



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: March 31, 2006

Effective Date: March 31, 2006

Expiration Date: April 30, 2011

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: 09-00012

Federal Tax Id - Plant Code: 36-2662685-1

Owner Information

Name: MEADWESTVACO CONSUMER PKG GROUP LLC DBA KLEARFOLD

Mailing Address: 364 VALLEY RD
WARRINGTON, PA 18976

Plant Information

Plant: KLEARFOLD/WARRINGTON

Location: 09 Bucks County 09950 Warrington Township

SIC Code: 2657 Manufacturing - Folding Paperboard Boxes

Responsible Official

Name: SCOTT HEADLEY

Title: OPERATIONS MANAGER

Phone: (215) 918 - 3000 Ext.3034

Permit Contact Person

Name: MIKE PARROTTA

Title:

Phone: (215) 918 - 3000 Ext.3027

[Signature] _____

FRANCINE B CARLINI, SOUTHEAST REGION AIR PROGRAM MANAGER



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Source ID	Source Name	Capacity/Throughput	Fuel/Material
103	SILKSCREEN PRESS (S-3)	40.000 Lbs / HR	SOLVENT
107	FINISHING & MAINTENANCE	18.000 Lbs / HR	FINISHING SOLV.
109	NEW SILK SCREEN PRESS (S-2)	40.000 Lbs / HR	SOLVENT
110	NEW SILK SCREEN PRESS (S-1)	40.000 Lbs / HR	SOLVENT
111	OFFSET PRESS 9	13.300 Lbs / HR	SOLVENT
114	SHEET-FED OFFSET LITHOGRAPHIC PRINTING PRESS		
S03	SILKSCREEN S-3 STACK		
S09	NEW SILKSCREEN S-2 STACK		
S10	NEW SILKSCREEN S-1 STACK		
S99	FINISHING ROOM STACK		

PERMIT MAPS

PROC
103 → STAC
S03

PROC
107 → STAC
S99

PROC
109 → STAC
S09

PROC
110 → STAC
S10



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,

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

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

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

Inspection and Entry

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

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

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

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

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

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

(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.

SECTION B. General Title V Requirements

#008 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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

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

Duty to Provide Information

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

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

#010 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

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

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

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of 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.

SECTION B. General Title V Requirements

#012 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

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

#013 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

- (a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (b) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to an operational flexibility change authorized by 25 Pa. Code § 127.462.

#014 [25 Pa. Code § 127.450]

Administrative Operating Permit 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).

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(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.

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, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less

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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 § 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).

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#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:

Air Enforcement Branch (3AP12)
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 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:

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(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. 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

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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 or, of the submittal date specified elsewhere in the permit, 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 shall authorized under 25 Pa. Code § 127.516 shall extend to operational flexibility changes made at this Title V facility pursuant to this permit condition and other applicable operational flexibility terms and conditions of this permit.

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

Risk Management

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the 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,

SECTION B. General Title V Requirements

(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.

(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.

SECTION B. General Title V Requirements

(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 §121.7]

Prohibition of air pollution.

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

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

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

003 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code §123.1, of this Section, if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]

Limitations

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

005 [25 Pa. Code §123.41]

Limitations

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

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

**SECTION C. Site Level Requirements**

006 [25 Pa. Code §123.42]

Exceptions

The limitations of 25 Pa. Code §123.41, of this Section, shall not apply to a visible emission in either of the following instances:

- (a) When the presence of uncombined water is the only reason for failure to meet the limitations.
- (b) When the emission results from the sources specified in 25 Pa. Code §123.1 of this Section.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.448]

The total Volatile Organic Compounds (VOC) emissions from all of the air contamination sources at this facility shall not exceed a plantwide applicability limit (PAL) of 68.6 tons per year in any consecutive twelve (12) month period.

008 [25 Pa. Code §129.14]

Open burning operations

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

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

II. TESTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511 and 129.92]

(a) The permittee shall determine the density, the weight percent of the VOC content and the weight percent of the HAPs content of all inks and solvents used by the sources listed in Section A, by one of the following methods:

(1) test each ink and solvent formulation applied on the presses using USEPA Method 24, as specified in 40 CFR Part 60, Appendix A, or

(2) determine or calculate for each ink and solvent applied on the presses, using the certified data provided by the supplier of the materials used in the ink and coating formulations. The certified data must be based on USEPA Reference Method 24 certification testing on the raw materials used. For materials that are assumed to be 100 percent VOC, Method 24 data is not required.

(b) The permittee shall determine the VOC content of fountain solution using the Department approved calculation which includes:

- (1) results from USEPA Method 24 testing,

SECTION C. Site Level Requirements

(2) certified data provided by suppliers of the concentrated materials used as additives to prepare the press ready fountain solution, and

(3) records of the proportions in which the additives are mixed in the fountain solutions.

(c) The calculations for the Condition #009(a)(2), above, shall be performed once for each fountain solution of the same formulation. The certified data from suppliers must be based on USEPA Reference Method 24 certification testing. For materials that are assumed to be 100 percent VOC, Method 24 data is not required.

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurements.
- (b) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511 and 129.92.]

(a) The permittee shall monitor the following information, monthly:

- (1) the amount of ink and solvent formulation applied:
- (2) percent by weight VOC and HAP content of all inks and solvents as applied; and
- (3) hours of operation

(b) The permittee shall monitor the clean-up solvents usage monthly, and its VOC content and solvent density.

(c) The monitoring required of this Section, shall be recorded and maintained in a format and time frame consistent with, and approved by the Department.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The permittee shall monitor the facility, once per operating day, for the following:

- (1) Odors which may be objectionable.
- (2) Visible Emissions.
- (3) Fugitive Particulate Matter.

(b) All detectable objectionable odors, that originated on-site and cross the property line, as well as fugitive particulate emissions and visible emissions that originated on site shall:

- (1) Be investigated.
- (2) Be reported to the facility management, or individual(s) designated by the permittee.
- (3) Be recorded in a permanent written log.

SECTION C. Site Level Requirements

- (c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next six month period.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification, complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall maintain a record of all reports of fugitive emissions, visible emissions and malodors which deviate from the terms and conditions of this permit. The report shall contain, at a minimum, the following items:

- (a) Date, time, and location of the incident(s).
- (b) The cause of the event.
- (c) The corrective action taken to abate the deviation and prevent future occurrences.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(b) Within sixty (60) days after permit issuance, the permittee shall submit, to the Department for approval, the proposed recordkeeping formats required in subparagraph (a), above.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511 and 129.52.]

(a) The permittee shall keep records of the following information, monthly:

- (1) the amount of ink and solvent formulation applied:
- (2) percent by weight VOC and HAP content, as applied, and
- (3) hours of operation

(b) The permittee shall record the clean-up solvents usage, monthly, and its VOC content and solvent density.

(c) The records shall be kept for a period five (5) years and shall be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The permittee shall, within two (2) hours of discovery of any occurrence, notify the Department, at (484) 250-5920, of any malfunction of the source(s) or associated air pollution control devices listed in Section A, of this permit, which results

SECTION C. Site Level Requirements

in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit, or of a regulation contained in 25 Pa. Code Article III.

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

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

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

017 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

(a) The permittee shall report semi-annually, the total emissions of VOCs, from the facility for the preceding six (6) month period, to the Department. The reporting period ends two months before this report is due. The report shall also list the monthly VOCs emissions for each of the sources.

(b) These reports shall be submitted to the Department on or before March 1, and September 1, of each year, in accordance with Condition #023, of Section B, of this Permit.

(c) Instances of deviation from permit requirements shall be clearly identified in these reports. The deviation report required by Condition #023(b), of Section B, of this permit, is for monitoring deviations, only. This report shall be submitted to the Department at a frequency of at least every six (6) months.

018 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

(a) The permittee shall maintain reports of the summary of the actual VOC emissions of each source to determine compliance with the facility wide emissions limit. The reports shall be made available to the Department upon request.

(b) The emission summary shall be generated within thirty (30) days of the end of each month and be based upon the prior twelve (12) months of operation.

(c) The report shall include, but not limited to:

- 1) monthly VOC emissions based on time / run averages,
- 2) monthly consumption by weight of material,
- 3) percent by weight VOC and HAP content of all inks and solvents as applied, and
- 4) clean-up solvent usage.

019 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

SECTION C. Site Level Requirements

[Additional authority for this permit condition is also derived from 40 CFR Part 68.]

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the threshold quantity at a 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 40 CFR § 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 this 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 this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If this 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 this 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 an annual Compliance Certification submittal for the previous year indicating compliance with the requirements of the terms and conditions of this permit, and the requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68. The certification shall include:
 - (i) The identification of each term or condition of the permit that is the basis of the certification.
 - (ii) The compliance status.
 - (iii) The methods used for determining the compliance status of the source, currently and over the reporting period.
 - (iv) Whether compliance was continuous or intermittent.
- (g) The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance of this permit.

020 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The Department has changed the deviation and compliance certification reporting requirements. The initial reports for (a)

SECTION C. Site Level Requirements

and (b), below, shall be due on the dates provided and may cover only a partial reporting period.

The permittee shall submit the following reports:

- (a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit.
- (b) A semi annual deviation report, due by October 1, of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the obligation for the second deviation reporting period (July 1 through December 31 of the previous year).

021 [25 Pa. Code §135.21]

Emission statements

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

022 [25 Pa. Code §135.3]

Reporting

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

VI. WORK PRACTICE REQUIREMENTS.

023 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

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

024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A, of this Permit, may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

SECTION C. Site Level Requirements

025 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall ensure that the source(s) and air pollution control device(s), listed in Section A and Section G, where applicable, of this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturer's specifications

026 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

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

027 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

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

(b) If an unauthorized modification of any source occurs at this facility, then this permit shall be suspended and the source(s) shall not be operated until authorized by the Department.

028 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(a) The permittee shall notify the Department, in writing, at least ten (10) days prior to making changes or modifications to VOC emitting sources at the facility which do not require USEPA or Pennsylvania DEP new source review pursuant to the provisions of 25 Pa. Code §127.448 and §129.92.

(b) The permittee shall maintain adequate records of all changes made to VOC emitting sources at the facility, and shall update the facility VOC emitting source list at the time of permit renewal.

029 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.91]

Any change that would result in an increase over the plantwide applicability limit (PAL) of 68.6 tons/yr shall be subject to the requirements of Title 25, Chapter 127, Subchapter E, New Source Review (NSR).

030 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Construction of any new source after April 14th, 1999 (plantwide applicability limit (PAL) initial issuance date) shall meet the requirements of Best Available Technology (BAT) as stated in 25 Pa. Code §§ 127.1 and 127.12(a)(5).

031 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

Each source shall be operated and maintained in a manner consistent with good operating and maintenance (O&M)

SECTION C. Site Level Requirements

practices such as:

- a) keep all solvent containers closed at all times unless filling or draining,
- b) keep all solvent laden shop towels in a closed container.

032 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

Any new source, or sources (from those listed in Section A) that are modified or reactivated, or air cleaning devices that are installed at the facility after April 14th, 1999 (initial issuance date of the PAL Operating Permit) shall obtain all required permits or approvals before construction, modification, reactivation, and operation pursuant to all applicable USEPA and PADEP major and minor new source review requirements with the exception of Title 25, Chapter 127, Subchapter E, new source review, relative to VOC emissions. Compliance with the plantwide applicability limit for VOC and the terms and conditions of this operating permit shall constitute compliance with the requirements of Title 25, Chapter 127, Subchapter E for VOC. The types of changes which may occur at the facility pursuant to the provisions of this operating permit include, but are not limited to the following:

- a) Increase production through new printing technology
- b) Expansions/modifications of the existing printing presses
- c) Addition of new sources
- d) Use of alternative raw materials, including inks and solvents and manufacture of different types products

VII. ADDITIONAL REQUIREMENTS.

033 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The facility does not have the availability of de minimis increase as indicated in Condition #017(b)(5), Section B, of this permit. These emissions were included in the calculations of the plantwide applicability limit (PAL).

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: 103

Source Name: SILKSCREEN PRESS (S-3)

Source Capacity / Throughput:

40.000 Lbs / HR

SOLVENT

PROC
103STAC
S03**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall monitor the following:

1) For each silk screen ink and solvent:

- a) the monthly consumption by weight of material as applied,
- b) the percent by weight VOC and HAP content as applied, monthly, and

2) hours of operation, for each source, monthly.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall record the following:

1) For each silk screen ink and solvent:

- a) the monthly consumption by weight of material as applied,
- b) the percent by weight VOC and HAP content as applied, and
- c) an estimate of VOC and HAP emissions, monthly.

2) Hours of operation, monthly, for each source.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Each silk screen press shall use ultraviolet (UV) inks to the maximum extent feasible.



SECTION D. Source Level Requirements

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

This silk screen press shall be operated and maintained according to manufacturer's specifications and good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

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

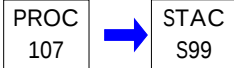
*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: FINISHING & MAINTENANCE

Source Capacity/Throughput: 18.000 Lbs/HR FINISHING SOLV.

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 PA. Code § 129.92]

Gluers shall be operated and maintained with good operating and air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

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

***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 109

Source Name: NEW SILK SCREEN PRESS (S-2)

Source Capacity / Throughput:

40.000 Lbs / HR

SOLVENT

PROC
109STAC
S09**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall monitor the following:

1) For each silk screen ink and solvent:

- a) the monthly consumption by weight of material as applied,
- b) the percent by weight VOC and HAP content as applied, monthly, and

2) hours of operation, for each source, monthly.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall record the following:

1) For each silk screen ink and solvent:

- a) the monthly consumption by weight of material as applied,
- b) the percent by weight VOC and HAP content as applied, and
- c) an estimate of VOC and HAP emissions, monthly.

2) Hours of operation, monthly, for each source.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Each silk screen press shall use ultraviolet (UV) inks to the maximum extent feasible.



SECTION D. Source Level Requirements

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

This silk screen press shall be operated and maintained according to manufacturer's specifications and good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 110

Source Name: NEW SILK SCREEN PRESS (S-1)

Source Capacity / Throughput:

40.000 Lbs / HR

SOLVENT

PROC
110STAC
S10**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall monitor the following:

1) For each silk screen ink and solvent:

- a) the monthly consumption by weight of material as applied,
- b) the percent by weight VOC and HAP content as applied, monthly, and

2) hours of operation, for each source, monthly.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall record the following:

1) For each silk screen ink and solvent:

- a) the monthly consumption by weight of material as applied,
- b) the percent by weight VOC and HAP content as applied, and
- c) an estimate of VOC and HAP emissions, monthly.

2) Hours of operation, monthly, for each source.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Each silk screen press shall use ultraviolet (UV) inks to the maximum extent feasible.



SECTION D. Source Level Requirements

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

This silk screen press shall be operated and maintained according to manufacturer's specifications and good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 111

Source Name: OFFSET PRESS 9

Source Capacity/Throughput:

13.300 Lbs/HR

SOLVENT

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall keep on file records of all previously performed/required testing for:

(a) Fountain Solutions VOC content

(b) Blanket and Roller Cleaning Solutions for VOC content or VOC composite partial vapor pressure of cleaning solutions.

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(1) The permittee shall monitor the following, monthly, for each blanket and roller cleaning solution used:

(a) The monthly consumption in pounds or gallons

(b) The percent by weight by weight to volume ratio (lbs/gal) VOC and HAP content

(c) An estimate of VOC and HAP emissions.

(2) The permittee shall monitor the following, monthly, for each sheet-fed offset lithographic ink or conventional varnish used:

(a) Percent by weight VOC and HAP content, as applied

(b) Estimate of VOC and HAP emissions

Alternately, the ink with the highest VOC and HAP content may be used to represent all inks by all sheet-fed offset lithographic printing presses.

(3) The permittee shall monitor the following, monthly, for each fountain solution and additive :

(a) Monthly consumption in pounds or gallons

(b) The percent by weight or weight to volume ratio (lbs/gal) VOC and HAP content

(c) Estimate of VOC and HAP emissions

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(1) The permittee shall record the following, monthly, for each blanket and roller cleaning solution used:

(a) The monthly consumption in pounds or gallons

(b) The percent by weight by weight to volume ratio (lbs/gal) VOC and HAP content

(c) An estimate of VOC and HAP emissions.

(2) The permittee shall record the following, monthly, for each sheet-fed offset lithographic ink or conventional varnish used:

SECTION D. Source Level Requirements

- (a) Percent by weight VOC and HAP content, as applied
- (b) Estimate of VOC and HAP emissions

Alternately, the ink with the highest VOC and HAP content may be used to represent all inks by all sheet-fed offset lithographic printing presses.

(3) The permittee shall record the following, monthly, for each fountain solution and additive :

- (a) Monthly consumption in pounds or gallons
- (b) The percent by weight or weight to volume ratio (lbs/gal) VOC and HAP content
- (c) Estimate of VOC and HAP emissions

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

- (a) The permittee shall record the volume of cleaning solution used, monthly.
- (b) The permittee shall record the VOC emissions, on a 12-month rolling basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall meet the following requirements for the fountain solution used on this source:

- (a) The applied VOC content shall be at 5.0 percent by weight, or below, or
- (b) The applied VOC content shall be at 8.5 percent by weight or below and refrigerate the fountain solution to 60°F or less.

006 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall for any blanket and roller cleaning solution used on a sheet-fed offset lithographic printing press meet the following requirements:

- (a) VOC content, as applied in less than or equal to 30 percent by weight, or
- (b) VOC composite partial vapor pressure, as used is less than or equal to 10 mm Hg at 20 °C (68°F).
- (c) The use of cleaning solutions do not have to meet the above conditions, provided that the quantity used does not exceed 55 gallons on a twelve (12) month rolling sum.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(A) The permittee shall keep all solvent containers closed at all times unless filling, draining, or performing clean-up operations.

(B) The permittee shall keep all solvent laden shop towels in a closed container when not being used.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 114

Source Name: SHEET-FED OFFSET LITHOGRAPHIC PRINTING PRESS

Source Capacity / Throughput:

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep on file records of all previously performed / required testing for:

- (a) Fountain Solutions VOC content
- (b) Blanket and Roller Cleaning Solutions for VOC content or VOC composite partial vapor pressure of cleaning solutions.

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(1) The permittee shall monitor the following, monthly, for each blanket and roller cleaning solution used:

- (a) The monthly consumption in pounds or gallons
- (b) The percent by weight by weight to volume ratio (lbs/gal) VOC and HAP content
- (c) An estimate of VOC and HAP emissions.

(2) The permittee shall monitor the following, monthly, for each sheet-fed offset lithographic ink or conventional varnish used:

- (a) Percent by weight VOC and HAP content, as applied
- (b) Estimate of VOC and HAP emissions

Alternately, the ink with the highest VOC and HAP content may be used to represent all inks by all sheet-fed offset lithographic printing presses.

(3) The permittee shall monitor the following, monthly, for each fountain solution and additive :

- (a) Monthly consumption in pounds or gallons
- (b) The percent by weight or weight to volume ratio (lbs/gal) VOC and HAP content
- (c) Estimate of VOC and HAP emissions

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(1) The permittee shall record the following, monthly, for each blanket and roller cleaning solution used:

- (a) The monthly consumption in pounds or gallons
- (b) The percent by weight by weight to volume ratio (lbs/gal) VOC and HAP content
- (c) An estimate of VOC and HAP emissions.

(2) The permittee shall record the following, monthly, for each sheet-fed offset lithographic ink or conventional varnish used:

- (a) Percent by weight VOC and HAP content, as applied

SECTION D. Source Level Requirements

(b) Estimate of VOC and HAP emissions

Alternately, the ink with the highest VOC and HAP content may be used to represent all inks by all sheet-fed offset lithographic printing presses.

(3) The permittee shall record the following, monthly, for each fountain solution and additive :

- (a) Monthly consumption in pounds or gallons
- (b) The percent by weight or weight to volume ratio (lbs/gal) VOC and HAP content
- (c) Estimate of VOC and HAP emissions

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

- (a) The permittee shall record the volume of cleaning solution used, monthly.
- (b) The permittee shall record the VOC emissions, on a 12-month rolling basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall meet the following requirements for the fountain solution used on this source:

- (a) The applied VOC content shall be at 5.0 percent by weight, or below, or
- (b) The applied VOC content shall be at 8.5 percent by weight or below and refrigerate the fountain solution to 60°F or less.

006 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall for any blanket and roller cleaning solution used on a sheet-fed offset lithographic printing press meet the following requirements:

- (a) VOC content, as applied in less than or equal to 30 percent by weight, or
- (b) VOC composite partial vapor pressure, as used is less than or equal to 10 mm Hg at 20 °C (68°F).
- (c) The use of cleaning solutions do not have to meet the above conditions, provided that the quantity used does not exceed 55 gallons on a twelve (12) month rolling sum.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(A) The permittee shall keep all solvent containers closed at all times unless filling, draining, or performing clean-up operations.

(B) The permittee shall keep all solvent laden shop towels in a closed container when not being used.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

**SECTION F. Emission Restriction Summary.**

Source Id	Source Description
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Site Emission Restriction Summary

Emission Limit	Pollutant
68.600 Tons / Yr	VOC

SECTION G. Miscellaneous.

(A) The following previously issued Title V Permit, 09-00012 and General Plan Approval # 09-320-057GP, serve as the basis for certain terms and conditions set forth in this Title V Renewal Permit.

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

(1) space heaters - there are sixteen (16) located throughout the facility. The maximum rated capacity of each ranges between 0.2 to 0.275 Million Btu per hour with a combined rated capacity of 3.76 Million Btu per hour using Natural Gas. The total NO_x and VOC emissions are estimated to 0.8 ton per year and 0.06 tons per year respectively.

(2) general maintenance - potential VOC emissions of less than one (1) ton per year.

(3) maintenance shop - containing small amounts of cleaners, lubricants, and other fluids that are routinely used for maintenance. These have a potential VOC emissions of less than one (1) ton per year.

(4) starch spray - used on the offset printing to prevent adhesion between jobs, having a potential VOC emissions of less than 0.01 ton per year.

(5) Parts washer: exempt according to 25 Pa. Code §129.63(a)(4), the freeboard ratio must be equal to or greater than 0.75 to remain exempt from §129.63.

(C) The following items have been changed or removed from the previous issued Title V permit:

(1) General Plan Approval # 09-320-057GP has been incorporated.

(2) Sources 105, 106 and 108 have been removed.

(3) monitoring and recordkeeping for silk screen presses and offset presses has been changed to monthly.

(4) Offset press #9 condition # 003 (from the previously issued Title V permit) has been changed to the following:

The permittee shall meet the following requirements for the fountain solution used on this source:

(a) The applied VOC content shall be at 5.0 percent by weight, or below.

(b) The applied VOC content shall be at 8.5 percent by weight or below and refrigerate the fountain solution to 60°F or less.

The above condition is consistent with the General Permit for Sheet-Fed Lithographic Printing Press and is more stringent than the previous permit condition.

(D) This facility is not subjected to CAM.



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