



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: July 24, 2000

Effective Date: April 22, 2003

Revision Date: April 22, 2003

Expiration Date: August 31, 2005

Revision Type: Amendment

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 this permit. 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 applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

[TITLE V Permit No: 06-05017](#)

Federal Tax Id - Plant Code: 59-3763231-3

Owner Information

Name: PKG GROUP INC

Mailing Address: 441 COUNTY LINE RD
GILBERTSVILLE, PA 19525

Plant Information

Plant: PACKAGING GROUP/BOYERTOWN PRINTING PLT

Location: 06 Berks County

06927 Colebrookdale Township

SIC Code: 2759 Manufacturing - Commercial Printing, Nec

Responsible Official

Name: KEN E CHURCH

Title: PLANT MANAGER

Phone: (610) 367 - 2991

Permit Contact Person

Name: KEN E CHURCH

Title: PLANT MANAGER

Phone: (610) 367 - 2991

[Signature] _____

LEIF ERICSON, SOUTHCENTRAL REGION AIR PROGRAM MANAGER



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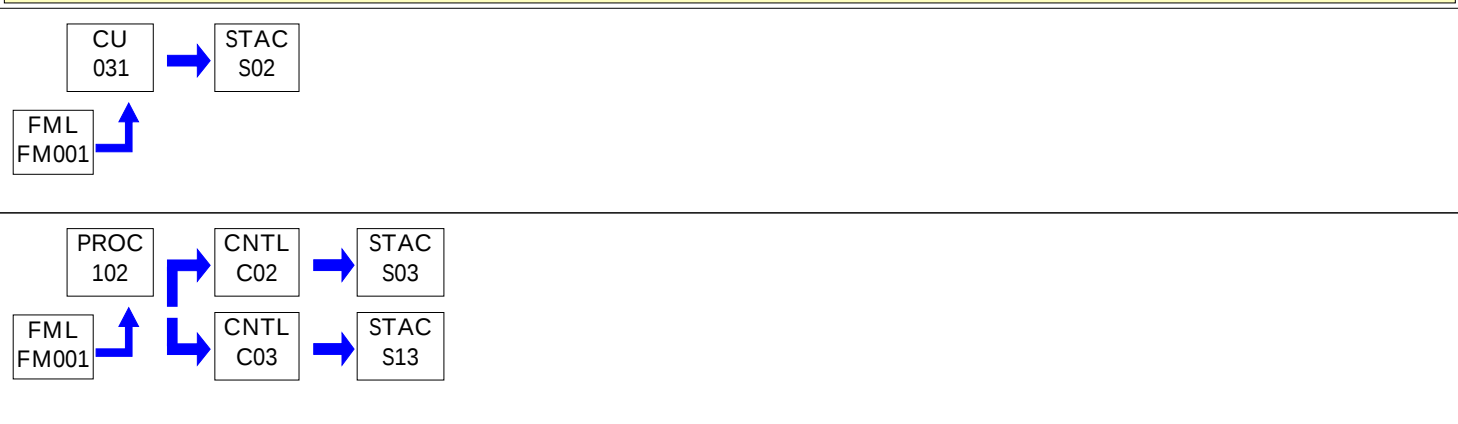
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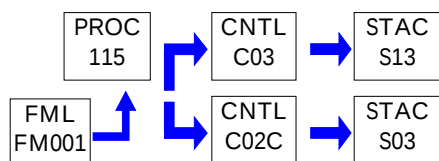
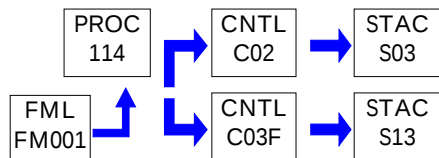
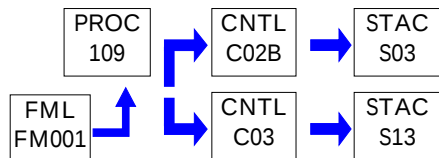
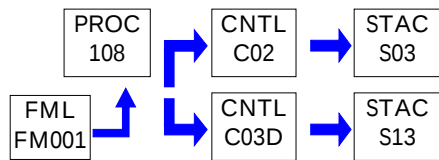
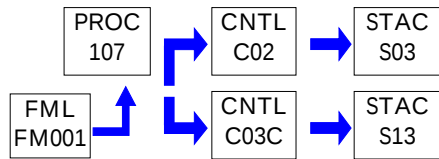
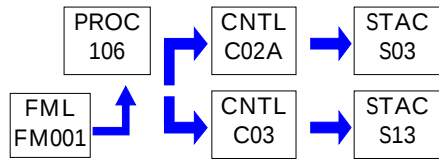
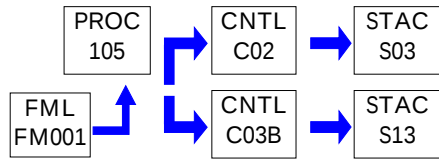
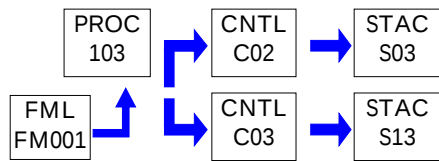


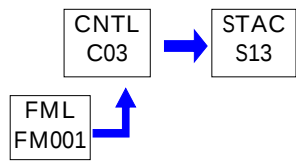
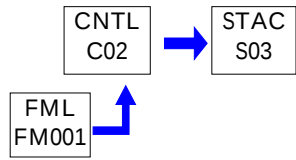
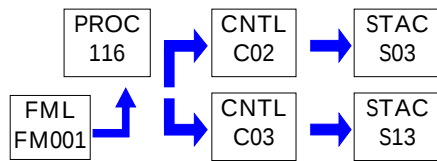
Section A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	ORR-SIMBOWER 300 HP	12.60 MMBTU / HR	
		150.00 Gal / HR	#6 OIL
		12.60 MCF / HR	NATURAL GAS
102	#8 LAMINATOR & OVEN	3.00 MCF / HR	NATURAL GAS
		106.20 Lbs / HR	ADHESIVES
103	PRESS # 6 & OVEN	1.00 MCF / HR	NATURAL GAS
		50.00 Lbs / HR	INKS
105	PRESS #10 & OVEN	1.00 MCF / HR	NATURAL GAS
		150.00 Lbs / HR	INKS
106	PRESS #12 & OVEN	1.00 MCF / HR	NATURAL GAS
		288.00 Lbs / HR	INKS
107	PRESS #7 & OVEN	1.00 MCF / HR	NATURAL GAS
		75.00 Lbs / HR	PRINTING INKS
108	PRESS #11 & OVEN	1.00 MCF / HR	NATURAL GAS
		200.00 Lbs / HR	PRINTING INKS
109	LAMINATOR #7 & OVEN	1.00 MCF / HR	NATURAL GAS
		400.00 Lbs / HR	ADHESIVES
114	PRESS # 14 & OVEN	1.50 MCF / HR	NATURAL GAS
		160.00 Lbs / HR	PRINTING INKS
115	LAMINATOR #9 & OVEN	1.00 MCF / HR	NATURAL GAS
		15.00 Lbs / HR	SOLVENT
116	PRESS #16 SOLVENT INKS & OVENS		
123	PRESS #15	100.00 Lbs / HR	PRINTING INKS
C02	PILLAR	0.47 MCF / HR	NATURAL GS
C03	REECO THERMAL OXIDIZER	5.50 MCF / HR	NATURAL GAS
FM001	NATURAL GAS PIPELINE		
S02	ORR-SIMBOWER BOILER		
S03	PILLAR CATALYTIC INCINER.		
S13	REECO THERMAL INCINERATOR		

PERMIT MAPS









Section B. General Title V Requirements

#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 operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 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 six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager 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.

Section B. General Title V Requirements

#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.

(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 (1) 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

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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 three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. 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.

Section B. General Title V Requirements

#014 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

(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 seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. 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.

Section B. General Title V Requirements

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) In accordance with § 127.14, the permittee may 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.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(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 (expressed 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 §

Section B. General Title V Requirements

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 same source.

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

Reactivation of Sources

(a) 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 five (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.

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#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:

Office of Enforcement and Permit Review (3AP10)
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 certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other

Section B. General Title V Requirements

certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#021 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

Sampling, Testing and Monitoring Procedures

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

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

Recordkeeping Requirements

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

- (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, 127.463(e) & 127.511(c)]

Reporting Requirements

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative 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.

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The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #020(c) of this permit.

(d) 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 consistent with Sections 112(d) and 114(c) of the Clean Air Act and 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) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, 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) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance to the Department and EPA in accordance with the submission requirements specified in 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



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program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency 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) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or 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 of 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 (5) 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.

Section B. General Title V Requirements

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

(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.

SECTION C. Site Level Requirements**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) 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.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations.
- (7) Sources and classes of sources other than those identified above, for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) the emissions are of minor significance with respect to causing air pollution; and
 - (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

002 [25 Pa. Code §123.2]

Fugitive particulate matter

A person shall not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Condition #001 if such emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

A person shall 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.

004 [25 Pa. Code §123.41]

Limitations

A person shall 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:

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

005 [25 Pa. Code §123.42]

Exceptions

The limitations of 123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:

SECTION C. Site Level Requirements

- (1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in Section C, Condition #001 (relating to prohibition of certain fugitive emissions).

II. TESTING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

A performance test shall be conducted on each control device within 1 year from the permit effective date and 6 months prior to the expiration date.

- (a) All testing is to be conducted in accordance with the Department's source testing procedures described in the latest Source Testing Manual or other source testing procedures approved by the Department prior to testing.
- (b) Testing procedures must be submitted to the Regional Air Quality Program Manager at least 90 days prior to testing.
- (c) The facility shall notify the Regional Air Quality Program Manager of the date and time of testing at least 30 days prior to testing.
- (d) The owner / operator shall submit three copies of the completed stack test reports, including all operating conditions, to the Regional Air Quality Program Manager within 60 days of the completion of testing.

007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The Department reserves the right to require exhaust stack testing of the sources by the permittee as necessary during the permit to verify emissions for purposes including emission fees, malfunctions or permit condition violations.

008 [25 Pa. Code §139.1]

Sampling facilities.

Upon the request of the Department, the person responsible for a source shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such source. The Department will set forth, in the request, the time period in which the facilities shall be provided as well as the specifications for such facilities.

009 [25 Pa. Code §139.11]

General requirements.

- (a) Performance tests shall be conducted under normal operating conditions while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.
- (b) The Department will consider for approval where sufficient information is provided to verify the source conditions existing at the time of the test and where adequate data is available to show the manner in which the test was conducted. Information submitted to the Department shall include, as a minimum all of the following:
 - (1) A thorough source description, including a description of any air cleaning devices and the flue.
 - (2) Process conditions, for example, the charging rate of raw material or rate of production of final product, boiler pressure, oven temperature, and other conditions which may affect emissions from the process.

SECTION C. Site Level Requirements

(3) The location of the sampling ports.

(4) Effluent characteristics, including velocity, temperature, moisture content, gas density (percentage CO, CO₂, O₂ and N₂), static and barometric pressures.

(5) Sample collection techniques employed, including procedures used, equipment descriptions and data to verify that isokinetic sampling for particulate matter collection occurred and that acceptable test conditions were met.

(6) Laboratory procedures and results.

(7) Calculated results.

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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

(2) 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.

(a) No testing of inks, solutions, coatings and other material testing is required for the following:

(1) When a certified product data sheet is provided, there is no need to replicate testing to verify the accuracy of the CPDS. If thinners are used, then compliance may be demonstrated by calculations or Method 24.

(2) When the ink, coating, or solution is less than 50% of a VOC content limitation (as calculated based on the upper bounds reported in a MSDS) no additional testing is required.

(b) Testing individual inks, solutions, coatings or other material is required when no CPDS is supplied, and VOC emissions from the individual materials exceed 10% of the Title V threshold. Whenever the 10% level is exceeded in any on-going calendar year, the material must be tested during that year. Testing should be conducted quarterly on at least 25% of the affected inks, solutions, coatings or other materials and all materials should be tested at least once during the calendar year.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall conduct a weekly inspection around the facility periphery during daylight hours when the facility is operating to detect visible emissions, fugitive visible emissions, and odorous emissions as follows:

(a) Visible emissions in excess of the limit stated in Section C, Condition #004. Visible emissions may be measured according to the methods specified in Section C, Condition #010, or alternatively, plant personnel who observe visible emissions may report the incidence of visible emission to the Department within two hours of each incident and make arrangements for a certified observer to verify the visible emissions.

(b) The presence of fugitive emissions visible beyond the facility's boundaries as stated in Section C, Condition #002.

(c) The presence of odorous air emissions beyond the facility's boundaries as stated in Section C, Condition #003.

SECTION C. Site Level Requirements**IV. RECORDKEEPING REQUIREMENTS.**

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

At the owner / operator's discretion, the emissions generated from clean up solvents may be included in the press or laminator emissions.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Manufacturer supplied VOC Data Sheets and / or Material Safety Sheets and / or Certified Product Data Sheets for all inks and coatings applied at this facility within the most recent five (5) year period shall be maintained at or accessible electronically by the site and be made available to a Department representative upon request.

015 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

(a) The permittee shall maintain a logbook for recording the status of odorous air contaminants, fugitive visible emissions, and visible emission exceedances.

(b) The logbook shall include the name of the company representative, the date and time of the monitoring and any exceedances.

016 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain at the facility, supporting documentation including calculations, emissions estimation factors, and assumptions with supporting documentation, and any other information required for determining compliance for the most recent five year period and made available to the Department upon request.

017 [25 Pa. Code §135.5]

Recordkeeping

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with Condition #018 of this section (relating to reporting; and emission statements). These 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.

V. REPORTING REQUIREMENTS.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Annual reports containing, but not limited to, the following data for each ink / coating shall be submitted to the Lancaster District Supervisor:

- (a) ink / coating identification
- (b) ink / coating use (print or lamination)
- (c) percent VOC by weight
- (d) pounds per year of VOC emissions

Each report for the calendar year, January 1 through December 31, is due no later than March 1 of the following year for each operating year.

This report may be in an alternate form so long as the above values can be determined, and the Department has approved the alternate form.

SECTION C. Site Level Requirements

019 [25 Pa. Code §127.442]

Reporting requirements.

[Additional authority derived from 25 Pa Code, Section 127.511]

The permittee shall report malfunctions which occur at the Title V facility to the Department. As defined in 40 CFR Section 60.2 and incorporated by reference in 25 Pa Code Chapter 122, a malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner which results in excess air emissions. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

(a) malfunctions which occur at the Title V facility and which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two hours after the incident. The permittee shall submit a written report of instances of such malfunctions to the Department, in writing, within three (3) days of discovery of the malfunction.

(b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirements on Condition #019 of Section C, shall be reported to the Department, in writing, within five (5) days of discovery of the malfunction.

020 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records of average hourly and monthly VOC emissions (on a 12 month rolling total) for flexographic presses #12, #14, #15, and laminators #8 and #9. These records shall be kept at the site for the most recent 5 year period and submit to the Department upon request.

021 [25 Pa. Code §135.21]

Emission statements

Annual emission statements are due by March 1 for the preceding calendar year and shall provide data consistent with requirements and guidance developed by the EPA. The guidance document is available from: United States Environmental Protection Agency, 401 M. Street, S.W., Washington, D.C. 20460. The Department may require more frequent submittals if the Department determines that one or more of the following applies:

(a) A more frequent submission is required by the EPA.

(b) Analysis of the data on a more frequent basis is necessary to implement the requirements of the act.

VI. WORK PRACTICE REQUIREMENTS.

022 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in Section C, Condition #001 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 chemicals 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, oil, water or suitable chemicals 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

**SECTION C. Site Level Requirements**

trucking or earth moving equipment, erosion by water, or other means.

023 [25 Pa. Code §129.14]

Open burning operations

(a) The permittee shall not permit the open burning of material on the permittee's property in a manner such that:

- (1) The emissions are visible, at any time, at the point such emissions pass outside the permittee's property.
- (2) Malodorous air contaminants from the open burning are detectable outside the permittee's property.
- (3) The emissions interfere with the reasonable enjoyment of life or property.
- (4) The emissions cause damage to vegetation or property.
- (5) The emissions are or may be deleterious to human or animal health.

(b) The requirements of subsection (a), above, do not apply when the open burning operations result from:

- (1) 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.
- (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) A fire set solely for recreational or ceremonial purposes.
- (5) A fire set solely for cooking food.

VII. ADDITIONAL REQUIREMENTS.

024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The emissions of volatile organic compounds (VOCs) from the flexographic press nos. 6, 7, 10, 11, 12, 14, 15 and 16 and laminator nos. 7, 8, and 9 shall be controlled by either the thermal or catalytic oxidizer when using non-compliant inks/coatings. When using compliant inks/coatings, flexographic press nos. 6,7,10,11,12,14,15 and 16 and laminator nos. 7, 8, and 9 may vent emissions directly to the atmosphere.

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

***** Permit Shield In Effect ****

**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: ORR-SIMBOWER 300 HP

Source Capacity / Throughput:

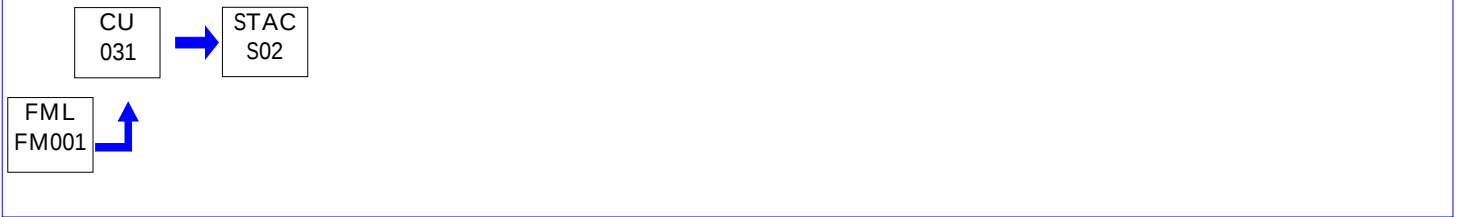
12.60 MMBTU / HR

150.00 Gal / HR

#6 OIL

12.60 MCF / HR

NATURAL GAS

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

001 [25 Pa. Code §123.11]

Combustion units

A person shall not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the rate of 0.4 pound per million Btu of heat input.

002 [25 Pa. Code §123.22]

Combustion units

No person shall permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from a combustion unit in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

[Compliance with the requirement(s) specified in this streamlined permit condition assures compliance with the SIP-approved sulfur dioxide emission limit specified in 40 CFR 52.2020(c)(1)]

Fuel Restriction(s).

003 [25 Pa. Code §123.22]

Combustion units

No person shall offer for sale, deliver for use, exchange in trade or permit the use of #6 fuel oil which contains sulfur in excess of 2.8% by weight.

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.

004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records of the fuel supplier's certification or laboratory analysis for each #6 fuel oil delivery received. The fuel supplier's certification or laboratory analysis shall include, at a minimum, the following information:

**SECTION D. Source Level Requirements**

(1) Percent sulfur (by weight).

(2) Percent ash (by weight).

The permittee shall retain these records for a minimum of five (5) years. The records shall be made available to the Department upon its request.

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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: #8 LAMINATOR & OVEN

Source Capacity / Throughput:

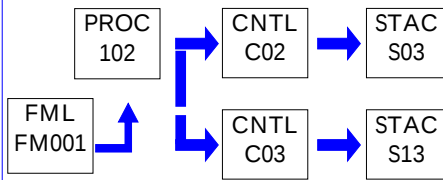
3.00 MCF / HR

NATURAL GAS

106.20 Lbs / HR

ADHESIVES

This source occurs in the following groups: GROUP 002

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The maximum actual VOC emissions shall not exceed 10 lbs/hr and 15 tons per year based on a 12-month rolling total.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: 103

Source Name: PRESS # 6 & OVEN

Source Capacity / Throughput:

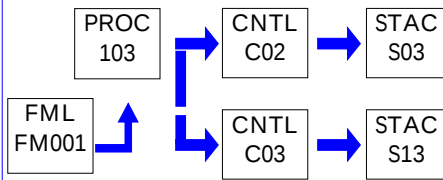
1.00 MCF / HR

NATURAL GAS

50.00 Lbs / HR

INKS

This source occurs in the following groups: GROUP 002

**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.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: 105

Source Name: PRESS #10 & OVEN

Source Capacity / Throughput:

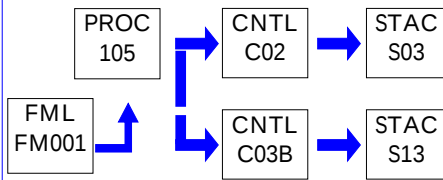
1.00 MCF / HR

NATURAL GAS

150.00 Lbs / HR

INKS

This source occurs in the following groups: GROUP 002

**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.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: 106

Source Name: PRESS #12 & OVEN

Source Capacity / Throughput:

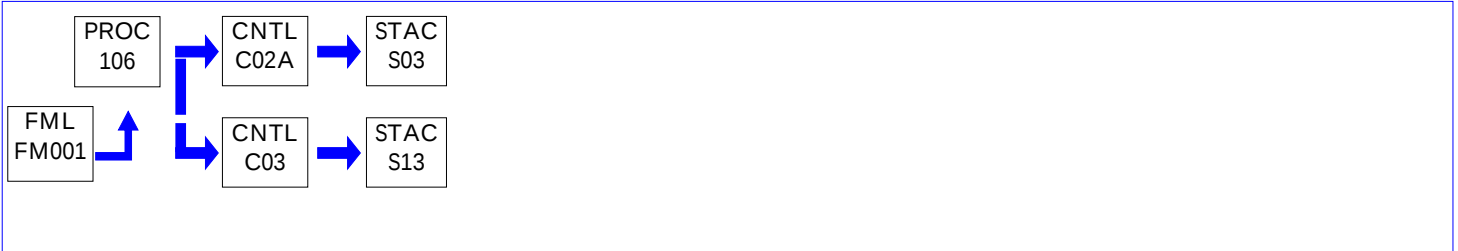
1.00 MCF / HR

NATURAL GAS

288.00 Lbs / HR

INKS

This source occurs in the following groups: GROUP 002

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The maximum actual VOC emissions shall not exceed 23 lbs/hr and 19 tons per year based on a 12-month rolling total.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: PRESS #7 & OVEN

Source Capacity / Throughput:

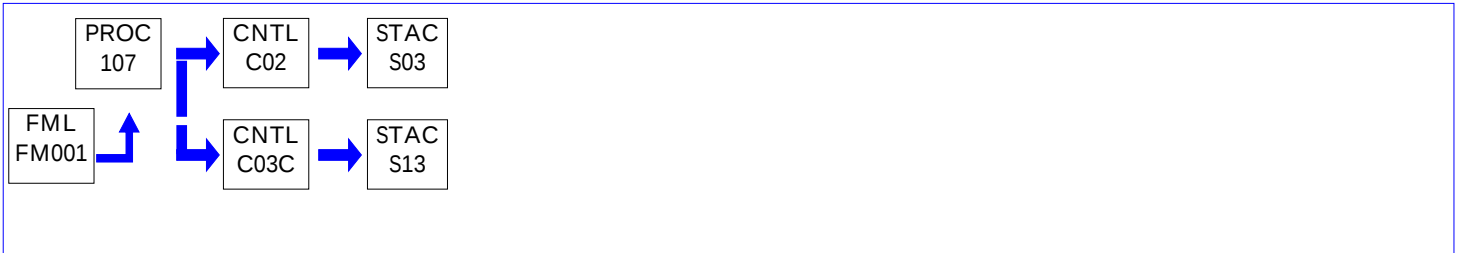
1.00 MCF / HR

NATURAL GAS

75.00 Lbs / HR

PRINTING INKS

This source occurs in the following groups: GROUP 002

**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.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: PRESS #11 & OVEN

Source Capacity / Throughput:

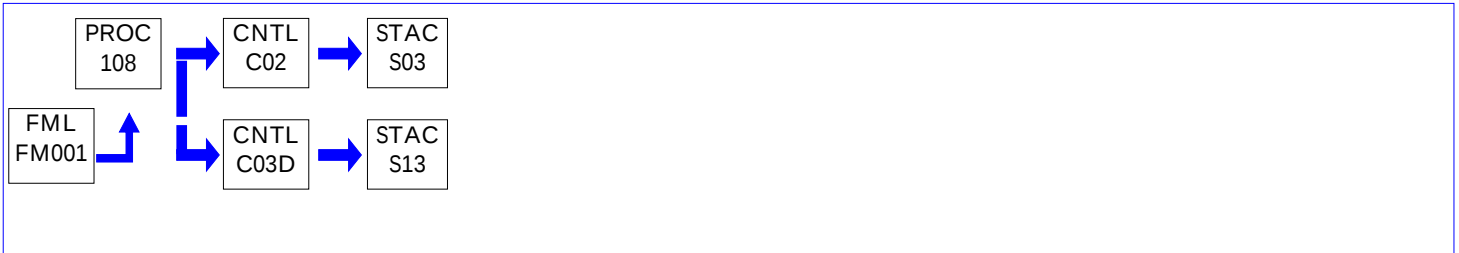
1.00 MCF / HR

NATURAL GAS

200.00 Lbs / HR

PRINTING INKS

This source occurs in the following groups: GROUP 002

**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.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: 109

Source Name: LAMINATOR #7 & OVEN

Source Capacity / Throughput:

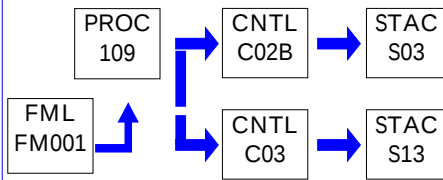
1.00 MCF / HR

NATURAL GAS

400.00 Lbs / HR

ADHESIVES

This source occurs in the following groups: GROUP 002

**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.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: 114

Source Name: PRESS # 14 & OVEN

Source Capacity / Throughput:

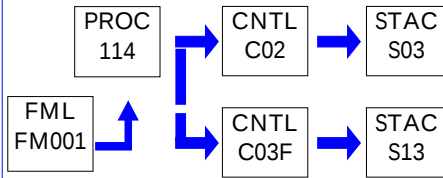
1.50 MCF / HR

NATURAL GAS

160.00 Lbs / HR

PRINTING INKS

This source occurs in the following groups: GROUP 002

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The maximum actual VOC emissions shall not exceed 21 lbs/hr and 11 tons per year based on a 12-month rolling total.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

When emissions are vented to the atmosphere, the VOC content of the compliant inks/coatings, as applied, used on flexographic press no. 14 shall not exceed 15% by volume of the volatile portion of the inks/coatings.

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 record keeping 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 REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner / operator shall operate the flexographic press no. 14 enclosure in such a manner as to meet the following:

SECTION D. Source Level Requirements

- (a) maintain a negative pressure differential
- (b) maintain a static pressure sensor to measure the static pressure differential within the enclosure on a continuous basis
- (c) all openings shall remain closed during the operation of the press except those used for ingress and egress, which shall be equipped with draft curtains.
- (d) any doors opening to the outside of the building shall be accessible only from the inside, unless prohibited by local fire codes.
- (e) all doors where possible shall be equipped with automatic closures
- (f) maintain on-site hand-held anemometer accurate to within plus or minus 5% to measure air speed into the enclosure at all openings
- (g) the exhaust methods presented in the submissions of August 11, 1989, March 9, 1990, June 7, 1990, and June 12, 1990.

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. ***

**SECTION D. Source Level Requirements**

Source ID: 115

Source Name: LAMINATOR #9 & OVEN

Source Capacity / Throughput:

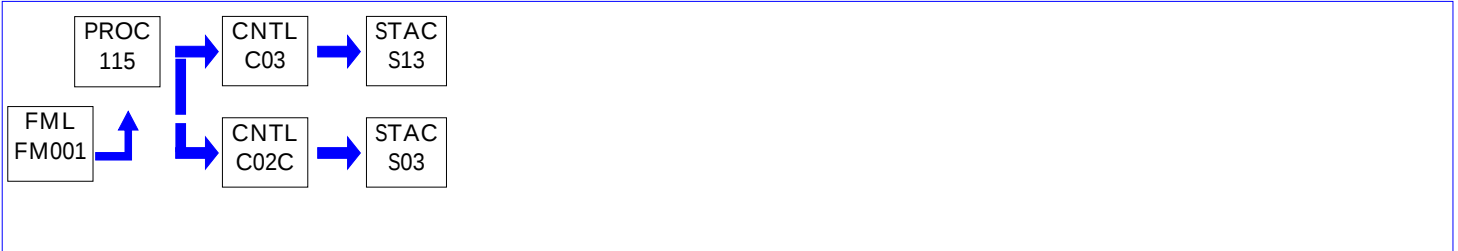
1.00 MCF / HR

NATURAL GAS

15.00 Lbs / HR

SOLVENT

This source occurs in the following groups: GROUP 002

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The maximum actual VOC emissions shall not exceed 2 lbs/hr and 5 tons per year based on a 12-month rolling total.

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 record keeping 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 REQUIREMENTS.

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

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. ***

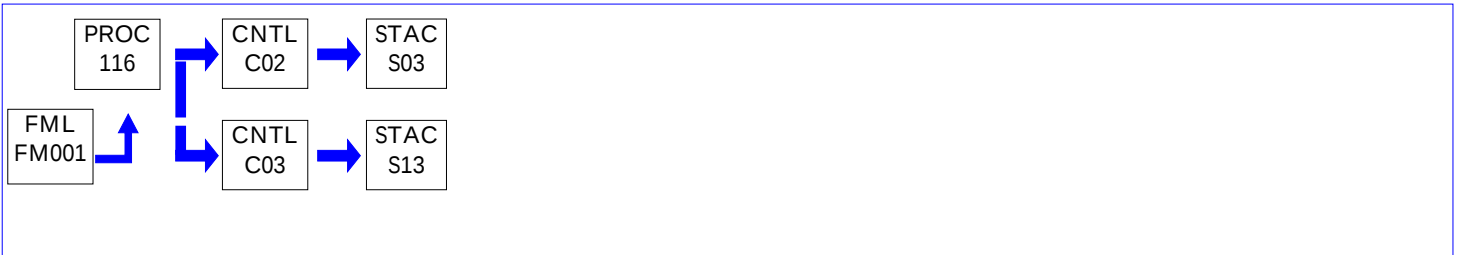
SECTION D. Source Level Requirements

Source ID: 116

Source Name: PRESS #16 SOLVENT INKS & OVENS

Source Capacity / Throughput:

This source occurs in the following groups: GROUP 002



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The maximum actual VOC emissions shall not exceed 20 tons per year based on a 12-month rolling total.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: 123

Source Name: PRESS #15

Source Capacity / Throughput:

100.00 Lbs/HR

PRINTING INKS

This source occurs in the following groups: GROUP 002

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The maximum actual VOC emissions shall not exceed 12 tons per year based on a 12-month rolling total.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

When emissions are vented to the atmosphere, the VOC content of the compliant inks, as applied, used on flexographic press no. 15 shall not exceed 15% by volume of the volatile portion of the inks.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: C02

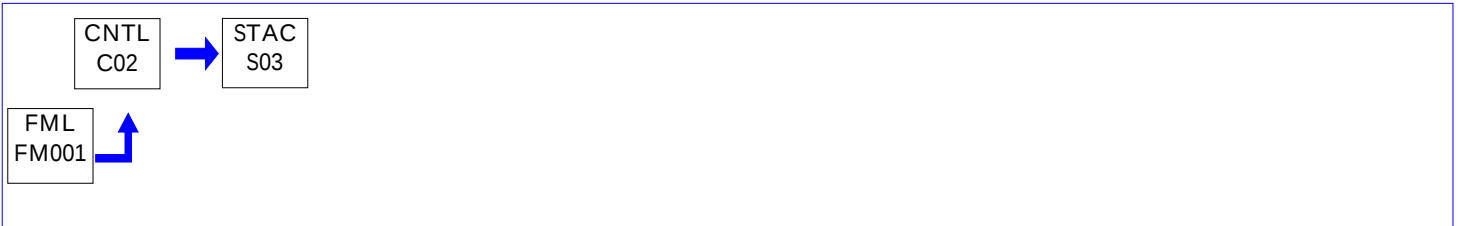
Source Name: PILLAR

Source Capacity / Throughput:

0.47 MCF / HR

NATURAL GS

This source occurs in the following groups: GROUP 001

**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.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION D. Source Level Requirements**

Source ID: C03

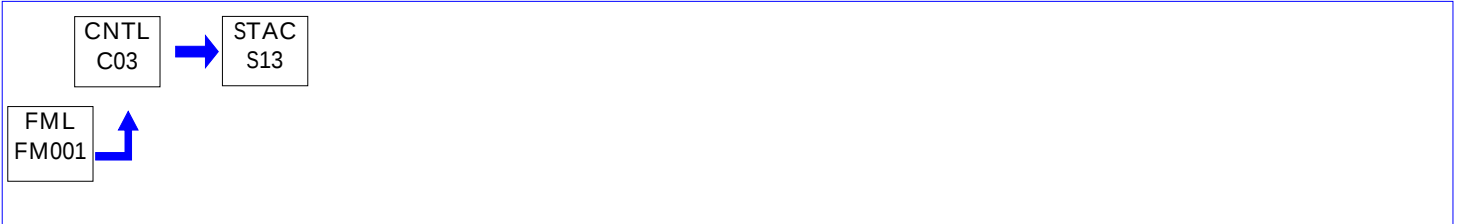
Source Name: REECO THERMAL OXIDIZER

Source Capacity / Throughput:

5.50 MCF / HR

NATURAL GAS

This source occurs in the following groups: GROUP 001

**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.

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 record keeping 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 REQUIREMENTS.

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

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. ***

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 001

Group Description: Control Devices

Sources included in this group:

ID	Name
C02	PILLAR
C03	REECO THERMAL OXIDIZER

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The oxidizers shall maintain the following minimum operating temperatures:

(a) thermal - 1,550 F (exit of combustion chamber)

(b) catalytic - 550 F (inlet of catalyst bed)

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner / operator shall limit the airflow to the air pollution control devices to no more than the total rated capacity of 40,000 cfm.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Each control device shall maintain a minimum of 95% destruction efficiency of VOCs.

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.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner / operator shall maintain temperature measuring and recording devices on the thermal and catalytic oxidizers that show the temperatures exiting the combustion chamber or zone and the inlet temperature to the catalyst bed.

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping 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 REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

No source requiring control by an oxidizer shall be operated during any oxidizer malfunctions or without the oxidizers attaining and maintaining the minimum operating temperatures. The owner / operator shall maintain a system to notify the

**SECTION E. Source Group Restrictions.**

press operators of any oxidizer malfunctions.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner / operator shall maintain the control system to prevent the exhausting of any source to either oxidizer prior to attaining proper operating temperatures and the overloading of either oxidizer.

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. ***

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 002

Group Description: Presses & Laminators

Sources included in this group:

ID	Name
102	#8 LAMINATOR & OVEN
103	PRESS # 6 & OVEN
105	PRESS #10 & OVEN
106	PRESS #12 & OVEN
107	PRESS #7 & OVEN
108	PRESS #11 & OVEN
109	LAMINATOR #7 & OVEN
114	PRESS # 14 & OVEN
115	LAMINATOR #9 & OVEN
116	PRESS #16 SOLVENT INKS & OVENS
123	PRESS #15

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

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.825]

Subpart KK--National Emission Standards for the Printing and Publishing Industry
Standards: Product and packaging rotogravure and wide-web flexographic printing.

The owner /operator shall limit emissions to no more than five percent of the organic HAP applied for the month; or to no more than four percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

II. TESTING REQUIREMENTS.

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.827]

Subpart KK--National Emission Standards for the Printing and Publishing Industry
Performance test methods.

In the event that a control device is used for demonstration of compliance with a standard, a performance test of a control device to determine destruction efficiency for the purpose of meeting the requirements of Condition #001 shall be conducted by the owner or operator in accordance with the following:

(a) An initial performance test to establish the destruction efficiency of an oxidizer and the associated combustion zone temperature for a thermal oxidizer and the associated catalyst bed inlet temperature for a catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

(1) Method 1 or 1A of 40 CFR part 60, appendix A is used for sample and velocity traverses to determine sampling locations.

(2) Method 2, 2A, 2C, or 2D of 40 CFR part 60, appendix A is used to determine gas volumetric flow rate.

(3) Method 3 of 40 CFR part 60, appendix A is used for gas analysis to determine dry molecular weight.

(4) Method 4 of 40 CFR part 60, appendix A is used to determine stack gas moisture.

(5) Methods 2, 2A, 3, and 4 of 40 CFR part 60, appendix A shall be performed, as applicable, at least twice during each test period.

(6) Method 25 of 40 CFR part 60, Appendix A, shall be used to determine organic volatile matter concentration. The

SECTION E. Source Group Restrictions.

owner or operator shall submit notice of the intended test method to the Department for approval along with notice of the performance test required under this section. The owner or operator may use Method 25A of 40 CFR part 60, appendix A, if

(i) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with the standards of Condition #001, or

(ii) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or

(iii) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(7) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

(8) Organic volatile matter mass flow rates shall be determined using Equation 20 of 40 CFR Subpart 63.827:

(9) Emission control device efficiency shall be determined using Equation 21:

(b) The owner or operator shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(c) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For an oxidizer other than catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum combustion temperature. For a catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition #001.

III. MONITORING REQUIREMENTS.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.825]
Subpart KK--National Emission Standards for the Printing and Publishing Industry
Standards: Product and packaging rotogravure and wide-web flexographic printing.

When demonstrating compliance in accordance with Condition #004(f)(§63.825(b)(6)), §63.825(c)(1)(xi)(D), 63.825(c)(2)(xi)(D), or 63.825(d)(1)(xi)(D), owners or operators may calculate the monthly allowable HAP emissions, for demonstrating compliance as follows:

(a) Determine the as-purchased mass of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month.

(b) Determine the as-purchased solids content of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month.

(c) Determine the as-purchased mass fraction of each ink, coating, varnish, adhesive, primer, and other solids-containing material which was applied at 20 weight-percent or greater solids content, on an as-applied basis.

(d) Determine the total mass of each solvent, diluent, thinner, or reducer added to materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, each month.

(e) Calculate the monthly allowable HAP emissions, H_a , using Equation 17 of CFR Subpart 68.828.

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.825]
Subpart KK--National Emission Standards for the Printing and Publishing Industry
Standards: Product and packaging rotogravure and wide-web flexographic printing.

SECTION E. Source Group Restrictions.

The owner /operator shall demonstrate compliance with this standard by following one of the following procedures:

- (a) Demonstrate that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.04 weight-fraction organic HAP, on an as-purchased basis, as determined in accordance with 40 CFR Subpart 63.827.
- (b) Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with paragraphs (b)(1) or (2) below. The owner or operator shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application, as follows:
 - (1) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with 40 CFR subpart 63.827.
 - (2) Calculate the monthly average as-applied organic HAP content, of each ink, coating, varnish, adhesive, primer, and other solids-containing material using Equation 3 contained in 40 CFR Subpart 63.825.
- (c)
 - (1) Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied, either
 - (i) Contains no more than 0.04 weight-fraction organic HAP on a monthly average as-applied basis, or
 - (ii) Contains no more than 0.20 kg of organic HAP per kg of solids applied, on a monthly average as-applied basis.
 - (2) The owner or operator may demonstrate compliance in accordance with paragraphs (c)(2)(ii)-(iii) of this condition.
 - (i) Use the procedures of paragraph (b) of this condition to determine which materials meet the requirements of paragraph (c)(1)(i) of this condition.
 - (ii) Determine the as-applied solids content following the procedure in 63.827(c)(2) of all materials which do not meet the requirements of paragraph (c)(1)(i) of this section. The owner or operator may calculate the monthly average as-applied solids content of materials which are reduced, thinned, or diluted prior to application, using Equation 4, of 40 CFR Subpart 63.825
 - (iii) Calculate the as-applied organic HAP to solids ratio, for all materials which do not meet the requirements of paragraph (c)(1)(i) of this section, using Equation 5, of 40 CFR Subpart 63.825.
- (d) Demonstrate that the monthly average as-applied organic HAP content of all materials applied is less than 0.04 kg HAP per kg of material applied, as determined by Equation 6, of 40 CFR Subpart 63.825.
- (e) Demonstrate that the monthly average as-applied organic HAP content on the basis of solids applied is less than 0.20 kg HAP per kg solids applied as determined by Equation 7, of 40 CFR Subpart 63.825.
- (f) Demonstrate that the total monthly organic HAP applied as determined by Equation 8, contained in 40 CFR 63.825.
- (g) Operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95 percent for each month. If the affected source operates more than one capture system or more than one control device, and has only always-controlled work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of Condition #005.
- (h) Operate a capture system and control device and limit the organic HAP emission rate to no more than 0.02 kg organic HAP emitted per kg solids applied as determined on a monthly average as-applied basis. If the affected source operates more than one capture system, more than one control device, one or more intermittently-controllable work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of paragraph (f) of §63.825. Otherwise, the owner or operator shall demonstrate compliance following the procedure in paragraph (c) of §63.825 when emissions from the affected source are controlled by a solvent recovery device or the procedure in paragraph (d) of §63.825 when emissions are controlled by an oxidizer.
- (i) Operate a capture system and control device and limit the organic HAP emissions rate to no more than 0.04 kg organic

SECTION E. Source Group Restrictions.

HAP emitted per kg material applied as determined in a monthly average as-applied basis. If the affected source operates more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controlled work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of paragraph (f) of §63.825. Otherwise, the owner or operator shall demonstrate compliance following the procedure in paragraph (c) of §63.825 when emissions from the affected source are controlled by a solvent recovery device or the procedure in paragraph (d) of §63.825 when emissions are controlled by an oxidizer.

(j) Operate a capture system and control device and limit the monthly organic HAP emission to less than the allowable emissions as calculated in accordance with paragraph (e) of §63.825. If the affected source operates more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controlled work stations, then the owner or operator shall demonstrate compliance in accordance with the provisions of paragraph (f) of §63.825. Otherwise, the owner or operator shall demonstrate compliance following the procedure in paragraph (c) of §63.825 when emissions from the affected source are controlled by a solvent recovery device or the procedure in paragraph (d) of §63.825 when emissions are controlled by an oxidizer.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.825]

Subpart KK--National Emission Standards for the Printing and Publishing Industry
Standards: Product and packaging rotogravure and wide-web flexographic printing.

In the event that a control device is used for demonstration of compliance with the standard, compliance with the overall organic HAP control efficiency requirement in Condition #001, each owner or operator using an oxidizer to control emissions for the purposes of compliance with 40 CFR 63.825 shall show compliance by following the procedures below:

(a) demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures below:

(1) Determine the oxidizer destruction efficiency (E) using the procedure in 63.827(d) of 40 CFR Part 63.

(2) Determine the capture system capture efficiency (F) in accordance with 63.827(e)-(f) of 40 CFR Part 63.

(3) Calculate the overall organic HAP control efficiency, (R), achieved using Equation 13 of 40 CFR Subpart 63.825.

(4) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on materials applied or emission of less than the calculated allowable organic HAP, measure the mass of each ink, coating, varnish, adhesive, primer, solvent, and other material applied on the press or group of presses controlled by a common solvent recovery device during the month.

(5) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on material applied or emission of less than the calculated allowable organic HAP, determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 63.827(b)(2) of 40 CFR Part 63.

(6) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied or emission of less than the calculated allowable organic HAP, determine the solids content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 63.827(c)(2) of 40 CFR Part 63.

(7) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, organic HAP emission rate based on material applied or emission of less than the calculated allowable organic HAP, calculate the organic HAP emitted during the month, H, for each month using Equation 14 of 40 CFR Subpart 63.825.

(8) If demonstrating compliance on the basis of organic HAP emission rate based on solids applied, calculate the organic HAP emission rate based on solids applied, L, for each month using Equation 15 of 40 CFR Subpart 63.825.

(9) If demonstrating compliance on the basis of organic HAP emission rate based on materials applied, calculate the organic HAP emission rate based on material applied, S, using Equation 16 of 40 CFR Subpart 63.825.

(10) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameters established in accordance with 63.828(a)(4)-(5) whenever a product and packaging rotogravure or wide-

SECTION E. Source Group Restrictions.

web flexographic press is operating.

(11) The affected source is in compliance, if the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with 63.828(a)(4) for each three-hour period, and the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with 63.828(a)(5) for each three hour period, and

(i) The overall organic HAP control efficiency, R, is 95 percent or greater, or

(ii) The organic HAP emission rate based on solids applied, L, is 0.20 kg organic HAP per kg solids applied or less, or

(iii) The organic HAP emission rate based on material applied, S, is 0.04 kg organic HAP per kg material applied or less, or

(iv) The organic HAP emitted during the month, H, is less than the calculated allowable organic HAP, Ha, as determined using paragraph (e) of this section.

(b) Use continuous emission monitors, conduct an initial performance test of capture efficiency, and continuously monitor a site specific operating parameter to assure capture efficiency. Compliance shall be demonstrated in accordance with the requirements of paragraph (c)(2) of this section.

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.828]

Subpart KK--National Emission Standards for the Printing and Publishing Industry
Monitoring requirements.

In the event that a control device is used for demonstration of compliance with the standard, an owner or operator complying with the requirements of Condition #001 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall:

(a) For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of 1 percent of the temperature being monitored in C or 1 C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

(b) For a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of 1 percent of the temperature being monitored in C or 1 C, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

IV. RECORDKEEPING REQUIREMENTS.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.829]

Subpart KK--National Emission Standards for the Printing and Publishing Industry
Recordkeeping requirements.

For each facility which meets the criteria of Condition #001, the owner or operator shall maintain records needed to demonstrate compliance with this standard. These records may include material usage, HAP usage, volatile matter usage, and solid usage. If demonstrating compliance using control equipment, these records may also include continuous emission monitor data, and control device and capture system operating parameter data. The owner / operator shall maintain these records for the most recent five year period and shall be made available to a Department representative upon request.

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).

**SECTION E. Source Group Restrictions.****VI. WORK PRACTICE REQUIREMENTS.**

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

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. ***

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Title V facility.



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

SECTION H. Miscellaneous.

The following activities are not required any testing and monitoring requirements, reporting requirements and work practice standards:

Activity	Rationale
1. Space heaters	Insignificant Emissions
2. Ink & adhesive mixing	Insignificant Emissions
3. Lamination wash-up	Insignificant Emissions
4. Bag machine #30	Insignificant Emissions
5. Welding station	Insignificant Emissions
6. Roll grinders	Insignificant Emissions
7. Core cutters	Insignificant Emissions
8. Laboratory Equipment	Insignificant Emissions
9. Diesel pump for fire protection	Insignificant Emissions
10. Small solvent metal cleaning units	Insignificant Emissions
11. Underground storage tank for N-Propyl alcohol, 90% ethyl alcohol & 10% N-Propyl alcohol, ethyl acetate, n-propyl acetate	Insignificant Emissions
12. Printing/coating wash-up	Insignificant Emissions

Note:

The capacities listed in Section A, pages 5 and 6 are, are for informational use only and should not be used as enforceable limitations.



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