



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

**STATE ONLY SYNTHETIC MINOR OPERATING PERMIT**

Issue Date: April 5, 2024

Effective Date:

Expiration Date:

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

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

**State Only Permit No: 09-00235**

Synthetic Minor

Federal Tax Id - Plant Code: 23-1544725-2

**Owner Information**

Name: CP CONVERTERS INC  
Mailing Address: 181 RITTENHOUSE CIR  
BRISTOL, PA 19007-1617

**Plant Information**

Plant: CP CONVERTERS INC/BRISTOL TWP  
Location: 09 Bucks County 09001 Bristol Township  
SIC Code: 2759 Manufacturing - Commercial Printing, Nec

**Responsible Official**

Name: ERIK ABROMAVAGE  
Title: PLANT MANAGER  
Phone: (215) 860 - 7676 Ext.2261 Email: eabromavage@cpflexpack.com

**Permit Contact Person**

Name: RYAN SMITH  
Title: SAFETY DIRECTOR  
Phone: (717) 515 - 9595 Email: rsmith@cpflexpack.com

[Signature] \_\_\_\_\_  
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER



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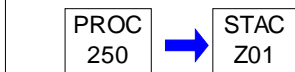
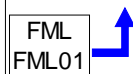
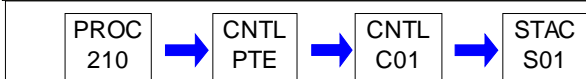
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
210	PRESS 21 - BOBST 10-COLOR	N/A	
		2,276.000 CF/HR	Natural Gas
220	PRESS 22 - BOBST 10-COLOR	2,276.000 CF/HR	Natural Gas
		N/A	
250	DAVIS STANDARD EXTRUSION LAMINATION SURFACE COATING PROCESS	N/A	ISOPROPYL ALCOHOL
C01	REGENERATIVE THERMAL OXIDIZER (RTO)	4,558.000 CF/HR	Natural Gas
PTE	PERMANENT TOTAL ENCLOSURE		
FML01	NATURAL GAS		
S01	RTO STACK		
Z01	FUGITIVE EMISSIONS		

**PERMIT MAPS**

**SECTION B. General State Only Requirements****#001 [25 Pa. Code § 121.1]****Definitions.**

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

**#002 [25 Pa. Code § 127.446]****Operating Permit Duration.**

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

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

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

**#004 [25 Pa. Code § 127.703]****Operating Permit Fees under Subchapter I.**

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

**SECTION B. General State Only Requirements**

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

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

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

**#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]****Transfer of Operating Permits.**

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

**#008 [25 Pa. Code § 127.441]****Need to Halt or Reduce Activity Not a Defense.**

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

**#009 [25 Pa. Code §§ 127.442(a) & 127.461]****Duty to Provide Information.**

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

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

**#010 [25 Pa. Code § 127.461]****Revising an Operating Permit for Cause.**

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

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

**#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]****Operating Permit Modifications**

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

**SECTION B. General State Only Requirements**

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

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

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

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

**#012 [25 Pa. Code § 127.441]****Severability Clause.**

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

**#013 [25 Pa. Code § 127.449]****De Minimis Emission Increases.**

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

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

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

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

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

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

(2) One ton of NO<sub>x</sub> from a single source during the term of the permit and 5 tons of NO<sub>x</sub> at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM<sub>10</sub> from a single source during the term of the permit and 3.0 tons of PM<sub>10</sub> at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:



**SECTION B. General State Only Requirements**

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
  - (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
  - (4) Space heaters which heat by direct heat transfer.
  - (5) Laboratory equipment used exclusively for chemical or physical analysis.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
  - (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
  - (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

**#014 [25 Pa. Code § 127.3]****Operational Flexibility.**

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)

**SECTION B. General State Only Requirements**

(6) Section 127.462 (relating to minor operating permit modifications)

(7) Subchapter H (relating to general plan approvals and general operating permits)

**#015 [25 Pa. Code § 127.11]****Reactivation**

(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

**#016 [25 Pa. Code § 127.36]****Health Risk-based Emission Standards and Operating Practice Requirements.**

(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].

(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

**#017 [25 Pa. Code § 121.9]****Circumvention.**

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

**#018 [25 Pa. Code §§ 127.402(d) & 127.442]****Reporting Requirements.**

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

(c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager  
PA Department of Environmental Protection  
(At the address given in the permit transmittal letter, or otherwise notified)

(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

(e) Any records, reports or information submitted to the Department shall be available to the public except for such

**SECTION B. General State Only Requirements**

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

**#019 [25 Pa. Code §§ 127.441(c) & 135.5]****Sampling, Testing and Monitoring Procedures.**

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

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

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

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

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

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

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

**#021 [25 Pa. Code § 127.441(a)]****Property Rights.**

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

**#022 [25 Pa. Code § 127.447]****Alternative Operating Scenarios.**

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

**SECTION B. General State Only Requirements****#023 [25 Pa. Code §135.3]****Reporting**

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

**#024 [25 Pa. Code §135.4]****Report Format**

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

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

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

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

- (1) Construction or demolition of buildings or structures;
- (2) Grading, paving and maintenance of roads and streets;
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets;
- (4) Clearing of land;
- (5) Stockpiling of materials;
- (6) Open burning operations, as specified in 25 Pa. Code § 129.14;
- (7) N/A
- (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(i) The emissions are of minor significance with respect to causing air pollution; and

(ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a), if such emissions are visible at the point the emissions pass outside the person's property.

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

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

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

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

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

**# 006 [25 Pa. Code §123.42]****Exceptions**

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

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from sources specified in 25 Pa. Code § 123.1 (relating to prohibition of certain fugitive emissions).

**SECTION C. Site Level Requirements****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall comply with the following facility-wide emissions limits:

- (1) Facility-wide VOC emissions equal to or less than 24.900 tons per year, based on a 12-month rolling sum.
- (2) Facility-wide HAP emissions as follows:
  - (i) less than 25 tons per year, any combination HAPs, based on a 12-month rolling sum,
  - (ii) less than 10 tons per year, any single HAP, based on a 12-month rolling sum.

(b) Facility-wide emissions include emissions from sources listed in Section A of the permit as well as miscellaneous sources exempt from plan approval requirements which are listed in Section H of the permit.

**# 008 [25 Pa. Code §129.14]****Open burning operations**

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

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

**II. TESTING REQUIREMENTS.****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, the most current version of the DEP Source Testing Manual, and the EPA Clean Air Act National Stack Testing Guidance, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

**III. MONITORING REQUIREMENTS.****# 010 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

**SECTION C. Site Level Requirements****# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

- (1) Odors which may be objectionable (as per 25 Pa. Code § 123.31).
- (2) Visible Emissions (as per 25 Pa. Code §§ 123.41 and 123.42).
- (3) Fugitive Particulate Matter (as per 25 Pa. Code §§ 123.1 and 123.2).

(b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:

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

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

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

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

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

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

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

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

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

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

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

The permittee shall maintain monthly records of facility-wide VOC and HAP emissions, including 12-month rolling sums. Records shall include emissions from sources listed in Section A of the permit as well as miscellaneous sources exempt from plan approval requirements which are listed in Section H of the permit.

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

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment,

**SECTION C. Site Level Requirements**

process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

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

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

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

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

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

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

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

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



**SECTION C. Site Level Requirements**

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

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

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

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

(1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,

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

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

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

**VI. WORK PRACTICE REQUIREMENTS.****# 017 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

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

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

(c) Paving and maintenance of roadways; and

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

**# 018 [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 air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A of this operating permit is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to 25 Pa. Code Article III or any other applicable rule promulgated under the Clean Air Act.

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

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



## SECTION C. Site Level Requirements

### # 020 [25 Pa. Code §127.441]

#### **Operating permit terms and conditions.**

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

#### **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: 210

Source Name: PRESS 21 - BOBST 10-COLOR

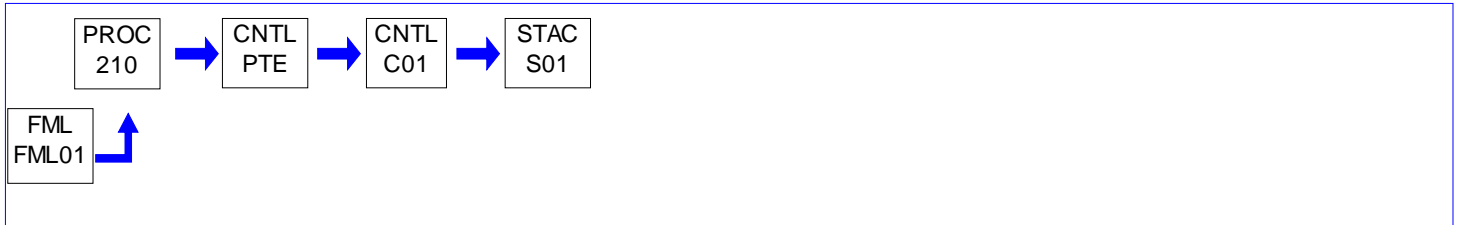
Source Capacity/Throughput:

N/A

2,276.000 CF/HR

Natural Gas

Conditions for this source occur in the following groups: FLEXO PRESSES

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

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

Source consists of a Bobst Model 20SIX 10-color press, Press 21, installed March 2016 with a dryer consisting of 2-1.195 MMBtu/hr natural gas burners.

**SECTION D. Source Level Requirements**

Source ID: 220

Source Name: PRESS 22 - BOBST 10-COLOR

Source Capacity/Throughput: 2,276.000 CF/HR

Natural Gas

N/A

Conditions for this source occur in the following groups: FLEXO PRESSES

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

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

This source consists of a Bobst Model 20SIX 10-color press, Press 22, installed in June 2016 with a dryer unit consisting of 2 - 1.195 MMBtu.hr natural gas burners.

**SECTION D. Source Level Requirements**

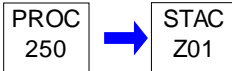
Source ID: 250

Source Name: DAVIS STANDARD EXTRUSION LAMINATION SURFACE COATING PROCESS

Source Capacity/Throughput:

N/A

ISOPROPYL ALCOHOL

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The VOC emissions from this source are limited to 4.05 tons per year on a 12-month rolling sum basis.

**II. TESTING REQUIREMENTS.****# 002 [25 Pa. Code §129.52b]****Control of VOC emissions from paper, film and foil surface coating processes.**

In accordance with 25 Pa. Code § 129.52b(c)(1)(iv), sampling and testing shall be done in accordance with the procedures and test methods specified in Chapter 139 (relating to sampling and testing).

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

The permittee shall calculate the VOC emissions from this source using the amount of VOC-containing material used per month (mass in pounds per month) and the VOC content of each material used (weight percent VOC).

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

(a) The permittee shall maintain records of the CPDS and SDS and/or data from any alternate Department-approved methods used to determine VOC and HAP content of each material used at this source.

(b) The permittee shall calculate and record the VOC emissions from this source on a monthly basis, including 12-month rolling sums.

(c) The permittee shall record the amount of isopropyl alcohol (IPA) used on this source on a monthly basis, including 12-month rolling sums.

**# 005 [25 Pa. Code §129.52b]****Control of VOC emissions from paper, film and foil surface coating processes.**

In accordance with 25 Pa. Code § 129.52b(d), the permittee shall maintain records sufficient to demonstrate compliance as follows:

(a) The permittee shall maintain daily records of the following parameters for each coating, thinner, component or cleaning solvent, as-supplied:

- (1) Name and identification number of the coating, thinner, component or cleaning solvent.
- (2) Volume used.
- (3) Mix ratio.
- (4) Density or specific gravity.
- (5) Weight percent of total volatiles, water, solids and exempt solvents.
- (6) VOC content.

**SECTION D. Source Level Requirements**

(b) The permittee shall maintain daily records of the VOC content of each as-applied coating or cleaning solvent.

**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.**

The permittee shall operate and maintain the source in accordance with manufacturers' specifications and good air pollution control practices.

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

The permittee shall limit the amount of isopropyl alcohol (IPA) used on this source to less than 8,100 pounds (or 1,236 gallons) per year, based on a 12-month rolling sum.

[Compliance with this condition demonstrates compliance with the 4.05 tons of VOC per year emissions limit, based on a 12-month rolling sum.]

**# 008 [25 Pa. Code §129.52b]****Control of VOC emissions from paper, film and foil surface coating processes.**

(a) In accordance with 25 Pa. Code § 129.52b(c)(1)(i), the permittee shall not cause or permit the emission into the outdoor atmosphere of VOCs from the surface coating process, unless the VOC content of each as-applied coating is equal to or less than 0.08 lb VOC per lb coating.

(b) In accordance with 25 Pa. Code § 129.52b(f)(7), the permittee shall not cause or permit the emission into the outdoor atmosphere of VOCs from the surface coating process, unless the coatings are applied using extrusion coating.

**# 009 [25 Pa. Code §129.52b]****Control of VOC emissions from paper, film and foil surface coating processes.**

In accordance with 25 Pa. Code § 129.52b(h), the permittee shall comply with the following work practices for cleaning materials:

- (a) Store all VOC-containing cleaning materials and used shop towels in closed containers.
- (b) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times, except when depositing or removing these materials.
- (c) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.
- (d) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- (e) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.

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

This source consists of a Davis Standard Extrusion Laminator with electric dryer, Extruder 21. A modification to the operation of the laminator was performed under plan approval 09-0235B in 2022 to allow the use of solvent in laminating process.

**SECTION D. Source Level Requirements**

Source ID: C01

Source Name: REGENERATIVE THERMAL OXIDIZER (RTO)

Source Capacity/Throughput: 4,558.000 CF/HR Natural Gas

**I. RESTRICTIONS.****Control Device Efficiency Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain a minimum overall VOC control efficiency of 98% for the Regenerative Thermal Oxidizer (Control Device C01 - RTO).

[Compliance with this streamline permit condition also assures compliance with 25 Pa. Code § 129.67a(c)(3), Table 1 which requires 80% overall control efficiency.]

**II. TESTING REQUIREMENTS.****# 002 [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.]

(a) The permittee shall perform a stack test on the Regenerative Thermal Oxidizer (Control Device ID C01) using Department approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while all sources ducted to the RTO are operating at maximum routine operating conditions or under other such conditions, within the capacity of the equipment, as may be requested by the Department. Refer to PADEP Source Testing Program website online for further information related to source testing including Source Testing FAQ and the PADEP Source Testing Manual.

(b) The source test shall, at a minimum, determine the RTO destruction efficiency of VOC emissions and control equipment capture efficiency, using methods in paragraph (d) of this condition, for all sources ducted to the RTO. The test shall be conducted in accordance with the provisions of the appropriate EPA Test Method(s) or other Department-approved methodology and in accordance with the procedures and test methods specified in Chapter 139 25 Pa. Code Chapter 139.

(c) The permittee shall monitor and record the 3-hour average RTO combustion chamber temperature during the stack test in order to determine a baseline for compliance with 25 Pa. Code § 129.67a(d)(2) once every five (5) years.

(d) The overall control efficiency of the add-on air pollution control device shall be determined by the following test methods and procedures subject to prior written approval by the Department.

(1) The capture efficiency for the permanent total enclosure encasing Source IDs 210 and 220 shall be determined in accordance with either of the following methods:

(i) 40 CFR Part 51, Appendix M, Methods 204—204F, including updates and revisions.

(ii) 40 CFR Part 63, Subpart KK, Appendix A (relating to data quality objective and lower confidence limit approaches for alternative capture efficiency protocols and test methods).

(2) The control efficiency shall be determined using one or more of the following methods, as applicable. The method used to measure the inlet concentration of VOC may be the same method used to determine the outlet concentration of VOC unless use of the same method is determined to be technically infeasible.

(i) EPA Reference Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon, codified in 40 CFR Part 60, Appendix A, including updates and revisions. EPA Reference Method 25 may be used if the total gaseous nonmethane organic compound concentration is equal to or greater than 50 parts per million by volume, measured as carbon.

(ii) EPA Reference Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization

**SECTION D. Source Level Requirements**

Analyzer, codified in 40 CFR Part 60, Appendix A, including updates and revisions. EPA Reference Method 25A may not be used if the total gaseous nonmethane organic compound concentration at the outlet of the add-on air pollution control device is equal to or greater than 50 parts per million by volume, measured as carbon.

(iii) EPA Reference Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography, codified in 40 CFR Part 60, Appendix A, including updates and revisions. EPA Reference Method 18 may be used if the total gaseous nonmethane organic compound concentration is equal to or greater than 50 parts per million by volume, measured as carbon. EPA Reference Method 18 may be used in conjunction with EPA Reference Method 25A to subtract emissions of exempt VOCs.

(e) Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with 25 Pa. Code § 129.67a may be used if prior approval is obtained in writing from the Department and the EPA.

(f) At least ninety (90) calendar days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of the sampling ports and other data necessary to ensure the collection of representative samples.

(g) At least thirty (30) calendar days prior to the test, the permittee shall notify the Regional Air Program Manager of the date and time of the test.

(h) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval

(i) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

[Subconditions (f), (g), (h) streamline compliance with 25 Pa. Code § 129.67a(e)(6).]

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

(a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region  
RA-EPSEstacktesting@pa.gov

Central Office  
RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.

## (1) Test Date(s)

- (i) For protocols, provide the proposed date on which testing will commence or "TBD"
- (ii) For reports, provide the first and last day of testing

(2) Primary Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

(3) Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other ID" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

(4) Testing Requirements (all that apply):



**SECTION D. Source Level Requirements**

- (i) Operating permit number 09-00235
- (ii) Applicable state regulation 25 Pa. Code §129.67a

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL."

**III. MONITORING REQUIREMENTS.****# 004 [25 Pa. Code §129.67a]****Control of VOC emissions from flexible packaging printing presses.**

(a) The permittee shall calibrate, maintain, and operate the add-on air pollution control device (Control Device C01 - RTO) monitoring equipment according to manufacturer's specifications at all times the add-on air pollution control device is in use, in accordance with 25 Pa. Code § 129.67a(d)(1).

(b) The permittee shall continuously monitor the minimum combustion or operating temperature of the RTO, in accordance with 25 Pa. Code § 129.67a(d)(1)(i).

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

The permittee shall record the temperature of the RTO combustion chamber on a continuous basis while the RTO is operating.

[This condition streamlines compliance with the requirements of 25 Pa. Code § 129.67a(d)(1)(i) and (e)(1)(i).]

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

The permittee shall maintain onsite a copy of the latest stack test report and records of all data gathered during the latest stack test, including the average temperature of the RTO during testing.

**# 007 [25 Pa. Code §129.67a]****Control of VOC emissions from flexible packaging printing presses.**

The permittee shall record the maintenance performed on the add-on air pollution control device and monitoring equipment, including the date and type of maintenance, in accordance with 25 Pa. Code § 129.67a(e)(1)(ii).

**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.****# 008 [25 Pa. Code §129.67a]****Control of VOC emissions from flexible packaging printing presses.**

The permittee shall operate the add-on air pollution control device (Control Device C01 - RTO) at a 3-hour average temperature not lower than 50°F below the average temperature demonstrated during the most recent compliant source test approved by the Department, in accordance with 25 Pa. Code § 129.67a(d)(2).

[Note: During the most recent stack test conducted on July 28, 2020, the RTO achieved compliance while operating at a 3-hour average temperature of 1600°F. Therefore, the minimum RTO temperature is 1550°F; an excursion will result any time the measured 3-hour average falls below 1550°F.]

**SECTION D. Source Level Requirements****# 009 [25 Pa. Code §129.67a]****Control of VOC emissions from flexible packaging printing presses.**

The permittee shall operate the RTO at all times that Source ID 210 (Press 21) and/or Source ID 220 (Press 22) is/are in operation, in accordance with 25 Pa. Code § 129.67a(d)(3).

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

The regenerative thermal oxidizer is a MEGTEC systems CLEANSWITCH Model 250-95.

**SECTION E. Source Group Restrictions.**

Group Name: FLEXO PRESSES

Group Description: Press 21, Press 22

Sources included in this group

ID	Name
210	PRESS 21 - BOBST 10-COLOR
220	PRESS 22 - BOBST 10-COLOR

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the aggregate post-control VOC emissions from all flexible packaging printing operations including VOC emissions from operation of Source ID 210 (Press 21), Source ID 220 (Press 22) and related cleaning activities at the presses to 20.00 tons per year, based on a 12-month rolling sum.

**II. TESTING REQUIREMENTS.****# 002 [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.]

The permittee shall use one of the following methods to determine the VOC and HAP content of each VOC-containing material used for flexographic printing operations at Press 21 and Press 22:

- (a) Conduct sampling of VOC-containing material and testing for the VOC content of the material in accordance with the procedures and test methods specified in Chapter 139, pursuant to 25 Pa. Code § 129.67a(f)(1)(i).
- (b) Use data from Certified Product Data Sheets (CPDS) and Safety Data Sheets (SDS) to determine the VOC and HAP content of inks, varnish, solvent, or other components applied at this source.
- (c) Perform USEPA Test Method 24 to determine the VOC and HAP content of inks, varnish, solvent, or other components applied at this source.

[Note: Items (b) and (c) have been approved by the Department in accordance with 25 Pa. Code § 129.67a(f)(3).]

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

The permittee shall calculate the aggregate post-control VOC emissions from Source ID 210 (Press 21) and Source ID 220 (Press 22) using the amount of VOC-containing material purchased or used per month (mass in pounds per month), the VOC content of each material purchased or used (weight percent VOC), and the overall control device efficiency of the RTO determined during the most recent compliant stack test.

**IV. RECORDKEEPING 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 § 129.67a(e)(4).]

- (a) The permittee shall maintain records of the CPDS and SDS and/or data from any alternate Department-approved methods used to determine VOC and HAP content of each material.
- (b) The permittee shall maintain records of the amount of each VOC-containing material, in pounds per month, purchased or used for flexographic printing operations on a monthly basis. The permittee may group materials into classes using the highest VOC content in any material in a class to represent that class of material.
- (c) The permittee shall calculate and record the aggregate post-control VOC emissions from all flexible packaging printing

**SECTION E. Source Group Restrictions.**

operations at Source ID 210 (Press 21) and Source ID 220 (Press 22) on a monthly basis, including 12-month rolling sums.

**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 operate and maintain each press in accordance with manufacturers' specifications and good air pollution control practices.

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

The permittee shall maintain the permanent total enclosure for this source in the same configuration as it is tested, unless otherwise approved by the Department.

[This condition serves as Best Available Technology (BAT).]

**# 007 [25 Pa. Code §129.67a]****Control of VOC emissions from flexible packaging printing presses.**

(a) The permittee shall comply with the following work practices for cleaning activities at the facility, pursuant to 25 Pa. Code § 129.67a(g):

- (1) Store all VOC-containing cleaning solutions, waste cleaning solutions and used shop towels in closed containers.
  - (2) Ensure that mixing vessels and storage containers used for VOC-containing cleaning solutions, waste cleaning solutions and used shop towels are kept closed at all times, except when depositing or removing these solutions or shop towels.
  - (3) Minimize spills of VOC-containing cleaning solutions and waste cleaning solutions and clean up spills immediately.
  - (4) Convey VOC-containing cleaning solutions, waste cleaning solutions and used shop towels from one location to another in closed containers or pipes.
- (b) The requirements in paragraph (a) apply to the following activities:
- (1) Cleaning of ink, coating or adhesive from a press.
  - (2) Cleaning of ink, coating or adhesive from press parts, including press parts that have been removed from the press for cleaning.
  - (3) Cleaning of ink, coating or adhesive from areas around a press.

**# 008 [25 Pa. Code §129.67a]****Control of VOC emissions from flexible packaging printing presses.**

The permittee shall reduce the overall weight of VOCs emitted to the atmosphere from all inks, coatings, and adhesives combined used on this press through the use of the regenerative thermal oxidizer (C01), according to 25 Pa. Code § 129.67a(c)(3).

**VII. ADDITIONAL REQUIREMENTS.****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

These sources are a flexible packaging flexographic printing presses.



**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
210	PRESS 21 - BOBST 10-COLOR		
<b>Emission Limit</b>		<b>Pollutant</b>	
20.000	Tons/Yr	12-month rolling sum; aggregate of Source ID 210 and Source ID 220	VOC
220	PRESS 22 - BOBST 10-COLOR		
<b>Emission Limit</b>		<b>Pollutant</b>	
20.000	Tons/Yr	12-month rolling sum; aggregate of Source ID 210 and Source ID 220	VOC
250	DAVIS STANDARD EXTRUSION LAMINATION SURFACE COATING PROCESS		
<b>Emission Limit</b>		<b>Pollutant</b>	
4.050	Tons/Yr	12-month rolling sum	VOC

**Site Emission Restriction Summary**

<b>Emission Limit</b>		<b>Pollutant</b>
24.900	Tons/Yr	12-month rolling sum
		VOC

**SECTION H. Miscellaneous.**

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 March 2018 - Initial Issuance (AUTH ID 1205385)  
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The following plan approvals serve as the basis for certain terms and conditions set forth in this Operating Permit:

- (1) Plan Approval No. 09-0235 (AUTH ID 1080607) for the installation of Source ID 210 and Source ID 220
- (2) Plan Approval No. 09-0235A (AUTH ID 1250153) for the installation of Source ID 240

The Department has determined that the emissions from the following activities do not require additional limitations, monitoring, or recordkeeping, other than the requirements set forth in Section C of this permit:

- (1) Natural gas usage in the RTO – 4.8 MMBtu/hr
- (2) Two (4) natural gas dryers on each press – 7.0 MMBtu/hr total
- (3) Seven (7) natural gas space heaters – 1.96 MMBtu/hr total
- (4) Fourteen (14) natural gas HVAC units – 2.47 MMBtu/hr total
- (5) Web extrusion laminating lines with corona treaters
  - (a) Davis-Standard LLC Web Extrusion Laminating Line
  - (b) Nordmeccanica Super Simplex SL Solventless Laminator
- (6) Corona treater on each press
- (7) Distillation unit and ink and solvent still located in separate room
- (8) Platemaking Still located on second floor (closed loop, heat exhaust only)
- (9) Two (2) resin silos located outside
- (10) Two (2) seaming machines
- (11) One (1) aqueous anilox roll cleaner located in the printing room
- (12) One (1) electric fire pump.

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 January 2022 - Administrative Amendment (AUTH ID 1380112)  
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The administrative amendment incorporates terms and conditions of Plan Approval No. 09-0235A which is for the installation of Source ID 240 (Press 24). The aggregate post-control VOC emission limit for all flexible packaging printing presses routed to the RTO is revised to 20.0 tons per year, based on a 12-month rolling sum.

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 November 2022 - Administrative Amendment (AUTH ID 1409419)  
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The administrative amendment incorporates terms and conditions of Plan Approval No. 09-0235B which is for the use of solvent-based lamination formulations on existing extrusion equipment (Source ID 250). The aggregate post-control VOC emission limit for all flexible packaging printing presses routed to the RTO is revised to 18.5 tons per year, based on a 12-month rolling sum.

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 April 2024 - renewal of SMOP permit 09-00235. Removal of Source ID 240- Press 24, due to fire; included 4.05 tpy limit for Source ID 250 in Section G and moved the throughput limit of 8,100 lb/yr of IPA to restrictions. Also included the spill and fugitive emission minimization workpractices under Sources rather than Section C for Operations ease of access during inspections.



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

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