur content:
- (1) The fuel sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).
- (2) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).
- (3) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).
- (b) The testing requirements in subpart (a) above, shall be waived in the event that a delivery receipt from the supplier, showing the sulfur content in the fuel, is obtained each time a fuel delivery is made.

MONITORING REQUIREMENTS. III.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following:

- (a) startup and shutdown time, operating status (such as maintenance and emergency), when it is in operation, and
- (b) emergency operating hours and non-emergency operating hours for each operation.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain the following records:

- (a) starting and ending times, and reasons in services when it is in operation.
- (b) operating hours for maintenance checks and readiness testing, non-emergency, and emergency operation, monthly.
- (c) total operating hours calculated as a 12-month rolling sum, monthly.
- (d) as per calendar year (annually),
- (i) total maintenance checks and readiness test hours and non-emergency hours, and
- (ii) total emergency operating hours.
- (e) a copy of manufacturer's operating and maintenance specifications.

[Compliance with this condition assures compliance with 40 CFR §63.6655(f).]

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following information, for each shipment of diesel fuel received, obtained either by laboratory analysis or from the fuel supplier's certification:

- (a) Sulfur content.
- (b) Cetane index or aromatic content.







SECTION D. Source Level 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.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of an emergency generator set, model no. 60DGCB, manufactured by Cummins Power Systems, Inc., comprised of the following equipment:

- (a) A four-cylinder, diesel fuel-fired engine, model no. 4BT3.9-G2. The engine is rated at 102 bhp power output and has a displacement of 0.975 L per cylinder.
- (b) An electric generator rated at 60 ekW power output.

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6603]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

The permittee shall do the following:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
- [Sources have the option to utilize an oil analysis program as described in 40 CFR §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d 40 CFR Part 63, Subpart ZZZZ.]
- (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in this condition, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

What are my monitoring, installation, operation, and maintenance requirements?

(a) The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.







SECTION D. **Source Level Requirements**

(b) The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal **Combustion Engines**

What records must I keep?

The permittee shall keep the following records:

- (1) the occurrence and duration of each malfunction of operation, or monitoring equipment;
- (2) the maintenance performed on this source;
- (3) the actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and monitoring equipment to its normal manner of operation; and
- (4) operating hours that is recorded through its non-resettable hour meter, including the hours for emergency operation and the hours for non-emergency operation.

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6675]

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal **Combustion Engines**

What definitions apply to this subpart?

Since this source is considered emergency, it shall comply with the work practice requirements of the most recent version of 40 CFR § 63.6640(f). If it is not operated in accordance with these requirements, the engines will not be considered emergency, and shall comply with all applicable requirements for non-emergency engine.



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 Descriptior	
101A	NO-TOX PRODUCTION AREA	
Emission Limit		Pollutant
0.020	gr/DRY FT3	TSP
0.021	Lbs/Hr	TSP
0.092	Tons/Yr	TSP
102	EMERGENCY GENERATOR SET (102 BHP)	
Emission Limit		Pollutant
0.040	gr/DRY FT3	TSP

Site Emission Restriction Summary

Emission Limit		Pollutant	
14.100 Tons/Yr	12-Month Rolling Sum, Calculated Monthly	VOC	





09-00159

(a) Previously-issued Plan Approval No. PA-09-0159 serves as the basis for certain terms and conditions set forth in this permit (AUTH ID 566128, 3/2005).

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

- (1) A natural gas-fired boiler, model no. FV1107SNG, manufactured by Burnham Corp. The boiler is rated at 1.281 mmBtu/hr heat input.
- (2) Three natural gas-fired space heaters, model no. PV300AE0130, manufactured by Modine Manufacturing Co. Each space heater is rated at 0.3 mmBtu/hr heat input (0.9 mmBtu/hr heat input total).
- (3) A natural gas-fired water heater, model no. BT 80 110, manufactured by A.O. Smith Corp. The water heater is rated at 0.076 mmBtu/hr heat input.
- (4) Four laboratories (quality control, research and development, samples, and technical service), each with a dedicated hood (and some with a Nederman extractor arm(s) ducted to the hood).
 - (5) A solvent distillation unit, model no. M200, manufactured by D.W. Renzmann Apparatebau GmbH.
 - (6) A process waste pit with waste water sump pump.
 - (7) A 10,000-gal wastewater collection tank associated with (b)(6), above.
- (b) This permit is a renewal of State Only Operating Permit No. 09-00159, originally issued on February 25, 2005 (APS ID 464323, Auth ID 566128). The following is a listing of the changes reflected in this permit (APS ID 464323, Auth ID 808132, 3/2011):
 - (1) The owner name has been changed to Colorcon, Inc.
 - (2) The plant name has been expanded to "Colorcon, Inc.--No-Tox Products Division."
 - (3) The phrase "No-Tox Division" has been removed from the title of the responsible official/permit contact person.
- (4) The source IDs and names for the following source grouping, source, control device, emission points, and emission point grouping, where applicable, have been changed (<added to source ID or name>, [deleted from source name]):

Source ID	Source Name
101 <a>	No-Tox Production Area
102	<60-ekW> Emergency Generator <set></set>
C01	[Baghouse] <no-tox area="" collector="" dust="" production=""></no-tox>
S101	No-Tox < Production Area Dust Collector > Stack
S102	<60-ekW> Emergency Generator <set> Stack</set>
Z01 <a>	No-Tox < Production Area > Fugitive[s] < Emissions >

- (5) The following for the fuel throughput listing for Source ID 102 in Sections A and D, of the original permit (same location in this permit):
 - (i) A fuel throughput value has been added.
 - (ii) The type of fuel has been changed from No. 2 fuel oil to diesel fuel.
- (6) The term "air contaminant" has been added after the terms "fugitive" and "visible" in Conditions # 002(f), 006, 010, and 011(a)(2) (3) and (b), Section C, of the original permit (Conditions # 002(g), 006, 010, and 011(a)(2) (3) and (b), Section C, of this permit), where applicable.
- (7) An exception for emission into the outdoor atmosphere of fugitive air contaminants from certain types of open burning operations has been added to Condition # 002, Section C, of the original permit (same condition number in this permit), as Sub-condition (f).





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- (8) An additional authority citation to 25 Pa. Code § 127.443(b) has been added to each condition in this permit that is based on a condition found in (a), above.
 - (9) The following for Condition # 007, Section C, of the original permit (same condition number in this permit):
 - (i) The HAP emission restriction has been removed.
 - (ii) The VOC emission restriction has been changed from 10.1 tons/yr to 14.1 tons/yr.
 - (10) The following for Condition # 011, Section C, of the original permit (same condition number in this permit):
 - (i) The phrase "may be" in Sub-condition (a) has been changed to "the Department may determine to be."
 - (ii) The terms "particulate matter" and "particulate" have been removed from Sub-conditions (a)(3) and (b), respectively.
- (iii) The language in Sub-condition (b) has been revised to apply to any fugitive air contaminant emissions that originate on-site, not only to those that cross the property line.
 - (iv) The phrase "the compliance certification" has been removed from Sub-condition (e).
 - (11) The following for Condition # 012, Section C, of the original permit:
- (i) The requirements to maintain records of and calculate the total VOC emissions from the facility have been reorganized as Conditions # 015 and 023, Section C, of this permit, respectively.
 - (ii) The requirements to maintain records of and calculate the total HAP emissions from the facility have been removed.
 - (12) The following for Condition # 013, Section C, of the original permit (Condition # 012(a), Section C, of this permit):
 - (i) Items to be maintained for the record of deviations have been added as all or part of Sub-condition (a)(1) (3).
- (ii) A requirement that the monitoring be recorded and maintained in a Department-approved format and time frame has been added as Sub-condition (b).
- (13) A requirement to maintain records of all of the facility's emission increases has been added as Condition # 013, Section C, of this permit.
- (14) A requirement to maintain and make available, upon request by the Department, all records, reports, and analysis results used to comply with this permit has been added as Condition # 014, Section C, of this permit.
- (15) Items to describe in the written report of a malfunction(s) have been added to Condition # 014, Section C, of the original permit (Condition # 016, Section C, of this permit), as all or part of Sub-condition (c)(2) (4).
 - (16) Conditions # 015, 016(f)(2) and (g), and 018, Section C, of the original permit, have been removed.
- (17) The requirement to submit a source report for the preceding calendar year, if previously advised by the Department, and the statement that the permittee may request an extension of time from the Department for the filing of a source report, as indicated in Condition # 017, Section C, of the original permit, have been reorganized as Condition # 018(a) and (b), Section C, of this permit, respectively.
- (18) The total PM concentration and rate restrictions for the No-Tox production area, as indicated in Condition # 001(a) and (b) (c), Section D (under Source ID 101), of the original permit, respectively, have been reorganized as Conditions # 001 and 002(a) (b), Section D (under Source ID 101A), of this permit, respectively.
- (19) The following for Condition # 002, Section D (under Source ID 101), of the original permit (Condition # 003, Section D (under Source ID 101A), of this permit):
- (i) The requirement to monitor the HAP-containing cleanup solvent usage has been removed from Sub-condition (a) (reorganized as Sub-condition (c)).







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- (ii) A requirement to monitor the number of batches of each type of ink produced in the No-Tox production area has been added as Sub-condition (b)(1).
- (20) The requirements to maintain records of and calculate the total PM emissions from the No-Tox production area, as indicated in Condition # 003, Section D (under Source ID 101), of the original permit, have been reorganized as Conditions # 007(a) and 012(a), Section D (under Source ID 101A), of this permit, respectively.
- (21) The following for Condition # 004, Section D (under Source ID 101), of the original permit (Condition # 005, Section D (under Source ID 101A), of this permit):
- (i) A frequency of maintaining records of the number of batches of each type of ink produced in the No-Tox production area on a 12-month rolling basis has been added to Sub-condition (a)(1) (reorganized as Sub-condition (b)(1)).
 - (ii) Sub-condition (a)(3) has been removed.
- (iii) A frequency of maintaining records of the number of batches of each type of ink produced in the No-Tox production area on a 12-month rolling basis has been added to Sub-condition (a)(4) (reorganized as Sub-condition (b)(2)).
 - (iv) The following for Sub-condition (a)(2) (reorganized as Sub-condition (a)):
 - (A) The language has been changed to apply to the No-Tox production area, not to each type of ink.
- (B) A frequency of maintaining records of the hours of operation for the No-Tox production area on a 12-month rolling basis has been added.
 - (v) The following for Sub-condition (a)(5):
 - (A) It has been reorganized as Condition # 007(b), Section D (under Source ID 101A), of this permit.
- (B) A frequency of maintaining records of the VOC emissions from ink production for the No-Tox production area on a monthly and 12-month rolling basis has been added.
 - (vi) The following for Sub-condition (b)(1) (reorganized as Sub-condition (c)):
 - (A) The language has been changed to apply to each VOC-containing cleanup solvent, not to the total.
- (B) A frequency of maintaining records of the amount of each VOC-containing cleanup solvent used in the No-Tox production area on a 12-month rolling basis has been added.
 - (vii) The following for Sub-condition (b)(2):
- (A) The requirement to maintain records of the total VOC emissions from the No-Tox production area has been reorganized as Condition # 007(d), Section D (under Source ID 101A), of this permit.
 - (B) The requirement to maintain records of the total HAP emissions from the No-Tox production area has been removed.
- (C) A frequency of maintaining records of the total VOC emissions from the No-Tox production area on a monthly basis has been added.
- (22) A requirement to maintain records of the VOC emissions from cleanup solvent usage in the No-Tox production area, on a monthly and 12-month rolling basis, has been added as Condition # 007(c), Section D (under Source ID 101A), of this permit.
- (23) The language in Condition # 005, Section D (under Source ID 101), of the original permit (Condition # 009, Section D (under Source ID 101A), of this permit), has been revised to also apply to the weighing areas of the No-Tox production area, not only to the certain equipment of the No-Tox production area routed to the dust collector.
- (24) The source description for the No-Tox production area, as indicated in Condition # 007, Section D (under Source ID 101), of the original permit (Condition # 013(a), Section D (under Source ID 101A), of this permit), has been updated.





- (25) The following for Condition # 008(a) (c), Section D (under Source ID 101), of the original permit (Condition # 012(b)(1), Section D (under Source ID 101A), of this permit):
 - (i) It has been moved from Sub-section VII to Sub-section VI.
- (ii) The VOC emission factor for production losses for paste inks has been changed from 3.00 lbs VOC/100 lbs ink to 0.156 lbs VOC/100 lbs ink.
- (iii) The VOC emission factor for production losses for water-based inks has been expanded from 0.11 lbs VOC/100 lbs ink to 0.110 lbs VOC/100 lbs ink.
- (iv) The VOC emission factor for production losses for solvent-based inks has been expanded from 2.10 lbs VOC/100 lbs ink to 2.085 lbs VOC/100 lbs ink.
- (26) VOC emission factors for cleaning losses for paste and solvent-based inks have been added as Condition # 012(b)(2), Section D (under Source ID 101A), of this permit.
 - (27) Condition # 002, Section D (under Source ID 102), of the original permit, has been removed.
- (28) Requirements that diesel fuel be the only fuel consumed by the engine of the emergency generator set, the sulfur content of the diesel fuel not exceed 0.3%, by weight, and the application of any other fuels be approved by the Department prior to their application, have been added as Condition # 002, Section D (under Source ID 102), of this permit.
- (29) Requirements for obtaining a representative sample of the diesel fuel consumed by the engine of the emergency generator set and testing its sulfur content, and a statement that these requirements shall be waived for a given shipment of diesel fuel in the event that a fuel supplier's certification, conforming to the requirements of Condition # 007, Section D (under Source ID 102), of this permit, is obtained, have been added as Condition # 004(a)(1) and (2) and (b), Section D (under Source ID 102), of this permit, respectively.
- (30) The frequency of monitoring the hours of operation for the emergency generator set, as indicated in Condition # 004, Section D (under Source ID 102), of the original permit (Condition # 005(a), Section D (under Source ID 102), of this permit), has been changed from "continuously" to "each operating day."
- (31) Requirements to monitor and maintain records of the amount of diesel fuel consumed by the engine of the emergency generator set, on a monthly basis and monthly and 12-month rolling basis, respectively, have been added as Condition # 005(b) and 006(b), Section D (under Source ID 102), of this permit, respectively.
- (32) A requirement to maintain records of the sulfur content of each shipment of diesel fuel received for the engine of the emergency generator set by either laboratory analysis or fuel supplier's certification has been added as Condition # 007, Section D (under Source ID 102), of this permit.
- (33) A source description for the emergency generator set has been added as Condition # 008, Section D (under Source ID 102), of this permit.
 - (34) The following for Condition # 001, Section D (under Source ID C01), of the original permit:
 - (i) It has been reorganized as Condition # 009, Section D (under Source ID 101A), of this permit.
 - (ii) It has been moved from Sub-section I (as a control device efficiency restriction) to Sub-section VI.
- (35) Condition # 002, Section D (under Source ID C01), of the original permit, has been reorganized as Condition # 003, Section D (under Source ID 101A), of this permit.
- (36) Condition # 003, Section D (under Source ID C01), of the original permit, has been reorganized as Condition # 005, Section D (under Source ID 101A), of this permit.
 - (37) Condition # 004, Section D (under Source ID C01), of the original permit, has been removed.
- (38) Condition # 005, Section D (under Source ID C01), of the original permit, has been reorganized as Condition # 010, Section







D (under Source ID 101A), of this permit.

- (39) The following for Source ID 101 in Section F, of the original permit (same location in this permit):
 - (i) The PM emission concentration restriction has been removed.
- (ii) The pollutant specified in the PM emission rate restrictions has been changed from P000 to total suspended particulate (TSP) (no change in meaning).
 - (40) The following for Source ID 102 in Section F, of the original permit (same location in this permit):
- (i) The pollutant specified in the PM emission concentration restriction has been changed from P000 to TSP (no change in meaning).
 - (ii) The sulfur oxides (SOx) emission concentration restriction has been removed.
- (41) The site-level VOC emission restriction, as indicated in Section F, of the original permit (same location in this permit), has been changed from 10.1 tons/yr to 14.1 tons/yr.
- (c) This permit has been renewed in accordance with Auth ID # 1084706 and APS ID # 464323 with the following changes (3/2016):
 - (i) Source ID 102 has been updated with applicable 40 CFR Part 63 Subpart ZZZZ regulations.
 - (ii) The operating permit contact person and responsible official have been changed from Michael F. Gettis to Knut Fenner.
- (iii) A letter from the department dated September 27, 2013, authorizes the permittee to monitor the facility for objectionable odors, visible air contaminant emissions and fugitive air contaminant emissions on a monthly basis.
- (d) This permit has been renewed with the following changes (AUTH ID 1326113, 3/2021):
 - (i) The changes made under RFD No. 8539 have been incorporated into Source ID 101A.



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