



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY NATURAL MINOR OPERATING PERMIT

Issue Date: April 4, 2023 Effective Date: April 4, 2023

Expiration Date: April 3, 2028

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

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

State Only Permit No: 46-00199

Natural Minor

Federal Tax Id - Plant Code: 23-1640799-2

Owner Information Name: ALCOM PRINTING GROUP INC Mailing Address: 140 CHRISTOPHER LN HARLEYSVILLE, PA 19438-2034 Plant Information Plant: ALCOM PRINTING/HARLEYSVILLE PLT Location: 46 46938 Lower Salford Township Montgomery County SIC Code: 2752 Manufacturing - Commercial Printing, Lithographic Responsible Official Name: ERIC HURLOCK Title: EHS MANAGER Phone: (215) 513 - 1600 Ext.367 Email: ehurlock@alcomprinting.com **Permit Contact Person** Name: DOUGLAS P YEAGER Title: CHIEF OPERATIONS OFFICER Phone: (215) 513 - 1600 Email: dyeager@alcomprinting.com [Signature] JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER



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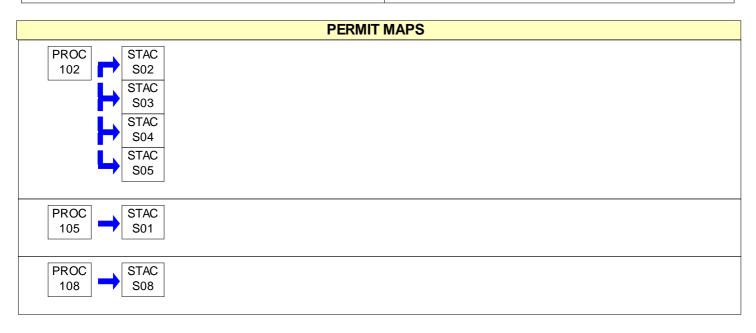
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SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
102	PRESS 2- HEIDELBERG540 5-STATION SHEETFED OFFSET LITHO PRESS		
105	PRESS 5 - SOLNA 2, 4 STATION WEB-OFFSET LITHO PRESS		
107	PRESS 7 - TENSOR 1400, WEB-OFFSET LITHO PRINTING PRESS		
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110	PRESS 10 - HEIDELBERG V30, WEB OFFSET LITHO PRESS		
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S08	HEIDELBERG PRESS EXHAUST (PRESS 108)		





SECTION B. General State Only Requirements

#001 [25 Pa. Code § 121.1]

Definitions.

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

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

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

Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
 - (1) For a synthetic minor facility, a fee equal to:
 - (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
 - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
 - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.



SECTION B. General State Only Requirements

- (2) For a facility that is not a synthetic minor, a fee equal to:
 - (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
 - (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
 - (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.
- (b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

Transfer of Operating Permits.

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and a written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee and a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

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

Inspection and Entry.

- (a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
 - (2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

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

Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:





- (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:





- (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.



SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall limit facility wide hazardous air pollutant (HAP) emissions to less than 10 tons per year any individual HAP, based on a 12-month rolling sum.
- (b) The permittee shall limit facility wide volatile organic compound (VOC) emissions, including any hazardous air pollutants, to less than 17 tons per year, based on a 12-month rolling basis. The VOC emission limit shall include emissions of VOCs generated from inks, coatings, fountain solutions, and press-cleaning operations.

[Condition (b) is more stringent than and streamlines the facility wide HAP emission limit of 25 tons per year, based on a 12-month rolling sum, any combination HAP.]

002 [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).

003 [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, as specified in 25 Pa. Code § 129.14.
- (7) N/A
- (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) of this condition, for which the permittee 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.

004 [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) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

005 [25 Pa. Code §123.31]

Limitations

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.

006 [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.





(b) Equal to or greater than 60% at any time.

007 [25 Pa. Code §123.42]

Exceptions

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

- (a) When the presence of uncombined water is the only reason for failure of the emission 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) (relating to prohibition of certain fugitive emissions).

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 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.
- (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 (if applicable), complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) Deminimus increases without notification to the Department.
- (b) Deminimus increases with notification to the Department by letter.
- (c) Increases resulting from a Request for Determination to the Department.
- (d) Increases resulting from the issuance of a Plan Approval and subsequent Operating Permit.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep on hand at all times either Certified Product Data Sheets (CPDS), or Safety Data Sheets (SDS) for each chemical (including all inks and solutions) used at the facility which contains VOCs or HAPs.

014 [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.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of facility-wide VOC and HAP emissions, including 12-monthly rolling sums.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall keep the facility-wide usage (in gallons) of all cleaning solutions, which do not meet the standards



as specified in §129.67b(c)(ii) monthly, as a 12-month rolling sum.

(b) The facility-wide usage specified in paragraph (a), above, shall not exceed 110 gallons per year, as per Condition #001, under Group A in Section E of this permit.

V. REPORTING REQUIREMENTS.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit 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.
- (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.





018 [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.

019 [25 Pa. Code §135.3]

Reporting

The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from all 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, including those sources listed in the Miscellaneous Section of this permit.

The permittee 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.

VI. WORK PRACTICE REQUIREMENTS.

020 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions





A person responsible for any source(s) specified in Condition #003 of this Section 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 chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (b) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
 - (c) Paving and maintenance of roadways.
- (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 other means.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

022 [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 Section A, of 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.

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that all sources and air cleaning devices are operated and maintained in accordance with manufacturer's specifications and good air pollution control practices.

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.



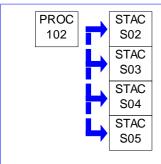
SECTION D. Source Level Requirements

Source ID: 102 Source Name: PRESS 2- HEIDELBERG540 5-STATION SHEETFED OFFSET LITHO PRESS

Source Capacity/Throughput:

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

GROUP B



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) This source is Heidelberg 540, 5-Station, Sheetfed Offset Lithographic Printing Press with Coater.
- (b) This source is subject to 25 Pa. Code §129.67b. Compliance with 25 Pa. Code 129.67b assures compliance with 25 Pa. Code §129.52.



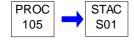
SECTION D. Source Level Requirements

Source ID: 105 Source Name: PRESS 5 - SOLNA 2, 4 STATION WEB-OFFSET LITHO PRESS

Source Capacity/Throughput:

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

GROUP B



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) This source is a Solna 2, 4-Station, Web-offset Lithographic Printing Press.

(b) This source is subject to 25 Pa. Code §129.67b.



SECTION D. Source Level Requirements

Source ID: 107 Source Name: PRESS 7 - TENSOR 1400, WEB-OFFSET LITHO PRINTING PRESS

Source Capacity/Throughput:

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

GROUP B

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) This source is a Tenser 1400, 2-Station, Web-offset Lithographic Printing Press.
- (b) This source is subject to 25 Pa. Code §129.67b.



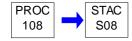
SECTION D. Source Level Requirements

Source ID: 108 Source Name: PRESS 8 - HEIDELBERG 105 6 STATION SHEETFED LITHO PRESS

Source Capacity/Throughput:

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

GROUP B



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) This source is a Heidelberg 105, 6-Station, Sheetfed Offset Lithographic Printing Press with Coater.
- (b) This source is subject to 25 Pa. Code §129.67b. Compliance with 25 Pa. Code 129.67b assures compliance with 25 Pa. Code §129.52.





SECTION D. Source Level Requirements

Source ID: 110 Source Name: PRESS 10 - HEIDELBERG V30, WEB OFFSET LITHO PRESS

Source Capacity/Throughput:

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

GROUP B

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) This source is a Heidelberg Model V30-4 (4 Station) Web Offset Lithographic Printing Press.

(b) This source is subject to 25 Pa. Code §129.67b.



SECTION D. Source Level Requirements

Source ID: 112 Source Name: PRESS 12 - HEIDELBERG CX102 6 STATION SHEETFED LITHO PRESS

Source Capacity/Throughput:

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

GROUP B

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) This source is a Heidelberg CX 102, 6-Station Sheetfed Offset Lithographic Printing Press with Coater.
- (b) This source is subject to 25 Pa. Code §129.67b. Compliance with 25 Pa. Code 129.67b assures compliance with 25 Pa. Code §129.52.





Group Name: GROUP A

Group Description: All presses §129.67b

Sources included in this group

ID	Name
102	PRESS 2- HEIDELBERG540 5-STATION SHEETFED OFFSET LITHO PRESS
105	PRESS 5 - SOLNA 2, 4 STATION WEB-OFFSET LITHO PRESS
107	PRESS 7 - TENSOR 1400, WEB-OFFSET LITHO PRINTING PRESS
108	PRESS 8 - HEIDELBERG 105 6 STATION SHEETFED LITHO PRESS
110	PRESS 10 - HEIDELBERG V30, WEB OFFSET LITHO PRESS
112	PRESS 12 - HEIDELBERG CX102 6 STATION SHEETFED LITHO PRESS

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §129.67b]

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

§129.67b(c)(1) - Cleaning Solutions

Cleaning solutions shall meet the following standards:

- (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) above is limited to 110 gallons per year, combined, of all cleaning solutions that exceed the limits in subparagraph (i).

129.67b(c)(2) - Fountain solutions

Except as specified in §129.67b(c)(3), the permittee 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.





II. TESTING REQUIREMENTS.

002 [25 Pa. Code §129.67b]

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

§129.67b(h)(1) - Sampling and testing

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.

§129.67b(h)(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.

The permittee shall keep records for the test results.

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §129.67b]

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

§129.67b(a)(2) - Emission Calculations

The permittee may use the VOC emission retention factors to determine the amount of potential or actual VOC emissions from the inks, fountain solutions and cleaning solutions used on the offset lithographic printing presses.

004 [25 Pa. Code §129.67b]

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

§129.67b(e)(2) - Fountain solution

The permittee shall monitor and 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 SDS, 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 25 Pa. Code § 129.67b(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:
 - (1) Be corrected for temperature one time per 8-hour shift.
 - (2) Have a visual, analog or digital readout with an accuracy of 0.5%.
 - (3) 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 25 Pa. Code § 129.67b(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.

005 [25 Pa. Code §129.67b]

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

§129.67b(e)(3) - Cleaning solution.

The permittee shall monitor and demonstrate compliance with the VOC content limit or VOC composite partial vapor pressure limit for cleaning solutions in §129.67b(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 25 Pa. Code § 129.67b(j) to calculate the composite partial vapor pressure of the press-ready (as applied) cleaning solution.
- (iii) Use of the methods in 25 Pa. Code § 129.67b(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 press-ready (as applied) cleaning solution may be performed or the VOC composite partial vapor pressure data may be determined by the supplier of the components or additives and these results provided to the owner or operator of the affected press.





- (vi) Another method to determine compliance with the VOC content limits for cleaning solutions in 25 Pa. Code § 129.67b(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.

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.

006 [25 Pa. Code §129.67b]

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

§129.67b(i) - Work practice requirements

§129.67b(i)(1)

The permittee 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.

§129.67b(i)(2)

The requirements in §129.67b(i)(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.

§129.67b(i)(3)

The requirements in §129.67b(i)(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.





SECTION E. Source Group Restrictions.

- (iv) Using janitorial supplies 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.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §129.67b]

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

§129.67b(d) - Emission limits for heatset web offset lithographic printing presses and letterpress printing presses

Pursuant to \$129.67b(d)(3), Emission Limits [\$129.67b(d)] do not apply to the facility as all lithographic printing presses at this facility are Non-Heatset presses.

008 [25 Pa. Code §129.67b]

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

The permittee shall determine VOC retention factors, vapor pressure of single and/or composite partial vapor pressure according to the provisions found in §129.67b.



SECTION E. Source Group Restrictions.

Group Name: GROUP B

Group Description: All presses §§ 127.441 and 129.67b(f)

Sources included in this group

ID	Name
102	PRESS 2- HEIDELBERG540 5-STATION SHEETFED OFFSET LITHO PRESS
105	PRESS 5 - SOLNA 2, 4 STATION WEB-OFFSET LITHO PRESS
107	PRESS 7 - TENSOR 1400, WEB-OFFSET LITHO PRINTING PRESS
108	PRESS 8 - HEIDELBERG 105 6 STATION SHEETFED LITHO PRESS
110	PRESS 10 - HEIDELBERG V30, WEB OFFSET LITHO PRESS
112	PRESS 12 - HEIDELBERG CX102 6 STATION SHEETFED LITHO PRESS

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following for each press:

- (a) for each offset lithographic printing ink (including varnish), coating, and adhesive used on a monthly basis:
- (1) name, identification number, specific gravity or density,
- (2) consumption, in pounds or gallons,
- (3) VOC and HAP content as supplied.
- (4) Alternately, the ink with the highest VOC and HAP content may be used to represent all inks used by all offset lithographic printing presses.
- (b) the volume of the cleaning solution used which does not meet the standards as specified in 25 §129.67b(c)(ii) [a higher VOC composite partial vapor pressure, or higher VOC content] on a monthly basis.
- (c) the fountain solution temperature on a daily basis, when the permittee opts to use the refrigeration system.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following for this press:

- (a) for each offset lithographic printing ink (including varnish), coating, and adhesive used on a monthly basis:
- (1) name, identification number, specific gravity or density,
- (2) consumption, in pounds or gallons,
- (3) VOC and HAP content as supplied.
- (4) Alternately, the ink with the highest VOC and HAP content may be used to represent all inks used by all offset lithographic printing presses.
- (b) the volume of the cleaning solution used which does not meet the standards as specified in 25 §129.67b(c)(ii) [a higher VOC composite partial vapor pressure, or higher VOC content] on a monthly basis.
- (c) the fountain solution temperature on a daily basis, when the permittee opts to use the refrigeration system.





(d) the total VOC and HAP emissions from this source on a monthly basis, including 12-month rolling sums.

[Compliance with this permit condition assures compliance with § 129.51(d).]

003 [25 Pa. Code §129.67b]

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

The permittee shall keep the following records:

§129.67b(f)(2): the amount of cleaning solutions and fountain solutions consumed at the facility monthly, 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.
 - (D) Records of cleaning solution monitoring as required under §129.67b(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 §129.67b(e)(2) [as specified under Group A in Section E of this permit].

§129.67b(f)(3): The permittee claiming exemption from a VOC control provision of this section based on potential or actual VOC emissions, as applicable, shall maintain records that demonstrate to the Department that the press or facility is exempt.

§129.67b(f)(4): The permittee may group materials into classes using the highest VOC content in any material in a class to represent that class of material.

[Compliance with this permit condition assures compliance with § 129.51(d).]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





SECTION G. Emission Restriction Summary.

Source Id

Source Description

Site Emission Restriction Summary

Emission Limit		Pollutant	
17.000 Tons/Yr	Total of VOCs and any combination HAPs	VOC	
10.000 Tons/Yr	Individual HAPs	Hazardous Air Pollutants	





SECTION H. Miscellaneous.

- (a) Certain terms and conditions for this State Only permit have been derived from the previously issued General Permit 46-320-035GP (Source ID 106 Press No. 6) and Plan Approval PA-46-0199 (Source ID 101 Press No. 1, 102 Press No. 2, 103 Press No. 3, 104 Press No. 4, and 105 Press No. 5).
- (b) December 2007 This Operating Permit, APS # 311126, AUTH # 683282 has been renewed.
 - (1) The information in Section A is for informational purposes only.
- (2) Press 4 is no longer a 3 over 3 press. A 4th unit was added in December of 2003, an RFD was submitted 10/24/2003 (#46-A01-2172). Press 4 is now designated as Solna 4 over 4 Solna III by the company.
- (c) December 2012 This Operating Permit, APS # 311126, AUTH # 931204 has been renewed; the following has been addressed with this permit renewal:
 - (1) The permit contact has been updated from Steve Hagan (VP Manufacturing) to Douglas P. Yeager (Chief Operations Officer).
- (2) Each press name has been revised to include press manufacturer, number of stations, and type of lithographic press for clarity and accuracy.
- (3) Press No. 7 Tensor 1400, 2-Station, Web-Offset Lithographic Printing Press, previously operating under General Permit No. GP10-46-0040, has been added to the permit as Source ID 107. The source now appears in Section A (Site Inventory) as Source ID 107 with applicable requirements listed in Section D (Source Level) of the permit.
- (4) Monitoring and recordkeeping requirements for each press have been revised to be more consistent with conditions derived from General Permit No. 7 (Sheet-fed Offset Lithographic Printing Press) and General Permit No. 10 (Non-heatset Web Offset Lithographic Printing Press).
- (5) The VOC and HAP emission limit at Press No. 6 has been removed; only facility-wide VOC and HAP emission limits apply to the facility. VOC and HAP recordkeeping requirements remain applicable per press.
 - (6) The following sources are exempt from plan approval and operating requirements:
 - (i) Additional Station Press No. 4 (Source ID 104) RFD No. 46-A01-2172 (November 2003)
 - (ii) Ink Jet Printers (2) RFD No. 46-A01-2330 (August 2005)
 - (iii) Propane Heater rated at 0.7 MMBtu/hr RFD No. 46-A01-2358 (November 2005)
 - (iv) Kodak NexPress 2500 Digital Press RFD No. 46-A01-2500 (April 2007)
- (v) Baler and Collection System exempt from Plan Approval Requirements according to 25 Pa. Code § 127.14(a)(8), No. 34 from Document No. 275-2101-003 dated July 26, 2003; the source does not exhaust to the outdoor atmosphere.
- (d) December 2017 This Operating Permit, APS # 311126, AUTH # 1187142 has been renewed; the following has been addressed with this permit renewal:
- (1) Source IDs 101, 103 and 106 (Presses 1, 3, & 6)) are deleted from the permit since they had been removed from the facility.
- (2) Press Nos. 8 and 9, installed under GP7-46-0046 and GP7-46-0048 (Source IDs 108 and 109) have been added to the permit.
- (e) May 2023 This Operating Permit, APS # 311126, AUTH # 1383690 has been renewed; the following has been addressed with this permit renewal:
- (1) Source IDs 110 and 112 (installed under GP10-46-0041 and GP7-46-0050) and applicable permit conditions are incorporated into the Operating Permit.
 - (2) Source IDs 104 and 109, and their conditions are removed.





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