67-05023

AMER COLOR GRAPHICS DBA VERTIS COMMUNICATIONS/YORK



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: November 19, 2008 Effective Date: December 1, 2008

Expiration Date: November 30, 2013

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: 67-05023

Federal Tax Id - Plant Code: 16-1003976-1

Owner Information

Name: AMER COLOR GRAPHICS Mailing Address: 215 N ZARFOSS DR YORK, PA 17404-5800

Plant Information

Plant: AMER COLOR GRAPHICS DBA VERTIS COMMUNICATIONS/YORK

Location: 67 York County 67963 West Manchester Township

SIC Code: 2752 Manufacturing - Commercial Printing, Lithographic

Responsible Official

Name: RIAN KELLY Title: PLANT MGR Phone: (717) 792 - 4623

Permit Contact Person

Name: GLENN SHAFFER
Title: CORPORATE ENGINEER

Phone: (717) 792 - 8104

[Signature]		

WILLIAM R WEAVER, SOUTHCENTRAL 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





SECTION A. Table of Contents

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

Section E. Source Group Restrictions

E-I: Restrictions

E-II: Testing RequirementsE-III: Monitoring RequirementsE-IV: Recordkeeping RequirementsE-V: Reporting Requirements

E-VI: Work Practice Standards
E-VII: Additional Requirements

Section F. Alternative Operating Scenario(s)

F-I: Restrictions

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

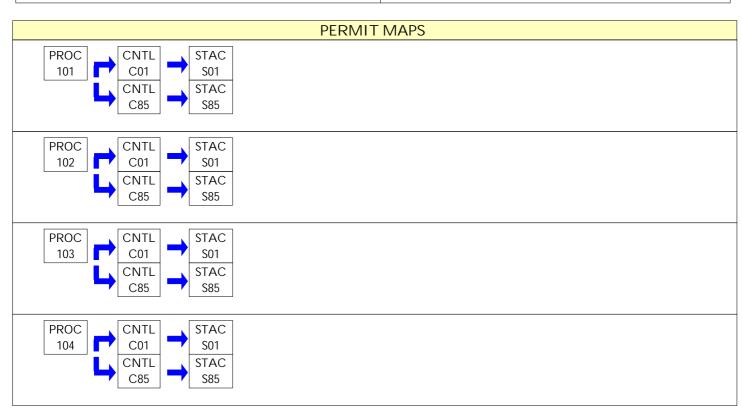
Section G. Emission Restriction Summary

Section H. Miscellaneous



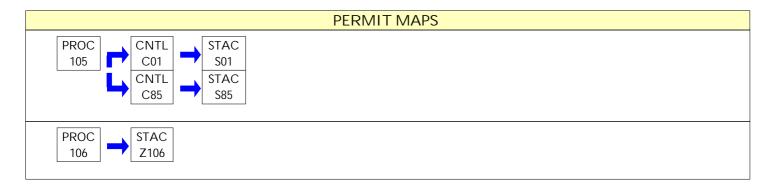
SECTION A. Site Inventory List

Source	ID Source Name	Capacity/Throughput	Fuel/Material
101	YO-1461 HARRIS 4465 DOUBLE WEB OFFSET	3.360 Lbs/HR	BLANKET WASH
		3.640 Lbs/HR	SOLVENT INKS
		0.420 Lbs/HR	FOUNTN SOLUTION
102	YO-1662 HARRIS 5663 SINGLE WEB OFFSET	3.010 Lbs/HR	BLANKET WASH
		3.580 Lbs/HR	SOLVENT INKS
		0.410 Lbs/HR	FNTN SOLUTION
103	YO-1661 HARRIS 4665 SINGLE WEB OFFSET	3.010 Lbs/HR	BLANKET WASH
		3.580 Lbs/HR	SOLVENT INKS
		0.410 Lbs/HR	FNTN SOLUTION
104	YO-1663 TOSHIBA 8661 DOUBLE WEB OFFSET	4.300 Lbs/HR	BLANKET WASH
		5.110 Lbs/HR	SOLVENT INKS
		0.580 Lbs/HR	FNTN SOLUTION
105	YO-1581 TOSHIBA 5584 SINGLE WEB OFFSET	3.010 Lbs/HR	BLANKET WASH
		3.580 Lbs/HR	SOLVENT INKS
		0.410 Lbs/HR	FNTN SOLUTION
106	COLD CLEANING MACHINES	0.020 Gal/HR	SOLVENTS
C01	SMITH ENGINEERING RTO		
C85	KATEC 7800 THERMAL INCINERATOR		
S01	SMITH RTO STACK		
S85	KATEC 7800 THERMAL INCINERATOR STACK		
Z106	FUGITIVE EMISSIONS		











#001 [25 Pa. Code § 121.1]

67-05023

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.

#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 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.

#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.

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 NOx from a single source during the term of the permit and 5 tons of NOx 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 § 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).

67-05023 AMER COLOR GRAPHICS DBA VERTIS COMMUNICATIONS/YORK



SECTION B. General Title V Requirements

#019 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

- (a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

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

Submissions

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

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

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

Air Enforcement Branch (3AP12) United States Environmental Protection Agency Region 3 1650 Arch Street Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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

Sampling, Testing and Monitoring Procedures

- (a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

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

Recordkeeping Requirements

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







- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#023 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

- (a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.
- (c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #020(c) of this permit.
- (d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#024 [25 Pa. Code § 127.513]

Compliance Certification

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This





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 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.
- (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.



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

No person shall permit the emission into the outdoor atmosphere of any 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 above, for which the operator has obtained a determination from the Department, in accordance with 25 PA Code, Section 123,1(b), 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;
- (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air standard.

002 [25 Pa. Code §123.2]

Fugitive particulate matter

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

003 [25 Pa. Code §123.31]

Limitations

No person shall permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source, in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

004 [25 Pa. Code §123.41]

Limitations

No person shall 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 3 minutes in any 1 hour.
- (b) Equal to or greater than 60% at any time.





005 [25 Pa. Code §123.42]

Exceptions

The limitations of Condition #004 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 the sources specified in Condition #001 of this Section.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The destruction/removal efficiency of the regenerative thermal oxidizer (Smith) shall be at least 95% for VOCs.

[This condition is derived from RACT Operating Permit # 67-2023]

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall keep volatile organic compound (VOC) emissions emitted to the atmosphere from the operation and cleanup of each of the following presses to less than or equal to the ton/yr based on a twelve month rolling total and lb/hr based on a twenty-four hour daily average as indicated below.

VOC Emissions

Source ID	New Press No.	Old Press No. (reference only)	Manufacturer I	b/hr	ton/yr
103	YO-1661	4665	Harris 1700	7.0	26
102	YO-1662	5663	Harris 1700	7.0	26
101	YO-1461	4465	Harris N-900	7.4	27
104	YO-1663	8661	Toshiba	10.0	37
105	YO-1581	5584	Toshiba	7.0	26

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The destruction/removal efficiency of the Katec thermal incinerator shall be at least 95% for VOCs.

009 [25 Pa. Code §129.14]

Open burning operations

No person shall conduct open burning of material at this facility except:

- (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 prevention and control of disease or pests, when approved by the Department.



- (c) A fire set solely for cooking food.
- (d) A fire set solely for ceremonial or recreational purposes.

II. TESTING REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) Pursuant to 25 Pa. Code § 139.3 to at least 45 calendar days prior to commencing an emissions testing program, a test protocol shall be submitted to the Department for review and approval. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (b) Pursuant to 25 Pa. Code § 139.3 at least 15 calendar days prior to commencing an emission testing program, notification as to the date and time of testing shall be given to the appropriate Regional Office. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.
- (c) Pursuant to 25 Pa. Code Section 139.53(a)(3) within 15 calendar days after completion of the on-site testing portion of an emission test program, if a complete test report has not yet been submitted, an electronic mail notification shall be sent to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office indicating the completion date of the on-site testing.
- (d) Pursuant to 40 CFR Part 60.8(a), 40 CFR Part 61.13(f) and 40 CFR Part 63.7(g) a complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program. For those tests being conducted pursuant to 40 CFR Part 61, a complete test report shall be submitted within 31 days after completion of the test
- (e) Pursuant to 25 Pa. Code Section 139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:
- 1. A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
- 2. Permit number(s) and condition(s) which are the basis for the evaluation.
- 3. Summary of results with respect to each applicable permit condition.
- 4. Statement of compliance or non-compliance with each applicable permit condition.
- (f) Pursuant to 25 Pa. Code § 139.3 to all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (g) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.
- (h) Pursuant to 25 Pa. Code Section 139.53(a)(1) and 139.53(a)(3) all submittals, besides notifications, shall be accomplished through PSIMS*Online available through https://www.depgreenport.state.pa.us/ecomm/Login.jsp when it becomes available. If internet submittal can not be accomplished, two copies of the submittal shall be sent to the Pennsylvania Department of Environmental Protection, Bureau of Air Quality, Division of Source Testing and Monitoring, 400 Market Street, 12th Floor Rachael Carson State Office Building, Harrisburg, PA 17105-8468 with deadlines verified through document postmarks. In a like manner, one copy of the submittal shall be sent to the appropriate Regional Office.







(i) The permittee shall ensure all federal reporting requirements contained in the applicable subpart of 40 CFR are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between state and the federal, the most stringent provision, term, condition, method or rule shall be used by default.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (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, 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.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall conduct a weekly inspection around the plant periphery during daylight hours when the plant is in production to detect visible emissions, fugitive emissions, and malodorous air contaminants. Weekly inspections are necessary to determine:

- (a) The presence of visible emissions as stated in Section C, Condition #004. Visible emissions may be measured according to the methods specified in Section C, Condition #019. Alternately, plant personnel who observe visible emissions may report the incident of visible emissions to the Department within two (2) hours of the incident and make arrangements for a certified observer to measure the visible emissions.
- (b) The presence of fugitive emission beyond the plant property boundaries, as stated in Section C, Condition #002.
- (c) The presence of odorous air contaminants beyond the plant property boundaries, as stated in Section C, Condition #003.

Any incidents of the above emissions shall be reported to the Department within two hours of each occurrence.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The records required by this Operating Permit shall be in a format approved by the Department and the records shall be retained for a minimum of five (5) years.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of weekly inspections referenced in Section C, Condition #012. The records shall include, at a minimum, the following information:

- (1) The name of the company representative monitoring these instances.
- (2) A description of the emissions and/or malodors observed and actions taken to mitigate them.







- (3) The date and time of the observation.
- (4) The wind direction during each observation.

The permittee shall maintain these records for a minimum of five years and shall make them available to Department representatives upon request.

REPORTING REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall demonstrate source compliance by using the following parameters along with other data to estimate **VOC** emissions:

- (a) Printing Ink 80% in ink solvents evaporated in the dryer 20% retained in the substrate
- (b) Automatic Blanket Wash 40% capture 60% fugitive emissions
- (c) Fountain Solution 70% capture 30% fugitive emissions and the fountain solution should not contain more than 1.6% alcohol by volume.
- (d) Dryers 100% capture efficiency 100% ducted to the thermal oxidizer / incinerator
- (e) Manual Cleanup Towels 50% retained in towels, 50% fugitive emission if the following conditions are met:
- (1) towels are kept in a container with a lid when not in use.
- (2) towels are placed in a container immediately following the use of the towels.
- (3) the vapor pressure of the cleanup solvent shall be less than 10 mmHg.
- (f) Smith Regenerative Thermal Oxidizer (RTO) 95% destruction efficiency, unless otherwise approved in writing by the Department.
- (g) Katec Thermal Incinerator 95% destruction efficiency, unless otherwise approved in writing by the Department.

016 [25 Pa. Code §127.512]

Operating permit terms and conditions.

[Additional Authority derived from 25 Pa Code Section 127.511]

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

- (a) Malfunctions which occur at the Title V facility which pose an iminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two (2) hours after the incident. The permitte shall submit a written report of such malfunctions to the Department within three (3) days of the telephone report.
- (b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirements of this condition, shall be reported to the Department, in writing, within five (5) days of discovery of the malfunction.





017 [25 Pa. Code §135.3]

Reporting

The permittee shall submit an annual emissions report to the Department. The report for a given calendar year is due no later than March 1 of the following year, and shall be submitted to the Air Quality District Supervisor. The permittee may request an extension of time from the Department for filing of the report specified above, and the Department may grant the extension for reasonable cause.

Reports shall be submitted to:

Air Quality District Supervisor
PA Department of Environmental Protection
York District Office
150 Roosevelt Avenue, Suite 200
York, PA 17401

VI. WORK PRACTICE REQUIREMENTS.

018 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A permittee responsible for any source(s) specified in Condition #001 of this section, shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

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

019 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions, pursuant to Condition #004 of this section, may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and certified in EPA method 9 to measure plume opacity with the naked eye or with the aid of any device(s) approved by the Department.

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The operator shall keep all materials containing VOCs and HAPs in closed containers unless placing or removing materials from those containers. This includes containers containing cleanup solvents and used liquids containing VOCs and HAPs. Solvent laden wipes shall be kept in closed containers when not in use.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.



SECTION C.

67-05023

Site Level Requirements



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

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the sources and air cleaning devices listed in Section A of this permit are operated and maintained in a manner consistent with good engineering practices.

VII. ADDITIONAL REQUIREMENTS.

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall submit reports as required under Condition #23 of Section B of this permit for each six-month reporting period from Jan 1 to June 30 and July 1 to Dec 31 for each calendar year beginning Jan 1, 2009. Reports shall be submitted within 30 days following each six-month reporting period.

VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit within thirty days of 01/01/2009 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.





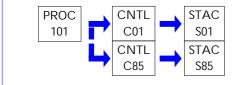
Source ID: 101 Source Name: YO-1461 HARRIS 4465 DOUBLE WEB OFFSET

Source Capacity/Throughput: 3.360 Lbs/HR BLANKET WASH

3.640 Lbs/HR SOLVENTINKS

0.420 Lbs/HR FOUNTN SOLUTION

Conditions for this source occur in the following groups: G01



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



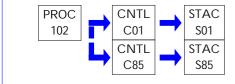


Source ID: 102 Source Name: YO-1662 HARRIS 5663 SINGLE WEB OFFSET

Source Capacity/Throughput: 3.010 Lbs/HR BLANKET WASH

3.580 Lbs/HR SOLVENT INKS 0.410 Lbs/HR FNTN SOLUTION

Conditions for this source occur in the following groups: G01



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



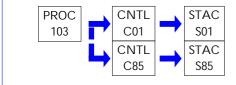


Source ID: 103 Source Name: YO-1661 HARRIS 4665 SINGLE WEB OFFSET

Source Capacity/Throughput: 3.010 Lbs/HR BLANKET WASH

3.580 Lbs/HR SOLVENT INKS
0.410 Lbs/HR FNTN SOLUTION

Conditions for this source occur in the following groups: G01



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



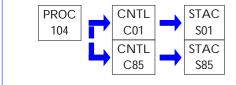


Source ID: 104 Source Name: YO-1663 TOSHIBA 8661 DOUBLE WEB OFFSET

Source Capacity/Throughput: 4.300 Lbs/HR BLANKET WASH

5.110 Lbs/HR SOLVENT INKS 0.580 Lbs/HR FNTN SOLUTION

Conditions for this source occur in the following groups: G01



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



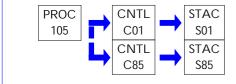


Source ID: 105 Source Name: YO-1581 TOSHIBA 5584 SINGLE WEB OFFSET

Source Capacity/Throughput: 3.010 Lbs/HR BLANKET WASH

3.580 Lbs/HR SOLVENT INKS
0.410 Lbs/HR FNTN SOLUTION

Conditions for this source occur in the following groups: G01



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



Source ID: 106 Source Name: COLD CLEANING MACHINES

Source Capacity/Throughput: 0.020 Gal/HR SOLVENTS



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §129.63]

Degreasing operations

Degreasing activities shall be conducted in accordance with the applicable requirements of 25 Pa. Code Section 129.63 to include the following:

- (a) Source ID 106 units shall not employ any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.
- (b) This permit condition does not apply:
- (1) Source ID 106 units used in extreme cleaning service. Extreme cleaning service is defined as the use of a cold cleaning machine to clean parts used in the manufacture of the following gases or to clean parts exposed to these gases in manufacturing, production, research and development, analytical work, or other similar operations:
 - (A) Oxygen in concentrations greater than 23%
 - (B) Ozone
 - (C) Nitrous oxide
 - (D) Fluorine
 - (E) Chlorine
 - (F) Bromine
 - (G) Halogenated compounds
- (2) If the permittee demonstrates, and the Department approves in writing, that compliance with this permit condition will result in unsafe operating conditions.
- (3) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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



IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall maintain the following records:

- (a) The name and address of the solvent supplier.
- (b) The type of solvent including the product or vendor identification number.
- (c) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

The permittee shall retain these records for a minimum of two (2) years and shall make them available to the Department upon its request.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §129.63]

Degreasing operations

Source ID 106 units shall have a permanent, conspicuous label summarizing the operating requirements in Condition #004. In addition, the label shall include the following discretionary good operating practices:

- (a) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the unit.
- (b) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
- (c) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.

004 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall operate Source ID 106 units in accordance with the following procedures:

- (a) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (b) Flushing of parts using a flexible hose or other flushing device shall be performed only within the unit. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (c) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in Source ID 106 units.
- (d) Air-agitated solvent baths may not be used.
- (e) Spills during solvent transfer and use of Source ID 106 units shall be cleaned up immediately.



67-05023

AMER COLOR GRAPHICS DBA VERTIS COMMUNICATIONS/YORK



SECTION D. Source Level Requirements

005 [25 Pa. Code §129.63]

Degreasing operations

Source ID 106 units shall be equipped with one of the following:

- (a) A cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent.
- (b) A perforated drain with a diameter of not more than six (6) inches, if the unit drains directly into the solvent storage reservoir.

006 [25 Pa. Code §129.63]

Degreasing operations

Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §129.63]

Degreasing operations

The aforementioned permit conditions apply to Source ID 106 units so long as the cold cleaning machine uses 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.







Group Name: G01
Group Description: Presses
Sources included in this group:

ID	Name
101	YO-1461 HARRIS 4465 DOUBLE WEB OFFSET
102	YO-1662 HARRIS 5663 SINGLE WEB OFFSET
103	YO-1661 HARRIS 4665 SINGLE WEB OFFSET
104	YO-1663 TOSHIBA 8661 DOUBLE WEB OFFSET
105	YO-1581 TOSHIBA 5584 SINGLE WEB OFFSET

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The weighted monthly average VOC content of all heatset inks used for the heatset lithographic printing process shall not exceed 45% by weight.
- (b) The fountain solution VOC content shall not exceed 3% by weight as applied.
- (c) The cleaning solutions used for both automatic and manual cleaning shall have a VOC composite partial vapor pressure of less than or equal to 10 mm Hg at 20 degrees Celsius or containing less than 30% by weight VOC. The company shall limit the use of higher vapor pressure cleaning solutions to less than 5% by weight of the total manual cleaning solutions used.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall collect and record information necessary for determining compliance with the requirements of Condition #001, Section E, Group G01. The records shall be kept in a manner which allows verification of compliance without additional calculations.

[Additional authority derived from 25 Pa Code, Section 129.91]

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall collect and record information necessary to verify compliance with the requirements of Condition #007 of Section C (Site Level Requirements). The records shall be kept in a manner which allows verification of compliance without additional calculations.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.





- (1) The following data shall be collected and recorded, by the permittee, on a monthly basis and included in annual reports submitted to the Department:
- (a) Press Run Time (hours or impressions for each press)
- (b) Materials containing VOCs and HAPs (for each press)
- (1) Manufacturer
- (2) Product Number and Type
- (3) Usage (by weight and volume)
- (4) Density (lb/gal)
- (5) VOC content (% by weight) as applied
- (6) Vapor Pressure (mm Hg)
- (7) Hazardous Air Pollutants (type and % by weight)
- (c) VOC Emissions (for each press)
- (1) The highest Ib/hr based on a 24 hour daily average
- (2) ton/year based on a twelve month rolling total
- (d) For VOC emission calculations purposes, the total quantities of VOCs used shall be determined from the actual VOCs in each material and the quantities of each of those materials used rather than using overall averages.
- (e) Supporting documentation including supporting calculations, emission estimation factors and assumptions with supporting documentation, and any other information required for determining compliance when requested by the Department.
- (2) Records shall include purchase orders and/or invoices and/or inventory reports of solutions containing VOCs and Hazardous Air Pollutants (HAPs) used in the facility and documentation of the VOC content and HAPs, type and content, in the materials obtained through EPA approved test methods.
- (3) Records shall be maintained for a period of five years at the facility and made available to the Department when requested.

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.

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

VII. ADDITIONAL REQUIREMENTS.

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



67-05023

AMER COLOR GRAPHICS DBA VERTIS COMMUNICATIONS/YORK



SECTION E. Source Group Restrictions.

Group Name: G02

Group Description: Thermal Oxidizers

Sources included in this group:

ID	Name
C01	SMITH ENGINEERING RTO
C85	KATEC 7800 THERMAL INCINERATOR

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority derived from 25 Pa. Code, Section 129.91]

The temperature of the combustion chamber of the Smith regenerative thermal oxidizer (RTO) shall be maintained at least 1,500 degrees Fahrenheit when controlling VOC emissions from the press' heatset dryers when the presses are in operation. Fluctuations below 1,500 degrees Fahrenheit which occur at press startups and shutdowns shall not be lower than 1,450 degrees Fahrenheit and below 1,500 degrees Fahrenheit for more than 5 minutes.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The temperature of the combustion chamber of the Katec thermal incinerator shall be maintained at least 1,375 degrees Fahrenheit when controlling VOC emissions from the press' heatset dryers when the presses are in operation. Fluctuations below 1,375 degrees Fahrenheit which occur at press startups and shutdowns shall not be lower than 1,325 degrees Fahrenheit and below 1,375 degrees Fahrenheit for more than 5 minutes.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall perform a stack test at least 180 days prior to the expiration date of this permit to demonstrate compliance with the 95% destruction rate of the Smith regenerative thermal oxidizer, control device ID C01.

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The following parts (a) through (d) are CAM related requirements for the Smith RTO, control device ID, C01:

- (a) The permittee shall use the approved process parameter(s) or indicator(s) to obtain data and monitor the emission control equipment performance.
- 1. Incinerator combustion temperature
- 2. Mechanical inspections
- 3. Performance testing
- (b) The permittee shall use the approved means or devices to measure the applicable indicator(s).
- 1. Incinerator combustion temperature thermocouples and combustion temperature alarms.
- 2. Internal and external structure and valve inspections.
- 3. EPA approved test protocol.
- (c) The permittee shall use the approved frequency for condition monitoring of indicator(s).







- 1. Incinerator combustion temperature continuously
- 2. Mechanical inspections:
 - a. External inspections quarterly
 - b. Internal inspections annually
 - c. Valve inspections annually
- 3. Performance testing Once every five (5) years.
- (d) The permittee shall use the approved period over which discrete data points for approved indicator(s) will be collected and averaged for the purpose of determining an excursion.
- 1. Incinerator combustion temperature every 5 minutes
- # 005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The following parts (a) through (d) are CAM related requirements for the Katec thermal oxidizer, control device ID, C85:

- (a) The permittee shall use the approved process parameter(s) or indicator(s) to obtain data and monitor the emission control equipment performance.
- 1. Incinerator combustion temperature
- 2. Mechanical inspections
- 3. Performance Testing
- (b) The permittee shall use the approved means or devices to measure the applicable indicator(s).
- 1. Incinerator combustion temperature thermocouples.
- 2. Internal and external structure inspections.
- 3. EPA approved test protocol.
- (c) The permittee shall use the approved frequency for condition monitoring of indicator(s).
- 1. Incinerator combustion temperature continuously
- 2. Mechanical inspections:
 - a. External inspections annually.
 - b. Internal inspections every five (5) years.
- 3. Performance testing as required per condition #010(b), Group G02, Section E.
- (d) The permittee shall use the approved period over which discrete data points for approved indicator(s) will be collected and averaged for the purpose of determining an excursion.
- 1. Incinerator combustion temperature every 5 minutes

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This is a CAM related requirement:

The permittee shall record all instances of malfunctions and/or excursions in a log book at the oxidizers, and in the weekly inspection log. The records shall include a reason for the malfunction, actions taken to correct the situation, and all emissions during such time.

- 1. Smith Engineering RTO:
- a. An excursion for the incinerator combustion temperature indicator identified in condition #004(a)(1) of this section shall be defined as a measurement of an average temperature less than 1500 degrees Fahrenheit when controlling VOC





emissions from the press' heatset dryers when the presses are in operation or temperature fluctuations below 1500 degrees Fahrenheit which occur at press startups and shutdowns that are below 1,450 degrees Fahrenheit or below 1500 degrees Fahrenheit for more than five (5) minutes.

- b. An excursion for the mechanical inspections indicator identified in condition #004(a)(2) of this section shall be defined as any finding that the oxidizer has been significantly jeopardized and no longer operates as designed.
- c. An excursion for the performance testing indicator identified in condition #004(a)(3) of this section shall be defined as any finding the oxidizer does not meet the required destruction efficiency.
- 2. Katec Thermal Incinerator
- a. An excursion for the incinerator combustion temperature indicator identified in condition #005(a)(1) of this section shall be defined as a measurement of an average temperature less than 1,375 degrees Fahrenheit when controlling VOC emissions from the press' heatset dryers when the presses are in operation or temperature fluctuations below 1,375 degrees Fahrenheit which occur at press startups and shutdowns that are below 1,325 degrees Fahrenheit or below 1,375 degrees Fahrenheit for more than five (5) minutes.
- b. An excursion for the mechanical inspections indicator identified in condition #005(a)(2) of this section shall be defined as any finding that the oxidizer has been significantly jeopardized and no longer operates as designed.
- c. An excursion for the performance testing indicator identified in condition #005(a)(3) of this section shall be defined as any finding the incinerator does not meet the required destruction efficiency.

These records shall be maintained on site for the most recent five year period, and made available to the Department upon request.

007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The following parts (a), (b) and (c) are CAM related requirements:

- (a) The permittee shall maintain a continuous record of the combustion chamber temperature for each incinerator, using a strip chart or equivalent to ensure that it meets the minimum temperature as required in Condition #001 or Condition #002 of Group GO2.
- (b) The permittee shall maintain records of the annual preventative maintenance activities relating to ensuring the accuracy of the thermocouples and all control instruments and calibration.
- (c) The permittee shall maintain records of the mechanical inspections as required in Condition #003 and Condition #004 of Group G02.

The records shall be kept on site for the most recent five years, and be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following are CAM related requirements:

The permittee shall report all excursions, corrective actions taken, dates, times, durations, and possible causes of the events to the Department for each six-month reporting period.

The permittee shall report all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable), their dates, times, durations, possible causes, and corrective actions taken, to the Department, for each six-month reporting period.





Six-month reporting periods shall be from Jan 1 to June 30 and July 1 to Dec 31 for each calendar year beginning Jan 1, 2009. Reports shall be submitted within 30 days following each six-month reporting period.

VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority derived from 25 Pa. Code, Section 129.91]

The standby backup thermal incinerator (Katec 7800) shall be operationally checked out at least once per year from the date of issuance of this operating permit. A report including operating condition of the burners, heat exchangers, fan, stack, operating temperatures and maintenance provided to the oxidizer, if any, shall be submitted to the Air Quality District Supervisor within thirty (30) days from the operational check.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority derived from 25 Pa Code, Section 129.91]

- (a) The standby backup thermal incinerator (KATEC 7800) shall be used only during periods of maintenance to the regenerative thermal oxidizer. During operation of the standby control system, no more than six dryers shall be used and the design inlet flow to the incinerator shall not be exceeded.
- (b) If the Katec thermal incinerator operates for the purposes of controlling VOC emissions from the presses for more than 200 hours in any calendar year during the term of this permit, then the permittee shall, within 180 days, conduct a stack test for VOC destruction efficiency on the unit, unless the unit has already been tested at least once already during the term of this permit.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

These are CAM related requirements:

The permittee shall update the preventative maintenance plan as deemed necessary by company maintenance operations or vendor recommendations.

The permittee shall perform the following annually:

- (a) Calibrate any instrument used to measure, control, display or record temperatures of the two thermal incinerators included in Group G02.
- (b) Preventative maintenance on any instrument used to measure, control, display or record temperatures of the two thermal incinerators included in Group G02.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

These are CAM related requirements:

- (a) In the event of a malfunction of either thermal incinerator, the permittee shall follow established procedures for shutdown, by-pass (if using appropriate coatings), and/or single incinerator usage.
- (b) Documentation of all coatings and emissions shall be maintained for such instances to assure that the facility remains in compliance.





AMER COLOR GRAPHICS DBA VERTIS COMMUNICATIONS/YORK



SECTION E. Source Group Restrictions

VII. ADDITIONAL REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority derived from 25 Pa Code, Section 129.91]

The company shall contact the Air Quality District Supervisor prior to performing scheduled maintenance to the regenerative thermal oxidizer if the standby control device is to be used. During periods of unscheduled maintenance or malfunction of the Smith RTO, the company shall make notification as early as possible but no later than 4:00 p.m. of the first working day if the standby control device is used to allow for system inspection during use.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Parts (a) through (e) are CAM related requirements

- a) The permittee shall develop and implement a quality improvement plan (QIP) if any of the following occurs:
- 1. Six excursions occur in a six-month period
- 2. The Department determines after review of all reported information that the permittee has not responded acceptably to an excursion
- b) The permittee shall record actions taken to implement a QIP during a reporting period and all related actions including, but not limited to, inspections, repairs and maintenance performed on the monitoring equipment.
- c) In accordance with 40 CFR 64.8, the QIP shall include procedures for evaluating the control performance problems. Based on the results of the evaluation procedures, the QIP shall be modified to include procedures for conducting more frequent or improved monitoring in conjunction with one or more of the following:
- 1. Improved preventive maintenance practices
- 2. Process operation changes
- 3. Appropriate improvements to control methods
- 4. Other steps appropriate to correct performance
- d) Following implementation of a QIP, the Department will require reasonable revisions to the QIP if the plan has failed to either:
- 1. Address the cause of the control device performance problem
- 2. Provide adequate procedures for correcting control device performance problems in as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions
- e) Implementation of a QIP, shall not excuse the permittee from compliance with any existing emission limitation or standard or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under any federal, state, or local laws or any other applicable requirements under the Clean Air Act.





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SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.





SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.







SECTION H. Miscellaneous.

The following activities are not required any emission restrictions, work practice standards, testing, monitoring, recordkeeping or reporting requirements:

Office and Manufacturing Area Air Conditioning equipment

Office equipment (copiers, printers, fax machines, etc.)

Plate baking oven

Gas fired space heaters

Electric machine tools

Maintenance vehicles

Emergency generator

Janitorial activities and products

Electric arc welding station (maintenance use only)

Fork truck

Floor scrubbing machine

Blueprint machine

Aqueous Parts Washer

Silicone Solution

Aqueous Glue

Oxygen-Acetylene gas cutting system (maintenance use only)

Paper shredder (vents indoors)



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