



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: November 15, 2001 Effective Date: September 23, 2005
Revision Date: September 23, 2005 Expiration Date: November 30, 2006
Revision Type: Transfer

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: 46-00062](#)

Federal Tax Id - Plant Code: 36-2041256-4

Owner Information

Name: SMURFIT STONE CONTAINER ENTERPRISES INC
Mailing Address: 500 CHURCH RD
NORTH WALES, PA 19454-4106

Plant Information

Plant: SMURFIT STONE CONTAINER ENTERPRISES / NORTH WALES
Location: 46 Montgomery County 46953 Upper Gwynedd Township
SIC Code: 2657 Manufacturing - Folding Paperboard Boxes

Responsible Official

Name: KEVIN J MURPHY
Title: GENERAL MANAGER
Phone: (215) 699 - 4444

Permit Contact Person

Name: RICHARD HUFF
Title: PLANT MANAGER
Phone: (215) 661 - 2035

[Signature] _____
FRANCINE B CARLINI, SOUTHEAST REGION AIR PROGRAM MANAGER



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General Title V Requirements

- #001 Definitions
- #002 Property Rights
- #003 Permit Expiration
- #004 Permit Renewal
- #005 Transfer of Ownership or Operational Control
- #006 Inspection and Entry
- #007 Compliance Requirements
- #008 Need to Halt or Reduce Activity Not a Defense
- #009 Duty to Provide Information
- #010 Reopening and Revising the Title V Permit for Cause
- #011 Reopening a Title V Permit for Cause by EPA
- #012 Significant Operating Permit Modifications
- #013 Minor Operating Permit Modifications
- #014 Administrative Operating Permit Amendments
- #015 Severability Clause
- #016 Fee Payment
- #017 Authorization for De Minimis Emission Increases
- #018 Reactivation of Sources
- #019 Circumvention
- #020 Submissions
- #021 Sampling, Testing and Monitoring Procedures
- #022 Recordkeeping Requirements
- #023 Reporting Requirements
- #024 Compliance Certification
- #025 Operational Flexibility
- #026 Risk Management
- #027 Approved Economic Incentives and Emission Trading Programs
- #028 Permit Shield

Section C. Site Level Title V Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

Section D. Source Level Title V Requirements

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

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



SECTION A. Table of Contents

Section E. Alternative Operating Scenario(s)

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

Section F. Emission Restriction Summary

Section G. Miscellaneous

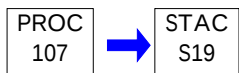
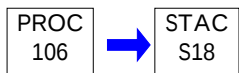
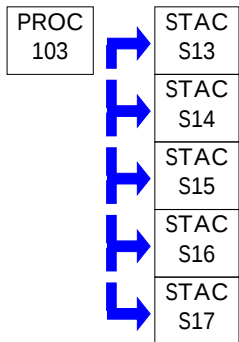
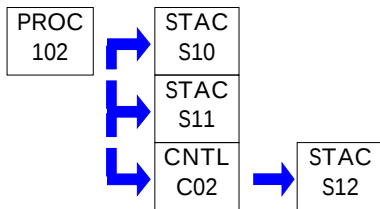
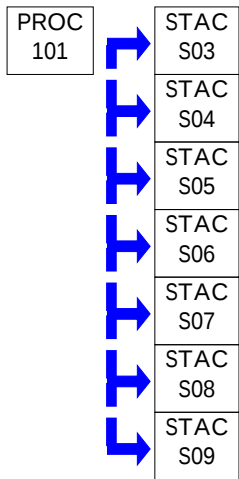
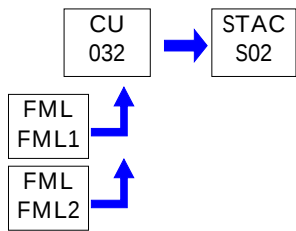


SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	H.B. SMITH BOILER #1	4.100 MMBTU / HR	
		30.00 Gal / HR	#2 Oil
		4.10 MCF / HR	Natural Gas
032	AJAX BOILER #2	6.300 MMBTU / HR	
		45.00 Gal / HR	#2 Oil
		6.30 MCF / HR	Natural Gas
101	NO. 501 GRAVURE PRESS	2.60 MCF / HR	Natural Gas
		270.00 Lbs / HR	INKS & SOLVENTS
102	NO. 502 ROTOGRAVURE PRESS	4.00 MCF / HR	Natural Gas
		400.00 Lbs / HR	INKS & SOLVENTS
103	NO. 503 ROTOGRAVURE PRESS	2.50 MCF / HR	Natural Gas
		275.00 Lbs / HR	INKS & SOLVENTS
106	SOLVENT CLEANING(COLD DEGREASING)	N / A	SOLVENT
107	RENMANN WASHING UNIT	N / A	SOLVENT
C02	NEW THERMAL OXIDIZER		
FML1	UST		
FML2	UTILITY		
S01	BOILER #1 STACK		
S02	BOILER #2 STACK		
S03	NO. 501 PRESS		
S04	NO. 501 PRESS		
S05	NO. 501 PRESS		
S06	NO. 501 PRESS		
S07	NO. 501 PRESS		
S08	NO. 501 PRESS		
S09	NO. 501 PRESS		
S10	NO. 502 PRESS		
S11	NO. 502 PRESS		
S12	NO. 502 PRESS / THERMAL OXIDIZER		
S13	NO. 503 PRESS		
S14	NO. 503 PRESS		
S15	NO. 503 PRESS		
S16	NO. 503 PRESS		
S17	NO. 503 PRESS		
S18	SOLVENT CLEANING		
S19	RENMANN STACK		

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

SECTION B. General Title V Requirements

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, liquefied 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:

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

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.

SECTION B. General Title V Requirements

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 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 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

**SECTION B. General Title V Requirements**

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 §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 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 that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) the emissions are of minor significance with respect to causing air pollution; and
 - (2) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

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

004 [25 Pa. Code §123.31]

Limitations

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

005 [25 Pa. Code §123.41]

Limitations

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

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

006 [25 Pa. Code §123.42]

Exceptions

The limitations of condition #005 (relating to limitations), of this section, shall not apply to a visible emission in any of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from sources specified in condition #002 (relating to prohibition of certain fugitive emissions), of this section.

**SECTION C. Site Level Requirements**

007 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material in the Southeast air basin except where the open burning operations result 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) A 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.

008 Elective Restriction

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

- (a) The aggregate Hazardous Air Pollutants (HAP) emissions from all of the sources listed in Section A at the North Wales facility, shall not exceed 25 tons per year, on a 12 month rolling basis.
- (b) The emissions of any individual Hazardous Air Pollutants (HAP) from all of the sources listed in Section A at the North Wales facility, shall not exceed 10 tons per year, on a 12 month rolling basis.

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 § 127.512.]

- (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.

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]

- (a). The permittee shall monitor the facility, once per operating day, for the following:
 - (1). Odors, which the Department may determine to be objectionable.

SECTION C. Site Level Requirements

- (2). Visible Emissions.
- (3). Fugitive Particulate Matter.

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

(c). At the end of six months, 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). At the end of the second six month period, 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 and the semi-annual report of monitoring and record keeping, complaints, monitoring results, and /or Department findings.

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]

The permittee shall maintain any data and /or information required to determine compliance with the facility-wide Hazardous Air Pollutant emission condition of this section.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

- (a) De minimis increases without notification to the Department.
- (b) De minimis increases with notification to the Department, via letter.
- (c) Increases resulting from a Request for Determination (RFD) to the Department.
- (d) Increases resulting from the issuance of a plan approval and subsequent operating permit.

014 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Within thirty (30) days after permit issuance, the permittee shall submit, to the Department for approval, the proposed recordkeeping formats required in this Operating Permit.

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.]

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations 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, if necessary, to abate the situation and prevent future occurrences.

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]

The permittee's records shall provide sufficient data and calculations to demonstrate that the facility's HAP emissions limit is

SECTION C. Site Level Requirements

met.

V. REPORTING REQUIREMENTS.

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, within two (2) hours of becoming knowledgeable 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 in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit, or regulation contained in 25 Pa. Code Article III.

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

(c) A written report shall be submitted to the Department within two (2) working days following the 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.

018 [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(c).]

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.

019 [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. Additionally, a description of the method used to calculate the emissions shall be included. The statement shall contain a certification by a company official or plant manager that the information contained in the statement is true and accurate.

020 [25 Pa. Code §135.3]

Reporting

The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from all previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported, including those sources listed in the Miscellaneous Section of this permit.

The permittee may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

021 [25 Pa. Code §135.4]

Report format

Source reports shall contain sufficient information to enable the Department to complete its emission inventory. Source reports shall be made by the source owner or operator in a format specified by the Department.

022 [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 135.21 (relating to reporting; and emission statements). These

SECTION C. Site Level Requirements

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.

VI. WORK PRACTICE REQUIREMENTS.

023 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee 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, 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 trucking or earth moving equipment, erosion by water, or 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 § 129.91.]

- (a) The press operators shall be trained in the proper cleaning procedures and equipment use. The press operators shall be given a periodic refresher course, when deemed necessary by the company.
- (b) The company shall keep a record, for each employee, that has successfully completed either the initial training or the refresher training in the proper cleaning procedures and equipment use.

025 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.11 & 127.512(h).]

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

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, upon discovery, immediately implement measures, which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A, of this permit, is causing the emission of air 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).]

The permittee shall ensure that the sources (and air pollution control devices) contained in this permit are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturers specifications.



SECTION C. Site Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit within thirty days of 11/01/2002 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and annually thereafter.

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Effect **

**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: H.B. SMITH BOILER #1

Source Capacity / Throughput:

4.100 MMBTU / HR

30.00 Gal / HR

#2 Oil

4.10 MCF / HR

Natural Gas

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

001 [25 Pa. Code §123.11]

Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from boiler in excess of 0.4 pounds per million Btu of heat input.

002 [25 Pa. Code §123.22]

Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from the boiler in excess of 1.2 pound per million Btu of heat input.

Fuel Restriction(s).

003 [25 Pa. Code §123.22]

Combustion units

No person may, at any time, offer for sale, deliver or use, exchange in trade or permit the use of commercial fuel oil for use in combustion units in the Southeast Pennsylvania, outer zone, air basin which contains sulfur in excess of 0.3% by weight for No. 2 and lighter fuel oil.

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §139.16]

Sulfur in fuel oil.

(a) The following are applicable to tests for the analysis of commercial fuel oil:

(1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).

(3) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

(b) The testing requirements in subpart (a), above, shall be waived in the event that a delivery receipt or invoice from the supplier, showing the percent sulfur in the fuel, is obtained each time a fuel oil delivery is made.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor the amount and type of fuel consumed on a monthly basis, using a Department approved

**SECTION D. Source Level Requirements**

method.

IV. RECORDKEEPING REQUIREMENTS.

006 [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 records of the amount and type of fuel consumed on a monthly basis, using a Department approved method.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall keep records to demonstrate that the boiler is maintained in accordance with the manufacturer's specifications.

008 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall obtain from the fuel oil supplier, a delivery receipt or invoice that shows the percentage of sulfur, by weight, is less than or equal to 0.3 percent, each time a delivery is made.

V. REPORTING 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 § 127.512.]

The permittee shall report fuel usage annually on the AIMS Report or as requested by the Department.

VI. WORK PRACTICE REQUIREMENTS.

010 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall operate and maintain the combustion units in accordance with manufacturer's specifications and good operating and maintenance practices to maintain compliance with Condition #001 and #002 of this Section.

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: 032

Source Name: AJAX BOILER #2

Source Capacity / Throughput:

6.300 MMBTU / HR

45.00 Gal / HR

#2 Oil

6.30 MCF / HR

Natural Gas

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

001 [25 Pa. Code §123.11]

Combustion units

A person may not permit the emission into the outdoor atmosphere of particulate matter from boiler in excess of 0.4 pounds per million Btu of heat input.

002 [25 Pa. Code §123.22]

Combustion units

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from the boiler in excess of 1.2 pound per million Btu of heat input.

Fuel Restriction(s).

003 [25 Pa. Code §123.22]

Combustion units

No person may, at any time, offer for sale, deliver or use, exchange in trade or permit the use of commercial fuel oil for use in combustion units in the Southeast Pennsylvania, outer zone, air basin which contains sulfur in excess of 0.3% by weight for No. 2 and lighter fuel oil.

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §139.16]

Sulfur in fuel oil.

(a) The following are applicable to tests for the analysis of commercial fuel oil:

(1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).

(3) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

(b) The testing requirements in subpart (a), above, shall be waived in the event that a delivery receipt or invoice from the supplier, showing the percent sulfur in the fuel, is obtained each time a fuel oil delivery is made.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall monitor the amount and type of fuel consumed on a monthly basis, using a Department approved

**SECTION D. Source Level Requirements**

method.

IV. RECORDKEEPING REQUIREMENTS.

006 [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 records of the amount and type of fuel consumed on a monthly basis, using a Department approved method.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall keep records to demonstrate that the boiler is maintained in accordance with the manufacturer's specifications.

008 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall obtain from the fuel oil supplier, a delivery receipt or invoice that shows the percentage of sulfur, by weight, is less than or equal to 0.3 percent, each time a delivery is made.

V. REPORTING 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 § 127.512.]

The permittee shall report fuel usage annually on the AIMS Report or as requested by the Department.

VI. WORK PRACTICE REQUIREMENTS.

010 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall operate and maintain the combustion units in accordance with manufacturer's specifications and good operating and maintenance practices to maintain compliance with Condition #001 and #002 of this Section.

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: 101

Source Name: NO. 501 GRAVURE PRESS

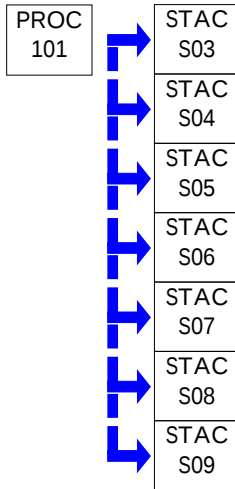
Source Capacity / Throughput:

2.60 MCF / HR

Natural Gas

270.00 Lbs / HR

INKS & SOLVENTS

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this process at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

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

003 [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.]

The company shall not exceed a combined VOC emissions total of 21 tons per year, as a result of manual clean up operations on press No. 501, 502, and 503, based on a twelve month rolling period.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

A person may not permit the emission into the outdoor atmosphere of VOCs from this rotogravure printing press unless one of the following limitations is met:

(a) The volatile fraction of the ink, as applied to the substrate, contains 25% or less by volume of VOC and 75% or more by volume of water.

(b) The ink, as applied to the substrate, less water, contains 60% by volume or more of solid material.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall not exceed a VOC emission rate of 660,000 lbs. per year, based on a twelve month rolling total, from Press No. 501.

**SECTION D. Source Level Requirements****II. TESTING REQUIREMENTS.**

006 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(a) The permittee shall determine the VOC emissions based on the following:

- (1) Reports based on formulation data certified by the coating supplier, or
- (2) Certified Product Data Sheets (CPDS), or
- (3) Material Safety Data Sheets (MSDS).

(b) If an MSDS shows a VOC content range greater than one percent for a material, the permittee shall use the high end of the range in determining the VOC emissions from the use of that material.

(c) At the request of the Department, the permittee will provide documentation on how formulation data was derived.

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall monitor the following information, for this rotogravure press, as applied, on a monthly basis:

(a) The identity of the ink and other printing material used including but not limited to the extenders.

(b) The composition of the inks, extenders and other printing material, including:

- (1) VOC content;
- (2) Solids and water content;
- (3) Percent VOC per gallon;
- (4) Density.

(c) The amount and type of fuel consumed, using a Department approved method.

If the VOC emissions from the previous 11 consecutive months, plus the projected emissions from the next month, are 90% of the annual cap for VOCs, then the permittee shall conduct more frequent monitoring as appropriate.

008 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall monitor, on a monthly basis, all printing press clean-up solvent usage and composition for this press to demonstrate compliance with the 12 month rolling summation emission limitation.

009 [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.]

The permittee shall monitor the monthly total and twelve (12) month summation of virgin solvent consumed.

IV. RECORDKEEPING REQUIREMENTS.

010 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall record the following information, for this rotogravure press, as applied, on a monthly basis:

(a) The identity of the ink and other printing material used including but not limited to the extenders.

(b) The composition of the inks, extenders and other printing material, including:

**SECTION D. Source Level Requirements**

- (1) VOC content;
- (2) Solids and water content;
- (4) Percent VOC per gallon; and
- (3) Density.

(c) The amount and type of fuel consumed, using a Department approved method.

If the VOC emissions from the previous 11 consecutive months, plus the projected emissions from the next month, are 90% of the annual cap for VOCs, then the permittee shall conduct more frequent recordkeeping as appropriate.

011 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall record, on a monthly basis, all printing press clean-up solvent usage and composition for this press to demonstrate compliance with the 12 month rolling summation emission limitation.

012 [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.]

The permittee shall maintain records of the monthly total and twelve (12) month summation of virgin solvent consumed.

013 [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.]

The company shall keep a record, for each employee that has successfully completed either initial training or refresher training in the proper cleaning procedures and equipment use.

014 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Records of the solvent usage shall be maintained for a minimum of five (5) years and shall be made available to Departmental personnel upon request.

V. REPORTING REQUIREMENTS.

015 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall file a quarterly report with the Department stating the volume of emissions, including but not limited to the clean-up solvent used and wasted, from this source. The permittee shall continue such quarterly reports until notified by the Department in writing that such reports are no longer necessary. The Department agrees annually to evaluate the necessity for such quarterly reports and agrees to advise permittee accordingly.

VI. WORK PRACTICE 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 § 129.91.]

The press operators shall be trained in the proper cleaning procedures and equipment use. The press operators shall be given a periodic refresher course, when deemed necessary by the company.

017 [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.]



SECTION D. Source Level Requirements

- (a) Virgin and waste solvents shall be stored in covered containers.
- (b) The cover of the solvent containers shall be closed after the rag / applicator has been dipped in the solvent.
- (c) Used rags / applicators shall be stored in closed containers after use.
- (d) Spillage and spashing during the transfer of solvent shall be minimized by all practical means.

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: 102

Source Name: NO. 502 ROTOGRAVURE PRESS

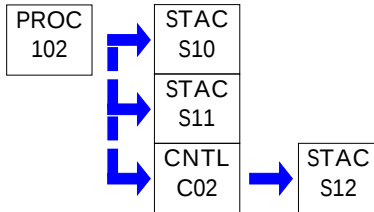
Source Capacity / Throughput:

4.00 MCF / HR

Natural Gas

400.00 Lbs / HR

INKS & SOLVENTS

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this process at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

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

003 [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.]

The company shall not exceed a combined VOC emissions total of 21 tons per year, as a result of manual clean up operations on press No. 501, 502, and 503, based on a twelve month rolling period.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The volatile organic compound (VOC) emissions from each printing station on printing press No. 502 shall be controlled by the regenerative thermal oxidizer whenever that station is using inks that do not meet one of the following:

(a) The volatile fraction of the ink, as applied to the substrate, contains 25% or less by volume of VOC and 75% or more by volume of water.

(b) The ink, as applied to the substrate, less water, contains 60% by volume or more of solid material.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The permittee shall operate Press No. 502 in such a manner that the VOC emissions from this printing press do not exceed 90.20 tons/yr, based on a 12-month rolling sum.

(b) The permittee shall operate Press No. 502 in such a manner that the NO_x emissions from this printing press do not exceed:

(1) 4.4 pounds/hr, and

(2) 10.0 tons/yr, based on a 12-month rolling sum.

SECTION D. Source Level Requirements**Control Device Efficiencies Restriction(s).**

006 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

- (a) The permittee shall operate the regenerative oxidizer to destroy at least 90% of the VOC entering the system.
- (b) The permittee shall operate the capture system in conjunction to the emission control systems to provide for a contemporaneous, overall reduction in VOC emission of at least 65%.
- (c) The permittee shall calculate the VOC emissions using the overall control efficiency as determined by the latest stack test.

II. TESTING REQUIREMENTS.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

(a) The permittee shall determine the VOC emissions based on the following:

- (1) Reports based on formulation data certified by the coating supplier, or
- (2) Certified Product Data Sheets (CPDS), or
- (3) Material Safety Data Sheets (MSDS).

(b) If an MSDS shows a VOC content range greater than one percent for a material, the permittee shall use the high end of the range in determining the VOC emissions from the use of that material.

(c) At the request of the Department, the permittee will provide documentation on how formulation data was derived.

008 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall, at least 180 days prior to expiration of this permit, or at a date agreed upon by the Department, perform a stack test to document the destruction efficiency and capture efficiency of the thermal oxidizer, in accordance with the provisions of Chapter 139 of the Pennsylvania Code, to show compliance with 25 Pa. Code § 129.67. The stack test shall be performed while the aforementioned source is operating at the maximum rated capacity as stated in the application.

At least sixty (60) days prior to the test(s), the company shall submit to the Department, for approval, the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

At least thirty (30) days prior to the test(s), the Regional Air Pollution Control Engineer shall be informed of the date and time of the test.

Within thirty (30) days after the source test(s), two copies of the complete test report, including all operating conditions shall be submitted to the Regional Air Pollution Control Engineer for approval.

The Department reserves the right to establish and impose more stringent limits than those stated above, based on the test results from each stack test performed as specified.

III. MONITORING 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]

The permittee shall monitor the following information, for this rotogravure press, as applied, on a monthly basis:

- (a) The identity of the ink and other printing material used including but not limited to the extenders.

**SECTION D. Source Level Requirements**

(b) The composition of the inks, extenders and other printing material, including:

- (1) VOC content;
- (2) Solids and water content;
- (3) Percent VOC per gallon;
- (4) Density.

(c) The amount and type of fuel consumed, using a Department approved method.

If the VOC emissions from the previous 11 consecutive months, plus the projected emissions from the next month, are 90% of the annual cap for VOCs, then the permittee shall conduct more frequent monitoring as appropriate.

010 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall monitor, on a monthly basis, all printing press clean-up solvent usage and composition for this press to demonstrate compliance with the 12 month rolling summation emission limitation.

011 [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.]

The permittee shall monitor the monthly total and twelve (12) month summation of virgin solvent consumed.

012 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The thermal oxidizer combustion chamber temperature shall be continuously monitored and recorded.

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 record the following information, for this rotogravure press, as applied, on a monthly basis:

(a) The identity of the ink and other printing material used including but not limited to the extenders.

(b) The composition of the inks, extenders and other printing material, including:

- (1) VOC content;
- (2) Solids and water content;
- (4) Percent VOC per gallon; and
- (3) Density.

(c) The amount and type of fuel consumed, using a Department approved method.

If the VOC emissions from the previous 11 consecutive months, plus the projected emissions from the next month, are 90% of the annual cap for VOCs, then the permittee shall conduct more frequent recordkeeping as appropriate.

014 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall record, on a monthly basis, all printing press clean-up solvent usage and composition for this press to demonstrate compliance with the 12 month rolling summation emission limitation.

**SECTION D. Source Level Requirements**

015 [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.]

The permittee shall maintain records of the monthly total and twelve (12) month summation of virgin solvent consumed.

016 [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.]

The company shall keep a record, for each employee that has successfully completed either initial training or refresher training in the proper cleaning procedures and equipment use.

017 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Records of the solvent usage shall be maintained for a minimum of five (5) years and shall be made available to Departmental personnel upon request.

018 [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.]

Temperature charts of the thermal oxidizer combustion chamber must be maintained and be made available to the Department upon request for a minimum of five (5) years.

019 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain records of inspections and maintenance performed on the associated control device for this source, any deficiencies, and any corrective action taken.

V. REPORTING REQUIREMENTS.

020 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall file a quarterly report with the Department stating the volume of emissions, including but not limited to the clean-up solvent used and wasted, from this source. The permittee shall continue such quarterly reports until notified by the Department in writing that such reports are no longer necessary. The Department agrees annually to evaluate the necessity for such quarterly reports and agrees to advise permittee accordingly.

VI. WORK PRACTICE REQUIREMENTS.

021 [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.]

The press operators shall be trained in the proper cleaning procedures and equipment use. The press operators shall be given a periodic refresher course, when deemed necessary by the company.

022 [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.]

(a) Virgin and waste solvents shall be stored in covered containers.

(b) The cover of the solvent containers shall be closed after the rag/applicator has been dipped in the solvent.

(c) Used rags/applicators shall be stored in closed containers after use.

SECTION D. Source Level Requirements

(d) Spillage and spashing during the transfer of solvent shall be minimized by all practical means.

023 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

(a) The permittee shall operate an incineration system which destroys at least 90% of the VOC's entering the system, unless compliant materials are utilized. The overall level of emission destruction may not be less than that necessary to comply with subsection (b).

(b) A capture system shall be used in conjunction with the emission control systems in subsection (a). The design and operation of the capture and control system shall be consistent with good engineering practice and shall be designed to provide for a contemporaneous, overall reduction in VOC emission from each press of at least 65%.

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) The thermal oxidizer shall maintain a minimum operating temperature of 1400°F in the combustion chamber.

(b) The thermal oxidizer and press capture ventilation system shall be maintained in good operating condition and operated whenever inks are used where the volatile fraction of the ink contains greater than 25% by volume of VOC and less than 75% by volume of water or the inks, less water, contain less than 60% by volume of solid material.

025 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain and operate flow rate measurement equipment associated with the regenerative thermal oxidizer system.

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: 103

Source Name: NO. 503 ROTOGRAVURE PRESS

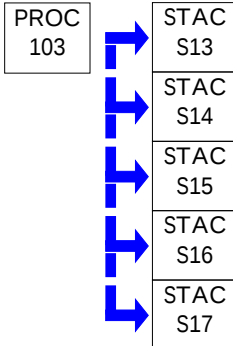
Source Capacity / Throughput:

2.50 MCF / HR

Natural Gas

275.00 Lbs / HR

INKS & SOLVENTS

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this process at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

002 [25 Pa. Code §123.21]

General

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

003 [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.]

The company shall not exceed a combined VOC emissions total of 21 tons per year, as a result of manual clean up operations on press No. 501, 502, and 503, based on a twelve month rolling period.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

A person may not permit the emission into the outdoor atmosphere of VOCs from this rotogravure printing press unless one of the following limitations is met:

(a) The volatile fraction of the ink, as applied to the substrate, contains 25% or less by volume of VOC and 75% or more by volume of water.

(b) The ink, as applied to the substrate, less water, contains 60% by volume or more of solid material.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall not exceed VOC emissions of 98.75 tons / yr, based on a twelve month rolling total.

II. TESTING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall determine the VOC emissions based on the following:

**SECTION D. Source Level Requirements**

- (1) Reports based on formulation data certified by the coating supplier, or
- (2) Certified Product Data Sheets (CPDS), or
- (3) Material Safety Data Sheets (MSDS).

(b) If an MSDS shows a VOC content range greater than one percent for a material, the permittee shall use the high end of the range in determining the VOC emissions from the use of that material.

(c) At the request of the Department, the permittee will provide documentation on how formulation data was derived.

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall monitor the following information, for this rotogravure press, as applied, on a monthly basis:

- (a) The identity of the ink and other printing material used including but not limited to the extenders.
- (b) The composition of the inks, extenders and other printing material, including:
 - (1) VOC content;
 - (2) Solids and water content;
 - (3) Percent VOC per gallon;
 - (4) Density.
- (c) The amount and type of fuel consumed, using a Department approved method.

If the VOC emissions from the previous 11 consecutive months, plus the projected emissions from the next month, are 90% of the annual cap for VOCs, then the permittee shall conduct more frequent monitoring as appropriate.

008 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall monitor, on a monthly basis, all printing press clean-up solvent usage and composition for this press to demonstrate compliance with the 12 month rolling summation emission limitation.

009 [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.]

The permittee shall monitor the monthly total and twelve (12) month summation of virgin solvent consumed.

IV. RECORDKEEPING REQUIREMENTS.

010 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall record the following information, for this rotogravure press, as applied, on a monthly basis:

- (a) The identity of the ink and other printing material used including but not limited to the extenders.
- (b) The composition of the inks, extenders and other printing material, including:
 - (1) VOC content;
 - (2) Solids and water content;
 - (4) Percent VOC per gallon; and
 - (3) Density.

SECTION D. Source Level Requirements

(c) The amount and type of fuel consumed, using a Department approved method.

If the VOC emissions from the previous 11 consecutive months, plus the projected emissions from the next month, are 90% of the annual cap for VOCs, then the permittee shall conduct more frequent recordkeeping as appropriate.

011 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall record, on a monthly basis, all printing press clean-up solvent usage and composition for this press to demonstrate compliance with the 12 month rolling summation emission limitation.

012 [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.]

The permittee shall maintain records of the monthly total and twelve (12) month summation of virgin solvent consumed.

013 [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.]

The company shall keep a record, for each employee that has successfully completed either initial training or refresher training in the proper cleaning procedures and equipment use.

014 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

Within twenty-four hours of completion of each press run the permittee shall conduct calculations to determine actual and allowable emissions for press No. 503 during that period. This information shall be maintained for a minimum of five (5) years and shall be made available to Departmental personnel upon request.

V. REPORTING REQUIREMENTS.

015 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall file a quarterly report with the Department stating the volume of emissions, including but not limited to the clean-up solvent used and wasted, from this source. The permittee shall continue such quarterly reports until notified by the Department in writing that such reports are no longer necessary. The Department agrees annually to evaluate the necessity for such quarterly reports and agrees to advise permittee accordingly.

VI. WORK PRACTICE 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 § 129.91.]

The press operators shall be trained in the proper cleaning procedures and equipment use. The press operators shall be given a periodic refresher course, when deemed necessary by the company.

017 [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.]

(a) Virgin and waste solvents shall be stored in covered containers.



SECTION D. Source Level Requirements

- (b) The cover of the solvent containers shall be closed after the rag / applicator has been dipped in the solvent.
- (c) Used rags / applicators shall be stored in closed containers after use.
- (d) Spillage and spashing during the transfer of solvent shall be minimized by all practical means.

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**

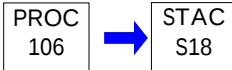
Source ID: 106

Source Name: SOLVENT CLEANING(COLD DEGREASING)

Source Capacity / Throughput:

N / A

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.

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.](#)

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

The permittee shall, on a monthly basis, monitor the amount of solvent added to the parts washer tank.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The company shall keep a record, for each employee that has successfully completed either initial training or refresher training in the proper cleaning procedures and equipment use.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall, on a monthly basis, record the amount of solvent added to the parts washer tank.

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.

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The operators shall be trained in the proper cleaning procedures and equipment use. The operators shall be given a periodic refresher course, when deemed necessary by the company.

005 [25 Pa. Code §129.63]

[Degreasing operations](#)

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

**SECTION D. Source Level Requirements**

(a) This source shall be equipped with:

- (1) A cover to prevent evaporation of solvent during periods of non-use.
- (2) Equipment for draining cleaned parts.
- (3) A permanent, conspicuous label summarizing the operating requirements.

(b) Be operated in accordance with the following requirements:

- (1) Do not dispose of waste solvent or transfer it to another party, such that greater than 20% of the waste solvent (by weight) can evaporate into the atmosphere; store waste solvent only in covered containers.
- (2) Close degreaser cover whenever not handling parts in the cleaner.
- (3) Drain cleaned parts for at least 15 seconds or until dripping ceases.

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**

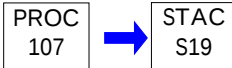
Source ID: 107

Source Name: RENZMANN WASHING UNIT

Source Capacity / Throughput:

N / A

SOLVENT

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

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

(a) The operation of the washing unit, the container and the distiller shall not result in the VOC fugitive emissions in excess of seven (7) tons per year.

(b) If at any time it is determined that the emissions of the aforementioned sources are causing VOC emissions in excess of the limitations specified in condition (a) above, the permittee shall take immediate steps, including the implementation of air cleaning device(s), if necessary, to reduce the VOC emissions to within the applicable limitations.

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.

002 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall monitor the amount of fresh isopropyl acetate solvent or other Department approved solvent added to the system on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The company shall keep a record, for each employee that has successfully completed either initial training or refresher training in the proper cleaning procedures and equipment use.

004 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall record keep the amount of fresh isopropyl acetate solvent or other Department approved solvent added to the system on a monthly basis.

V. REPORTING REQUIREMENTS.

005 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

**SECTION D. Source Level Requirements**

The permittee shall file a quarterly report with the Department stating the volume of emissions, including but not limited to the clean-up solvent used and wasted, from this source. The permittee shall continue such quarterly reports until notified by the Department in writing that such reports are no longer necessary. The Department agrees annually to evaluate the necessity for such quarterly reports and agrees to advise permittee accordingly.

VI. WORK PRACTICE REQUIREMENTS.

006 [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.]

The operators shall be trained in the proper cleaning procedures and equipment use. The operators shall be given a periodic refresher course, when deemed necessary by the company.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The permittee shall use isopropyl acetate or other Department approved solvent as a solvent in the washing unit, the containers and the distiller. The Department's prior approval shall be obtained for any changes of the solvents.

008 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

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

The Renzmann washing chamber shall be completely drained before it is opened for loading and unloading. The Renzmann washing chamber door shall be closed at all times except during loading, unloading and maintenance services.

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		
031	H.B. SMITH BOILER #1		
Emission Limit		Pollutant	
1.200	Lbs / MMBTU	SOX	
0.400	Lbs / MMBTU	TSP	
032	AJAX BOILER #2		
Emission Limit		Pollutant	
1.200	Lbs / MMBTU	SOX	
0.400	Lbs / MMBTU	TSP	
101	NO. 501 GRAVURE PRESS		
Emission Limit		Pollutant	
500.000	PPMV	SOX	
0.040	gr / DRY FT3	TSP	
21.000	Tons / Yr	Combined for 501, 502, 503	VOC
660,000.000	Lbs / Yr	VOC	
102	NO. 502 ROTOGRAVURE PRESS		
Emission Limit		Pollutant	
4.400	Lbs / Hr	NOX	
10.000	Lbs / Yr	NOX	
500.000	PPMV	SOX	
0.040	gr / DRY FT3	TSP	
21.000	Tons / Yr	Combined for 501, 502, 503	VOC
90.200	Tons / Yr	VOC	
103	NO. 503 ROTOGRAVURE PRESS		
Emission Limit		Pollutant	
500.000	PPMV	SOX	
0.040	gr / DRY FT3	TSP	
21.000	Tons / Yr	Combined for 501, 502, 503	VOC
98.750	Tons / Yr	VOC	
107	RENMANN WASHING UNIT		
Emission Limit		Pollutant	
7.000	Tons / Yr	VOC	

Site Emission Restriction Summary

Emission Limit		Pollutant
10.000 Tons / Yr	Single HAP	Hazardous Air Pollutants
25.000 Tons / Yr	Combined HAPs	Hazardous Air Pollutants

**SECTION G. Miscellaneous.**

(a) The following previously issued Operating permits serve as the basis for certain terms and conditions set forth in this Title V Permit:

- (1) 46-323-016
- (2) 46-315-001
- (3) 46-320-005
- (4) OP-46-0062

(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 limitations, monitoring, or record keeping:

- (1) Space heaters
- (2) Five (5), 5,000 gallon underground solvent storage tanks
- (3) 8,000 gallon underground waste solvent storage tank
- (4) Glue / Finishing equipment
- (5) 12,000 gallon underground No.2 oil (FML #2) storage tank
- (6) Chemical parts cleaning station
- (7) Parking areas and roadway
- (8) Collection, transport, handling, and bailing of paperboard trimmings.

(c) The mapping diagrams and the source capacities listed in Section A and D of this operating permit are for information purposes only; they do not represent permit limits or restrictions unless explicitly stated under item I - Restrictions - of Section D - Source Level Requirements.

(d) This permit is an Administrative Amendment to TVOP-46-00062 previously issued November 15, 2001, AUTH ID 355302. The amendment addresses objections raised during the appeal of the original Title V permit. New AUTH ID 485428, APS 346496.

(e) This permit is an Administrative Amendment to TVOP-46-00062 previously issued July 24, 2003, AUTH ID 485428. The amendment incorporates terms and conditions from Plan Approval PA-46-0062, which permits the replacement of the AER Thermal Afterburner (Source ID C01) with New Thermal Oxidizer (C02). The oxidizer controls VOC emissions from Rotogravure Printing Press No. 502 (Source ID 102). New AUTH ID 563567, APS 346496.

(f) APS No. 346496; Authorization No. 568799 - The Department has reopened this Title V Permit to address changes in permit conditions cited from plan approval PA-46-0062 that has been appealed. The hourly and daily emission limits for volatile organic compounds have been removed from Source ID No. 102 (No. 502 Rotogravure Press).

(g) The Client ID has been corrected for this facility. Current Client ID 84906; new AUTH ID 606460; new APS 563647; Master AUTH ID 355302. Previous AUTH ID 568799 has been "removed / entered in error" in eFACTS.



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