



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: April 24, 2018

Effective Date: April 27, 2018

Expiration Date: April 26, 2023

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: 46-00169

Synthetic Minor

Federal Tax Id - Plant Code: 23-2619815-3

Owner Information

Name: CONSTANTIA COLMAR LLC

Mailing Address: 92 COUNTY LINE RD
COLMAR, PA 18915

Plant Information

Plant: CONSTANTIA COLMAR/HATFIELD TWP

Location: 46 Montgomery County 46930 Hatfield Township

SIC Code: 2759 Manufacturing - Commercial Printing, Nec

Responsible Official

Name: DAVID MOSGROVE

Title: VP OPR FOOD US

Phone: (803) 404 - 6583

Permit Contact Person

Name: RICHARD KLECKNER

Title: TECH MGR

Phone: (215) 997 - 6222 Ext.124

[Signature] _____

JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER

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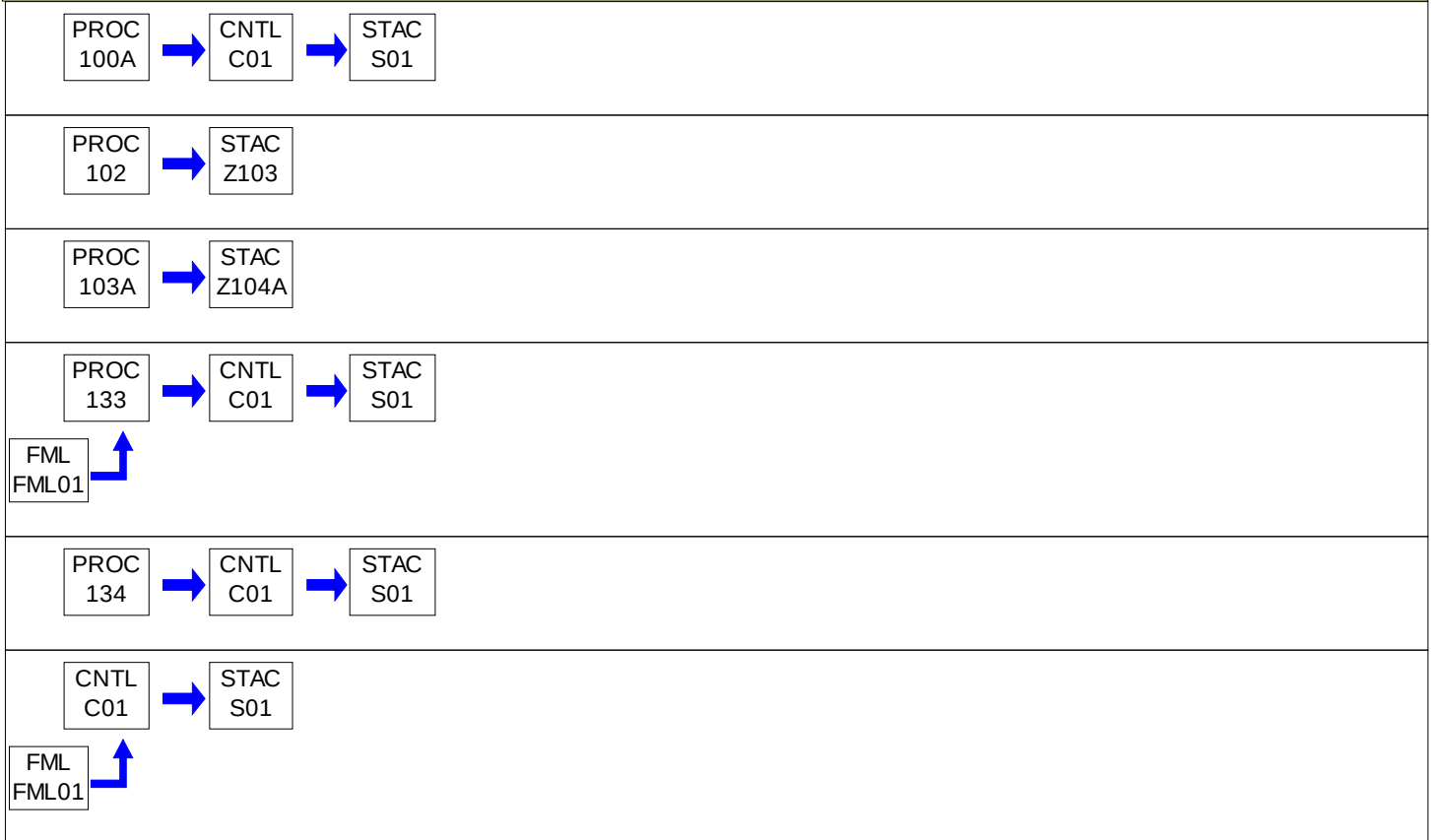
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Source ID	Source Name	Capacity/Throughput		Fuel/Material
100A	RENZMANN AUTOMATIC PARTS WASHING SYSTEM	15.850	Gal/HR	DISTILLED SOLVENT
102	SOLVENT ABOVEGROUND STORAGE TANKS (ASTS) (3)	N/A		SOLVENT
103A	COLD PARTS CLEANER	N/A		SOLVENT NAPHTHA
133	ROTOMECH 9-COLOR ROTOGRAVURE PRESS (MACHINE NO. 24001)	5.400	MMBTU/HR	
		5.294	MCF/HR	Natural Gas
		N/A		INKS/COATINGS/ADHESIVE
134	UTECO 10-COLOR FLEXOGRAPHIC PRESS (MACHINE NO. 23002)	1.547	MMBTU/HR	
		1.517	MCF/HR	Natural Gas
		N/A		INKS/COATINGS
C01	DÜRR REGENERATIVE THERMAL OXIDIZER (RTO)	5.882	MCF/HR	Natural Gas
FML01	NATURAL GAS PIPELINE			
S01	DÜRR RTO STACK			
Z103	SOLVENT ASTS FUGITIVE EMISSIONS			
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PERMIT MAPS



SECTION B. General State Only Requirements

#001 [25 Pa. Code § 121.1]

Definitions.

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

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

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

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

Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

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

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

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

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

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

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

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

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

Transfer of Operating Permits.

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

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

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

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

Inspection and Entry.

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

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

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

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

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

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

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

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

Compliance Requirements.

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

SECTION B. General State Only Requirements

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

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

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

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

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

#009 [25 Pa. Code §§ 127.442(a) & 127.461]

Duty to Provide Information.

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

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

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

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

#011 [25 Pa. Code §§ 127.450 & 127.462]

Operating Permit Modifications

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

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

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

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

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

#012 [25 Pa. Code § 127.441]

Severability Clause.

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

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

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

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

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

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

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

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

(2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x 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:

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)

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(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

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

#019 [25 Pa. Code §§ 127.441(c) & 135.5]

Sampling, Testing and Monitoring Procedures.

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

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

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

Recordkeeping.

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

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

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

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

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

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

SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

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

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee shall ensure that emission into the outdoor atmosphere of fugitive air contaminants does not occur from any source, except for the following:

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving, and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Open burning operations, as specified in 25 Pa. Code § 129.14 (see Condition # 010(a)–(g), Section C, of this permit).
- (g) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.
- (h) Coke oven batteries, provided that the fugitive air contaminant emissions from any coke oven battery comply with the standards for visible fugitive emissions in 25 Pa. Code §§ 123.44 and 129.15.
- (i) Sources and classes of sources other than those indicated in (a)–(h), above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1(b), that fugitive air contaminant emissions from the sources, after appropriate controls, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution.
 - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

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

004 [25 Pa. Code §123.31]

Limitations

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

005 [25 Pa. Code §123.41]

Limitations

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

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

SECTION C. Site Level Requirements

006 [25 Pa. Code §123.42]

Exceptions

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

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the restrictions.
- (b) When the emission results from a source(s) specified in 25 Pa. Code § 123.1 (see Condition # 002(a)–(i), Section C, of this permit).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall ensure that emission into the outdoor atmosphere of nitrogen oxides (NO_x) from this facility occurs in such a manner that the rate of the emission is less than 5.4 tons/yr, calculated monthly as a 12-month rolling sum.

008 [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).]

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 24.7 tons/yr, calculated monthly as a 12-month rolling sum.

009 Elective Restriction

[25 Pa. Code § 127.441]

Operating permit terms and conditions.

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

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

[Compliance with this permit condition assures that the permittee will not be subject to the provisions of 40 C.F.R. Part 63, Subpart KK.]

010 [25 Pa. Code §129.14]

Open burning operations

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

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

SECTION C. Site Level Requirements

(f) A fire set solely for recreational or ceremonial purposes.

(g) A fire set solely for cooking food.

II. TESTING REQUIREMENTS.**# 011 [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).]

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

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

III. MONITORING REQUIREMENTS.**# 012 [25 Pa. Code §123.43]****Measuring techniques**

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

(a) A device approved by the Department and maintained to provide accurate opacity measurements.

(b) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

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

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

(1) Odors, which may be objectionable (as per 25 Pa. Code § 123.31; see Condition # 004, Section C, of this permit).

(2) Visible air contaminant emissions (as per 25 Pa. Code §§ 123.41 and 123.42; see Conditions # 005–006, Section C, of this permit, respectively).

(3) Fugitive air contaminant emissions (as per 25 Pa. Code §§ 123.1 and 123.2; see Conditions # 002–003, Section C, of this permit, respectively).

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

(1) Be investigated.

(2) Be reported to the facility management, or individual(s) designated by the permittee.

(3) Have appropriate corrective action taken (for emissions that originate on-site).

(4) Be recorded in a permanent written log.

(c) After 6 months of daily monitoring, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to weekly.

SECTION C. Site Level Requirements

(d) After 6 months of weekly monitoring, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

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

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

IV. RECORDKEEPING REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 129.51(d)(2) and 129.67a(e)(5).]

The permittee shall maintain all records, reports, and analysis results generated in compliance with the requirements of any section of this permit in accordance with Condition # 020(b), Section B, of this permit, and shall make them available to the Department upon written or verbal request within a reasonable time.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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

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

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall maintain records of the dates of operation and maintenance (O&M) training, as specified in Condition # 025, Section C, of this permit.

SECTION C. Site Level Requirements

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

020 [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).]

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

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

V. REPORTING REQUIREMENTS.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall, within 2 hours of discovery of any occurrence, notify the Department, at (484) 250-5920, of any malfunction(s) of a source(s) and/or associated air pollution control device(s) listed in Sections A or G, of this permit, that results in, or may possibly result in, the emission of air contaminants in excess of the restrictions specified in this permit or established pursuant to any applicable rule or regulation contained in 25 Pa. Code, Subpart C, Article III.

(b) The permittee shall immediately report to the Department, by telephone at the above number, any malfunction(s) that occurs at this facility and poses an imminent danger to public health, safety, welfare, and the environment, or would violate permit conditions if the source(s) and/or associated air pollution control device(s) were to continue to operate after the malfunction(s).

(c) The permittee shall submit, to the Department, a written report within 2 working days following the notification of the incident. The report shall include, at a minimum, the following:

- (1) A description of the malfunction(s).
- (2) The source(s) and/or associated air pollution control device(s) and location(s).
- (3) The duration (including the starting and ending date(s) and times).
- (4) The cause(s).
- (5) The emission(s).
- (6) Any corrective action(s) taken.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. Part 68.]

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with all applicable provisions of the Clean Air Act, 40 C.F.R. 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).

SECTION C. Site Level Requirements

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

(1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:

(i) Three (3) years after the date on which a regulated substance is first listed in 40 C.F.R. § 68.130.

(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 C.F.R. § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with all applicable provisions of 40 C.F.R. 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 C.F.R. § 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 C.F.R. Part 68, as part of the certification required under this permit, the permittee shall perform the following:

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

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

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

(f) When the facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 C.F.R. 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 C.F.R. Part 68.

023 [25 Pa. Code §135.3]

Reporting

(a) If the permittee has been previously advised by the Department to submit a source report, the permittee shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from each previously-reported source(s), a new source(s) that was first operated during the preceding calendar year, and each source(s) modified during the same period that was not previously reported, including any source(s) listed in Section G, of this permit.

(b) 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.

024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

SECTION C. Site Level Requirements

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

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

025 [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), 127.444, and 129.67a(d)(1).]

The permittee shall ensure that the source(s) and associated air pollution control device(s) listed in Sections A and G, of this permit, are operated and maintained in a manner consistent with good safety, O&M, and air pollution control practices, and in accordance with the manufacturers' specifications. To this end, the permittee shall provide introductory training to new operators and refresher training to all operators on the proper O&M practices for the source(s) and associated air pollution control device(s).

026 [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 pollution control device(s), if necessary, to reduce the air contaminant emissions to within applicable restrictions, if at any time the operation of a source(s) listed in Sections A or G, of this permit, is causing the emission of air contaminants in excess of the restrictions specified in this permit or established pursuant to any applicable rule or regulation contained in 25 Pa. Code, Subpart C, Article III.

027 [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.

028 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67a(g)(1)(i)–(iv).]

The permittee shall ensure that the VOC-containing coating materials (i.e., coatings,¹ inks, diluents,¹ components, etc.), adhesive materials (i.e., adhesives,¹ sealants,¹ adhesive primers,¹ sealant primers,¹ catalysts, reducers, etc.), surface preparation solvents,¹ cleaning solutions,¹ cleanup solvents,¹ and waste materials used at this facility are managed in accordance with the following good air pollution control practices:

- (a) Storing all VOC-containing coating materials, adhesive materials, surface preparation solvents, cleanup solvents, cleaning solutions, and waste materials, as well as used shop towels containing these same materials, in nonabsorbent, nonleaking containers. The containers shall be kept closed at all times except when adding or removing VOC-containing coating materials, adhesive materials, surface preparation solvents, cleaning solutions, cleanup solvents, and/or waste materials.
- (b) Keeping all mixing vessels that contain VOC-containing coating materials, adhesive materials, surface preparation solvents, cleaning solutions, and cleanup solvents closed at all times, except when adding to, removing, or mixing the

¹ As defined in 25 Pa. Code § 121.1.

SECTION C. Site Level Requirements

contents.

(c) Minimizing spills of VOC-containing coating materials, adhesive materials, surface preparation solvents, cleaning solutions, cleanup solvents, and waste materials, and cleaning up spills immediately.

(d) Conveying VOC-containing coating materials, adhesive materials, surface preparation solvents, cleaning solutions, cleanup solvents, and waste materials from one location to another in closed containers or pipes.

(e) Minimizing VOC emissions from the cleaning of storage, mixing, and conveying equipment.

029 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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

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

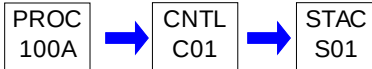
Source ID: 100A

Source Name: RENZMANN AUTOMATIC PARTS WASHING SYSTEM

Source Capacity/Throughput:

15.850 Gal/HR

DISTILLED SOLVENT

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor the following operating parameters for this automatic parts washing system:

- (a) The hours of operation, on an operating day basis.
- (b) The amount of each solvent added (gallons) on a monthly and 12-month rolling basis.

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

The permittee shall calculate the VOC emissions from this automatic parts washing system on a monthly and 12-month rolling basis, using a Department-approved method.

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

The permittee shall maintain records of the following operating parameters for this automatic parts washing system:

- (a) The hours of operation, on an operating day basis.
- (b) The amount of each solvent added (gallons) on a monthly and 12-month rolling basis.

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

The permittee shall maintain records of the VOC emissions from this automatic parts washing system on a monthly and 12-month rolling basis, calculated using a Department-approved method.

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

The permittee shall ensure that the temperature of the solvent being distilled in the solvent distillation unit of this automatic

SECTION D. Source Level Requirements

parts washing system does not exceed the boiling point of the solvent plus 10 °C (18 °F).

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the outlet temperature of the cooling water used in the condenser of the solvent distillation unit of this automatic parts washing system does not exceed 40 °C (104 °F).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the solvent used in the parts washing machine of this automatic parts washing system drains back into the contaminated solvent container of the solvent distillation unit of the automatic parts washing system.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that this automatic parts washing system is operated in accordance with the following operating practices and procedures:

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

(b) Work area fans should be located and positioned so that they do not blow across the openings of the parts washing machine.

(c) Sponges, fabric, wood, leather, paper products, and other absorbent materials shall not be cleaned in the parts washing machine.

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

(e) Spills during solvent transfer and use of the parts washing machine shall be cleaned up immediately.

009 [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).]

The permittee shall ensure that all air contaminants from this automatic parts washing system are captured by a total enclosure and routed to the RTO (Source ID C01).

VII. ADDITIONAL REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source is an automatic parts washing system manufactured by D.W. Renzmann Apparatebau GmbH and comprised of the following equipment:

(a) A solvent distillation unit, type ROTO 18, comprised of the following equipment:

(1) A contaminated solvent container, which receives used cleaning solution/cleanup solvent from a parts washing machine [(b), below] and Source IDs 133–134. The contaminated solvent container has a capacity of 1,000 L (264.1 gal).

(2) A distilling kettle with condenser. Contaminated solvent is pumped from (a)(1), above, into the distilling kettle, which heats the solvent until it evaporates. The condenser uses non-contact cooling water from an electric chiller (Sub-section (b)(5), Section G, of this permit) to condense the distilled solvent vapors. The distilling kettle has a capacity of 700 L (184.8 gal).

SECTION D. Source Level Requirements

(3) A distilled solvent container, which receives distilled solvent vapors from the condenser of (a)(2), above. The distilled solvent container has a capacity of 264.1 gal (1,000 L).

(b) An enclosed, automatic, parts washing machine, type 200, size 4. The parts washing machine has a minimum solvent capacity of 200 L (52.8 gal), and uses distilled solvent from (a)(3), above. Makeup solvent is supplied by drums, totes, and the solvent ASTs (Source ID 103).

SECTION D. Source Level Requirements

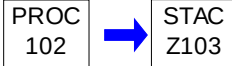
Source ID: 102

Source Name: SOLVENT ABOVEGROUND STORAGE TANKS (ASTS) (3)

Source Capacity/Throughput:

N/A

SOLVENT



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for each solvent stored in each of these solvent ASTs:

- (a) The name and type.
- (b) The throughput, on a monthly basis.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the VOC emissions from these solvent ASTs on a monthly and 12-month rolling basis, using a Department-approved method.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for each solvent stored in each of these solvent ASTs:

- (a) The name and type.
- (b) The throughput, on a monthly and 12-month rolling basis.
- (c) The starting and ending dates of storage.
- (d) The average storage temperature for the hottest month of the year in which the storage takes place.
- (e) The maximum true vapor pressure of each solvent as stored.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the VOC emissions from these solvent ASTs on a monthly and 12-month rolling basis, calculated using a Department-approved method.

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.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.57.]

The permittee shall ensure that, whenever the true vapor pressure of the solvent(s) stored in any of these solvent ASTs is greater than 1.5 psia, the applicable AST(s) is/are equipped with a pressure relief valve(s), which is/are set to release at no less than 0.7 psig of pressure or 0.3 psig of vacuum or the highest possible pressure and vacuum in accordance with state or local fire codes or National Fire Prevention Association guidelines or other national consensus standards acceptable to the Department.

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source grouping consists of three horizontal, fixed roof, solvent ASTs, as follows:

AST No.	Capacity
1	8,000 gal
2	6,000 gal
3	6,000 gal

The solvents are used as diluents and as cleaning solutions/cleanup solvents.

**SECTION D. Source Level Requirements**

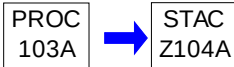
Source ID: 103A

Source Name: COLD PARTS CLEANER

Source Capacity/Throughput:

N/A

SOLVENT NAPHTHA

**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 operating parameters for this cold parts cleaner on a monthly and 12-month rolling basis:

- (a) The amount of solvent added.
- (b) The amount of solvent removed/recycled.

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

The permittee shall calculate the VOC emissions from this cold parts cleaner on a monthly and 12-month rolling basis, using a Department-approved method.

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

The permittee shall maintain records of the following operating parameters for this cold parts cleaner on a monthly and 12-month rolling basis:

- (a) The amount of solvent added.
- (b) The amount of solvent removed/recycled.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.63(a)(5)–(6).]

(a) The permittee shall maintain records of the following information for the solvent used in this cold parts cleaner:

- (1) The type of solvent used, including the product or vendor identification number.
- (2) The name and address of the solvent supplier.
- (3) The vapor pressure of the solvent (mm Hg, at 20 °C [68 °F]).

(b) The permittee may use invoices, bills of sale, certificates that correspond to the number of sales, certified product data

SECTION D. Source Level Requirements

sheets (CPDSs), safety data sheets (SDSs), or other appropriate documentation acceptable to the Department to demonstrate compliance with (a)(1)–(3), above.

005 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain records of the VOC emissions from this cold parts cleaner on a monthly and 12-month rolling basis, calculated using a Department-approved method.

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 §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.63(a)(4).]

The permittee shall ensure that the solvent used in each of this cold parts cleaner has a vapor pressure of less than 1.0 mm Hg and/or contains less than 5% VOC, by weight, measured at 20 °C (68 °F).

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.63(a)(2)(ii).]

The permittee shall ensure that this cold parts cleaner is equipped with a cover that remains closed at all times except during cleaning of parts or the addition or removal of solvent. A perforated drain with a diameter that does not exceed 6 inches shall constitute an acceptable cover.

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

The permittee shall ensure that all solvent used in this cold parts cleaner immediately drains into the solvent storage reservoir.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.63(a)(3)(i)–(v).]

The permittee shall ensure that this cold parts cleaner is operated in accordance with the following procedures:

- (a) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (b) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold parts cleaner. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (c) Sponges, fabric, wood, leather, paper products, and other absorbent materials may not be cleaned in the cold parts cleaner.
- (d) Air-agitated solvent baths may not be used.
- (e) Spills during solvent transfer and use of the cold parts cleaner shall be cleaned up immediately.

010 [25 Pa. Code §127.441]

SECTION D. Source Level Requirements**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.63(a)(2)(i)(A)–(C).]

The permittee shall ensure that this cold parts cleaner has a permanent, conspicuous label summarizing the operating requirements indicated in Condition # 008(a)–(e), Section D (under Source ID 103), of this permit. In addition, the label shall include the following discretionary good operating practices:

- (a) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining. During the draining, tipping, or rotating, the parts should be positioned so that solvent drains directly back to the cold parts cleaner.
- (b) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
- (c) Work area fans should be located and positioned so that they do not blow across the opening of the cold parts cleaner.

VII. ADDITIONAL REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of a remote reservoir cold parts cleaner, model no. 34.1, manufactured by Safety-Kleen Systems, Inc. The cold parts cleaner has a rated capacity of 24.5 gallons, and is located in the maintenance shop.

SECTION D. Source Level Requirements

Source ID: 133

Source Name: ROTOMEC 9-COLOR ROTOGRAVURE PRESS (MACHINE NO. 24001)

Source Capacity/Throughput:

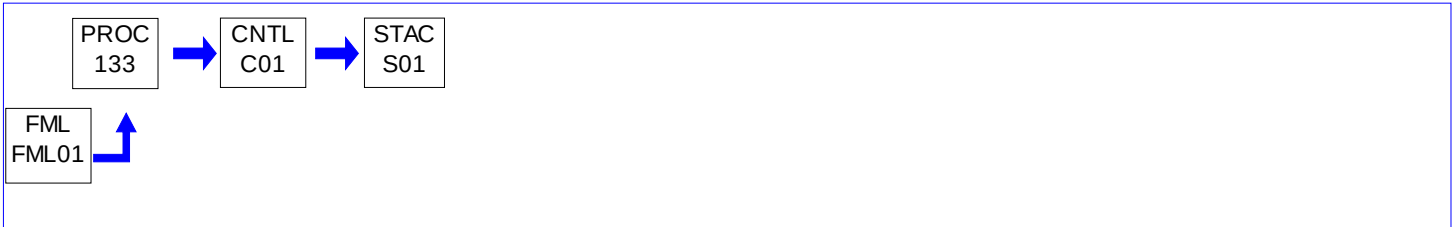
5.400 MMBTU/HR

5.294 MCF/HR

Natural Gas

N/A

INKS/COATINGS/ADHESIVES



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 operating parameters for this rotogravure press:

- The hours of operation, on a per-job basis.
- The amount of each as supplied² coating material, adhesive material, surface preparation solvent, cleaning solution, and cleanup solvent used (gallons) on a per-job basis.
- The amount of each as applied² coating, adhesive, surface preparation solvent, cleaning solution, and cleanup solvent used (pounds and gallons) on a per-job, monthly, and 12-month rolling basis.
- The amount of each as supplied adhesive material, surface preparation solvent, cleaning solution, and cleanup solvent purchased (gallons) on a quarterly and annual basis.

² As defined in 25 Pa. Code § 121.1.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the VOC emissions from this rotogravure press on a monthly and 12-month rolling basis, using a Department-approved method.

IV. RECORDKEEPING REQUIREMENTS.

003 [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 129.67a(e) and (e)(4).]

(a) The permittee shall maintain records of the following operating parameters for this rotogravure press:

- The hours of operation, on a per-job basis.
- For each as supplied coating material, adhesive material, surface preparation solvent, cleaning solution, and cleanup

SECTION D. Source Level Requirements

solvent used:

- (i) The name and identification number.
- (ii) The amount used (gallons) on a per-job basis.
- (iii) The mix ratio.
- (iv) The density or specific gravity.
- (v) The VOC content (weight percent), obtained from one of the following:
 - (A) ACPDS.
 - (B) A SDS. If the VOC content value is reported as a range, the upper bound of the range shall be considered the actual value.
 - (C) Testing in accordance with EPA Method 24/24A, as specified in 40 C.F.R. Part 60, Appendix A.
 - (D) An alternative method, as approved by the Department.
- (vi) The HAP content (weight percent), calculated using a Department-approved method(s).
- (vii) The solids content (weight percent and volume percent).
- (viii) The water content (weight percent).
- (ix) The exempt solvents content (weight percent).
- (3) For each as applied coating, adhesive, surface preparation solvent, cleaning solution, and cleanup solvent used, calculated using Department-approved methods:
 - (i) The amount used (pounds and gallons) on a per-job, monthly, and 12-month rolling basis.
 - (ii) The VOC content (weight percent and lbs/gal of coating solids, as applicable).
 - (iii) The HAP content (weight percent and lbs/gal of coating solids, as applicable).
- (4) The amount of each as supplied adhesive material, surface preparation solvent, cleaning solution, and cleanup solvent purchased (gallons) on a quarterly and annual basis.
- (b) Alternatively, the as supplied coating or ink with the highest VOC and HAP content may be used for VOC and HAP emission calculation purposes to represent all as supplied coatings or inks used in the presses (i.e., Source IDs 133–134).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

V. REPORTING REQUIREMENTS.

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

SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

005 [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).]

The permittee shall ensure that all air contaminants from this rotogravure press are captured by a total enclosure and routed to the RTO (Source ID C01).

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall not commence operation (i.e., begin exhausting to the RTO (Source ID C01), including during pre-production color testing) of this rotogravure press and the flexographic press (Source ID 134) within 60 seconds of each other.

(b) The permittee shall develop and implement an operating procedure to comply with (a), above, as part of the O&M training indicated in Condition # 025, Section C, of this permit.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of a 1,000-mm (39-inch) web width, nine-color, rotogravure printing press, model no. 355, manufactured by Rotomec SpA (Constantia machine no. 24001). The rotogravure press is rated at 300 m/min (980 ft/min) line speed, and is equipped with a laminating station and five natural gas-fired belt dryers associated with the color stations, as follows:

Burner No.	Rated Heat Input	Color Station No.
1	1.5 mmBtu/hr	1, 2
2	0.8 mmBtu/hr	3, 4
3	1.5 mmBtu/hr	5, 6, 7
4	0.8 mmBtu/hr	8
5	0.8 mmBtu/hr	9

	5.4 mmBtu/hr	

SECTION D. Source Level Requirements

Source ID: 134

Source Name: UTECO 10-COLOR FLEXOGRAPHIC PRESS (MACHINE NO. 23002)

Source Capacity/Throughput:

1.547 MMBTU/HR

1.517 MCF/HR

Natural Gas

N/A

INKS/COATINGS



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor the following operating parameters for this flexographic press:

- (a) The hours of operation, on a per-job basis.
- (b) The amount of each as supplied coating material, cleaning solution, and cleanup solvent used (gallons) on a per-job basis.
- (c) The amount of each as applied coating, cleaning solution, and cleanup solvent used (pounds and gallons) on a per-job, monthly, and 12-month rolling basis.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the VOC emissions from this flexographic press on a monthly and 12-month rolling basis, using a Department-approved method.

IV. RECORDKEEPING REQUIREMENTS.

003 [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 129.67a(e) and (e)(4).]

(a) The permittee shall maintain records of the following operating parameters for this flexographic press:

- (1) The hours of operation, on a per-job basis.
- (2) For each as supplied coating material, cleaning solution, and cleanup solvent used:
 - (i) The name and identification number.
 - (ii) The amount used (gallons) on a per-job basis.
 - (iii) The mix ratio.

SECTION D. Source Level Requirements

- (iv) The density or specific gravity.
- (v) The VOC content (weight percent), obtained from one of the following:
 - (A) A CPDS.
 - (B) A MSDS. If the VOC content value is reported as a range, the upper bound of the range shall be considered the actual value.
 - (C) Testing in accordance with EPA Method 24/24A, as specified in 40 C.F.R. Part 60, Appendix A.
 - (D) An alternative method, as approved by the Department.
- (vi) The HAP content (weight percent), calculated using a Department-approved method(s).
- (vii) The solids content (weight and volume percent).
- (viii) The water content (weight percent).
- (ix) The exempt solvents content (weight percent).
- (3) For each as applied coating, cleaning solution, and cleanup solvent used, calculated using Department-approved methods:
 - (i) The amount used (pounds and gallons) on a per-job, monthly, and 12-month rolling basis.
 - (ii) The VOC content (weight percent and lbs/gal of coating solids).
 - (iii) The HAP content (weight percent and lbs/gal of coating solids).
- (b) Alternatively, the as supplied coating or ink with the highest VOC and HAP content may be used for VOC and HAP emission calculation purposes to represent all as supplied coatings or inks used in the presses.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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.

005 [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).]

The permittee shall ensure that all air contaminants from this flexographic press are captured by a total enclosure and routed to the RTO (Source ID C01).

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall ensure that this flexographic press and the rotogravure press (Source ID 133) do not commence operation within 60 seconds of each other.

SECTION D. Source Level Requirements

(b) The permittee shall develop and implement an operating procedure to comply with (a), above, as part of the O&M training indicated in Condition # 025, Section C, of this permit.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of a 1,350-mm (53.1-inch) web width, ten-color, flexographic press, model type Diamond HP 108, model no. 130, manufactured by Uteco Converting SpA (Constantia machine no. 23002). The flexographic press is rated at approximately 600 m/min (1,970 ft/min) line speed and is equipped with two natural gas-fired dryer burners manufactured by Maxon Corp., as follows:

Burner Type	Rated Heat Input
Between Color	0.595 mmBtu/hr
Overhead	0.952 mmBtu/hr

	1.547 mmBtu/hr

SECTION D. Source Level Requirements

Source ID: C01

Source Name: DÜRR REGENERATIVE THERMAL OXIDIZER (RTO)

Source Capacity/Throughput:

5.882 MCF/HR

Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [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).]

(a) The permittee shall ensure that emission into the outdoor atmosphere of VOCs from this RTO occurs in such a manner that the rate of the emission does not exceed 28.3 lbs/hr.

(b) The Department reserves the right to change the VOC emission rate restriction specified in (a), above, based on actual operating parameters and/or the results of the stack testing required in Condition # 003(a), Section D (under Source ID C01), of this permit.

Control Device Efficiencies Restriction(s).

002 [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).]

The permittee shall ensure that this RTO achieves 100% capture of the exhaust gas flow from Source IDs 100A and 133–134, with a minimum VOC destruction efficiency of 98%.

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 129.67a(c)(3).]

II. TESTING REQUIREMENTS.

003 [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 129.67a(e)(6) and (f)(2)(i)–(ii).]

(a) On or before August 23, 2022, the permittee shall perform the following tests for this RTO:

(1) A VOC emission stack test, in accordance with 25 Pa. Code § 129.67a(f)(2)(ii) and the provisions of 25 Pa. Code Chapter 139. The test shall be performed at the inlet and outlet of the RTO to demonstrate compliance with the VOC emission rate specified in Condition # 001(a), Section D (under Source ID C01), of this permit (except for the averaging period), and the VOC destruction efficiency restriction specified in Condition # 002, Section D (under Source ID C01), of this permit. During the test, all sources indicated in Condition # 002, Section D (under Source ID C01), of this permit, shall be operated at normal operating capacities, such that the test results are representative of normal operations.

(2) Verification that the sources indicated in Condition # 002, Section D (under Source ID C01), of this permit, are operated within a total enclosure, in accordance with 25 Pa. Code § 129.67a(f)(2)(i)(A). The test shall be performed for the press room to demonstrate compliance with the capture efficiency restriction specified in Condition # 002, Section D (under Source ID C01), of this permit.

SECTION D. Source Level Requirements

(b) At least 90 days prior to the stack test, the company shall submit, to the Department for approval, the procedures for the source testing and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples. A test protocol shall be approved by the Source Testing Section of the Department prior to the stack test.

(c) At least 30 days prior to the stack test, the Regional Air Quality Manager shall be informed of the date(s) and time(s) of the stack test.

(d) Within 60 days after the stack test, two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(e) The permittee may request an extension of time for any deadlines indicated in (a)–(d), above, with which it is unable to comply. The request must be in writing and include a justification for the extension. The Department may grant the extension for reasonable cause.

III. MONITORING REQUIREMENTS.

004 [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 129.67a(d)(1)(i).]

The permittee shall monitor the following operating parameters for this RTO:

- (a) The hours of operation, on an operating day basis.
- (b) The combustion chamber gas temperature, on a continuous basis.

IV. RECORDKEEPING REQUIREMENTS.

005 [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).]

The permittee shall maintain records of the following operating parameters for this RTO:

- (a) The hours of operation, on an operating day basis.
- (b) The combustion chamber gas temperature, on a continuous basis (i.e., at least once every 15 seconds).

[Compliance with this streamlined permit condition assures compliance with 25 Pa. Code § 129.67a(d)(2)(i) and (e)(1).]

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67a(e)(1)(ii).]

The permittee shall maintain records of all maintenance (i.e., routine and/or preventative maintenance, repairs, adjustments, parts replacements, calibrations, etc.) performed for this RTO. These records shall include, at a minimum, the following:

- (a) The date of the maintenance.
- (b) The type of maintenance performed.

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.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67a(d)(2).]

The permittee shall ensure that, whenever operating any of the sources indicated in Conditions # 002 or 011, Section D (under Source ID C01), of this permit, or conducting any other VOC-emitting activities within the press room, the combustion chamber gas temperature of this RTO is maintained at a minimum of both of the following:

(a) 1600 °F, based on a 2-minute average.

(b) 1626 °F, based on a 3-hour average, pursuant to 25 Pa. Code § 129.67a(d)(2) (i.e., not lower than 50 °F below the average temperature of 1676 °F measured during the most recent compliant VOC emission stack test, which was performed on August 23, 2017).

008 [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 129.67a(d)(3).]

The permittee shall not operate any of the sources indicated in Conditions # 002 or 011, Section D (under Source ID C01), of this permit, nor conduct any other VOC-emitting activities within the press room, unless this RTO is operating in compliance with Condition # 007, Section D (under Source ID C01), of this permit.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that this RTO is equipped with an interlock that shuts down the RTO and precludes operation of the sources indicated in Conditions # 002 or 011, Section D (under Source ID C01), of this permit, if the combustion chamber temperature drops to less than 1350 °F.

010 [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 129.67a(d)(1) and (e)(1).]

The permittee shall operate and maintain a device that indicates and records the combustion chamber gas temperature of this RTO on a continuous basis. An alternative method may be used, if approved by the Department.

VII. ADDITIONAL REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of a two-chamber, natural gas-fired RTO, job no. 22280, manufactured by Dürr Environmental, Inc. The RTO is rated at 6.0 mmBtu/hr heat input and 32,000 scfm total air flow, and controls VOC and HAP emissions from Source IDs 100A and 133–134.



SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

SECTION F. Emission Restriction Summary.

Source Id	Source Description
C01	DÜRR REGENERATIVE THERMAL OXIDIZER (RTO)
Emission Limit	Pollutant
28.300 Lbs/Hr	VOC

Site Emission Restriction Summary

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

SECTION G. Miscellaneous.

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

- (1) Plan Approval No. 46-0169A.
- (2) Plan Approval No. 46-0169B.
- (3) RFD No. 46-A01-2314.
- (4) Plan Approval No. 46-0169D.
- (5) RFD No. 2838.
- (6) RFD No. 4140.

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

- (1) Ten natural gas-fired space heaters, as follows:

Manufacturer	Model No.	Rated Heat Input	Quantity
Reznor	F125	125 mBtu/hr	2
Reznor	F200	200 mBtu/hr	2
Reznor	FE125	125 mBtu/hr	1
Reznor	XE75	75 mBtu/hr	1
Reznor	XL75	75 mBtu/hr	1
Trane	GRAA80PFGB0L1JT502A0CKRVX	800 mBtu/hr	2
Trane	SFCB-B504-LB	75 mBtu/hr	1
		-----	-----
		2.60 mmBtu/hr	10

- (2) Twenty-nine (29) natural gas-fired HVAC units (with electric cooling), as follows:

Manufacturer	Model No.	Rated Heat Input	Quantity
Fujitsu General	AOU30RLXB X2	30 mBtu/hr	2
Mitsubishi Electric U.S., Inc.	PU12EK 39	30 mBtu/hr	1
Trane	GRAA50PFHFF0L3LL2C2AOAJ38	500 mBtu/hr	1
Trane	GAD300A4EHA	400 mBtu/hr	1
Trane	TTA300J400AA	800 mBtu/hr	2
York	D1NA024N05606C	70 mBtu/hr	1
York	D2CG180N24046ECE	300 mBtu/hr	1
York	D2CG240N24046ECC	300 mBtu/hr	1
York	D2CG240N32046ECE	400 mBtu/hr	2
York	D2CG240N32046ECF	400 mBtu/hr	1
York	D3CG120N16546B	204 mBtu/hr	1
York	D7CG036N07946A	100 mBtu/hr	1
York	ZF048N10N4AAA2A	125 mBtu/hr	1
York	ZF060N10N4AAA2A	125 mBtu/hr	1
York	ZF090N18D4A1AAA1A1	180 mBtu/hr	3
York	ZF120N24D4A	240 mBtu/hr	4
York	ZF120N24D4A1AAA1A1	240 mBtu/hr	1
York	ZF240N32B4AAA1B	400 mBtu/hr	1
York	ZF240N32B4AAA2	400 mBtu/hr	1
York	ZF240N32B4AAA2A	400 mBtu/hr	2
		-----	-----
		8.354 mmBtu/hr	29

SECTION G. Miscellaneous.

(3) Two electric HVAC units (heating and cooling), as follows:

Manufacturer	Model Type / No.
Marvair	ModPac II / AVP36ACD09M-1000
York	Sunline 2000 / D3CE060N1404GA

(4) An electric air conditioner, model no. D2CE036A25B, manufactured by York.

(5) An electric chiller, which is used to provide cold water for the facility (including the automatic parts washing system (Source ID 100A)).

(6) Several 55-gal solvent drums, which are used to pre-soak parts prior to their being placed in the automatic parts washing machine of the automatic parts washing system (Source ID 100A). The solvent drums shall be closed when not in use.

(7) A hotmelt coating machine, model type Laminawax, manufactured by DCM Usimeca.

(8) Four slitters, each with a dedicated chopper.

(9) Two die cutters, model no. M139, manufactured by Ing. Helmut Berger GmbH & Co KG.

(10) A baler associated with (b)(8)–(9), above. The baler is used to dispose of film and foil trimmings.

(c) This permit (APS ID 603024, Auth ID 1207729) is a renewal of State Only Operating Permit No. 46-00169, which was originally issued on April 5, 2007 (APS ID 603024, Auth ID 659320); previously amended on July 20, 2010 (APS ID 603024, Auth ID 830291), April 12, 2011 (APS ID 603024, Auth ID 873433), and September 22, 2014 (APS ID 603024, Auth ID 1034348); and previously renewed on April 26, 2013 (APS ID 603024, Auth ID 901080). The following is a listing of the changes reflected in this permit:

(1) The name of the permittee/owner, as indicated on the cover page of the previously-amended permit (same location in this permit), has been changed from “Constantia Colmar, Inc.” to “Constantia Colmar, LLC.”

(2) The responsible official, as indicated on the cover page of the previously-amended permit (same location in this permit), has been changed to David Mosgrove, Vice President, Operations Food U.S., (678) 378-7518.

(3) The permit contact person, as indicated on the cover page of the previously-amended permit (same location in this permit), has been changed to Richard Kleckner, Technical Manager, (215) 997-6222, ext. 124.

(4) The source IDs for the following source and emission point in Sections A and D, of the previously-amended permit (same locations in this permit), have been changed (<added to source ID>):

Source ID	Source Name
103<A>	Cold Parts Cleaner
Z104<A>	Cold Parts Cleaner Fugitive Emissions

(5) The Kroenert 5-color flexographic press (former Source ID 181), along with all corresponding capacity (i.e., rated heat input) and fuel and material throughput listings, permit maps, conditions, and references in Sections A and D, of the previously-amended permit, where applicable, have been removed.

(6) Capacity and fuel throughput listings for the Uteco 10-color flexographic press have been added to Sections A and D (under Source ID 134), of this permit.

(7) The additional authority citations to 25 Pa. Code §§ 129.52b(e)(1)–(2) and 129.77(q)(1)–(2) at the beginning of Condition # 015, Section C, of the previously-amended permit (same condition number in this permit), have been replaced by an additional authority citation to 25 Pa. Code § 129.67a(e)(5).

(8) The following for Condition # 024, Section C, of the previously-amended permit (same condition number in this permit):

(i) The citation has been changed from 25 Pa. Code § 123.1 to 25 Pa. Code § 127.441.

SECTION G. Miscellaneous.

- (ii) An additional authority citation to 25 Pa. Code § 123.1(c) has been added to the beginning of the condition.
- (9) The following for Condition # 025, Section C, of the previously-amended permit (same condition number in this permit):
- (i) An additional authority citation to 25 Pa. Code § 129.67a(d)(1) has been added to the beginning of the condition.
- (ii) The requirement for the manner in which the source(s) and associated air pollution control device(s) listed in Sections A and G, of this permit, are operated and maintained has been extended to being consistent with good safety and air pollution control practices.
- (10) The following for Condition # 028, Section C, of the previously-amended permit (same condition number in this permit):
- (i) The additional authority citations to 25 Pa. Code §§ 129.52b(h)(1)–(5) and 129.77(h) at the beginning of the condition have been replaced with an additional authority citation to 25 Pa. Code § 129.67a(g)(1)(i)–(iv).
- (ii) The requirements of Sub-conditions (a)–(d) have been extended to apply to cleaning solutions.
- (11) The following for Conditions # 001–002, Section D (under Source ID 100A), of the previously-amended permit (Conditions # 001 and 003, Section D (under Source ID 100A), of this permit, respectively):
- (i) Sub-condition (b) has been removed.
- (ii) Sub-condition (c) has been reorganized as Sub-condition (b).
- (12) Requirements to calculate and maintain records of the VOC emissions from the automatic parts washing system, Rotomec 9-color rotogravure press, and Uteco 10-color flexographic press on a monthly and 12-month rolling basis, have been added as Conditions # 002 and 004, Section D (under Source IDs 100A and 133–134), of this permit, respectively.
- (13) Condition # 008, Section D (under Source ID 100A), of the previously-amended permit, has been removed.
- (14) The term "cleanup solvent" in Condition # 009(a)(1), Section D (under Source ID 100A), of the previously-amended permit (Condition # 010(a)(1), Section D (under Source ID 100A), of this permit), has been changed to the term "cleaning solution/cleanup solvent."
- (15) Condition # 005, Section D (under Source IDs 102–103), of the previously-amended permit, has been moved to Condition # 002, Section D (under Source IDs 102 and 103A), of this permit, respectively (from Sub-section VI to Sub-section III).
- (16) The term "cleanup solvents" in Condition # 006, Section D (under Source ID 102), of the previously-amended permit (same condition number in this permit), has been changed to the term "cleaning solutions/cleanup solvents."
- (17) The source description for the cold parts cleaner, as indicated in Condition # 011, Section D (under Source ID 103), of the previously-amended permit (Condition # 011, Section D (under Source ID 103A), of this permit), has been updated to refer to the current unit.
- (18) The following for Condition # 001, Section D (under Source ID 133), of the previously-amended permit (same condition number in this permit):
- (i) The frequency of monitoring the hours of operation for the Rotomec 9-color rotogravure press, as indicated in Sub-condition (a), has been changed from "on an operating day basis" to "on a per-job basis."
- (ii) Sub-condition (b) has been removed.
- (iii) The following for Sub-condition (c):
- (A) It has been reorganized as Sub-condition (b).
- (B) The frequency of monitoring has been changed from "on an operating day basis" to "on a per-job basis."
- (C) The requirement has been extended to apply to each as supplied cleaning solution.

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(iv) The following for Sub-condition (d):

- (A) It has been reorganized as Sub-condition (c).
- (B) The requirement has been extended to apply to each as applied cleaning solution.
- (C) The frequency of monitoring has been extended to on a per-job basis.

(v) The following for Sub-condition (e):

- (A) It has been reorganized as Sub-condition (d).
- (B) The requirement has been extended to apply to each as supplied cleaning solution.

(19) The following for Condition # 002, Section D (under Source ID 133), of the previously-amended permit (Condition # 003, Section D (under Source ID 133), of this permit):

(i) The additional authority citation to 25 Pa. Code § 129.77(g)(5) and (6)(i) at the beginning of the condition has been replaced with an additional authority citation to 25 Pa. Code § 129.67a(e) and (e)(4).

(ii) The following for Sub-condition (a):

(A) The frequency of maintaining records of the hours of operation for the Rotomec 9-color rotogravure press, as indicated in Sub-condition (a)(1), has been changed from "on an operating day basis" to "on a per-job basis."

(B) Sub-condition (a)(2) has been removed.

(C) The following for Sub-condition (a)(3):

(I) It has been reorganized as Sub-condition (a)(2).

(II) The requirement has been extended to apply to each as supplied cleaning solution.

(III) The frequency of maintaining records of the amount of each as supplied coating material, adhesive material, surface preparation solvent, (cleaning solution,) and cleanup solvent used, as indicated in (the reorganized) Sub-condition (a)(2)(ii), has been changed from "on an operating day basis" to "on a per-job basis."

(D) The following for Sub-condition (a)(4):

(I) It has been reorganized as Sub-condition (a)(3).

(II) The requirement has been extended to apply to each as applied cleaning solution.

(III) The frequency of maintaining records of the amount of each as applied coating, adhesive, surface preparation solvent, (cleaning solution,) and cleanup solvent used, as indicated in (the reorganized) Sub-condition (a)(3)(i), has been changed from "on an operating day basis" to "on a per-job basis."

(E) Sub-condition (a)(5) has been reorganized as Sub-condition (a)(4).

(iii) The reference to Source ID 181 has been removed from Sub-condition (b).

(20) Condition # 004, Section D (under Source ID 133), of the previously-amended permit, has been removed.

(21) Requirements that the Rotomec 9-color rotogravure press and Uteco 10-color flexographic press do not commence operation within 60 seconds of each other, and to develop and implement an associated operating procedure as part of the permittee's O&M training, have been added as Condition # 006(a)–(b), Section D (under Source IDs 133–134), of this permit, respectively.

(22) The source description for the Rotomec 9-color rotogravure press, as indicated in Condition # 005, Section D (under Source

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ID 133), of the previously-amended permit (Condition # 007, Section D (under Source ID 133), of this permit), has been updated to include the Constantia machine number.

(23) The following for Condition # 001, Section D (under Source ID 134), of the previously-amended permit (same condition number in this permit):

(i) The frequency of monitoring the hours of operation for the Uteco 10-color flexographic press, as indicated in Sub-condition (a), has been changed from "on an operating day basis" to "on a per-job basis."

(ii) Sub-condition (b) has been removed.

(iii) The following for Sub-condition (c):

(A) It has been reorganized as Sub-condition (b).

(B) The frequency of monitoring has been changed from "on an operating day basis" to "on a per-job basis."

(C) The requirement has been extended to apply to each as supplied cleaning solution.

(iv) The following for Sub-condition (d):

(A) It has been reorganized as Sub-condition (c).

(B) The requirement has been extended to apply to each as applied cleaning solution.

(C) The frequency of monitoring has been extended to on a per-job basis.

(24) The following for Condition # 002, Section D (under Source ID 134), of the previously-amended permit (Condition # 003, Section D (under Source ID 134), of this permit):

(i) The additional authority citation to 25 Pa. Code § 129.52(d)(1)–(3) at the beginning of the condition has been replaced with an additional authority citation to 25 Pa. Code § 129.67a(e) and (e)(4).

(ii) The following for Sub-condition (a):

(A) The frequency of maintaining records of the hours of operation for the Uteco 10-color flexographic press, as indicated in Sub-condition (a)(1), has been changed from "on an operating day basis" to "on a per-job basis."

(B) Sub-condition (a)(2) and (4) has been removed.

(C) The following for Sub-condition (a)(3):

(I) It has been reorganized as Sub-condition (a)(2).

(II) The requirement has been extended to apply to each as supplied cleaning solution.

(III) The frequency of maintaining records of the amount of each as supplied coating material(cleaning solution,) and cleanup solvent used, as indicated in (the reorganized) Sub-condition (a)(2)(ii), has been changed from "on an operating day basis" to "on a per-job basis."

(IV) The units of measure have been extended to volume percent.

(D) The following for Sub-condition (a)(5):

(I) It has been reorganized as Sub-condition (a)(3).

(II) The requirement has been extended to apply to each as applied cleaning solution.

(III) The frequency of maintaining records of the amount of each as applied coating(, cleaning solution,) and cleanup solvent

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used, as indicated in (the reorganized) Sub-condition (a)(3)(i), has been changed from "on an operating day basis" to "on a per-job basis."

(iii) The reference to Source ID 181 has been removed from Sub-condition (b).

(25) Condition # 003, Section D (under Source ID 134), of the previously-amended permit, has been removed.

(26) The averaging period for the VOC emission rate restriction for the RTO, as indicated in Condition # 001, Section D (under Source ID C01), of the previously-amended permit (same condition number in this permit), has been removed.

(27) The following for Condition # 002, Section D (under Source ID C01), of the previously-amended permit (same condition number in this permit):

(i) The reference to Source ID 181 has been removed.

(ii) The citations to 25 Pa. Code §§ 129.52b(c)(2), 129.67(b)(3) and (c)(2), and 129.77(g)(1) and (i)–(j) in the streamlining language at the end of the condition have been replaced with a citation to 25 Pa. Code § 129.67a(c)(3).

(28) The following for Condition # 003, Section D (under Source ID C01), of the previously-amended permit (same condition number in this permit):

(i) The additional authority citation to 25 Pa. Code § 129.77(g)(1)(i)–(ii) and (y)(1)–(2) at the beginning of the condition has been replaced with an additional authority citation to 25 Pa. Code § 129.67a(e)(6).

(ii) The following for Sub-condition (a):

(A) The date by which to perform testing for the RTO has been changed to August 23, 2022.

(B) The references to 25 Pa. Code § 129.77(y)(2) and (1), as indicated in Sub-condition (a)(1)–(2), respectively, have been changed to references to 25 Pa. Code § 129.67a(f)(2)(ii) and (i)(A), respectively.

(iii) The date by which to submit the procedures for the source testing and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples, as indicated in Sub-condition (b), has been changed from "at least 60 days prior to the stack test" to "at least 90 days prior to the stack test."

(29) The additional authority citation to 25 Pa. Code § 129.77(g)(2) at the beginning of Condition # 004, Section D (under Source ID C01), of the previously-amended permit (same condition number in this permit), has been replaced with an additional authority citation to 25 Pa. Code § 129.67a(d)(1)(i).

(30) The following for Condition # 005, Section D (under Source ID C01), of the previously-amended permit (same condition number in this permit):

(i) The additional authority citation to 25 Pa. Code § 129.77(g)(2) and (6)(ii) has been removed from the beginning of the condition.

(ii) The frequency of maintaining records of the combustion chamber gas temperature on a continuous basis, as indicated in Sub-condition (b), has been further defined as "at least once every 15 seconds."

(iii) Sub-condition (c) has been removed.

(iv) Streamlining language to 25 Pa. Code § 129.67a(d)(2)(i) and (e)(1) has been added to the end of the condition.

(31) The additional authority citation to 25 Pa. Code § 129.77(g)(6)(iii) at the beginning of Condition # 006, Section D (under Source ID C01), of the previously-amended permit (same condition number in this permit), has been replaced with an additional authority citation to 25 Pa. Code § 129.67a(e)(1)(ii).

(32) Conditions # 007, 009, and 012–013, Section D (under Source ID C01), of the previously-amended permit, have been removed.

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(33) The following for Condition # 008, Section D (under Source ID C01), of the previously-amended permit (Condition # 007(a), Section D (under Source ID C01), of this permit):

(i) An additional authority citation to 25 Pa. Code § 129.67a(d)(1)(ii) has been added to the beginning of the condition.

(ii) Language has been added to clarify that the combustion chamber gas temperature restriction applies "whenever operating any of the sources indicated in Conditions # 002 or 011, Section D (under Source ID C01), of this permit, or conducting any other VOC-emitting activities within the press room."

(iii) A requirement that the combustion chamber gas temperature of the RTO be maintained at a minimum of 1626 °F, based on a 3-hour average, has been added as Sub-condition (b).

(34) An additional authority citation to 25 Pa. Code § 129.67a(d)(3) has been added to the beginning of Condition # 010, Section D (under Source ID C01), of the previously-amended permit (Condition # 009, Section D (under Source ID C01), of this permit).

(35) An additional authority citation to 25 Pa. Code § 129.67a(d)(1) and (e)(1) has been added to the beginning of Condition # 011, Section D (under Source ID C01), of the previously-amended permit (Condition # 010, Section D (under Source ID C01), of this permit).

(36) A requirement that the RTO be equipped with an interlock that shuts down the RTO and precludes operation of the automatic parts washing system, Rotomec 9-color rotogravure press, and Uteco 10-color flexographic press if the combustion chamber temperature drops to less than 1350 °F, has been added as Condition # 009, Section D (under Source ID C01), of this permit.

(37) The reference to Source ID 181 has been removed from Condition # 014, Section D (under Source ID C01), of the previously-amended permit (Condition # 012, Section D (under Source ID C01), of this permit).



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