



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date: October 10, 2025 Effective Date: October 10, 2025

Expiration Date: October 9, 2030

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: 09-00018

Synthetic Minor

Federal Tax Id - Plant Code: 16-0331690-1

	Owner Information	
Name: RR DONNELLEY		
Mailing Address: 227 W MONROE ST		
SUITE 500		
CHICAGO, IL 60606-5001		
	Plant Information	
Plant: RR DONNELLEY/QUAKERTOWN		
Location: 09 Bucks County	09940 Richland Township	
SIC Code: 2761 Manufacturing - Manifold Busine	ess Forms	
	Responsible Official	
Name: JOHN KIEGLER		
Title: DIRECTOR OF OPERATIONS		
Phone: (215) 804 - 8510	Email: john.kiegler@rrd.com	
Permit Contact Person		
Name: MIKE MILSAP		
Title: MFG SUPERVISOR		
Phone: (267) 209 - 0154	Email: mike.milsap@rrd.com	
[Signature]		
JILLIAN A. GALLAGHER, SOUTHEAST REGION	I AIR PROGRAM MANAGER	



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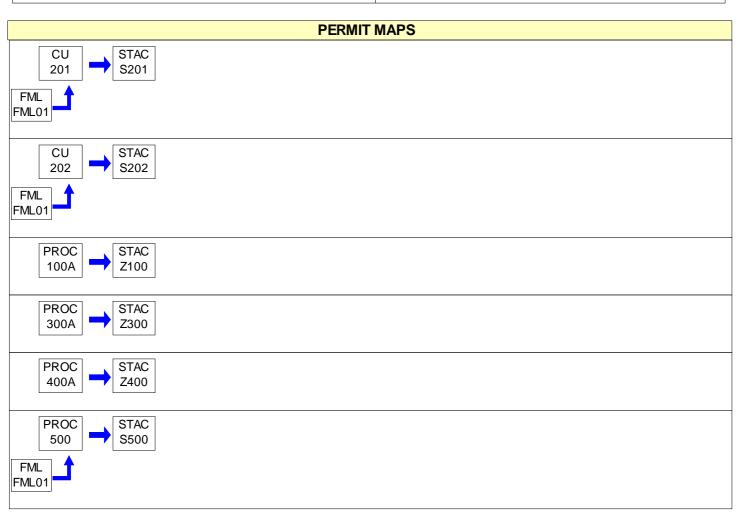
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SECTION A. Site Inventory List

Source II	Source Name	Capacity	/Throughput	Fuel/Material
201	CLEAVER BROOKS BOILER	6.300	MMBTU/HR	
		6,000.000	CF/HR	Natural Gas
202	CLEAVER BROOKS BOILER	6.300	MMBTU/HR	
		6,000.000	CF/HR	Natural Gas
100A	LITHOGRAPHIC PRESSES (6 UNITS)		N/A	
300A	THREE (3) UV CURE LITHO PRESSES		N/A	
400A	UV FLEXOGRAPHIC PRESSES (2 UNITS)		N/A	
500	CUMMINS/ONAN EMERG GENERATOR (35KW)	0.394	MMBTU/HR	
		394.000	CF/HR	Natural Gas
FML01	NATURAL GAS			
S201	BOILER STACK			
S202	BOILER STACK			
S500	CUMMINS/ONAN EMERG GEN STACK			
Z100	FUGITIVE EMISSIONS: LITHOGRAPHIC PRESSES			
Z300	FUGITIVE EMISSIONS: UV PRESSES			
Z400	FUGITIVE EMISSIONS: UV FLEXO PRESSES			





#001 [25 Pa. Code § 121.1]

Definitions.

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

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

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

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

Permit Renewal.

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

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

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





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

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

Transfer of Operating Permits.

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

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

Inspection and Entry.

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

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

Compliance Requirements.

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





- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

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

Duty to Provide Information.

- (a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.
- (b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

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

#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]

Operating Permit Modifications

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





- (b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.
- (e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#012 [25 Pa. Code § 127.441]

Severability Clause.

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

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
 - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:



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

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

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

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



- (6) Section 127.462 (relating to minor operating permit modifications)
- (7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11a]

Reactivation of Sources

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

- (a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
- (b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]

Circumvention.

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

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

Reporting Requirements.

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

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

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





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

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

Sampling, Testing and Monitoring Procedures.

- (a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
- (b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

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

Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
 - (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of the analyses.
 - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

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





#023 [25 Pa. Code §135.3]

Reporting

- (a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.
- (b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]

Report Format

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

#025 [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. §§ 4001-4015).



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:

- (a) Construction or demolition of buildings or structures;
- (b) Grading, paving and maintenance of roads and streets;
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets;
- (d) Clearing of land;
- (e) Stockpiling of materials;
- (f) Open burning operations, as specified in 25 Pa. Code § 129.14;
- (g) N/A;
- (h) N/A; and,
- (i) Sources and classes of sources other than those identified in (a)-(h), above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution; and,
 - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a)(1)-(9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]

Limitations

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 minutes in any 1 hour.
- (b) Equal to or greater than 60% at any time.

006 [25 Pa. Code §123.42]

Exceptions

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

(a) When the presence of uncombined water is the only reason for failure to meet the limitations.





- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a)(1)-(9) (relating to prohibition of certain fugitive emissions).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The aggregate Volatile Organic Compound (VOC) emissions from all emission sources at this facility shall not exceed 20 tons per year as a twelve (12) month rolling sum, calculated monthly.

008 [25 Pa. Code §129.14]

Open burning operations

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

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

II. TESTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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





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

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall monitor the facility, once per operating day, for the following:
 - (1) Odors which may be objectionable (as per 25 Pa. Code §123.31);
 - (2) Visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
 - (3) Fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).
- (b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:
 - (1) Be investigated;
 - (2) Be reported to the facility management, or individual(s) designated by the permittee;
 - (3) Have appropriate corrective action taken (for emissions that originate on-site); and
 - (4) Be recorded in a permanent written log.
- (c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification (if applicable), complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall compile and maintain records of the aggregate VOC emissions from all emission sources monthly, as a 12-monthly rolling sum.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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





REPORTING REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the threshold quantity at a facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:
 - (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
 - (i) Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or,
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
 - (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
 - (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If this facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
 - (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
 - (2) Certify that this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If this facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to DEP's 24-hour Emergency Hotline at 800.541.2050. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or





operator error.

- (b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.
- (c) The report shall describe the following:
 - (1) Name, permit or authorization number, and location of the facility;
 - (2) Nature and cause of the malfunction, emergency or incident;
 - (3) Date and time when the malfunction, emergency or incident was first observed;
 - (4) Expected duration of excess emissions;
 - (5) Estimated rate of emissions; and
 - (6) Corrective actions or preventative measures taken.
- (d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.
- (e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.
- (f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.
- (g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

VI. WORK PRACTICE REQUIREMENTS.

017 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

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

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the source(s), listed in Section A and Section H, where applicable, of this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with





manufacturer's specifications.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.



Source ID: 201 Source Name: CLEAVER BROOKS BOILER

Source Capacity/Throughput: 6.300 MMBTU/HR

6,000.000 CF/HR Natural Gas

Conditions for this source occur in the following groups: BOILERS



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.

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).





Source ID: 202 Source Name: CLEAVER BROOKS BOILER

Source Capacity/Throughput: 6.300 MMBTU/HR

6,000.000 CF/HR Natural Gas

Conditions for this source occur in the following groups: BOILERS



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.

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).

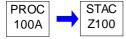




Source ID: 100A Source Name: LITHOGRAPHIC PRESSES (6 UNITS)

Source Capacity/Throughput: N/A

Conditions for this source occur in the following groups: ALL 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.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall monitor and calculate the following, for this source:
 - (1) For each non-heatset ink:
 - (i) Monthly consumption in pounds or gallons.
 - (ii) The percent by weight of VOC and Hazardous Air Pollutants (HAP), as applied.
 - (iii) Monthly VOC and HAP emissions.
 - (2) For each fountain solution and additive:
 - (i) Monthly consumption in pounds or gallons.
 - (ii) The percent by weight or weight to volume ratio (lbs/gal) of VOC and HAP.
 - (iii) Monthly VOC and HAP emissions.
 - (3) For each cleaning solution:
 - (i) Monthly consumption in pounds or gallons.
 - (ii) The percent by weight or weight to volume ratio (lbs/gal) of VOC and HAP.
 - (iii) Monthly VOC and HAP emissions.
- (b) The permittee shall calculate VOC emissions based on the emission retention factors as specified in §129.67b.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following, for this source:

- (a) For each non-heatset ink:
- (1) Monthly consumption in pounds or gallons.
- (2) The percent by weight of VOC and Hazardous Air Pollutants (HAP), as applied.





- (3) Monthly VOC and HAP emissions.
- (b) For each fountain solution and additive:
 - (1) Monthly consumption in pounds or gallons.
 - (2) The percent by weight or weight to volume ratio (lbs/gal) of VOC and HAP.
 - (3) Monthly VOC and HAP emissions.
- (c) For each cleaning solution:
 - (1) Monthly consumption in pounds or gallons.
 - (2) The percent by weight or weight to volume ratio (lbs/gal) of VOC and HAP.
 - (3) Monthly VOC and HAP emissions.
- (d) Monthly VOC and HAP emissions from this source.
- (e) MSDS and/or CPDS of each ink, cleaning solution, and any chemical compounds used in the operation.

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.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The as applied VOC content of the non-heatset web inks used on the presses shall remain at or below 20 percent, by weight.

VII. ADDITIONAL REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 100A is composed of the following Lithographic Presses:

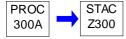
- (a) Press 42, 6 Color Lithographic Press; Manufacturer Toppan Moore Co; Model No. TMSW20V-6; Mfr. date Jan 1984.
- (b) Press 45, 6 Color Lithographic Press; Manufacturer Toppan Moore Co; Model No. TMSW20V-41; Mfr. date Jan 1987; SN 87002.
- (c) Press 49, 4 Color Lithographic Press; Manufacturer Toppan Moore Co; Model No. TMSW20V-76; Mfr. date Dec 1990; SN 90038.
- (d) Press 52, 7 Color Lithographic Press; Manufacturer Muller Martini; Model Type: 2302; Mfr. date 1996; SN 93.00855.
- (e) Press 54, 4 Color Lithographic Press; Manufacturer Toppan Moore Co; Model No. TMSW20V-13; Mfr. date Feb 1984.
- (f) Press 55, 6 Color Lithographic Press; Manufacturer Toppan Moore Co; Model No. TMSW20V-56; Mfr. date Apr 1989; SN 89009.



Source ID: 300A Source Name: THREE (3) UV CURE LITHO PRESSES

Source Capacity/Throughput: N/A

Conditions for this source occur in the following groups: ALL 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.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor and calculate the following, for this source:

- (a) For each UV ink:
 - (1) Monthly consumption in pounds or gallons.
 - (2) The percent by weight of VOC and Hazardous Air Pollutants (HAP), as applied.
 - (3) Monthly VOC and HAP emissions.
- (b) For each fountain solution and additive:
 - (1) Monthly consumption in pounds or gallons.
 - (2) The percent by weight or weight to volume ratio (lbs/gal) of VOC and HAP.
 - (3) Monthly VOC and HAP emissions.
- (c) For each cleaning solution:
 - (1) Monthly consumption in pounds or gallons.
 - (2) The percent by weight or weight to volume ratio (lbs/gal) of VOC and HAP.
 - (3) Monthly VOC and HAP emissions.
- (d) The permittee shall calculate VOC emissions based on the emission retention factors as specified in §129.67b.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following, for this source:

- (a) For each UV ink:
- (1) Monthly consumption in pounds or gallons.
- (2) The percent by weight of VOC and Hazardous Air Pollutants (HAP), as applied.





- (3) Monthly VOC and HAP emissions.
- (b) For each fountain solution and additive:
 - (1) Monthly consumption in pounds or gallons.
 - (2) The percent by weight or weight to volume ratio (lbs/gal) of VOC and HAP.
 - (3) Monthly VOC and HAP emissions.
- (c) For each cleaning solution:
 - (1) Monthly consumption in pounds or gallons.
 - (2) The percent by weight or weight to volume ratio (lbs/gal) of VOC and HAP.
 - (3) Monthly VOC and HAP emissions.
- (d) Monthly VOC and HAP emissions from this source.
- (e) MSDS and/or CPDS of each ink, cleaning solution, and any chemical compounds used in the operation.

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.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 300A consists of the following UV Cure Presses:

- (a) Press 57, 8 Color UV Cure Press; Manufacturer Toppan Moore; Model TMSW20V-31; Mfr. date July 1986; SN 86029.
- (b) Press 58, 8 Color UV Cure Press; Manufacturer Toppan Moore; Model TMSW20V-40; Mfr. date Feb 1987; SN 87003.
- (c) Press 61, 8 Color UV Cure Press; Manufacturer Muller Martini; Model Type: 2088; Mfr. date 1997; SN 93.00879.





Source ID: 400A Source Name: UV FLEXOGRAPHIC PRESSES (2 UNITS)

Source Capacity/Throughput: N/A

PROC STAC Z400

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The total VOC emissions from all inks, coatings and adhesives, combined with related cleaning activities, shall be less than the following emission rates for each flexographic printing line:

- (a) 450 lbs per month; and,
- (b) 2.7 tons per 12 month rolling period

[If either emission rate is exceeded, the permittee will be required to submit a Plan Approval for the respective source(s).]

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The as applied cleaning solutions shall meet one of the following limits:
 - (1) VOC composite partial vapor pressure less than 10 millimeters of mercury at 68 °F (20 °C).
 - (2) A VOC content less than 70% by weight.
- (b) The facility-wide usage of cleaning solution(s), which does not meet the above requirements, shall not exceed 110 gallons per year, annually.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

If the permittee does not have the necessary records to certify the composition of inks, coatings, adhesives, and/or solvents by means of Certified Product Data Sheets (CPDS), Safety Data Sheets (SDS), or other such manufacturer documentation, then the permittee shall perform EPA Method 24 testing, as specified in 40 CFR Part 60, Appendix A, for those materials that are missing the required documentation.

- (a) Testing is to be performed at least once per year on all inks, coatings, and solvents that do not have the required documentation.
- (b) Copies of the annual (once per year) test results are to be maintained on site.

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following information:

(a) The amount (in gallons or pounds) of inks, coatings, adhesives, and clean up solvents used by each flexographic printing press, on a monthly basis.





(b) Calculations of total VOC emissions from each flexographic printing press, on a monthly basis and as a 12-month rolling sum.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain on site the chemical composition data for all VOC containing inks, coatings, adhesives, and cleaning solvents.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following information for each flexographic printing press:

- (a) The amount (in gallons or pounds) of imaging oil, inks, coatings/primers, and clean up solvents used, on a monthly basis.
- (b) The following parameters for the inks, coatings, adhesives, and clean up solvents, as supplied:
 - (1) Component name and identification number;
 - (2) Weight per gallon, as delivered from the vendor or supplier.
 - (3) Percent (by weight) of volatile organic compounds (VOCs) per gallon, as delivered from the vendor or supplier.
 - (4) Percent solids (by weight) per gallon, as delivered from the vendor or supplier.
 - (5) Percent water and exempt solvent, as delivered from vendor or supplier.
 - (6) Density of VOC, as delivered from the vendor or supplier.
- (c) For cleaning solvents, as applied, either:
 - (1) The composite partial vapor pressure (in millimeters of mercury at 68 °F or 20 °C); or,
 - (2) The VOC content, by weight.
- (d) All inspections/maintenance performed on the press, any deficiencies, and any corrective action taken.
- (e) Calculations of total VOC emissions, on a monthly basis and as a 12-month rolling sum.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Records shall be maintained at the site for five (5) years and made available upon request.

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 §127.441]

Operating permit terms and conditions.

- (a) The permittee shall:
 - (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 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) Each flexographic printing press shall be operated and maintained in accordance with manufacturer's specifications.

VII. ADDITIONAL REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 400A consists of the following flexographic printing presses:

- (a) Press 62, 3 Color UV Cure Press; Manufacturer ETI Converting Equipment; Model Cohesio 2603; SN 23C2697.
- (b) Press 63, 3 Color UV Cure Press; Manufacturer ETI Converting Equipment; Model Cohesio 2603; SN 23C2688.

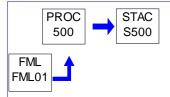




Source ID: 500 Source Name: CUMMINS/ONAN EMERG GENERATOR (35KW)

Source Capacity/Throughput: 0.394 MMBTU/HR

394.000 CF/HR Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

Emissions of filterable PM from this source shall not exceed 0.04 grains per dry standard cubic feet.

002 [25 Pa. Code §123.21]

General

Emissions of SOx from this source shall not exceed 500 ppm, on a dry volume basis.

Operation Hours Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 40 CFR § 63.6640(f).]

- (a) The permittee shall not operate the emergency generator for more than 500 hours in any consecutive twelve (12) month period.
- (b) The emergency generator may be operated up to 100 hours per year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the EPA and DEP for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of the emergency generator beyond 100 hours per calendar year.
- (c) The emergency generator may be operated up to 50 hours per year in non-emergency situations. The 50 hours of operation in non-emergency situations counts as part of the 100 hours per year for maintenance and testing in paragraph (b), above. The emergency generator may NOT be used for peak shaving purposes. However, the 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
 - (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - (4) The power is provided only to the facility itself or to support the local transmission and distribution system.





(5) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]

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

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

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

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.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]

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

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

The emergency generator shall be equipped with a functional non-resettable hour meter to monitor the hours of operation.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 40 CFR §§ 63.6640, 63.6655, and 63.6660.]

- (a) Records shall be in a form suitable and readily available for expeditious review.
- (b) The permittee shall keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (c) The permittee shall maintain records to demonstrate compliance with either of the following:
 - (1) Operating and maintaining the emergency generator according to the manufacturer's emission-related operation and maintenance instructions; or,
 - (2) Operating and maintaining the emergency generator according to a maintenance plan developed by the permittee such that it provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- (d) The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purpose specified in 40 CFR § 63.6640(f)(4)(ii), as referenced in Condition #003, paragraph (c), the permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.
- (e) The permittee shall record on a monthly basis and as a 12-month rolling total the total number of hours that the emergency generator operates, to calculate the emissions of air pollutants and to demonstrate compliance with the rolling





12-month operating hours restriction.

- (f) The permittee shall maintain the following maintenance records:
- (1) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or monitoring equipment.
- (2) Records of all required maintenance performed on the emergency generator and on the monitoring equipment, including oil analysis and results.
- (3) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR § 63.6605(b), including corrective actions to restore malfunctioning process and monitoring equipment to its normal or usual manner of operation.
- (g) If the permittee participates in an oil analysis program pursuant to 40 CFR § 63.6625(i), the permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. Otherwise, the permittee shall maintain the necessary documentation to demonstrate compliance with the oil change requirements identified under Work Practice Requirements, pursuant to 40 CFR § 63.6640.

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

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

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

- (a) The following requirements apply to the emergency generator:
 - (1) The permittee shall change the oil and filter in each unit every 500 hours of operation or annually, whichever comes first;
 - (2) The permittee shall inspect the air cleaner in each unit every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and,
 - (3) The permittee shall inspect all hoses and belts in each unit every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- (b) The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirements in paragraph (a) above. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following, such that the oil meets the following parameters:
 - (1) Total Base Number, such that it is greater than or equal to 30% of the Total Base Number of the oil when new;
 - (2) Viscosity, such that it has not changed more than 20% from the viscosity of the oil when new; and,
 - (3) Percent water content (by volume), such that it is not greater than 0.5.
- (c) If the permittee complies with all applicable parameters in paragraph (b) above, the permittee is not required to change the oil. If any of the parameters are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must





change the oil within 2 business days or before commencing operation, whichever is later.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6625]

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

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

- (a) The permittee shall operate and maintain the emergency generator according to the manufacturer's emission-related written instructions or develop a source specific maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- (b) If the permittee participates in an oil analysis program pursuant to 40 CFR 63.6625(i), the analysis program must be part of the maintenance plan for each engine.

VII. ADDITIONAL REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The natural gas-fired backup generator is manufactured by Onan Corporation and rated at 35 kW. It is operated by a Ford engine, model CSG-6491-6005-A, and serial No. 01308 G-31-RC.





Group Name: ALL PRESSES

Group Description: non-heat and heat set presses

Sources included in this group

ID Name

100A LITHOGRAPHIC PRESSES (6 UNITS)

300A THREE (3) UV CURE LITHO PRESSES

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §129.67b]

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

- (a) The as applied fountain solutions shall contain a VOC content of 5% or less by weight and no alcohol in the fountain solutions.
- (b) The above requirements do not apply to an offset lithographic printing press with total fountain solution reservoir of less than 1 gallon.

002 [25 Pa. Code §129.67b]

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

- (a) The as applied cleaning solutions shall meet one of the following limits:
 - (1) VOC composite partial vapor pressure less than 10 millimeters of mercury at 68 °F (20 °C).
 - (2) A VOC content less than 70% by weight.
- (b) The facility-wide usage of cleaning solution(s), which does not meet the above requirements, shall not exceed 110 gallons per year, annually.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §129.67b]

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

If the permittee does not have the necessary records to certify the composition of inks, varnishes, coatings, fountain solutions, and/or solvents by means of Certified Product Data Sheets (CPDS), Safety Data Sheets (SDS), or other such manufacturer documentation, then the permittee shall perform EPA Method 24 testing, as specified in 40 CFR Part 60, Appendix A, for those materials that are missing the required documentation.

- (a) Testing is to be performed at least once per year on all inks, coatings, and solvents that do not have the required documentation.
- (b) Copies of the annual (once per year) test results are to be maintained on site.

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §129.67b]

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

The permittee shall monitor and demonstrate compliance with Conditions #001 and #002 by using one or more the following methods:

- (a) For fountain solution VOC content:
 - (1) USEPA Reference Method 24 (codified in 40 CFR Part 60, Appendix A).
 - (2) MSDS, CPDS, or other data provided by the manufacturers.
 - (3) Calculation of the VOC content of the as applied fountain solution.
 - (4) Monitoring the as applied fountain solution with one or more of the following instruments:





- (i) A refractometer or a hydrometer
- (ii) A conductivity meter.
- (iii) Other method(s) approved by the Department.
- (5) Other method(s) approved by the Department.
- (b) For cleaning solution VOC content and VOC partial pressure:
 - (1) USEPA Reference Method 24.
 - (2) Equation in 25 Pa. §129.67b(j) to determine composite partial vapor pressure.
 - (3) Testing methods in 25 Pa. §129.67b(k) to determine partial pressure of single organic compounds.
 - (4) MSDS, CPDS or other data provided by the manufacturer of as-applied cleaning solution.
 - (5) Calculation of the VOC content or the VOC composite partial vapor pressure, or both.
 - (6) Other method(s) approved by the Department.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §129.67b]

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

- (a) The permittee shall keep the following records:
 - (1) For each press blanket, roller or other cleaning solution:
 - (i) The name and identification number for the blanket, roller or other cleaning solution.
 - (ii) The VOC content (weight %) or VOC composite partial vapor pressure, as applied.
 - (iii) Any data and information which are used to determine VOC content and VOC composite partial vapor pressure, including, but not limited to, testing procedures and methods.
 - (2) For each as applied fountain solution:
 - (i) The VOC content (weight %).
 - (ii) Any data and information which are used to determine VOC content, including, but not limited to, testing procedures and methods.
- (b) The permittee shall keep the required records for 5 years. The records shall be submitted to the Department in an acceptable format upon receipt of a written request.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §129.67b]

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

The permittee shall:

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





VII. ADDITIONAL REQUIREMENTS.

09-00018

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





Group Name: BOILERS
Group Description: Boilers
Sources included in this group

ID	Name
201	CLEAVER BROOKS BOILER
202	CLEAVER BROOKS BOILER

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.11(a)(1).

002 [25 Pa. Code §123.22]

Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from any combustion unit, in the Southeast Air Basin, in excess of 1.2 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The boilers under Source IDs 201 and 202 shall only be fired on natural gas.

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.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor fuel usage on a monthly basis from each boiler (Source IDs 201 and 202).

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of fuel usage for each boiler (Source IDs 201 and 202) on a monthly basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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





VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The boilers covered under this Group include the following:
 - (1) Source ID 201: Cleaver Brooks Boiler #1 (6.3 MMBtu/hr), Model CB907-150; SN 1-39412, Manf. 7/22/66.
 - (2) Source ID 202: Cleaver Brooks Boiler #2 (6.3 MMBtu/hr), Model CB907-150; SN 1-39411, Manf. 7/22/66.
- (b) The gas-fired boilers are exempt from the requirements of 40 CFR Part 63 Subpart JJJJJJ, according to 40 CFR § 63.11195(e).



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.





SECTION G. Emission Restriction Summary.

Source id	Source Description		
201 CLEAVER BROOKS BOILER		BOILER	
Emission Limit			Pollutant
1.200	Lbs/MMBTU	Expressed as SO2	SOX
0.400	Lbs/MMBTU	Total Particulates	TSP
-			-

202 CLEAVER BROOKS BOILER

Emission Limit			Pollutant
1.200	Lbs/MMBTU	Expressed as SO2	SOX
0.400	Lbs/MMBTU	Total Particulates	TSP

400A UV FLEXOGRAPHIC PRESSES (2 UNITS)

Emission Limit			Pollutant
2.700	Tons/Yr	Determined on a 12-month rolling period	VOC
450.000	Lbs/Mth		VOC

500 CUMMINS/ONAN EMERG GENERATOR (35KW)

Emission Limit			Pollutant	
0.040	gr/DRY FT3		PM_FILT	
500.000	PPMV	Determined on a dry basis	SOX	

Site Emission Restriction Summary

Emission Limit		Pollutant	
20.000 Tons/Yr	12-month rolling sum	VOC	





SECTION H. Miscellaneous.

The following previously issued Operating Permit(s) serve(s) as the basis for certain terms and conditions set forth in this Permit: OP-09-0018

The following sources are located at the facility but are exempt from permitting requirements:

- -Hole punch machine and "pip" collector: This machine is powered by electric utility and the exhaust is vented inside. The "pips" are collected in a drum on the shop floor.
- -Shredder: This machine is powered by electric utility and emissions are vented indoors.
- -Five (5) Collators: These machines are powered by electric utility and have no emissions.
- -Plate Room: This machine is powered by electric utility and has no emissions.
- -lnk Room: This area of the facility is devoted to storage and mixing of inks for the presses. Emissions are negligible and this source will be excluded from the permit.
- -FlexoWash Machine (operates like a remote resevoir parts washer).

APS ID: 501524; AUTH ID: 813594; Date: May 2010 - Operating Permit Renewal:

- A new Press #59 had been installed under RFD No. 09-A01-1091, and this press is added to Source ID 300A.
- The Parts Degreasing Unit currently uses Safety Kleen Premium Gold solvent which has a VOC content of 100% by weight. Since the degreaser uses more than 2 gallons of a solution containing more than 5% VOC, this unit is subject to 25 Pa. Code §129.63 Degreasing Operations. The applicable requirements are added in Section D of this Operating Permit.

APS ID: 501524; AUTH ID: 1052746; Date: July 2015 - Operating Permit Renewal:

- Press #60 constructed under GP10-09-0064, is incorporated into the Operating Permit, under Source ID 300A. Press #47 was removed in June 2014, and is deleted from the Operating Permit.
- The applicable requirements under 25 Pa. Code §129.67b are added.
- For Source ID 100A, VOC ink content limit is modified as per the premittee request, from 10% to 20% by weight.

APS ID: 501524; AUTH ID: 1297997; Date: July 2020 - Operating Permit Renewal:

- Press #59, under Source ID 300A, and Degreasing Unit (Source ID 200) are deleted from this operating permit.

APS ID: 501524; AUTH ID: 1510769; Date: September 2025 - Operating Permit Renewal:

- Presses #48 (Source ID 116) and \$53 (Source ID 126) have been decommissioned and are removed from Source ID 100A.
- Presses #51 (Source ID 124) and #60 (Source ID 134) have been decommissioned and are removed from Source ID 300A.
- This permit renewal incorporates General Permit No. GP10-09-0064; Press #61 (Source ID 135) has been included under Source ID 300A.
- Source ID 400A has been created for two (2) flexographic UV presses, Presses #62 (Source ID 136) and #63 (Source ID 137).
- This permit renewal reflects the removal of the following insignificant sources: carbonless coater and one (1) collator.
- This permit renewal reflects the addition of a FlexoWash Machine as an insignificant source.





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