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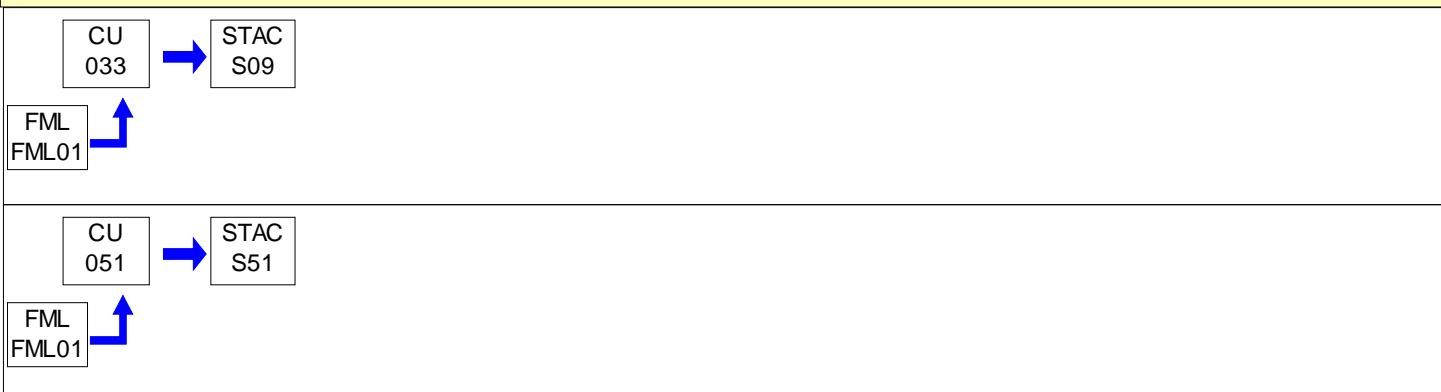
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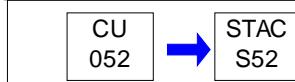
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033	CLEAVER BROOKS BOILER 10	6.300	MMBTU/HR
		6.200	MCF/HR Natural Gas
051	CLEAVER BROOKS BOILER 11	25.100	MMBTU/HR
		25.000	MCF/HR Natural Gas
052	CLEAVER BROOKS BOILER 12	25.100	MMBTU/HR
		25.000	MCF/HR Natural Gas
106	BLDG 121 ROTO-PRESS	12.900	MCF/HR Natural Gas
		144.300	Gal/HR Liquid Petroleum Gas (Lp)
		107.000	Lbs/HR SOLVENT
108	INK MIX BLDG 124	20.000	Lbs/HR SOLVENT
200	COATING LINE 121	59.800	MMBTU/HR
		58.630	MCF/HR Natural Gas
201	COATING LINE 126	18.600	MMBTU/HR
		18.200	MCF/HR Natural Gas
300	EMERGENCY GENERATORS (2)	10.453	MMBTU/HR
		73.200	Gal/HR Diesel Fuel
301	PARTS WASHER UNITS	N/A	SOLVENT
C05	REECO AFTERBURNER BLDG 121	51.000	MCF/HR VOC'S/NATL GAS
FML01	NATURAL GAS LINE		
FML02	#2 FUEL OIL		
FML03	PROPANE		
S04	COATING LINE STACK		
S06	ROTO (B-121) STACK		
S08	INK MIX STACK		
S09	BOILER 10 STACK		
S300	GENERATOR STACK		
S301	PARTS WASHER STACK		
S51	BOILER 11 STACK		
S52	BOILER 12 STACK		

PERMIT MAPS

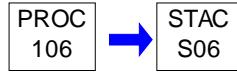




PERMIT MAPS

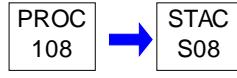


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FML
FML01

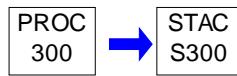
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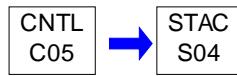
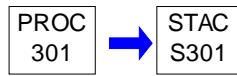
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FML
FML02



FML
FML01



SECTION B. General Title V 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 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 121.7]

Prohibition of Air Pollution

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. §§ 4001-4015).

#003 [25 Pa. Code § 127.512(c)(4)]

Property Rights

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

#004 [25 Pa. Code § 127.446(a) and (c)]

Permit Expiration

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. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V 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. 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.

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e), 127.503 & 127.704(b)]

Permit Renewal

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.

(c) 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. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) 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 during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]

Transfer of Ownership or Operational Control

(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:

(1) The Department determines that no other change in the permit is necessary;

(2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit



SECTION B. General Title V Requirements

responsibility, coverage and liability between the current and the new permittee; and,

(3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

Inspection and Entry

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

(1) Enter at reasonable times upon the permittee's premises where a Title V 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 or remove, at reasonable times, records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, 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, 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.

(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.

#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

Compliance Requirements

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) 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 to the source are 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 Title V permit.



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#009 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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

#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

Duty to Provide Information

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#012 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.



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#013 [25 Pa. Code § 127.522(a)]

Operating Permit Application Review by the EPA

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#014 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#015 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#016 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

#017 [25 Pa. Code § 127.512(b)]

Severability Clause

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



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#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). 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.
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.
- (1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.
 - (2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.
 - (3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

#019 [25 Pa. Code §§ 127.14(b) & 127.449]

Authorization for De Minimis Emission Increases

- (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. 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.

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

- (b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit 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



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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 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 or 25 Pa. Code Article III.

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

(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, liquefied petroleum gas 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.

(d) 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 (b)(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 the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).

(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 allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical 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.



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(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#020 [25 Pa. Code §§ 127.11a & 127.215]

Reactivation of Sources

(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.

(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).

#021 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) 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 this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]

Submissions

(a) 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 on the permit transmittal letter, or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

Sampling, Testing and Monitoring Procedures

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this



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permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#024 [25 Pa. Code § 127.513]

Compliance Certification

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

#025 [25 Pa. Code §§ 127.511 & Chapter 135]

Recordkeeping Requirements

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

- (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 the 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. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.



SECTION B. General Title V Requirements

#026 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#027 [25 Pa. Code § 127.3]

Operational Flexibility

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

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

#028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

Risk Management

(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 listed threshold quantity at the Title V 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:



SECTION B. General Title V Requirements

- (i) Three years after the date on which a regulated substance is first listed under § 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 the Title V 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 the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If the Title V 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 the Title V 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:

- (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.
- (2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

Permit Shield

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.



SECTION B. General Title V Requirements

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.
- (4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.
- (c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

#031 [25 Pa. Code §135.3]

Reporting

- (a) 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 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.

#032 [25 Pa. Code §135.4]

Report Format

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 §123.1]

Prohibition of certain fugitive emissions

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving, and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations, as specified in 25 Pa. Code § 129.14.
- (7) N/A
- (8) N/A

(9) Sources, and classes of sources, other than those identified in (1) - (8) of this condition, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1(b), that fugitive emissions from the source, after appropriate controls, 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.

002 [25 Pa. Code §123.2]

Fugitive particulate matter

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

003 [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.

004 [25 Pa. Code §123.41]

Limitations

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

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

005 [25 Pa. Code §123.42]

Exceptions

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

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



SECTION C. Site Level Requirements

(b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

(c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a) (relating to prohibition of certain fugitive emissions).

006 [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.

007 [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.

008 [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.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 25 Pa. Code § 127.511.]



SECTION C. Site Level Requirements

- (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.

010 [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.

011 [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.

V. REPORTING REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.



SECTION C. Site Level Requirements

(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.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this condition is also derived from 25 Pa. Code § 127.511(c).]

The permittee shall submit the following:

(a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certification of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under Condition #26 of section B, of the permit. The annual certificate of compliance shall be submitted to the DEP electronically and to the EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov. The subject line shall read: "TVOP No. xxxx, Facility Namexxxx."

(b) A semi-annual deviation report, due by October 1st of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the second reporting period (July 1 through December 31 of the previous year).

014 [25 Pa. Code §135.21]

Emission statements

The permittee shall submit by March 1, of each year, an annual emission statement for NOx and VOC emissions for the preceding calendar year. Additionally, a description of the method used to calculate the emissions shall be included. The statement shall contain a certification by a company official or plant manager that the information contained in the statement is true and accurate.



SECTION C. Site Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

015 [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.
- (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.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) All VOC-containing materials shall be stored in closed, non-leaking containers when not being mixed or transferred to another container.
- (b) All spills shall be cleaned up as soon as possible.
- (c) Cloth and paper, or other absorbent applicators, laden with VOC-containing materials, shall be stored in closed containers.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The permittee may not modify any source identified in this permit, prior to obtaining Department approval, except those modifications authorized by Condition #019(g), of Section B, of this permit.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.



23-00021

NEW CONGOL/TRAINER PLT



SECTION C. Site Level Requirements

No compliance milestones exist.

***** Permit Shield In Effect *****



SECTION D. Source Level Requirements

Source ID: 033

Source Name: CLEAVER BROOKS BOILER 10

Source Capacity/Throughput: 6.300 MMBTU/HR

6.200 MCF/HR Natural Gas

CU
033 → STAC
S09

FML
FML01

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 lb/MMBtu 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 this combustion unit, in excess of 1.0 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.

This boiler 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 (Title V General Requirements).

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall monitor the following monthly:

- (a) the amount of fuel, and
- (b) the hours of operation.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall keep records of the following monthly:

- (a) the amount of fuel used, and
- (b) the hours of operation.



SECTION D. Source Level Requirements

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

This boiler shall be operated and maintained in accordance with manufacturer's specifications to assure compliance with particulate matter and sulfur oxides emission limitations.

VII. ADDITIONAL REQUIREMENTS.

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

***** Permit Shield in Effect. *****



SECTION D. Source Level Requirements

Source ID: 051

Source Name: CLEAVER BROOKS BOILER 11

Source Capacity/Throughput: 25.100 MMBTU/HR

25.000 MCF/HR Natural Gas

Conditions for this source occur in the following groups: 1



I. RESTRICTIONS.

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

***** Permit Shield in Effect. *****



SECTION D. Source Level Requirements

Source ID: 052

Source Name: CLEAVER BROOKS BOILER 12

Source Capacity/Throughput: 25.100 MMBTU/HR

25.000 MCF/HR Natural Gas

Conditions for this source occur in the following groups: 1



I. RESTRICTIONS.

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

***** Permit Shield in Effect. *****



SECTION D. Source Level Requirements

Source ID: 106

Source Name: BLDG 121 ROTO-PRESS

Source Capacity/Throughput:

12.900 MCF/HR

Natural Gas

144.300 Gal/HR

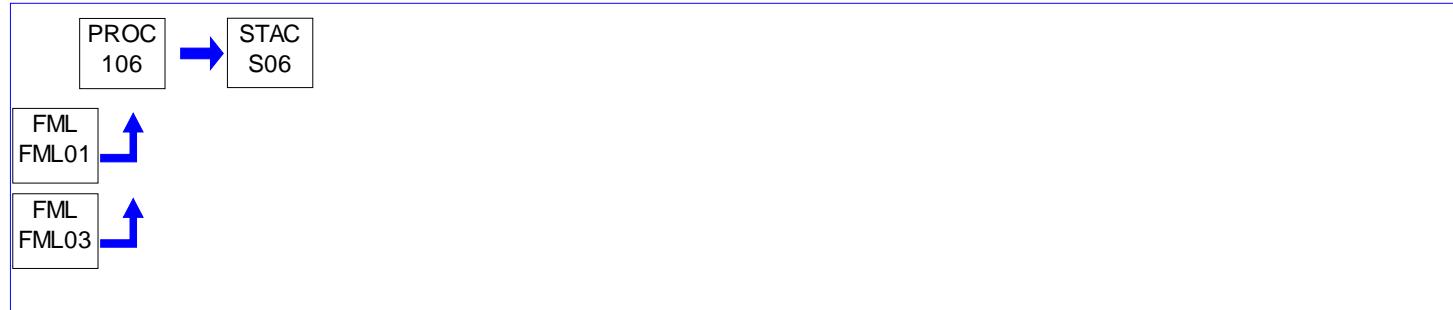
Liquid Petroleum Gas (Lpg)

107.000 Lbs/HR

SOLVENT

Conditions for this source occur in the following groups: 2

4



I. RESTRICTIONS.

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

VII. ADDITIONAL REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Source 106 consists of:

(a) the Building 121 Roto Press Dryer, and



SECTION D. Source Level Requirements

(b) the Building 121 Roto Press.

***** Permit Shield in Effect. *****



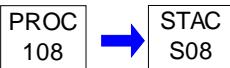
SECTION D. Source Level Requirements

Source ID: 108

Source Name: INK MIX BLDG 124

Source Capacity/Throughput: 20.000 Lbs/HR SOLVENT

Conditions for this source occur in the following groups: 4



I. RESTRICTIONS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

(a) The permittee shall monitor the amount of IPA used on a monthly basis, as long as the VOC emissions from the ink mixing operation do not exceed 80% of the VOC emission limit of 7.2 tons per year in a twelve (12) month rolling sum.

(b) If the VOC emissions exceed 80% of the limit of 7.2 tons per year in a twelve (12) rolling sum, the facility shall monitor the IPA usage on a daily basis. The permittee shall continue daily monitoring as long as the VOC emissions remain above 80% of the permitted VOC limit. If the VOC emissions return to less than 80% of the permitted VOC limit, the permittee may return to a monthly frequency of monitoring.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor and calculate the VOC emissions from the Ink Mix Building using a Department approved method that includes, but is not limited to, the following:

(a) Hours of operation for Ink Mix Building per month: equal to sixty percent (60%) of hours of operation for Source ID(s): 105 or 106, whichever has greater operating time.

Ink room operating hours/month = 60% * Source 105 (or 106) operating hours/month

(b) VOC emission factor for Ink Room Building: 0.69 lbs. per operating hour. (The emission factor was established during the initial operating permit review process.)

(c) Monthly Ink Room VOC emissions (lb/month) =
60% * operating hours/month (of Sources 105 or 106, whichever greater) * 0.69

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

(a) The permittee shall keep records of:



SECTION D. Source Level Requirements

- (1) the amount of IPA used, monthly or at the frequency consistent with the monitoring requirements.
 - (2) the emission calculations for the ink room monthly as well as twelve (12) month rolling sum.
- (b) The permittee shall keep records of the SDS/CPDS indicating the VOC content of the ink components.

V. REPORTING REQUIREMENTS.

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

***** Permit Shield in Effect. *****



SECTION D. Source Level Requirements

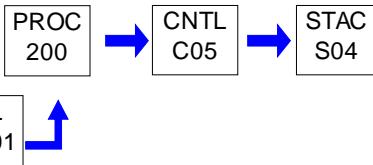
Source ID: 200

Source Name: COATING LINE 121

Source Capacity/Throughput: 59.800 MMBTU/HR

58.630 MCF/HR Natural Gas

Conditions for this source occur in the following groups: 3



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91 - 95.]

The Nitrogen Oxides (NOx) emissions from the Coating Line 121 ovens shall not exceed twenty-five (25) tons per year on a twelve (12) month rolling sum basis.

Throughput Restriction(s).

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The annual natural gas usage for the Coating Line 121 ovens shall not exceed 250 million cubic feet per year, on a 12-month rolling sum basis.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code 127.512]

The permittee shall monitor monthly:

- (a) the amount of fuel used by the ovens; and
- (b) the hours of operations.

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 127.512]

The permittee shall keep records of:

- (a) the amount of fuel used, on a monthly and 12-month rolling sum basis;
- (b) the hours of operations, monthly; and
- (c) the calculations of the Nitrogen Oxides (NOx) emissions on a monthly and twelve (12) month rolling sum basis (using



SECTION D. Source Level Requirements

emission factor of 0.1 lb NOx/MMBtu, or emission rate in the most up-to-date version of the EPA publication, "AP-42 Compilation of Air Pollutant Emission Factors"), to demonstrate compliance status with the NOx emission limits.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The Coating Line 121 ovens shall be equipped with a totalizer, or equivalent to measure the total usage of natural gas.

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The Coating Line 121 (Source ID: 200) includes coating area, conventional and curing infrared ovens, and cooling area.

(b) The total heat capacity of the ovens is 59.8 MMBtu/hr, firing on natural gas.

***** Permit Shield in Effect. *****



SECTION D. Source Level Requirements

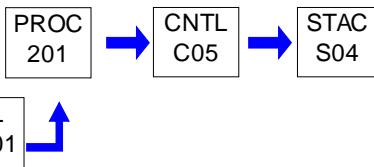
Source ID: 201

Source Name: COATING LINE 126

Source Capacity/Throughput: 18.600 MMBTU/HR

18.200 MCF/HR Natural Gas

Conditions for this source occur in the following groups: 3



I. RESTRICTIONS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The permittee shall monitor monthly:

- (a) the amount of fuel used; and
- (b) the hours of operations.

IV. RECORDKEEPING 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 § 127.512.]

The permittee shall keep monthly records of:

- (a) the amount of fuel used;
- (b) the hours of operations; and
- (c) the calculations of the monthly emissions for Nitrogen Oxides (NOx).

V. REPORTING REQUIREMENTS.

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



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The Coating Line 126 (Source ID: 201) includes coating area, conventional and curing infrared ovens, and cooling area.
- (b) The total heat capacity of the ovens is 18.6 MMBtu/hr, firing on natural gas.

***** Permit Shield in Effect. *****



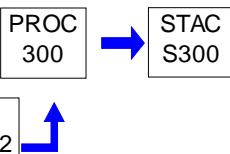
SECTION D. Source Level Requirements

Source ID: 300

Source Name: EMERGENCY GENERATORS (2)

Source Capacity/Throughput: 10.453 MMBTU/HR

73.200 Gal/HR Diesel Fuel



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from either engine in this source, at any time, in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from either engine in this source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 ppmvd, dry basis.

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that only diesel fuel shall be used to operate either of the emergency generators.

Operation Hours Restriction(s).

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The Spectrum Detroit Diesel generator engine shall not operate more than 20 hours per year in any 12 consecutive month period.

(b) The Caterpillar generator engine shall not operate more than 500 hours per year in any 12-consecutive month period.

II. TESTING REQUIREMENTS.

005 [25 Pa. Code §139.16]

Sulfur in fuel oil.

(a) The following are applicable to the analysis of commercial fuel oil:

(1) the fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 139.4(10) (relating to references);

(2) test methods and procedures for the determination of viscosity shall be that specified in 139.4(11) (relating to references). The viscosity shall be determined at 100°F;

(3) tests methods and procedures for the determination of sulfur shall be those specified in 139.4(12)--(15); and

(4) results shall be reported in accordance with the units specified in 123.22 (relating to combustion units).

(b) The requirements in subpart (a), above, shall be waived in the event that a delivery receipt from the supplier, showing the maximum percent sulfur in the fuel, is obtained each time a fuel oil delivery is made.



SECTION D. Source Level Requirements

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the hours of operation for each engine monthly.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall record the hours of operation for each engine and the reason for service (i.e. "emergency operation" or "non-emergency operation (testing)"), on a monthly basis and as a 12-month rolling sum.

(b) The permittee shall retain fuel oil delivery receipts, and/or test results of sulfur concentration in the fuel oil, to demonstrate compliance with the sulfur content requirement for this source.

V. REPORTING REQUIREMENTS.

008 [25 Pa. Code §139.16]

Sulfur in fuel oil.

Results of the fuel oil sulfur test shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §129.203]

Stationary internal combustion engines.

(a) By October 31 of each year, the owner or operator of the stationary internal combustion engine shall calculate the difference between the actual emissions from this internal combustion engine during the period from May 1 through September 30 and the allowable emissions for that same period. The permittee shall keep the calculation records on site.

(b) The owner or operator shall calculate allowable emissions shall be calculated by multiplying the cumulative hours of operations for this source for the period by the horsepower rating of the unit set forth in paragraph (1).

(1) For a compression ignition stationary internal combustion engine firing diesel fuel, 2.3 grams of NOx per brake horsepower-hour.

[Note: This condition applies only to the Spectrum Detroit Diesel engine.]

010 [25 Pa. Code §129.204]

Emission accountability.

(a) The owner or operator shall determine actual emissions in accordance with one of the following:

(1) If the owner or operator of the unit is required to monitor NOx emissions with a CEMS operated and maintained in accordance with a permit or State or Federal regulation, the CEMS data reported to the Department to comply with the monitoring and reporting requirements of this article shall be used. Any data invalidated under Chapter 139 (relating to sampling and testing) shall be substituted with data calculated using the potential emission rate for the unit or, if approved by the Department in writing, an alternative amount of emissions that is more representative of actual emissions that occurred during the period of invalid data.

(2) If the owner or operator of the unit is not required to monitor NOx emissions with a CEMS, one of the following shall be used to determine actual emissions of NOx:

(i) The 1-year average emission rate calculated from the most recent permit emission limit compliance demonstration test data for NOx.

(ii) The maximum hourly allowable NOx emission rate contained in the permit or the higher of the following:



SECTION D. Source Level Requirements

- (A) The highest rate determined by use of the emission factor for the unit class contained in the most up-to-date version of the EPA publication, "AP-42 Compilation of Air Pollution Emission Factors."
- (B) The highest rate determined by use of the emission factor for the unit class contained in the most up-to-date version of EPA's "Factor Information Retrieval (FIRE)" data system.
- (iii) CEMS data, if the owner or operator elects to monitor NOx emissions with a CEMS. The owner or operator shall monitor emissions and report the data from the CEMS in accordance with Chapter 139 or Chapter 145 (relating to interstate pollution transport reduction). Any data invalidated under Chapter 139 shall be substituted with data calculated using the potential emission rate for the unit or, if approved by the Department in writing, an alternative amount of emissions that is more representative of actual emissions that occurred during the period of invalid data.
- (iv) An alternate calculation and recordkeeping procedure based upon emissions testing and correlations with operating parameters. The operator of the unit shall demonstrate that the alternate procedure does not underestimate actual emissions throughout the allowable range of operating conditions. In regard to obtaining the Department's approval for an alternate calculation method and recordkeeping procedure for actual emissions, the owner or operator may request an adjustment to the allowable emissions calculations set forth in 25 Pa. Code §§ 129.201—129.203. An allowable emission adjustment may not overestimate a unit's allowable emissions and must be based upon the parameters and procedures proposed in the alternate calculation method for actual emissions. The alternate calculation and recordkeeping procedures must be approved by the Department, in writing, prior to implementation.
- (b) The owner or operator of a unit subject to this section shall surrender to the Department one CAIR NOx allowance and one CAIR NOx Ozone Season allowance, as defined in 40 CFR §§ 96.102 and 96.302 (relating to definitions), for each ton of NOx by which the combined actual emissions exceed the allowable emissions of the units subject to this section at a facility from May 1 through September 30. The surrendered allowances shall be of current year vintage. For the purpose of determining the amount of allowances to surrender, any remaining fraction of a ton equal to or greater than 0.50 ton is deemed to equal 1 ton and any fraction of a ton less than 0.50 ton is deemed to equal zero tons.
- (c) If the combined allowable emissions from units subject to this section at a facility from May 1 through September 30 exceed the combined actual emissions from units subject to this section at the facility during the same period, the owner or operator may deduct the difference or any portion of the difference from the amount of actual emissions from units subject to this section at the owner or operator's other facilities.
- (d) November 1 of each year thereafter, an owner or operator of a unit subject to this section shall surrender the required NOx allowances to the Department's designated NOx allowance tracking system account and provide to the Department, in writing, the following:
- (1) The serial number of each NOx allowance surrendered.
- (2) The calculations used to determine the quantity of NOx allowances required to be surrendered.
- (f) If an owner or operator fails to comply with subsection (e), the owner or operator shall by December 31 surrender three NOx allowances of the current or later year vintage for each NOx allowance that was required to be surrendered by November 1 of that year.
- (g) The surrender of NOx allowances under subsection (f) does not affect the liability of the owner or operator of the unit for any fine, penalty or assessment, or an obligation to comply with any other remedy for the same violation, under the CAA or the act.
- (1) For purposes of determining the number of days of violation, if a facility has excess emissions for the period May 1 through September 30, each day in that period (153 days) constitutes a day in violation unless the owner or operator of the unit demonstrates that a lesser number of days should be considered.
- (2) Each ton of excess emissions is a separate violation.
- [Note: This condition applies only to the Spectrum Detroit Diesel engine.]



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source group consists of the two (2) diesel fuel-fired emergency generators listed:

(1) The Spectrum Detroit Diesel emergency generator, Model No. 1000 DS4, Serial No. 0677419, is equipped with a Spectrum Detroit Diesel engine, Model Year 2000. The engine has a power output rating of 1,495-hp (i.e., 1,115 kW) and a heat input capacity of 3.8 MMBTU/hr is used to provide emergency power.

(2) The Caterpillar emergency generator engine, Serial No. 5YF01901, with a power output rating 263-hp (i.e., 196-kW) and a rated heat input capacity 0.67 MMBtu/hr is used to provide emergency power to the REECO Afterburner Bldg. 121 (Source ID: C05).

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6580]

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

What is the purpose of subpart ZZZZ?

(a) The permittee shall operate the emergency stationary R.I.C.E. according to the requirements in the most recent version of 40 C.F.R. Section 63.6640(f).

(b) If the permittee does not operate the engine according to the requirements of 40 C.F.R. Section 63.6640(f), the engine will not be considered an emergency engine under 40 C.F.R. Part 63 Subpart ZZZZ and must meet all requirements for non-emergency engines.

*** Permit Shield in Effect. ***



SECTION D. Source Level Requirements

Source ID: 301

Source Name: PARTS WASHER UNITS

Source Capacity/Throughput:

N/A

SOLVENT

PROC
301



STAC
S301

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §129.63]

Degreasing operations

A person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:

- (a) the name and address of the solvent supplier.
- (b) the type of solvent including the product or vendor identification number.
- (c) the vapor pressure of the solvent measured in mm hg at 20°C (68°F).

The permittee shall maintain records for at least five (5) years and shall provide to the Department, on request, the information specified above. An invoice, bill of sale, certificate that corresponds to a number of sales, Safety Data Sheet (SDS), or other appropriate documentation acceptable to the Department may be used to comply with 25 Pa. Code § 129.63(a).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The individual cold cleaning machines in this source shall be maintained and operated in accordance with manufacturers' specifications and good air pollution control practices.

003 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall maintain the following parameters:

- (a) immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater; and



SECTION D. Source Level Requirements

- (b) immersion cold cleaning machines and remote reservoir cold cleaning machines shall:
- (1) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (3). In addition, the label shall include the following discretionary good operating practices:
- (i) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.
- (ii) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
- (iii) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.
- (2) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.
- (c) Cold cleaning machines shall be operated in accordance with the following procedures:
- (1) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (2) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (3) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
- (4) Air agitated solvent baths may not be used.
- (5) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.
- (d) The permittee shall not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.

004 [25 Pa. Code §129.63]

Degreasing operations

- (a) A person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.
- (b) The above does not apply:
- (1) if the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with (a), above, will result in unsafe operating conditions; or
- (2) to immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

VII. ADDITIONAL REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source group consists of the following Safety-Kleen Parts Washers:

Location	Solvent	Volume (gal)	Model No.	Serial No.
89 1st Fl.	Immersion Cleaner w. power head	25	---	11013118
89 1st Fl.	Premium Solvent	5	14	13227087
89 1st Fl.	Solvent Recycling RW	25	250	14138293
89 2nd Fl.	Premium Solvent	60	81	13127148
102 Pipe Shop	Virgin Premium Solvent	25	250	13138681
102 Machine Shop	Virgin Premium Solvent	25	250	13138543
121 Machin Shop	Premium Solvent	25	257	25700718



23-00021

NEW CONGOL/TRAINER PLT



SECTION D. Source Level Requirements

*** Permit Shield in Effect. ***



SECTION D. Source Level Requirements

Source ID: C05

Source Name: REECO AFTERBURNER BLDG 121

Source Capacity/Throughput: 51.000 MCF/HR VOC'S/NATL GAS



I. RESTRICTIONS.

Control Device Efficiency Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

- (a) The thermal oxidizer shall be operated with a minimum destruction efficiency of ninety-five (95) percent.
- (b) The burners associated with the thermal oxidizer shall be fired and modulated so as to maintain a combustion zone gas temperature of at least 1400°F and ensure compliance with the minimum destruction efficiency in paragraph (a) of this condition.

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 § 127.512]

- (a) The permittee shall perform a stack test using the 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. The performance test shall be conducted while the source is operating at maximum routine operating conditions or under such other 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 stack test shall, at a minimum, test for the VOC destruction efficiency. Tests shall be conducted in accordance with the provisions of EPA Methods 1, 2, 3A, 4 and 25A or other Department approved methodology and 25 Pa. Code Chapter 139.
- (c) At least ninety (90) days prior to the test, the company shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.
- (d) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.
- (e) Within sixty (60) days after the source test(s), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.
- (f) 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.



SECTION D. Source Level Requirements

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall continuously monitor the temperature of the thermal oxidizer, when in operation.

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 § 127.512]

The permittee shall keep records of:

- (a) the type of training conducted;
- (b) the hours of training; and
- (c) the list of attendees.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall continuously record the temperature of the thermal oxidizer, when in operation.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91 - 95.]

The permittee shall provide at least twenty-four (24) hours of introductory training to new employees and eight (8) hours per year of refresher training on the proper operation and maintenance of the source/control device.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

The permittee shall, when in operation:

- (a) operate and maintain the source(s) and air pollution control device(s) in a manner consistent with the Master Operations and Maintenance (O&M) Instructions;
- (b) keep a copy of the O&M instructions at the site and make available to the Department upon request; and
- (c) follow the O&M instructions and /or checklists and sign off daily.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

- (a) The thermal oxidizer shall be equipped with a temperature monitoring and recording device which continuously indicates and records the temperature of the gases exiting the combustion zone.
- (b) The oxidizer temperature readings (the sensor and signal output) shall be calibrated annually according to the manufacturer's recommendation and instruction.



SECTION D. Source Level Requirements

(c) The permittee shall operate and maintain the control system for this source, such that if the oxidizer were to fail or shutoff, the coating lines would be shutoff automatically.

(d) The permittee may operate the coating lines (Source ID(s): 200 and 201) only if the oxidizer is operating properly.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



SECTION E. Source Group Restrictions.

Group Name: 1

Group Description: Cleaver Brooks Boilers 11 & 12

Sources included in this group

ID	Name
051	CLEAVER BROOKS BOILER 11
052	CLEAVER BROOKS BOILER 12

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 lb/MMBtu 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 this combustion unit, in excess of 1.0 lb/MMBtu 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.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

This boiler shall only operate on natural gas.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall monitor the following monthly:

- (a) the amount of fuel, and
- (b) the hours of operation.

[Compliance with this condition assures compliance with 40 CFR § 60.48c(g).]

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall record the following monthly:

- (a) the amount of fuel, and
- (b) the hours of operation.

[Compliance with this condition assures compliance with 40 CFR § 60.48c(g).]



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 (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

The permittee shall inspect, operate and maintain as per manufacturer's specifications and good air pollution control practices to assure compliance with the Particulate Matter and Sulfur Oxide emission limitations.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.93.]

(a) The permittee shall perform an annual tune-up on the combustion process for this boiler. The annual tune-up shall consist of, at a minimum, the following:

- (1) inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer;
- (2) inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NOx, and to the extent practicable, minimize the emissions of CO;
- (3) inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

(b) The annual combustion tune-up shall be made in accordance with EPA document "Combustion Efficiency Optimization Manual for Operators of Oil and Gas-fired Boilers," September 1983 (EPA-3401/1-83-023) or equivalent procedures approved by the Department in writing.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.512(h) and 129.91 - 129.95.]

Each adjustment conducted under the tune-up procedures, for this boiler, shall be recorded in a permanently bound log book or in a system of filing the test equipment printouts, and contain the following:

- (a) the date of the tuning procedure;
- (b) the name of the service company and technician;
- (c) the final operating rate or load;
- (d) the final CO and NOx emission rates; and
- (e) the final excess oxygen rate.

VII. ADDITIONAL REQUIREMENTS.

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

***** Permit Shield in Effect. *****



SECTION E. Source Group Restrictions.

Group Name: 2

Group Description: Roto-Press Operations

Sources included in this group

ID	Name
106	BLDG 121 ROTO-PRESS

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this press at any time, in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this press in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 ppmv, dry basis.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67 and 40 CFR 63, Subpart KK.]

(a) The permittee shall meet one of the following:

- (1) the volatile fraction of the ink, as applied to the substrate, contains twenty-five (25) percent or less by volume of VOC and seventy-five (75) percent or more by volume of water; or
- (2) the ink, as applied to the substrate, less water, contains sixty (60) percent by volume or more of solid material.

(b) The permittee shall not use any HAP-containing ink, coating, varnish, solvent, thinner, and other material, for operation of this source.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code 127.512]

The permittee shall monitor the following monthly:

- (a) the amount of cleaning solution and VOC-containing ink (as applied) consumed; and
- (b) the VOC content of the cleaning solution and ink (as applied).

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The permittee shall monitor monthly:

- (a) the amount and type of fuel used; and
- (b) the hours of operations.



SECTION E. Source Group Restrictions.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code 127.512]

The permittee shall keep monthly records of:

- (a) the amount of cleaning solution and VOC-containing ink (as applied) consumed; and
- (b) the VOC content of the cleaning solution and ink (as applied).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The permittee shall keep monthly records of:

- (a) the amount and type of fuel used;
- (b) the hours of operations; and
- (c) the calculations of the monthly emissions for Nitrogen Oxides (NOx).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain this source in a manner consistent with safety and good air pollution control practices for minimizing emissions.

VII. ADDITIONAL REQUIREMENTS.

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

***** Permit Shield in Effect. *****



SECTION E. Source Group Restrictions.

Group Name: 3

Group Description: Coating Lines Operations

Sources included in this group

ID	Name
200	COATING LINE 121
201	COATING LINE 126

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from the convectional and infrared ovens of the coating line at any time, in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from the convection and infrared ovens in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 ppmv, dry basis.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The total Volatile Organic Compounds (VOC) emissions from the Coating Lines 121 and 126 (Source ID(s): 200 and 201) shall not exceed 353 tons per year on a twelve (12) month rolling sum basis.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code 127.512]

(a) The permittee shall monitor daily based on square footage of flooring:

- (1) the amount of coating "as applied";
- (2) the VOC content of the coating "as supplied" and "as applied"; and
- (3) the coating composition.

(b) The VOC usage (in weight) on the Coating Lines (121 & 126) shall be determined based on the following equations. The terms plasticizer and coating are synonymous.

- (1) Gel Coating Usage = 0.1LVP + 0.5MVP + 1.0HVP
- (2) Warelayer Coating Usage = 0.1MVPgel + 0.2LVP + 0.67MVP + 1 HVP

where

LVP = Low Volatility Plasticizers (vapor pressure < 10 mmHg @ 200°C)

MVP = Medium Volatility Plasticizers

HVP = High Volatility Plasticizers (vapor pressure > 100 mmHg @ 200°C)

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code 127.512 & 129.52]



SECTION E. Source Group Restrictions.

- (a) The permittee shall keep daily records of:
- (1) the following parameters for each coating, thinner and other component as supplied:
 - (i) the coating, thinner or component name and identification number;
 - (ii) the volume used;
 - (iii) the mix ratio;
 - (iv) the density or specific gravity;
 - (v) the weight percent of total volatiles, water, solids and exempt solvents; and
 - (vi) the volume percent of solids for Table I surface coating process categories 110.
 - (2) the VOC content of each coating, thinner and other component as supplied.
 - (3) the VOC content of each as applied coating.
- (b) The permittee shall keep monthly records of the total VOC emissions from the Coating Lines (Number 121 & Number 126), as a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code 127.512]

The permittee shall submit to the Department coating composition and usage records on a semiannual basis from January 1 through June 30 and from July 1 through December 31. Reports shall be due no later than 30 days following each semiannual period.

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The coating line shall be operated and maintained in accordance with the manufacturer's specifications and/or good air pollution control practices, to assure compliance with the emission limitations.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The permittee shall:

(a) not operate the Coating Lines 121 and 126 (Source ID(s): 200 and 201) before the thermal oxidizer combustion zone gas temperature reaches 1400°F; and

(b) not bypass the thermal oxidizer at any time when the Coating Lines are operating.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

The volatile organic compounds (VOC) emissions from the Coating Lines 121 and 126 (Source ID(s): 200 and 201) shall be ducted to REECO Afterburner Bldg. 121 regenerative thermal oxidizer (Source ID: C05).

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



SECTION E. Source Group Restrictions.

Group Name: 4

Group Description: Other Press Operations

Sources included in this group

ID	Name
106	BLDG 121 ROTO-PRESS
108	INK MIX BLDG 124

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

- (a) The total Volatile Organic Compound (VOC) emissions from the presses shall not exceed the federally enforceable cap, including emissions from press cleaning and ink mixing operations of 119.5 tons per year on a twelve (12) month rolling sum.
- (b) Any changes that would result in an emissions increase of 25 tons or more per year of VOC at the facility, including those sources covered by the federally enforceable cap, shall be subject to the requirements of 25 Pa. Code, Chapter 127, Subchapter E, New Source Review.
- (c) The Volatile Organic Compound (VOC) emissions from the clean-up operations per press shall not exceed 15.9 tons per year per press in a twelve (12) month rolling sum.
- (d) The Volatile Organic Compound (VOC) emissions from ink mixing operation in Building 124 shall not exceed 7.2 tons per year in a twelve (12) month rolling sum.

The emissions, listed in paragraphs (c) and (d), are included in the federally enforceable emission cap of 119.5 tons per year in a twelve (12) month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING 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 § 127.512]

The permittee maintain:

- (a) a VOC emission tracking system to document compliance with the VOC federally enforceable cap;
- (b) the system shall quantify the monthly total VOC emissions from the federally enforceable sources by accounting for the amount, in tons, based on mass balance methods approved by the Department; and
- (c) the emissions summary shall be generated within 30 days of the end of each month based upon the prior 12 month operation.

V. REPORTING REQUIREMENTS.

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



SECTION E. Source Group Restrictions.

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

The printing presses shall only apply water-based inks.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



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SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description	
033	CLEAVER BROOKS BOILER 10	
Emission Limit		Pollutant
1.000	Lbs/MMBTU	SOX
0.400	Lbs/MMBTU	particulate matter
051	CLEAVER BROOKS BOILER 11	
Emission Limit		Pollutant
1.000	Lbs/MMBTU	SOX
0.400	Lbs/MMBTU	particulate matter
052	CLEAVER BROOKS BOILER 12	
Emission Limit		Pollutant
1.000	Lbs/MMBTU	SOX
0.400	Lbs/MMBTU	particulate matter
106	BLDG 121 ROTO-PRESS	
Emission Limit		Pollutant
500.000	PPMV	SOX
0.040	gr/DRY FT3	particulate matter
7.200	Tons/Yr	mixing op. in bldg. 124
15.900	Tons/Yr	cleaning op. per press
119.500	Tons/Yr	Federally enforceable cap
108	INK MIX BLDG 124	
Emission Limit		Pollutant
7.200	Tons/Yr	mixing op. in bldg. 124
15.900	Tons/Yr	cleaning op. per press
119.500	Tons/Yr	Federally enforceable cap
200	COATING LINE 121	
Emission Limit		Pollutant
25.000	Tons/Yr	12 month rolling sum basis
500.000	PPMV	SOX
0.040	gr/DRY FT3	particulate matter
353.000	Tons/Yr	12 month rolling sum basis
201	COATING LINE 126	
Emission Limit		Pollutant
500.000	PPMV	SOX
0.040	gr/DRY FT3	particulate matter
353.000	Tons/Yr	12 month rolling sum basis
300	EMERGENCY GENERATORS (2)	
Emission Limit		Pollutant
500.000	PPMV	dry basis
0.040	gr/DRY FT3	particulate matter



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SECTION G. Emission Restriction Summary.

Site Emission Restriction Summary

Emission Limit	Pollutant



SECTION H. Miscellaneous.

(1) The Department has determined that the emissions from the following activities, excluding those indicated as site level requirements, in Section C, of this permit, do not require additional limitations, monitoring, or recordkeeping:

(a) Ovens/Heaters/Boilers from which minimal emissions occur

Boiler whose rated capacity is 1 MMBtu/h

Laboratory ovens

Bldg. 28 - Test ovens

Bldg. 50 - Test Ovens

Bldg. 121 - Test Ovens

(b) Equipment/Area used for routine maintenance:

Maintenance Welding Equipment

Carpenters shop

Machine Shop

Forklifts

(c) Fire protection equipment and activities involved in fire protecting training:

Emergency Fire Pumps

(d) Mixing Areas whose actual VOC emissions are minimal

Bldg. 26 - Mixing

Bldg. 121 - Ink Mix

Bldg. 17 - Mix

(e) Fuel tanks:

Above Ground Gasoline storage tank

Underground Diesel storage tank

(2) The following previously issued Operating Permit(s) serve(s) as the basis for certain terms and conditions set forth in this Title V Permit:

OP 23-0021

23-313-010

(3) Administrative Amendment to incorporate Plan Approval PA 23-0021B and address the facility's concerns in the appeal document.

(4) APS# 346201, AUTH# 655727, Date: April 2008 - Permit Renewal and Changes:

(a) The following sources are removed from the permit due to deactivation:

- Source ID 102 - BLDG. 50 Fusion Oven, and

- Source ID CO2 - HIRT Incinerator

(b) The following sources are added in the permit:

- Source ID 300- Emergency Generator, and

- Source ID 301 - Parts Washer Units

(c) The Department consented to the facility's request and required once-a-month monitoring of malodor, fugitive and visible emissions on November 15, 2004.

(5) APS# 346201, AUTH# 947633, Date: June 2013 - Permit Renewal:

- Source IDs 033, 051 & 052, Boilers, are restricted to burn natural gas only, not subject to 40 CFR Part 63 Subpart JJJJJ.

- Source IDs 105 & 106, ROTO Presses, are no longer subject to 40 CFR Part 63 Subpart KK, due to delisting MEK as a HAP.

- Source ID 300, Emergency Generator, is subject to 40 CFR Part 63 Subpart ZZZZ.

- CAM (Compliance Assurance Monitoring) addressed and found to be exempt under 40 CFR § 64.2(b)(1)(v).

(6) August 2018. Permit renewal. APS: 93537, AUTH: 1212890.

Source 300 - new emergency generator added to this source. The engine is subject to NESHAP, Subpart ZZZZ.

No other changes at this time.

(7) August 2023. Permit renewal. APS: 346201, AUTH: 1424187.



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