

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM**

TITLE V/STATE OPERATING PERMIT

ISSUE DATE: 02/25/2000
EXPIRATION DATE: 04/01/2005

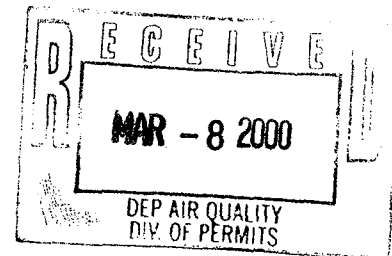
EFFECTIVE DATE: 04/01/2000

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

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

TITLE V PERMIT NO: 09-00044
TAX-ID/PLANT CODE 22-1903518/01

OWNER DUNMORE CORP
MAILING 207 PENNS TRAIL
ADDRESS NEWTOWN, PA. 18940



PLANT NEWTOWN
LOCATION 09 Bucks County
SIC CODE 2295 Manufacturing - Coated Fabrics

09935 Newtown Twp

RESPONSIBLE OFFICIAL
NAME RICHARD SEGEL
TITLE PRESIDENT

PERMIT CONTACT PERSON
NAME TIM CARROLL
TITLE DIRECTOR OF CONTINUOUS IMPROVEMENT
PHONE (215)968-0442

[SIGNATURE] *Francine Carlini*
FRANCINE CARLINI, SOUTHEAST REGION AIR PROGRAM MANAGER

Section A. Facility/Source Identification*Table of Contents**Site Inventory List***Section B. General Title V Requirements***#001 Definitions**#002 Property Rights**#003 Permit Expiration**#004 Permit Renewal**#005 Transfer of Ownership or Operational Control**#006 Inspection and Entry**#007 Compliance Requirements**#008 Need to Halt or Reduce Activity Not a Defense**#009 Duty to Provide Information**#010 Reopening and Revising the Title V Permit for Cause**#011 Reopening a Title V Permit for Cause by EPA**#012 Significant Operating Permit Modifications**#013 Minor Operating Permit Modifications**#014 Administrative Operating Permit Modifications**#015 Severability Clause**#016 Fee Payment**#017 Authorization for De Minimis Emission Increases**#018 Reactivation of Sources**#019 Circumvention**#020 Submissions**#021 Sampling, Testing and Monitoring Procedures**#022 Recordkeeping Requirements**#023 Reporting Requirements**#024 Compliance Certification**#025 Operational Flexibility**#026 Risk Management**#027 Approved Economic Incentives and Emission Trading Programs**#028 Permit Shield***Section C. Site Level Requirements***C-I: Restrictions**C-II: Testing Requirements**C-III: Monitoring Requirements**C-IV: Recordkeeping Requirements**C-V: Reporting Requirements**C-VI: Work Practice Standards**C-VII: Additional Requirements**C-VIII: Compliance Certification**C-IX: Compliance Schedule***Section D. Source Level Requirements**

- D-I: Restrictions*
- D-II: Testing Requirements*
- D-III: Monitoring Requirements*
- D-IV: Recordkeeping Requirements*
- D-V: Reporting Requirements*
- D-VI: Work Practice Standards*
- D-VII: Additional Requirements*

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

Section E. Alternative Operating Scenario(s)

- E-I: Restrictions*
- E-II: Testing Requirements*
- E-III: Monitoring Requirements*
- E-IV: Recordkeeping Requirements*
- E-V: Reporting Requirements*
- E-VI: Work Practice Standards*
- E-VII: Additional Requirements*

Section F. Emission Trading Groups**Section G. Emission Restriction Summary****Section H. Miscellaneous**

SECTION A. Site Inventory List

02/18/00 PAGE: 5
09-00044

ID	Source Name	Capacity	Fuel/Material
101	PRESS #1	111.0 Lbs/HR	SOLVENT
102	SOLVENT RECOVERY UNIT	37.0 Lbs/HR	SOLVENT
103	MIXERS (4)	80.0 Lbs/HR	SOLVENT
104	COATER (LAB)	10.0 Lbs/HR	SOLVENT
105	EMERGENCY GENERATOR	690.0 CF/HR	Natural Gas
301	PRESS #3	95.0 Lbs/HR	SOLVENT
C01	THERMAL OXIDIZER	3.6 MCF/HR	Natural Gas
S01	OXIDIZER STACK		
S02	RECOVERY UNIT STACK		
S03	COATER STACK		
S11	EMERGENCY GENERATOR		

Proc CD EP
101 -->C01 -->S01

Proc EP
102 -->S02

Proc CD EP
103 -->C01 -->S01

Proc EP
104 -->S03

Proc EP
105 -->S11

Proc CD EP
301 -->C01 -->S01

Cont EP
C01 -->S01

#001 [25 Pa. Code §121.1]
Definitions

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

#002 [25 Pa. Code §127.512(c)(4)]
Property Rights

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

#003 [25 Pa. Code §127.446(a) and (c)]
Permit Expiration

This permit is issued for a fixed term of 5 years from the effective date shown on page 2 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#004 [25 Pa. Code §§127.412, 127.413, 127.414, 127.446(e) & 127.503]
Permit Renewal

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

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

(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#005 [25 Pa. Code §§127.450(a)(4) & 127.464(a)]
Transfer of Ownership or Operational Control

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

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

(2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and

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

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

#006 [25 Pa. Code §127.513, 35 P.S. §4008 and §114 of the CAA]
Inspection and Entry

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

(1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder.

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

#007 [25 Pa. Code §§127.25, 127.444, & 127.512(c)(1)]
Compliance Requirements

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

(1) Enforcement action

(2) Permit termination, revocation and reissuance or modification

(3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the

Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code §127.512(c)(2)]
Need to Halt or Reduce Activity Not a Defense

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

#009 [25 Pa. Code §§127.411(d) & 127.512(c)(5)]
Duty to Provide Information

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

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

#010 [25 Pa. Code §§127.463, 127.512(c)(3) & 127.542]
Reopening and Revising the Title V Permit for Cause

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

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

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of 3 or more years prior to the expiration date of this permit. The permit revision shall be completed within 18 months after promulgation of the applicable requirement. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

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

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

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

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

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

#011 [25 Pa. Code §127.543]

Reopening a Title V Permit for Cause by EPA

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

#012 [25 Pa. Code §127.541]
Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541.

#013 [25 Pa. Code §§121.1 & 127.462]
Minor Operating Permit Modifications

(a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(b) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to an operational flexibility change authorized by 25 Pa. Code § 127.462.

#014 [25 Pa. Code §127.450]
Administrative Operating Permit Modifications

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations thereunder from being processed as an administrative amendment.

(b) Upon taking final action granting a request for an administrative permit amendment in accordance with § 127.450(c), the Department will allow coverage under 25 Pa. Code § 127.516 (relating to permit shield) for administrative permit amendments which meet the relevant requirements of 25 Pa. Code Article III, unless precluded by the Clean Air Act or the regulations thereunder.

#015 [25 Pa. Code §127.512(b)]
Severability Clause

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

#016 [25 Pa. Code §§127.704, 127.705 & 127.707]
Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).
- (b) **Emission Fees.** The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) **Late Payment.** Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.
- (f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

#017 [25 Pa. Code §§127.14(b) & 127.449]
Authorization for De Minimis Emission Increases

- (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with 7 days prior written notice before commencing any de minimis emissions increase.

The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

(b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(c) The permittee is authorized to install the following minor sources without the need for a plan approval:

(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquified petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

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

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases allowed under this permit,

25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

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

#018 [25 Pa. Code §§127.11a & 127.215]
Reactivation of Sources

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

#019 [25 Pa. Code §§121.9 & 127.216]
Circumvention

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

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#020 [25 Pa. Code §§127.402(d) & 127.513(1)]
Submissions

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

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

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

Enforcement Programs Section (3AT13)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d).

(d) Unless otherwise required by the Clean Air Act or regulations adopted thereunder, a responsible official of the facility shall certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

#021 [25 Pa. Code §127.441(c) & Chapter 139; §§114(a)(3), 504(b) of the CAA]
Sampling, Testing and Monitoring Procedures

(a) The permittee shall perform all applicable emissions monitoring and analysis procedures or test methods, including procedures and methods under Sections 114(a)(3) or 504(b) of the Clean Air Act.

(b) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the monitoring requirements of 40 CFR Part 64, if applicable.

(c) Unless alternative methodology is required by the Clean Air Act and

regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#022 [25 Pa. Code §§127.511 & Chapter 135]
Recordkeeping Requirements

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

(1) The date, place (as defined in the permit) and time of sampling or measurements.

(2) The dates the analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of the analyses.

(6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#023 [25 Pa. Code §§ 127.411(d), 127.442 & 127.511(c)]
Reporting Requirements

(a) The permittee shall comply with the applicable reporting requirements of this Title V permit including Sections C and D, the Clean Air Act and the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

(b) Pursuant to 25 Pa. Code § 127.511(c), the reporting requirements for the Title V facility shall include the following:

(1) Submittal of reports of required monitoring at least every six months. The reports shall include instances of deviations (as defined in 25 Pa. Code §121.1) from the requirements of this Title V permit.

(2) The permittee shall report deviations (as defined in 25 Pa. Code § 121.1) from permit requirements within the timeframes specified in this permit. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventive measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source.

(c) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

(d) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Condition #020 (relating to submissions) of this permit.

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

#024 [25 Pa. Code §127.513]
Compliance Certification

(a) Within one year from the date of issuance of the Title V permit and each year thereafter, the permittee shall submit to the Department and

EPA Region III a certification of compliance with the terms and conditions in this permit including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
 - (2) A description of the means used to monitor compliance with the emission limitations, standards and work practices, consistent with 25 Pa. Code Article III.
 - (3) The compliance status.
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period.
 - (5) Whether compliance was continuous or intermittent.
 - (6) Other facts the Department may require to determine the compliance status of a source.
- (b) The compliance certification shall be submitted to the Department and EPA in accordance with the submission requirements specified in permit condition #020 of this section.

#025 [25 Pa. Code §127.3]
Operational Flexibility

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

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

(6) Section 127.462 (relating to minor operating permit amendments)

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

(b) Unless precluded by the Clean Air Act or the regulations adopted thereunder, the permit shield authorized under 25 Pa. Code § 127.516 shall extend to operational flexibility changes made at this Title V facility pursuant to this permit condition and other applicable operational flexibility terms and conditions of this permit.

#026 [25 Pa. Code §§127.441(d), 127.512(i) and 40 CFR Part 68]
Risk Management

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Chemical Safety Information, Site Security and Fuels Regulatory Review 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 Chemical Safety Information, Site Security and Fuels Regulatory Review Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility . The permittee shall prepare and implement the RMP according to the following schedule and requirements:

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

(i) June 21, 1999;

(ii) Three years after the date on which a regulated substance is first listed under § 68.130; or

(iii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

(1) Submit a compliance schedule for satisfying the requirements 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or

(2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

(e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five years in accordance with 40 CFR § 68.200.

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

(1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #24 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#027 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

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

#028 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]
Permit Shield

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

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

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

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

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

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

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department on minor or significant permit modifications, and operational flexibility changes shall be covered by the permit shield. Upon taking final action granting a request for an administrative permit amendment, the Department will allow coverage of the amendment by the permit shield in § 127.516 for administrative amendments which meet the relevant requirements of 25 Pa. Code Article III.

(d) The permit shield authorized under § 127.516 is in effect for the permit terms and conditions in this Title V permit, including administrative operating permit amendments and minor operating permit modifications.

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §121.7]

Prohibition of air pollution.

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

#002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving, and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Sources, and classes of sources, other than those identified in (a) - (d) above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1(b), that fugitive emissions from the source, after appropriate controls, meet the following requirements:
 - (1) The emissions are of minor significance with respect to causing air pollution; and
 - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

#003 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Condition #002, of this Section, if such emissions are visible at the point the emissions pass outside the person's property.

#004 [25 Pa. Code §123.31]

Limitations

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

#005 [25 Pa. Code §123.41]

Limitations

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

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

#006 [25 Pa. Code §123.42]

Exceptions

The limitations of Condition #005, of this Section, shall not apply to a visible emission in either of the following instances:

- (a) When the presence of uncombined water is the only reason for failure to meet the limitations.
- (b) When the emission results from the sources specified in Condition #002, of this Section.

#007 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material in the Southeast Air Basin, except when the open burning results from:

- (a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (c) A fire set solely for cooking food.
- (d) A fire set solely for recreational or ceremonial purposes.

II. TESTING REQUIREMENTS.

#008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.513.]

(a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A, of this permit, may be in excess of the limitations specified in this permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

#009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h) and the Rule Effectiveness Program.]

The permittee shall have a stack test performed once every five (5) years to determine the overall control efficiency of the thermal oxidizer for VOC emissions. The permittee shall use test methods and procedures approved by the Department's Source Testing and Monitoring Section. The test shall be conducted within the final year before the Title V operating permit expires. Results of the stack test shall be submitted to the Department for review at least 60 days prior to the expiration of this operating permit.

III. MONITORING REQUIREMENTS.

#010 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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

(b) Observers, trained and qualified to measure plume opacity with the

naked eye or with the aid of any devices approved by the Department.

#011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor, the following, at least once per operating shift:

- (a) Odors that the Department may consider to be malodors.
- (b) Fugitive particulate emissions.
- (c) Visible emissions.

IV. RECORDKEEPING REQUIREMENTS.

#012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) Records of the monitoring and supporting data required by this Operating Permit shall be retained for a minimum of five (5) years.

(b) Within thirty (30) days of permit issuance, the permittee shall submit, to the Department for approval, the recordkeeping formats required in subparagraph (a), above.

#013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall record, at a minimum, the following information relating to the reports malodors, and/or exceedances of any fugitive particulate or visible emission:

- (a) Date, time, and location of incident(s).
- (b) Results of the investigation.
- (c) Any corrective action taken.

#014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h) and the Rule Effectiveness Program.]

Coating composition and usage records required for Presses #1 and #3, of Section D, of this permit, are required for the Rule Effectiveness Program. These records shall be submitted to the Department semi-annually, and cover the six (6) month period beginning January 1, and July 1, of each year. These records shall be due to the Department within thirty (30) days following the end of each six (6) month period.

#015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall document the type and amount of training provided to each operator as noted in Condition #023, of this Section, of this permit.

V. REPORTING REQUIREMENTS.

#016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The permittee shall, within two (2) hours of becoming knowledgeable of any occurrence, notify the Department, at (610) 832-6241, of any malfunction of the source(s) or associated air pollution control devices listed in Section A, of this permit, which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit, or regulation contained in 25 Pa. Code Article III.

(b) Malfunction(s) which occur at this Title V facility, and pose(s) an imminent danger to public health, safety, welfare and the environment, and would violate permit conditions if the source were to continue to operate after the malfunction, shall immediately be reported to the Department by telephone at the above number.

(c) A written report shall be submitted to the Department within two (2) working days following the incident, and shall describe, at a minimum, the following:

- (1) The malfunction(s).
- (2) The emission(s).
- (3) The duration.
- (4) Any corrective action taken.

#017 [25 Pa. Code §135.3]

Reporting

The permittee shall submit by March 1, of each year, an Air Information Management System (AIMS) inventory report for the preceding calendar year.

#018 [25 Pa. Code §135.21]

Emission statements

The permittee shall submit by March 1, of each year, an annual emission statement for the preceding calendar year.

VI. WORK PRACTICE STANDARDS.

#019 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in Condition #002, above, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

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

#020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall ensure that the sources and air pollution control devices, listed in Section A, of this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and consistent with the operation and maintenance (O & M) instructions supplied by the manufacturer.

A copy of the O & M instructions shall be kept on site and made available to the Department upon request. Operators must follow the O & M instructions and/or checklists and sign off daily.

#021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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

#022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The permittee may not modify any source identified in Section A, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition #017(g), of Section B, of this permit.

(b) If an unauthorized modification of any source occurs at this facility, then this permit shall be suspended, as it pertains to that source and the source(s) shall not be operated.

#023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h) and the Rule Effectiveness Program.]

The permittee shall provide at least 41 hours of introductory training to new employees and 25 hours per year of refresher training on the proper operation and maintenance of the source(s) and control device.

VII. ADDITIONAL REQUIREMENTS.

#024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following previously issued plan approvals and operating permits serve as the basis for certain terms and conditions set forth in this Title V Permit:

09-320-011A

09-320-011

VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit on or before 03/01/2001 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and semi-annually thereafter.

IX. COMPLIANCE SCHEDULE.

#001 01-JAN-02

The permittee shall comply with the surface coating regulations, 25 Pa. Code Chapter 129, upon revision, within one (1) year after their effective date or sooner if indicated in the regulations.

***** PERMIT SHIELD IN EFFECT. *****

Source ID: 101
Source Name: PRESS #1

SOURCE CAPACITY: 111.0 Lbs/HR SOLVENT

Proc CD EP
101 -->C01 -->S01

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The VOC emissions resulting from the use of Ultraviolet (UV) coatings from Press 101 shall not exceed 1000 pounds, in any 12 consecutive month period. This total shall be included in the aggregate VOC emission limit indicated in Condition #002(a), below.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The overall aggregate emissions from Press 101 and Press 301 shall not exceed 25.0 pounds/hour, 525.0 pounds/day, or 17.0 tons in any 12 consecutive month period, whichever is more restrictive.

(b) The aggregate VOC emissions, from Press 101 and Press 301, from high solvent coatings, shall not exceed 2.5 tons in any 12 consecutive month period. The VOC emissions from high solvent coatings shall be included in the aggregate VOC emissions indicated in Condition #002(a), above.

(c) High solvent coatings are defined as all coatings that require an overall control efficiency greater than 95%.

(d) The permittee shall, through the use of a thermal oxidizer, reduce the VOC emissions from all non-compliant coatings from this press by a minimum of 95%.

Control Device Efficiency Restriction(s).

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 139.]

The permittee shall operate this press in a total enclosure to ensure a 100% capture efficiency.

#004 [25 Pa. Code §129.52]

Surface coating processes

The permittee shall use only compliant coatings meeting the VOC emission standard set forth in the following formula, or use an add-on control equipment to achieve an equivalent reduction in overall VOC emissions pursuant to 25 Pa. Code Section 129.52(b)(2).

$$\% \text{ Reduction} = 100 \left\{ 1 - \frac{Y \left\{ 1 - \frac{X}{Z_1} \right\}}{X \left\{ 1 - \frac{Y}{Z_2} \right\}} \right\}$$

where:

X = Pounds of VOC per gallon of coating (minus water) for present coating.

Y = Pounds of VOC per gallon of coating (minus water) found in Table I, of 25 Pa. Code § 129.52.

Z₁ = Density of VOC in pounds per gallon for present coating.

Z₂ = Standard solvent density (7.36 pounds per gallon).

II. TESTING REQUIREMENTS.

#005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.441, 129.52 and 40 CFR part 60, Appendix A.]

(a) The permittee shall test their coating(s) for the following, in accordance with Method 24, as specified in 40 CFR part 60, Appendix A:

- (1) Volatile matter content.
- (2) Water content.
- (3) Density.
- (4) Volume solids.
- (5) Weight solids.

(b) The permittee shall test each coating for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.

(c) The above testing requirements shall be waived if the permittee demonstrates compliance with Condition #013, of this Section, of this Permit.

III. MONITORING REQUIREMENTS.

#006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall monitor the amount of high-solvent coatings used, on a per-job basis.

#007 [25 Pa. Code §129.52]

Surface coating processes

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall monitor the following information, for this press, per job, on a daily and an average hourly basis:

(a) Ink and coating in gallons, and pounds, applied,

(b) The ink/coating composition:

1. Percent solids by volume and weight.
2. Percent solvent by volume and weight.
3. Percent water by volume and weight.
4. Pounds of VOC per gallon minus water.
5. Solvent density.

(c) Daily clean-up solvents usage, and its VOC content and solvent density.

(d) The hours of operation of this press, per job.

IV. RECORDKEEPING REQUIREMENTS.

#008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

Coating test results, or manufacturers certified analysis, shall be recorded and retained, on site.

#009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain separate records to demonstrate compliance with the emission limits in Conditions #001, #002(a), and #002(b), above.

#010 [25 Pa. Code §129.52]

Surface coating processes

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall record the following information, for this press, per job, on a daily and an average hourly basis:

(a) Ink and coating in gallons, and pounds, applied,

(b) The ink/coating composition:

1. Percent solids by volume and weight.
2. Percent solvent by volume and weight.
3. Percent water by volume and weight.
4. Pounds of VOC per gallon minus water.
5. Solvent density.

(c) Daily clean-up solvents usage, and its VOC content and solvent density.

(d) The hours of operation for this press, per job.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE STANDARDS.

#011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall operate and maintain this press and total enclosure in accordance with good operating and maintenance practices and good air pollution control practices.

#012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Non-compliant coatings are defined as those coatings for which the weight of VOC's per gallon of coating (minus water) is greater than 2.92 pounds/gallon after adjustment to a standard solvent density of 7.36 pounds per gallon and to a solids basis.

#013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall ensure that a minimum operating temperature of 1400° F is attained at the combustion chamber exit before dispensing coatings to this press.

#014 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

Compliance with the testing requirements of Condition #005, above, can be demonstrated through certification from the supplier showing that Method 24, as specified in 40 CFR part 60, Appendix A, was used to test the coating. In the event that proper documentation is not obtained, the permittee shall perform testing in accordance with Condition #005, of this Section, for this press.

If proper testing has been demonstrated, and the coating is altered prior to use with a VOC-containing thinner, the permittee shall demonstrate compliance with the allowable VOC limit, through either of the following:

(a) Perform calculations to demonstrate that compliance is still

maintained with the, as applied, coating reduction requirement stated in Condition #004, of this Section, for this press, or

(b) Retest the coating, in accordance with Condition #005, of this Section, for this press.

#015 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall not make any physical modifications to the total enclosure, without the Department's approval.

VII. ADDITIONAL REQUIREMENTS.

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

***** PERMIT SHIELD IN EFFECT. *****

Source ID: 102

Source Name: SOLVENT RECOVERY UNIT

SOURCE CAPACITY:

37.0 Lbs/HR SOLVENT

Proc EP
102 -->S02

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor the following information monthly, for this recovery unit:

- (a) The amount of spent solvent input.
- (b) The amount of reclaimed solvent.
- (c) The amount of still bottoms pumped to waste.

IV. RECORDKEEPING REQUIREMENTS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall record the following information monthly, for this recovery unit:

- (a) The amount of spent solvent input.
- (b) The amount of reclaimed solvent.

(c) The amount of still bottoms pumped to waste.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE STANDARDS.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall operate and maintain this recovery unit in accordance with manufacturers specifications.

VII. ADDITIONAL REQUIREMENTS.

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

***** PERMIT SHIELD IN EFFECT. *****

Source ID: 103
Source Name: MIXERS (4)

SOURCE CAPACITY: 80.0 Lbs/HR SOLVENT

Proc CD EP
103 -->C01 -->S01

I. RESTRICTIONS.

Control Device Efficiency Restriction(s).

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 139.]

The permittee shall operate these four (4) mixers in a total enclosure to ensure a 100% capture efficiency.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE STANDARDS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall not make any physical modifications to the total enclosure, without the Department's approval.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall operate and maintain these four (4) mixers, and total enclosure, in accordance with good operating and maintenance practices and good air pollution control practices.

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall ensure that a minimum operating temperature of 1400° F is attained at the combustion chamber exit before dispensing coatings to any of these four (4) mixers.

VII. ADDITIONAL REQUIREMENTS.

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

***** PERMIT SHIELD IN EFFECT. *****

Source ID: 104
Source Name: COATER (LAB)

SOURCE CAPACITY: 10.0 Lbs/HR SOLVENT

Proc EP
104 -->S03

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor, monthly, the type and amount, of coating used by this lab coating press.

IV. RECORDKEEPING REQUIREMENTS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall record, monthly, the type and amount, of coating used by this lab coating press.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE STANDARDS.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall operate and maintain this lab coating press in accordance with manufacturers specifications.

VII. ADDITIONAL REQUIREMENTS.

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

***** PERMIT SHIELD IN EFFECT. *****

Source ID: 105

Source Name: EMERGENCY GENERATOR

SOURCE CAPACITY:

690.0 CF/HR Natural Gas

Proc EP
105 -->S11

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §123.13]

Processes

The particulate emissions from this auxiliary generator shall not exceed 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

#002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

Fuel Restriction(s).

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall use only natural gas as fuel for this emergency generator.

Operating Schedule Restriction(s).

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall ensure this emergency generator is operated less than

500 hours in any 12 consecutive month period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor, monthly, the hours of operation for this emergency generator.

IV. RECORDKEEPING REQUIREMENTS.

#006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record, on a monthly basis, the hours of operation for this emergency generator.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE STANDARDS.

#007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall operate and maintain this emergency generator in accordance with manufacturers specifications.

VII. ADDITIONAL REQUIREMENTS.

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

***** PERMIT SHIELD IN EFFECT. *****

Source ID: 301

Source Name: PRESS #3

SOURCE CAPACITY:

95.0 Lbs/HR SOLVENT

Proc CD EP
301 -->C01 -->S01

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) The overall aggregate emissions from Press 101 and Press 301 shall not exceed 25.0 pounds/hour, 525.0 pounds/day, or 17.0 tons in any 12 consecutive month period, whichever is more restrictive.
- (b) The aggregate VOC emissions, from Press 101 and Press 301, from high solvent coatings, shall not exceed 2.5 tons in any 12 consecutive month period. The VOC emissions from high solvent coatings shall be included in the aggregate VOC emission total indicated in Condition #001(a), above.
- (c) High solvent coatings are defined as all coatings that require an overall control efficiency greater than 95%.
- (d) The permittee shall, through the use of a thermal oxidizer, reduce the VOC emissions from all non-compliant coatings from this press a minimum of 95%.

Control Device Efficiency Restriction(s).

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 139 and 40 CFR 60, Subpart SSS.]

The permittee shall operate this press in a total enclosure to ensure a 100% capture efficiency.

(c) The above testing requirements shall be waived if the permittee demonstrates compliance with Condition #011, of this Section, of this Permit.

III. MONITORING REQUIREMENTS.

#005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall monitor the amount of high-solvent coatings used, on a per-job basis.

#006 [25 Pa. Code §129.52]

Surface coating processes

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall monitor the following information, for this press, per job, on a daily and an average hourly basis:

(a) Ink and coating in gallons, and pounds, applied,

(b) The ink/coating composition:

1. Percent solids by volume and weight.
2. Percent solvent by volume and weight.
3. Percent water by volume and weight.
4. Pounds of VOC per gallon minus water.
5. Solvent density.

(c) Daily clean-up solvents usage, and its VOC content and solvent density.

(d) The hours of operation of this press, per job.

IV. RECORDKEEPING REQUIREMENTS.

#007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

Coating test results, or manufacturers certified analysis, shall be recorded and retained, on site.

#003 [25 Pa. Code §129.52]

Surface coating processes

The permittee shall use only compliant coatings meeting the VOC emission standard set forth in the following formula, or use an add-on control equipment to achieve an equivalent reduction in overall VOC emissions pursuant to 25 Pa. Code Section 129.52(b)(2).

$$\% \text{ Reduction} = 100 \left\{ 1 - \frac{Y \left\{ 1 - \frac{X}{Z_1} \right\}}{X \left\{ 1 - \frac{Y}{Z_2} \right\}} \right\}$$

where:

X = Pounds of VOC per gallon of coating (minus water) for present coating.

Y = Pounds of VOC per gallon of coating (minus water) found in Table I, of 25 Pa. Code § 129.52.

Z₁ = Density of VOC in pounds per gallon for present coating.

Z₂ = Standard solvent density (7.36 pounds per gallon).

II. TESTING REQUIREMENTS.

#004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.441, 129.52 and 40 CFR part 60, Appendix A.]

(a) The permittee shall test their coating(s) for the following, in accordance with Method 24, as specified in 40 CFR part 60, Appendix A:

- (1) Volatile matter content.
- (2) Water content.
- (3) Density.
- (4) Volume solids.
- (5) Weight solids.

(b) The permittee shall test each coating for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.

#008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain separate records to demonstrate compliance with the emission limits in Condition #001(a) and #001(b), above.

#009 [25 Pa. Code §129.52]

Surface coating processes

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee shall record the following information, for this press, per job, on a daily and an average hourly basis:

(a) Ink and coating in gallons, and pounds, applied,

(b) The ink/coating composition:

1. Percent solids by volume and weight.
2. Percent solvent by volume and weight.
3. Percent water by volume and weight.
4. Pounds of VOC per gallon minus water.
5. Solvent density.

(c) Daily clean-up solvents usage, and its VOC content and solvent density.

(d) The hours of operation for this press, per job.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE STANDARDS.

#010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall operate and maintain this press and total enclosure in accordance with good operating and maintenance practices and good air pollution control practices.

#011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Non-compliant coatings are defined as those coatings for which the weight of VOC's per gallon of coating (minus water) is greater than 2.92 pounds/gallon after adjustment to a standard solvent density of 7.36 pounds per gallon and to a solids basis.

#012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall ensure that a minimum operating temperature of 1400° F is attained at the combustion chamber exit before dispensing coatings to this press.

#013 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

Compliance with the testing requirements of Condition #004, above, can be demonstrated through certification from the supplier showing that Method 24, as specified in 40 CFR part 60, Appendix A, was used to test the coating. In the event that proper documentation is not obtained, the permittee shall perform testing in accordance with Condition #004, of this Section, for this press.

If proper testing has been demonstrated, and the coating is altered prior to use with a VOC-containing thinner, the permittee shall demonstrate compliance with the allowable VOC limit, through either of the following:

(a) Perform calculations to demonstrate that compliance is still maintained with the, as applied, coating reduction requirement stated in Condition #003, of this Section, for this press, or

(b) Retest the coating, in accordance with Condition #004, of this Section, for this press.

#014 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall not make any physical modifications to the total enclosure, without the Department's approval.

VII. ADDITIONAL REQUIREMENTS.

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

***** PERMIT SHIELD IN EFFECT. *****

Source ID: C01

Source Name: THERMAL OXIDIZER

SOURCE CAPACITY:

3.6 MCF/HR Natural Gas

Cont EP
C01 -->S01

I. RESTRICTIONS.

Control Device Efficiency Restriction(s).

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The burners of this thermal oxidizer are to be set, to maintain a minimum combustion chamber exit gas temperature of 1400° F.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The thermal oxidizer shall be equipped with temperature monitoring instrumentation which continuously monitors the combustion chamber exit gas temperature.

IV. RECORDKEEPING REQUIREMENTS.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The thermal oxidizer shall be equipped with a temperature recorder which

continuously records the combustion chamber exit gas temperature.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE STANDARDS.

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall ensure that a minimum operating temperature of 1400° F is attained at the combustion chamber exit before dispensing coatings to either of the presses, or any of the four (4) mixers.

#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall operate and maintain this thermal oxidizer in accordance with manufacturers specifications to maintain a minimum destruction efficiency of 95%.

VII. ADDITIONAL REQUIREMENTS.

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

***** PERMIT SHIELD IN EFFECT. *****

No Alternative Operations exist for this Title V Facility

No Emission Trading Groups exist for this Title V Facility.

SECTION G.
Emission Restriction Summary

02/18/00 PAGE: 55
09-00044

DEP ID	Source Description	Emission Limit	Pollutant
101	PRESS #1	1,000.000 Lbs/Yr UV Coatings	VOC
		25.000 Lbs/Hr Press 1 & 3	VOC
		525.000 Lbs/Day Press 1 & 3	VOC
		17.000 Tons/Yr Press 1 & 3 (aggregate)	VOC
		2.500 Tons/Yr Press 1 & 3 (high solids)	VOC
105	EMERGENCY GENER	.040 gr/DRY FT3 Total Particulates	P000
		500.000 PPMV	S02
301	PRESS #3	25.000 Lbs/Hr Press 1 & 3	VOC
		525.000 Lbs/Day Press 1 & 3	VOC
		17.000 Tons/Yr Press 1 & 3 (aggregate)	VOC
		2.500 Tons/Yr Press 1 & 3 (high solids)	VOC

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

- Three (3) underground storage tanks.
- Lab hood.