



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: April 29, 2024 Effective Date: September 24, 2026
Revision Date: September 24, 2026 Expiration Date: April 29, 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. 46-0040E

Federal Tax Id - Plant Code: 20-5017397-2

Owner Information

Name: MCC MFG INC
Mailing Address: 2025 JOSHUA RD
LAFAYETTE HILL, PA 19444-2431

Plant Information

Plant: MCC MFG INC/LAFAYETTE HILL
Location: 46 Montgomery County 46960 Whitemarsh Township
SIC Code: 2759 Manufacturing - Commercial Printing, Nec

Responsible Official

Name: ERIC SCHWARTZ
Title: GENERAL MANAGER
Phone: (610) 772 - 0695 Email: eric.schwartz@mcclabel.com

Plan Approval Contact Person

Name: ED PACKER
Title: EH&S MANAGER
Phone: (215) 354 - 6881 Email: edgar.packer@mcclabel.com

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



Plan Approval Description

This plan approval is for the installation of a new press designated as Source ID 730 - Nilpeter Press. The new press includes four (4) UV stations using water-based inks, two (2) gravure stations using solvent inks, and two (2) flexographic stations using solvent based inks. The UV stations will be included in Source ID 112 and the solvent stations will be included in Source ID 120. VOC emissions from the solvent stations will exhaust to the existing Regenerative Thermal Oxidizer (C01 - RTO).

Source ID 101 (Gravure Press/Laminator Fisher-Krecke Press) will be removed with this project.



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

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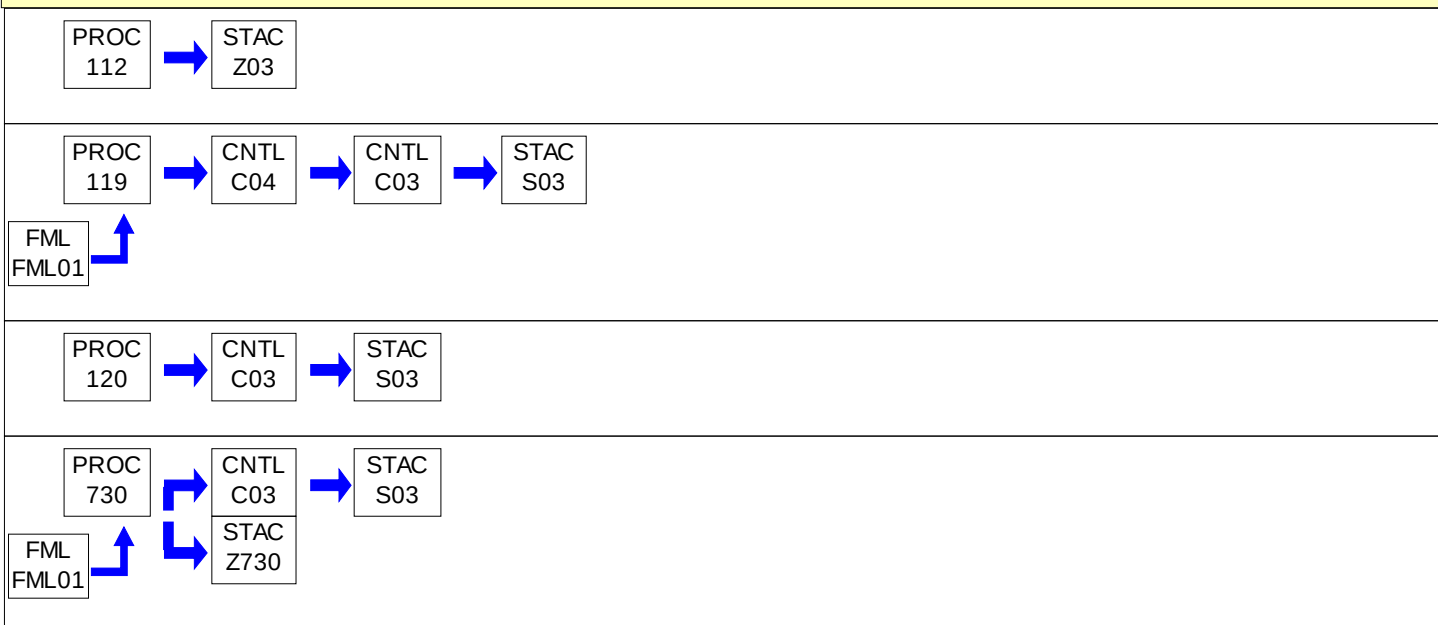
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**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
112	UV STATIONS		
119	CERUTTI PRESS - 8 COLOR (GRAVURE)		
120	SOLVENT STATIONS		
730	NILPETER 8-STATION COMBINATION PRESS (4 UV + 4 SOLVENT)		
C03	REGENERATIVE THERMAL OXIDIZER (RTO)	5.730 MCF/HR	Natural Gas
C04	TOTAL ENCLOSURE (SOURCE 119)		
FML01	NAT GAS		
S03	RTO STACK		
Z03	GENERAL VENTILLATION		
Z730	PRESS 730 UV FUGITIVES		

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.

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.

001 [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;
- (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.

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

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

VI. WORK PRACTICE REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall comply with all of the existing requirements of the current Synthetic Minor Operating Permit No. 46-00040, 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.

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

The sources listed in this plan approval shall be installed and operated in accordance with the plans submitted with the plan approval application (as approved herein).

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

The permittee shall comply with the following work practice standards:

- (a) The permittee shall keep all solvent containers closed at all times unless filling, draining, or performing cleanup operations.
- (b) The permittee shall keep all solvent laden shop towels in a closed container when not being used.
- (c) The permittee shall clean up all solvent-related spills as soon as possible.

VII. ADDITIONAL REQUIREMENTS.

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

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.

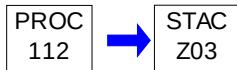
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 112

Source Name: UV STATIONS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1
GROUP 2

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.**# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

This source consists of the following ten (10) individual UV presses:

- Press 311, 6-station UV curable inks and coatings;
- Press 715, 8-station Nilpeter flexographic press using UV curable inks and coatings (installed May 2010);
- Press 716, 8-station Nilpeter flexographic printing press using UV curable inks and coatings (installed in July 2009);
- Press 717, 10-station Nilpeter flexographic printing press using UV curable inks and coatings (installed in September 2006);
- Press 718, 7-Station Comco flexographic printing press using UV curable inks and coatings (installed in September 1996, under RFD 46-A01-1328);
- Press 719, 10-station Nilpeter flexographic press using UV curable inks and coatings (installed under eRFD 8747 September 2020);
- Press 909, 13-station Nilpeter combination press with seven (7) offset, three (3) rotogravure, and three (3) combination

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

stations using UV curable inks (installed under eRFD number 4622, August 2014). Three (3) of these stations are solvent based and now under Source ID 120;

- Press 910, 12-station Nilpeter combination press with offset, flexographic, rotogravure, and rotary screen printing press using UV curable inks and coatings (installed under eRFD number 1862, approved in December 2010) with the 12th station added in June 2011. Three (3) of these stations are solvent based and now under Source ID 120;

- Press 912, 11-station Nilpeter combination offset, flexographic, and rotary screen printing press using UV curable and solvent based inks and coatings (installed in January 2010). Two (2) of these stations are solvent based and now under Source ID 120;

- Press 913, 11-station Nilpeter combination offset, flexographic, and rotary screen printing press using UV curable and solvent based inks and coatings (installed in July 2008). Three (3) of these stations are solvent based and now under Source ID 120;

- Press 730, 8-station Nilpeter combination gravure and flexo press using UV curable and solvent based inks and coatings (installed in 2024). 4 UV stations are listed in Source ID 112, and 4 solvent stations are listed in Source ID 120.

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

Source ID: 119

Source Name: CERUTTI PRESS - 8 COLOR (GRAVURE)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1
GROUP 2

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

001 [25 Pa. Code §127.12b]
Plan approval terms and conditions.

The total post-control VOC emissions from this source, including cleanup solvent usage, shall not exceed 10.0 tons in any 12 consecutive month period.

Control Device Efficiency Restriction(s).

002 [25 Pa. Code §127.12b]
Plan approval terms and conditions.

The permittee shall maintain a permanent total enclosure (100% capture efficiency) for the solvent stations on this press which are routed to the RTO.

[Compliance with this condition assures compliance with 25 Pa. Code § 129.67a(c)(3).]

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) and/or Section E (Source Group Restrictions).

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) and/or Section E (Source Group Restrictions).

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) and/or Section E (Source Group Restrictions).

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) 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Plan Approval 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) and/or Section E (Source Group Restrictions).

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

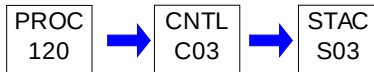
Source ID: 120

Source Name: SOLVENT STATIONS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1

GROUP 2

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall limit the aggregate post-control VOC emissions from the fifteen (15) Solvent Stations including VOC emissions from related cleaning activities at each solvent station, to 6.08 tons per year, based on a 12-month rolling sum.

[Note: This limit is based on a minimum capture system efficiency of 85% at each station, and a minimum destruction efficiency of 98% for the 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) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall calculate the aggregate post-control VOC emissions from Source ID 120 using the amount of VOC-containing material purchased or used per month (mass in pounds per month), the VOC content of each material purchased or used (weight percent VOC), and the overall control device efficiency of the RTO determined during the most recent compliant stack test.

IV. RECORDKEEPING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 003 [25 Pa. Code §129.67a]****Control of VOC emissions from flexible packaging printing presses.**

The permittee shall reduce the overall weight of VOCs emitted to the atmosphere from all VOC-containing materials such as inks, coatings, varnishes, diluents and cleaning solvents combined used on the solvent stations of the presses listed in Source ID 120 through the use of the regenerative thermal oxidizer (C03), according to 25 Pa. Code § 129.67a(c)(3).

**SECTION D. Source Level Plan Approval Requirements****VII. ADDITIONAL REQUIREMENTS.****# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

This source consists of the following fifteen (15) individual solvent-based printing stations located on their respective combination printing press:

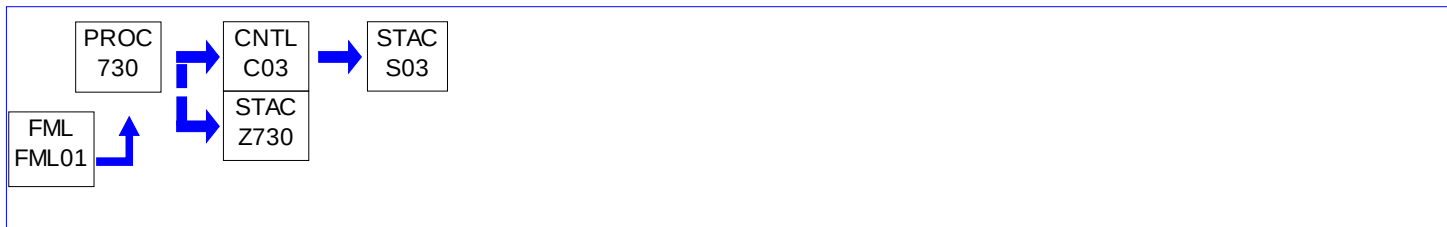
- Press 909, three (3) rotogravure stations;
- Press 910, three (3) rotogravure stations;
- Press 912, two (2) rotogravure stations;
- Press 913, three (3) rotogravure stations;
- Press 730, two (2) gravure stations, and (2) flexographic stations.

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

Source ID: 730

Source Name: NILPETER 8-STATION COMBINATION PRESS (4 UV + 4 SOLVENT)

Source Capacity/Throughput:

**I. RESTRICTIONS.****Control Device Efficiency Restriction(s).**

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall achieve a capture efficiency of at least 85% for the solvent stations on this press which are routed to the RTO.

[Compliance with this condition assures compliance with 25 Pa. Code § 129.67a(c)(3).]

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: C03

Source Name: REGENERATIVE THERMAL OXIDIZER (RTO)

Source Capacity/Throughput:

5.730 MCF/HR

Natural Gas

I. RESTRICTIONS.**Control Device Efficiency Restriction(s).****# 001 [25 Pa. Code §129.67a]****Control of VOC emissions from flexible packaging printing presses.**

The overall control efficiency of the RTO system, as determined by the test methods and procedures specified in this plan approval, shall not be less than 75%, in accordance with 25 Pa. Code § 129.67a(c)(3), Table 1.

[Note: overall control efficiency = VOC destruction efficiency * capture efficiency]

II. TESTING REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67a.]

(a) The permittee shall perform a stack test on the Regenerative Thermal Oxidizer (Control Device ID C03) within 180 days of start up of the Nilpeter Press Source ID 730 using Department approved procedures. Performance tests shall be conducted while all sources ducted to the RTO are operating at maximum routine operating conditions or under other such conditions, within the capacity of the equipment, as may be requested by the Department.

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

(c) The permittee shall monitor and record the average temperature demonstrated during the stack test in order to determine a new baseline while all sources ducted to the RTO are operating for compliance with 25 Pa. Code § 129.67a(d)(2) once every five (5) years.

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

(1) The capture efficiency at the solvent stations of Source ID 730 (included in Source ID 120) shall be determined in accordance with either of the following methods:

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

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

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

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

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

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

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

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

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

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

(h) Within sixty (60) calendar days after the source test, two (2) copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Program Manager for approval.

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

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

[The performance test conducted to demonstrate compliance with conditions of this plan approval may also satisfy testing required once every five (5) years as required in the Synthetic Minor Operating Permit No. 46-00040 if all requirements of the SMOP testing condition are also met.]

003 [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)

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

(2) 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) Plan Approval Testing Requirements and the applicable sections of 25 Pa. Code § 129.67a.

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

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

III. MONITORING REQUIREMENTS.**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall monitor the following operating parameters for the RTO on a continuous basis, when any source ducted to the RTO is in operation (and using solvent material):

- (a) Combustion chamber temperature,
- (b) Air flow rate of the source(s) ducted to the RTO,
- (c) Time and date of operation.

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

005 [25 Pa. Code §129.67a]**Control of VOC emissions from flexible packaging printing presses.**

The permittee shall calibrate, maintain, and operate the add-on air pollution control device (Control Device C03 - RTO) monitoring equipment according to manufacturer's specifications at all times the add-on air pollution control device is in use, in accordance with 25 Pa. Code § 129.67a(d)(1).

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

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

007 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) The permittee shall record the following operating parameters for the RTO every 15 minutes, when the RTO is in operation:

- (1) Combustion chamber temperature, on a 3-hour average basis,
- (2) Total air flow rate of the sources ducted to the RTO, on a 3-hour average basis.

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

(b) The permittee shall maintain monthly records of the date and time the RTO operated.

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

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

(b) The permittee shall keep annual records of the following for the RTO:

- (1) inspections performed,
- (2) any deficiencies, and
- (3) any corrective actions taken.

**SECTION D. Source Level Plan Approval 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.

009 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Air flow to this RTO shall not exceed 30,000 scfm at any time.

010 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall operate the RTO using good operating and maintenance practices to provide the following minimum VOC destruction performance:

- (a) 40 ppm_{dv} as methane by EPA Method 25A for inlet VOC concentrations less than 500 ppm; or
- (b) 98% destruction or greater for inlet VOC concentrations greater than or equal to 500 ppm.

[This condition serves as Best Available Technology. Compliance with this condition streamlines compliance with 25 Pa. Code § 129.67a(c)(3).]

011 [25 Pa. Code §129.67a]

Control of VOC emissions from flexible packaging printing presses.

The permittee shall operate the RTO at all times that any of the solvent stations listed in Source ID 120 are in operation, in accordance with 25 Pa. Code § 129.67a(d)(3).

012 [25 Pa. Code §129.67a]

Control of VOC emissions from flexible packaging printing presses.

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

[Note: The source test required by this plan approval will be used to determine a new baseline temperature.]

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 E. Source Group Plan Approval Restrictions.**

Group Name: GROUP 1

Group Description: 25 Pa. Code Section 129.67a Requirements

Sources included in this group

ID	Name
112	UV STATIONS
119	CERUTTI PRESS - 8 COLOR (GRAVURE)
120	SOLVENT STATIONS

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.**# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67a.]

The permittee shall use one of the following methods to determine the VOC content of each VOC-containing material used in printing operations for the presses included in Source ID 112 and Source ID 120.

(a) Conduct sampling of VOC-containing material and testing for the VOC content of the material in accordance with the procedures and test methods specified in Chapter 139, pursuant to 25 Pa. Code § 129.67a(f)(1)(i).

(b) Use data from Certified Product Data Sheets (CPDS) and Safety Data Sheets (SDS) to determine the VOC content of inks, varnish, solvent, or other components applied at this source.

(c) Perform USEPA Test Method 24 to determine the VOC content of inks, varnish, solvent, or other components applied at this source.

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

III. MONITORING REQUIREMENTS.

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.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67a(e)(4).]

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

(b) The permittee shall maintain records of the amount of each VOC-containing material, in pounds per month, purchased or used for printing operations on a monthly basis. The permittee may group materials into classes using the highest VOC content in any material in a class to represent that class of material.

(c) The permittee shall calculate and record the aggregate post-control VOC emissions from Source ID 112 and Source ID 120 on a monthly basis, including 12-month rolling sums.

V. REPORTING REQUIREMENTS.

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

**SECTION E. Source Group Plan Approval Restrictions.****VI. WORK PRACTICE REQUIREMENTS.****# 003 [25 Pa. Code §129.67a]****Control of VOC emissions from flexible packaging printing presses.**

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

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

(b) The requirements in paragraph (a) apply to the following activities:

- (1) Cleaning of ink or coating from a press.
- (2) Cleaning of ink or coating from press parts, including press parts that have been removed from the press for cleaning.
- (3) Cleaning of ink or coating from areas around a press.

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

The permittee shall reduce the overall weight of VOCs emitted to the atmosphere from all inks and coatings combined used on this press through the use of the regenerative thermal oxidizer (C03), according to 25 Pa. Code § 129.67a(c)(3).

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 E. Source Group Plan Approval Restrictions.**

Group Name: GROUP 2

Group Description: General Conditions

Sources included in this group

ID	Name
112	UV STATIONS
119	CERUTTI PRESS - 8 COLOR (GRAVURE)
120	SOLVENT STATIONS

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.

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

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

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 F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
119	CERUTTI PRESS - 8 COLOR (GRAVURE)		
Emission Limit		Pollutant	
10.000	Tons/Yr	based on a 12-month rolling sum	VOC
120	SOLVENT STATIONS		
Emission Limit		Pollutant	
6.080	Tons/Yr	based on a 12-month rolling sum	VOC

Site Emission Restriction Summary

Emission Limit	Pollutant
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SECTION H. Miscellaneous.



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