



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: October 1, 2021

Effective Date: April 1, 2026

Revision Date: April 1, 2026

Expiration Date: October 1, 2026

Revision Type: Extension

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

The regulatory or statutory authority for each plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 09-0027J

Federal Tax Id - Plant Code: 23-2056204-1

Owner Information

Name: FRES CO SYS USA INC

Mailing Address: 3005 STATE RD
TELFORD, PA 18969-1021

Plant Information

Plant: FRES CO SYS USA INC/TELFORD PLT

Location: 09 Bucks County 09952 West Rockhill Township

SIC Code: 2754 Manufacturing - Commercial Printing, Gravure

Responsible Official

Name: EDWARD W WALSH

Title: SR. VP., OPERATIONS

Phone: (215) 721 - 4600

Email: ewalsh@fresco.com

Plan Approval Contact Person

Name: AUTUMN ZANDER

Title: EHS MANAGER

Phone: (215) 721 - 4600

Email: azander@fresco.com

[Signature] _____

JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



Plan Approval Description

This Plan Approval is for the installation of a new Regenerative Thermal Oxidizer to control the VOC emissions from Source 206 (PA 09-0027I).



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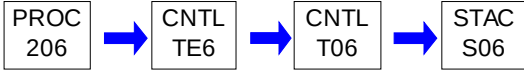
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**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
206	BOBST LAMINATOR (3 STATIONS)		
T06	S & S THERMAL OXIDIZER	N/A	Natural Gas
TE6	TOTAL ENCLOSURE FOR PRESS 206		
S06	S & S THERMAL OXIDIZER STACK		

PERMIT MAPS

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

Words and terms that are not otherwise defined in this plan approval 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 § 127.12b (a) (b)]**Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]**Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]**Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]**Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.12b]**Plan Approval Terms and Conditions**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

#007 [25 Pa. Code § 127.32]**Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(a)(4) & 35 P.S. § 4008 & § 114 of the CAA]**Inspection and Entry**

(a) 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.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

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

#009 [25 Pa. Code 127.13a]**Plan Approval Changes for Cause**

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

(a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.

(b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(c) The permittee fails to submit a report required by this plan approval.

(d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The permittee, 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 plan approval, 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.

#011 [25 Pa. Code § 127.12c]**Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

Regional Air Program Manager

PA Department of Environmental Protection

(At the address given on the plan approval transmittal letter or otherwise notified)

#012 [25 Pa. Code § 127.12(a)(9) & 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 facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:

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

**SECTION B. General Plan Approval 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 the Environmental Protection Agency 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 plan approval 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.

#013 [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).

#014 [25 Pa. Code § 127.25]**Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.



SECTION C. Site Level Plan Approval Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The combined site level NOx emissions from this facility shall not exceed 24.99 tons per year, based on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The permittee shall calculate and record the site level NOx emissions on a monthly basis and a 12-month rolling basis.

(b) When calculating the site level NOx emissions, the permittee shall use the latest edition of the EPA's AP-42 emission factors, manufacturer's emission factor if available, or a specific emission factor demonstrated by performance stack testing in accordance with applicable provisions of 25 Pa. Code Chapter 139.

(c) All records shall be kept for a minimum of five years and be made readily available for the Departments review upon request.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all of the existing requirements of its current Title V operating permit 09-00027 unless specifically revised in this plan approval. The provisions in this plan approval shall be construed to supersede any contrary provisions in any previous operating permit.

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

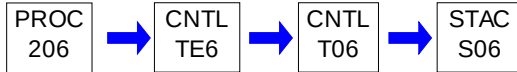
No compliance milestones exist.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 206

Source Name: BOBST LAMINATOR (3 STATIONS)

Source Capacity/Throughput:

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION D. Source Level Plan Approval Requirements**

Source ID: T06

Source Name: S & S THERMAL OXIDIZER

Source Capacity/Throughput:

N/A

Natural Gas

I. RESTRICTIONS.**Emission Restriction(s).**

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The Regenerative Thermal Oxidizer (RTO) shall be operated as the only control device for Source 206 and the associated dryers.

(b) No other sources shall be connected to the RTO without prior written approval from the Department.

Fuel Restriction(s).

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall only use natural gas as a fuel in the RTO.

Operation Hours Restriction(s).

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The dryers, total enclosure and the RTO shall be operated for at least 15 minutes after the last application of VOC based materials in Source 206.

Throughput Restriction(s).

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

All VOC emissions from Source 206 and any VOC emitting processes associated with Source 206 shall be ducted to this RTO at all times that Source 206 is in operation.

Control Device Efficiency Restriction(s).

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The permittee shall maintain at least a 98.0% VOC destruction efficiency in the RTO, or a post control minimum outlet VOC concentration not to exceed 20.0 ppm as methane on a dry basis.

(b) Prior to the operation of Source 206, the RTO combustion chamber temperature shall be operating at a minimum temperature of 1,500° F. The permittee shall operate the RTO using the manufacturer's recommended temperatures until source testing is completed and operating temperatures can be established and rolled into the Operating Permit.

(c) The dryers, total enclosure and the RTO shall be operated at all times while materials containing VOCs, to include cleaning solvent, are being applied to Source 206.

II. TESTING REQUIREMENTS.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The permittee shall perform a source test, using Department-approved procedures, to show compliance with the RTOs VOC destruction efficiency of 98.0%. During testing the permittee shall use the RTO manufacturer's recommended operating temperatures. The testing shall be performed within 180 days after startup of Source 206.

(b) The permittee shall perform the source test in accordance with 25 Pa. Code Chapter 139 and the latest edition of the Department's Source Testing Manual (Document No. 274-0300-002). Testing 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

**SECTION D. Source Level Plan Approval Requirements**

may be requested by the Department. The permittee shall operate the RTO using the manufacturer's recommended temperatures until source testing is completed and operating temperatures can be established and rolled into the Operating Permit.

(c) Testing shall be conducted at the combustion chamber inlet and outlet of the RTO to demonstrate compliance with the VOC destruction efficiency of 98.0%, or a post control emission of 20.0 ppmvd or less as methane, whichever is less stringent. The VOC test results are to be expressed as methane. Also, the permittee shall conduct a source test to determine the emission rates of: VOC, NO_x and CO at the outlet of the RTO in pounds per hour.

(d) The following process data shall be recorded during each test run to document the operation of Source 206:

- (1) Line speed (fpm)
- (2) Web width
- (3) Materials usage
- (4) Number of Materials
- (5) Press downtime (minutes)

(e) The RTO operating temperature (°F) shall be recorded at least every fifteen (15) minutes during each test run to document the operation of the RTO.

(f) At the same time as the above source test the permittee shall also perform a source test in accordance with the provisions of Chapter 139 of the rules and regulations to measure the total enclosure capture efficiency of TE6 using EPA Method 204.

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

(h) 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.

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

(j) 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.

007 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

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

Central Office
RA-EPstacktesting@pa.gov

Southeast Region
RA-EPSEstacktesting@pa.gov

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

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

**SECTION D. Source Level Plan Approval Requirements**

- (2) Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF Id under which the protocol was stored in PSIMS, as indicated in the protocol response letter.
- (3) Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment.
- (4) Testing Requirements (all that apply).
- (i) Plan approval number(s).
 - (ii) Operating permit number.
 - (iii) Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ).
 - (iv) Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.).
- (c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

III. MONITORING REQUIREMENTS.**# 008 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The inward flow of air from all natural draft openings into the total enclosure shall be verified by continuous observation of streamers, or other means approved by the Department, maintained at the natural draft openings while Source 206 is operating.

009 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall monitor the amount of natural gas used in the RTO on a monthly basis.

010 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) The combustion chamber temperature of the RTO shall be visually displayed.
- (b) The RTO combustion chamber temperature must be continuously monitored while the RTO is operating.
- (c) The permittee shall continuously monitor the inlet airflow to the RTO while the RTO is operating.
- (d) The permittee shall monitor the startup and shutdown times of the RTO.

IV. RECORDKEEPING REQUIREMENTS.**# 011 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) The permittee shall record the amount of natural gas used in the RTO on a monthly basis.
- (b) The permittee shall calculate and record the NOx and VOC emissions from the RTO on a monthly basis and a 12-month consecutive basis.
 - (1) NOx and VOC emissions shall be recorded in tons per year.
- (c) The permittee shall use the latest EPA AP-42 emission factors and the amount of fuel used in the RTO when calculating and recording the NOx and VOC emissions from the RTO. After source testing has been completed and the source test results have been reviewed and approved by the Department's Source Testing Section the permittee shall use an emission factor demonstrated during the test to calculate NOx and VOC emissions.

012 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) The permittee shall continuously record the RTO combustion chamber temperature while the RTO is operating. The

**SECTION D. Source Level Plan Approval Requirements**

temperature recording shall be performed using a Department approved method.

(b) The permittee shall continuously record the inlet airflow to the RTO while the RTO is operating.

(c) The permittee shall record the startup and shutdown times of the RTO on daily basis.

013 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) The permittee shall record all excursions and any corrective actions taken in response to an excursion.

(b) The permittee shall record the time elapsed between the excursion and when the corrective action has been taken.

(c) The permittee shall record all inspections, repair, and maintenance performed on the RTO.

(d) The permittee shall maintain records of all monitoring downtime incidents. The permittee shall also record the dates, times and durations, probable causes and corrective actions taken for the incidents.

(e) The permittee shall maintain one digital copy of the manufacturer's operating manual onsite at all times.

014 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain all records for a minimum of five years and these records shall be made readily available to the Department.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.**# 015 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The RTO shall be operated and maintained in accordance with the manufacturer's recommendations.

(b) The permittee shall create an inspection checklist similar to the checklist in Section 7 of the manufacturer's operating manual. The Checklist shall include sections for daily, monthly, quarterly, semi-annual, and annual inspections as needed to ensure proper operation of the RTO.

(c) The checklist will then be approved by the Department before incorporation into the Operating Permit.

016 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) When starting the RTO, the permittee shall ensure that the normal start-up and shutdown procedures are followed as indicated in the manufacturer's operating manual.

(b) The permittee shall maintain a copy of the manufacturer's startup and shutdown procedures for the RTO.

017 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) The permittee shall follow the following procedures if an excursion occurs to the RTO.

(1) During an excursion no new solvent-based materials may be fed to Source 206.

(2) Should the permittee continue to operate Source 206 to evacuate all the material already fed into the presses, then all emissions associated with this excursion process during the "run out" shall be considered fugitive.

**SECTION D. Source Level Plan Approval Requirements****# 018 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall install an electronic data recording system which continuously records the combustion chamber center temperature.

VII. ADDITIONAL REQUIREMENTS.**# 019 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The RTO is manufactured by Ship & Shore Environmental, Inc., Model No. SSE-56K-95X-RTO.



SECTION E. Source Group Plan Approval Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

Source Id

Source Description

Site Emission Restriction Summary

Emission Limit		Pollutant
24.990 Tons/Yr	Based on a 12-month rolling sum	NOX



SECTION H. Miscellaneous.



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