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OFFICE OF AIR QUALITY



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

TITLE V OPERATING PERMIT

Beckett Corporation

15-00040

Based upon Pennsylvania's Operating Permit Program
25 Pa. Code Chapter 127
Effective November 25, 1994

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

TITLE V/STATE OPERATING PERMIT

ISSUE DATE: 8/25/1999

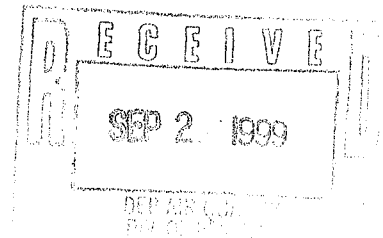
EFFECTIVE DATE: 9/1/1999

EXPIRATION DATE: 8/27/2004

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: 15-00040
TAX-ID/PLANT CODE 22-3574893/01



OWNER BECKETT CORP (FKA DECORAPAK INC)
MAILING 721 DRESHER RD
ADDRESS HORSHAM, PA. 19044

PLANT LIONVILLE/UWCHLAN
LOCATION 15 Chester County 15955 Uwchlan Twp
SIC CODE 2759 Manufacturing - Commercial Printing, Nec

RESPONSIBLE OFFICIAL

NAME WILLIAM FLISHER
TITLE CHIEF OPERATING OFFICER

PERMIT CONTACT PERSON

NAME KEVIN P

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*

- 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

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

Proc EP
106 -->Z01

Proc EP
107 -->Z01

Proc EP
108 -->Z01

Proc EP
201 -->Z01

#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

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. 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;

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.

inconsistent with good operating practices.

c) For purposes 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.

#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

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. Excess emissions offset plans for an affected source shall be incorporated into the permit upon approval by the Administrator of EPA.

(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.

#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

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 per centum (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 was required to be paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

(e) The permittee shall pay an

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

(b) Except as provided below in (c), 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:

(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

(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.

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,

responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d).

(d) 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

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.

(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 and 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

final action by the Department on minor and 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.

VII. ADDITIONAL REQUIREMENTS.

#024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following previously issued Operating Permit (OP-15-0040) serves as the basis for certain terms and conditions set forth in this Title V Permit.

VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit on or before 09/01/2000 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 annually thereafter.

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No Alternative Operations exist for this Title V Facility

No Emission Trading Groups exist for this Title V Facility.

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

Source ID# Z10 - 3 Blade Ventilation fans

Source ID# Z11 - 3 Blade Ventilation fans

Source ID# Z12 - 2 Blade Ventilation fans

Reasons:

(1) They are ventilating units being used for human comfort that do not exhaust air pollutants into the ambient air from any graphic arts printing process.

(2) They are electrically operated equipments from which negligible or no emissions of air contaminants occur.

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