



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: March 28, 2024 Effective Date: September 30, 2026
Revision Date: September 8, 2026 Expiration Date: September 30, 2027
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. 46-0026L

Federal Tax Id - Plant Code: 23-2863392-1

Owner Information

Name: GLOBAL PKG INC
Mailing Address: 209 BROWER AVE
OAKS, PA 19456

Plant Information

Plant: GLOBAL PKG/OAKS
Location: 46 Montgomery County 46957 Upper Providence Township
SIC Code: 2759 Manufacturing - Commercial Printing, Nec

Responsible Official

Name: MICHAEL J FROST
Title: PRES
Phone: (610) 666 - 1608 Email: Michael.Frost@glopkg.com

Plan Approval Contact Person

Name: KATE SCHAEFFER
Title: EHS MANAGER
Phone: (484) 831 - 1119 Email: Kate.Schaeffer@glopkg.com

[Signature] _____
JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



Plan Approval Description

This Plan Approval is for the installation of a new TANN (C05) Thermal Oxidizer Model No. TR 2590C. This oxidizer has a design inlet volume of 30,000 scfm, bringing the facility's total oxidizer capacity to 70,000 scfm. Heat will be provided by one (1) Maxon 6.0 mmBtu/hr burner.



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Note: These same sub-sections are repeated for each source!

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SECTION A. Table of Contents

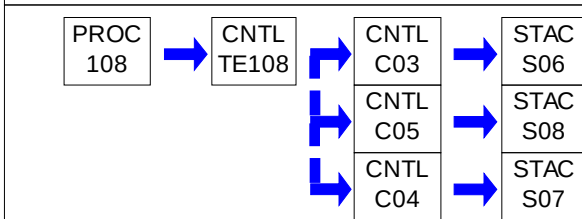
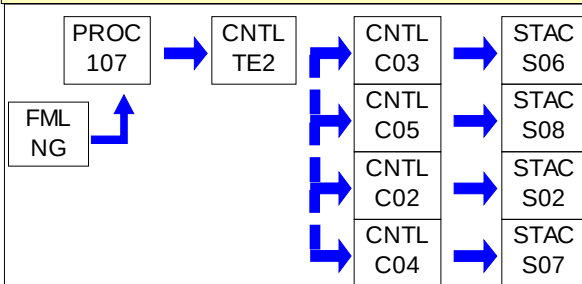
F-III: Monitoring Requirements
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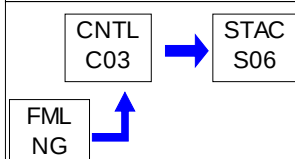
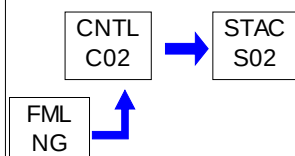
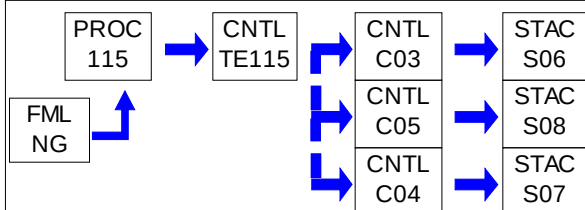
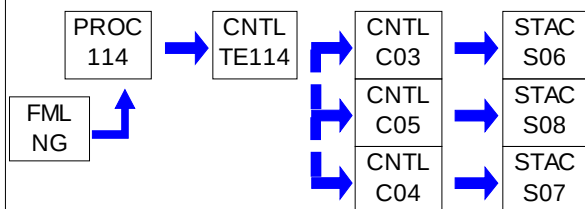
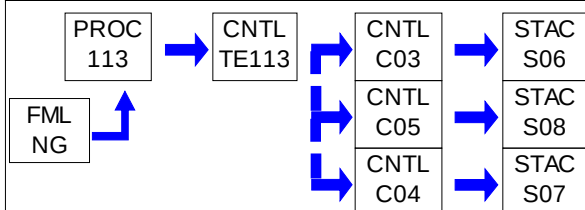
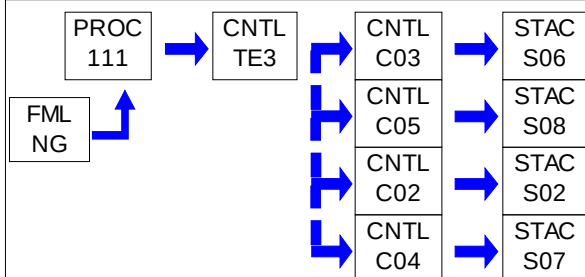
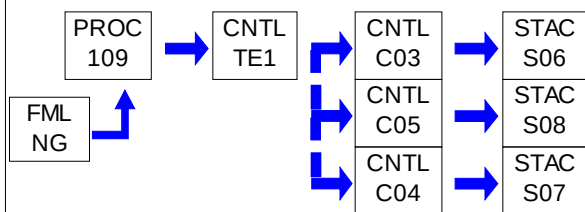
**SECTION A. Plan Approval Inventory List**

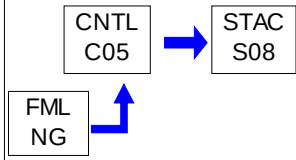
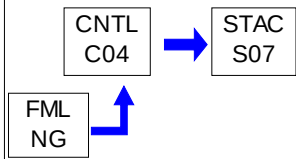
Source ID	Source Name	Capacity/Throughput	Fuel/Material
107	W&H PRIMAFLEX 1		
108	FUSION PRESS & DRYER		
109	W&H MIRAFLEX FLEXO PRESS		
111	WINDMOELLER & HOELSCHER NOVAFLEX PRESS 1 #111		
113	W&H MIRAFLEX FLEXOGRAPHIC PRESS		
114	(W&H) MIRAFLEX FLEXO PRESS & DRYER	0.512 MMBTU/HR	
115	NOVOFLEX 2 PRESS	0.512 MMBTU/HR	
C02	CATALYTIC OXIDIZER-ANGUIL		
C03	MEGTEC REGENERATIVE THERMAL OXIDIZER		
C04	TANN REGENERATIVE THERMAL OXIDIZER		
C05	TANN 2 REGENERATIVE THERMAL OXIDIZER	6.000 MCF/HR	Natural Gas
TE1	TOTAL ENCLOSURE MIRAFLEX 1 PRESS		
TE108	TOTAL ENCLOSURE - FUSION PRESS CAPTURE SYSTEM		
TE113	TOTAL ENCLOSURE FOR PRESS NO. 113		
TE114	TOTAL ENCLOSURE MIRAFLEX 3 PRESS		
TE115	TOTAL ENCLOSURE NOVOFLEX 2		
TE2	W&H PRIMAFLEX TOTAL ENCLOSURE		
TE3	TOTAL ENCLOSURE NOVOFLEX 1		
NG	NATURAL GAS		
S02	ANGUIL OXIDIZER STACK		
S06	MEGTEC REGENERATIVE THERMAL OXIDIZER STACK		
S07	TANN REGENERATIVE THERMAL OXIDIZER STACK		
S08	TANN 2 REGENERATIVE THERMAL OXIDIZER STACK		

PERMIT MAPS



PERMIT MAPS



**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.

Throughput Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) One, two or all three RTOs (C03, C04, or C05) shall be operating when any of the presses are operating.

(b) The permittee shall install pressure sensors in the inlet duct to each RTO in order to control the variable frequency drive (VFD) of the fans to direct the emissions from the presses to either one, two or all three RTOs simultaneously. The presses and RTOs may operate in the following scenarios:

Any combination of presses may be operated together as long as the total inlet volume to

(1) C03 is less than 25,000 scfm and

(2) C04 is less than 15,000 scfm and

(3) C05 is less than 30,000 scfm.

(c) The permittee shall install airflow monitoring devices at the inlet of each RTO.

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.

002 [25 Pa. Code §127.12b]

Plan approval 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.

(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;

**SECTION C. Site Level Plan Approval Requirements**

- (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.

003 [25 Pa. Code §127.12b]
Plan approval terms and conditions.

Within thirty (30) days after permit issuance the permittee shall submit, to the Department for approval, the proposed recordkeeping formats required in this plan approval.

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.12b]
Plan approval terms and conditions.

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

VII. ADDITIONAL REQUIREMENTS.

005 [25 Pa. Code §127.12b]
Plan approval terms and conditions.

The permittee shall comply with all of the existing requirements of its current permit, No. 46-00026, 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.

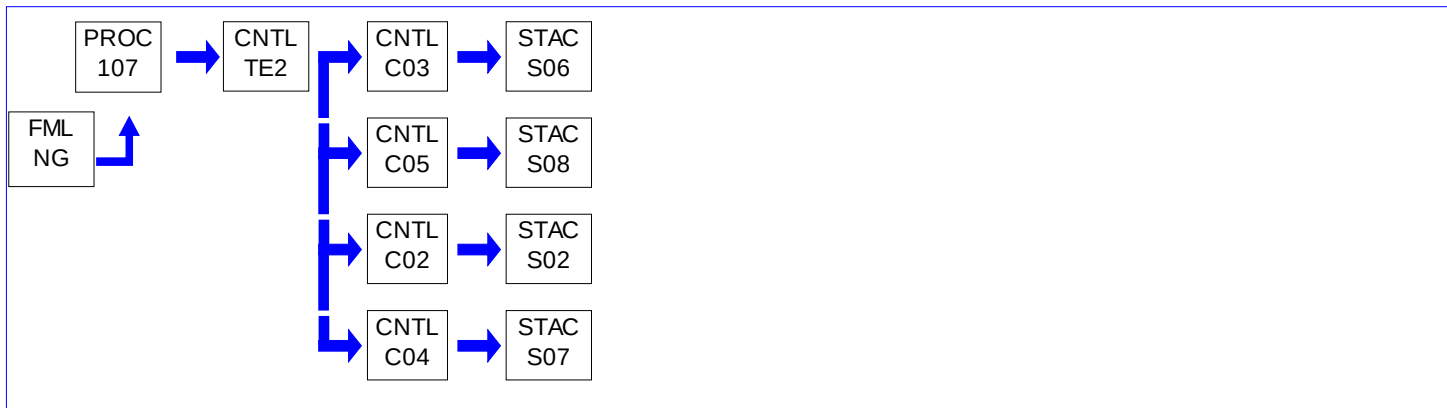
No compliance milestones exist.

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

Source ID: 107

Source Name: W&H PRIMAFLEX 1

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.

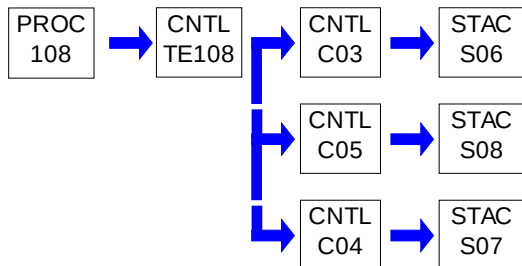
No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

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

Source ID: 108

Source Name: FUSION PRESS & DRYER

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.

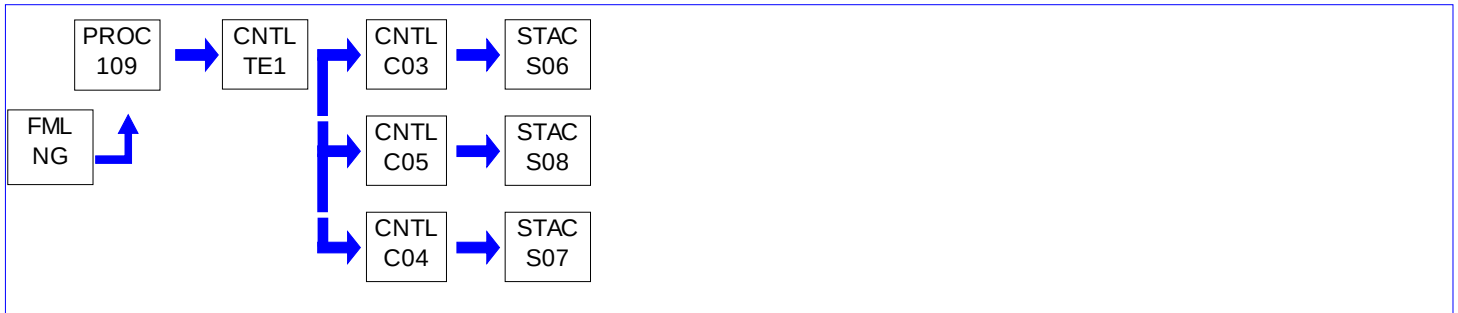
No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

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

Source ID: 109

Source Name: W&H MIRAFLEX FLEXO PRESS

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.

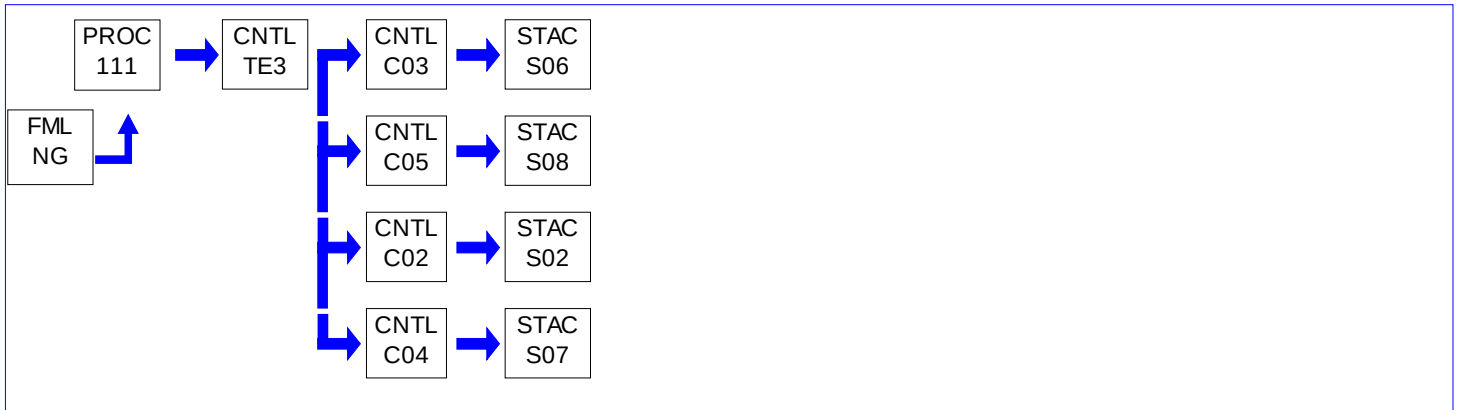
No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

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

Source ID: 111

Source Name: WINDMOELLER & HOELSCHER NOVAFLEX PRESS 1 #111

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.

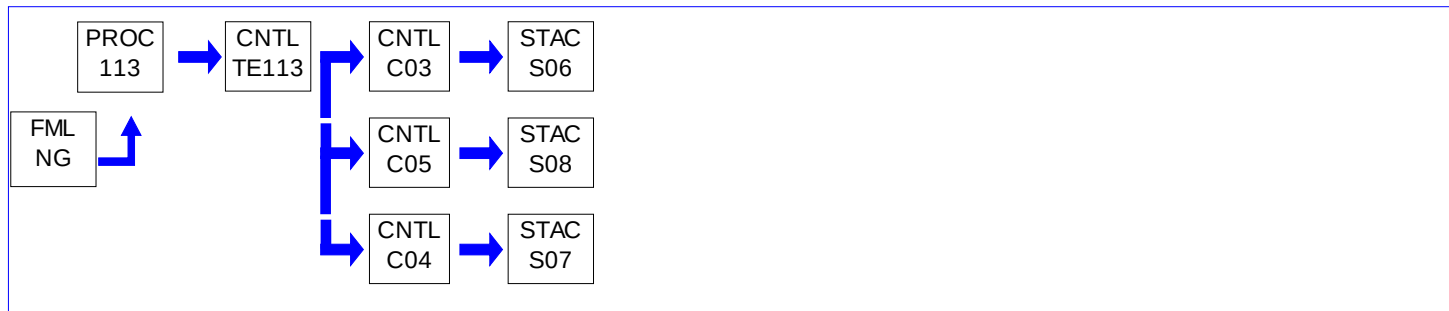
No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

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

Source ID: 113

Source Name: W&H MIRAFLEX FLEXOGRAPHIC PRESS

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).

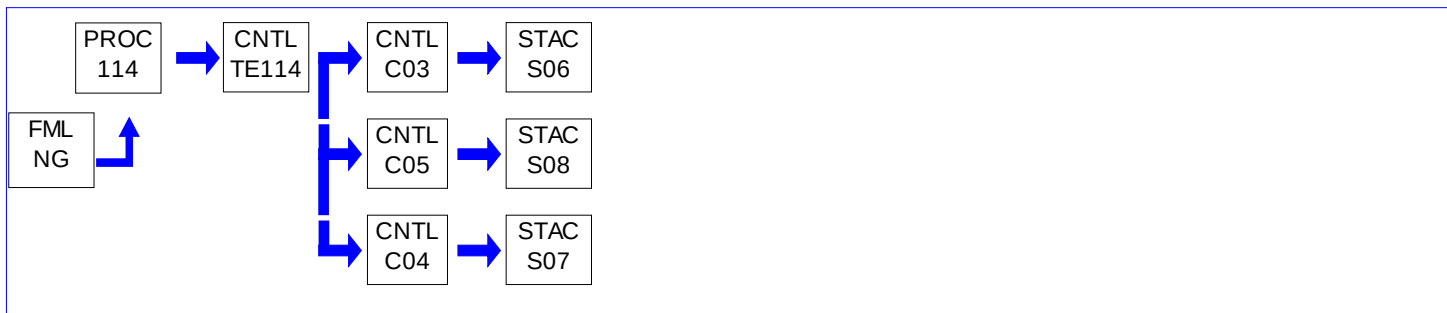
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 114

Source Name: (W&H) MIRAFLEX FLEXO PRESS & DRYER

Source Capacity/Throughput:

0.512 MMBTU/HR

**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).

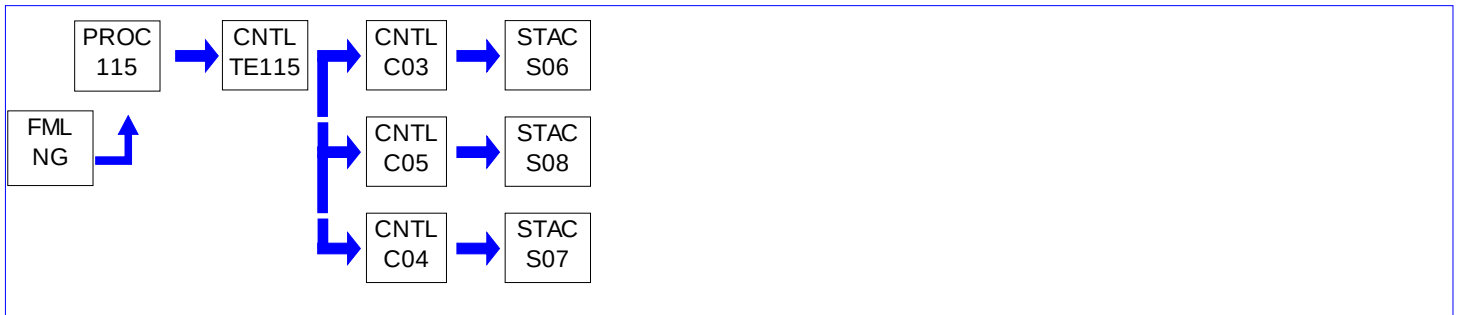
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 115

Source Name: NOVOFLEX 2 PRESS

Source Capacity/Throughput:

0.512 MMBTU/HR

**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: C05

Source Name: TANN 2 REGENERATIVE THERMAL OXIDIZER

Source Capacity/Throughput:

6.000 MCF/HR

Natural Gas

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

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The RTO burner shall fire natural gas only.

Control Device Efficiency Restriction(s).

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) When operating the regenerative thermal oxidizer (RTO), the permittee, shall maintain a minimum 3-hour rolling combustion chamber temperature equal to no less than 50 °F below the 3-hour average temperature demonstrated during the most recent compliant source test approved by DEP . The 3-hour average shall be calculated each hour. Until DEP Source Testing Section approves the initial performance test this RTO shall be operated at the a minimum 3-hour rolling combustion chamber temperature equal to the manufacturer's recommended temperature of 1,500°F. The permittee shall not vent any VOC emissions from the presses to the RTO until the minimum temperature is reached.

[25 Pa. Code 129.67a(d)(2).]

(b) The RTO shall maintain at least a 98% VOC Overall Control Efficiency (OCE) or a post control minimum outlet VOC concentration not to exceed 20 ppmvd as methane, whichever is less stringent, for all sources controlled by this RTO.

[Compliance with this streamlined condition, assures compliance with 25 Pa. Code 129.67a(c)(3) & 129.77(g)(1).]

(c) VOC emissions from the press shall not bypass the total enclosure and the RTO.

(d) The dryer(s), total enclosure and the RTO shall be operated for at least 15 minutes after the last VOC and/or HAP application.

Note: Overall Control Efficiency (OCE) = Capture Efficiency (CE) * Destruction Efficiency (DE)

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The permittee shall perform a stack test using the Department-approved procedures and test methods specified in Chapter 139, to show compliance with the emission limits set for the source. The Source testing shall be performed within 180 days after startup of the source and/or control device. [25 Pa. Code 129.67a(f)(1)]

(b) Testing shall be conducted at the combustion chamber inlet and outlet of the RTO to demonstrate compliance with the 98% VOC destruction efficiency, or a post control non-methane hydrocarbon (NMHC) emission of 20 ppmvd or less as

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

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.

(c) The following process data shall be recorded during each test run to document the operation of the presses:

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

(d) The RTO combustion chamber temperature (°F) shall be recorded in fifteen (15) minute intervals during each test run to document the operation of the RTO.

(e) The initial Performance Test shall be conducted on this TANN RTO while the maximum possible number of presses are operating at maximum routine operating conditions such that the inlet volumetric flow rate of this RTO does not exceed 30,000 scfm or under such other conditions, within the capacity of the equipment, as may be requested by the Department. (Please see Section VII, Issue 5, page 15 (Representative Testing Conditions) in the EPA Clean Air Act National Stack Testing Guidance)

(f) Tests shall also be conducted in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance.

(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), 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.

004 [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.

Southeast Region
RA-EPSEstacktesting@pa.gov

Central Office
RA-EPstacktesting@pa.gov

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

1. Test Date(s)

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

- a. For protocols, provide the proposed date on which testing will commence or "TBD"
 - b. For reports, provide the first and last day of testing
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:
- a. Plan approval number(s)
 - b. Operating permit number
 - c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
 - d. Special purpose(s) (Consent Order, RFD, RACT, 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".

005 [25 Pa. Code §129.77.]**Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

- (a) The measurement of capture efficiency shall be conducted and reported in accordance with the EPA Technical Document "Guidelines for Determining Capture Efficiency," issued January 9, 1995.
- (b) The control efficiency shall be determined in accordance with one of the following:
- (i) EPA Reference Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.
 - (ii) EPA Reference Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.
 - (iii) EPA Reference Method 25B, Determination of Total Gaseous Organic Concentration Using a Nondispersive Infrared Analyzer, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.
 - (iv) CARB Method 100, Procedures for Continuous Gaseous Emission Stack Sampling, California Air Resources Board, 1001 "I" Street, Post Office Box 2815, Sacramento, CA 95812 USA, including updates and revisions.

[25 Pa. Code 129.77(y)(1)&(2)]

III. MONITORING REQUIREMENTS.**# 006 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The air flow from the presses to the oxidizer shall be continuously monitored while the presses are running.

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

The minimum combustion or operating temperature must be continuously monitored.

[25 Pa. Code 129.67a(d)(1)(i) & 129.77(g)(2)]

**SECTION D. Source Level Plan Approval Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 008 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The permittee shall keep the following records for the RTO;

- (1) The 3-hour rolling combustion chamber temperature, at least once every 15 minutes, while the RTO is operating.
- (2) The inlet airflow rate, continuously when the RTO is operating.
- (3) The start-up & shut-down times and daily records of hours of operation.
- (4) All maintenance performed on the TANN RTO and monitoring equipment, to include;
 - (i) Type of maintenance or malfunction.
 - (ii) Name and company of the person performing the maintenance.
 - (iii) Time and date of maintenance.

(b) The records must be maintained for five years and shall be submitted to the DEP in an acceptable format upon receipt of a written request.

(c) The permittee shall keep records of VOC and HAP emissions on a monthly and 12-month rolling basis.

Compliance with this streamline condition assures compliance with 25 Pa. Code §129.77(g)(6), §129.67a(d)(1)(i)&(e)(1).

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

Reports of overall control efficiency testing must be submitted to DEP in accordance with Chapter 139.

[25 Pa. Code 129.67a(e)(6)]

VI. WORK PRACTICE REQUIREMENTS.**# 010 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall operate and maintain the RTO in accordance with:

- (A) good combustion practices,
- (B) manufacturer's specifications and
- (C) good air pollution control practices.

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

A temperature range will be established, after the source testing of the RTO is completed, and added as a condition to the Operating Permit when the Plan Approval is incorporated into the Operating Permit.

012 [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) The permittee shall curtail its operation as soon as possible and not to exceed 15 minutes. No new material may be fed to the presses after 15 minutes.
- (2) Should the permittee continue to operate the presses to evacuate all the material already fed into the presses, then all

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

emissions associated with this excursion process during the "run out" shall be considered fugitive.

(3) The Department defines the word excursion as a departure from the established specified temperature range over a specified averaging period.

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

The oxidizers must be in operation whenever the presses are operating.

[25 Pa. Code 129.67a(d)(3)]

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

The RTO shall be equipped with a temperature monitoring, reading, and recording device to continuously measure and record the combustion zone temperature.

015 [25 Pa. Code §129.67a]**Control of VOC emissions from flexible packaging printing presses.**

Temperature monitoring equipment shall be installed, calibrated, operated and maintained according to manufacturer's specifications at all times the oxidizer is in use.

[25 Pa. Code 129.67a(d)(1)]

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

This control device is composed of one (1) TANN regenerative thermal oxidizer (RTO), model No. TR2590C, with a maximum design flow of 30,000 scfm. Heat energy is provided by one (1) Maxon 6.0 mmBtu/hr burner.



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
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Site Emission Restriction Summary

Emission Limit		Pollutant
24.990 Tons/Yr	12-month rolling sum	VOC
9.990 Tons/Yr	Individual HAP in 12-month rolling sum	Hazardous Air Pollutants
24.990 Tons/Yr	Combined HAP Total in 12-month rolling sum	Hazardous Air Pollutants

**SECTION H. Miscellaneous.**

This plan approval is for the installation of a regenerative thermal oxidizer (RTO) manufacture by TANN Corporation, Model No. TR2590C, under AUTH No. 1455847 and APS ID No. 1097363.



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