



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: April 10, 2013

Effective Date: April 12, 2013

Expiration Date: April 11, 2018

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 unless otherwise designated.

State Only Permit No: 09-00046

Synthetic Minor

Federal Tax Id - Plant Code: 23-2477974-1

Owner Information

Name: RJM MANUFACTURING INC

Mailing Address: 250 CANAL RD

FAIRLESS HILLS, PA 19030-4306

Plant Information

Plant: RJM MFG INC/FAIRLESS HILLS

Location: 09 Bucks County

09002 Falls Township

SIC Code: 2672 Manufacturing - Paper Coated And Laminated, Nec

Responsible Official

Name: JOHN LIBERATORE

Title: PRESIDENT

Phone: (215) 736 - 3644

Permit Contact Person

Name: JAY CHATTIN

Title: OPERATIONS MANAGER

Phone: (215) 736 - 3644

[Signature] _____

JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER

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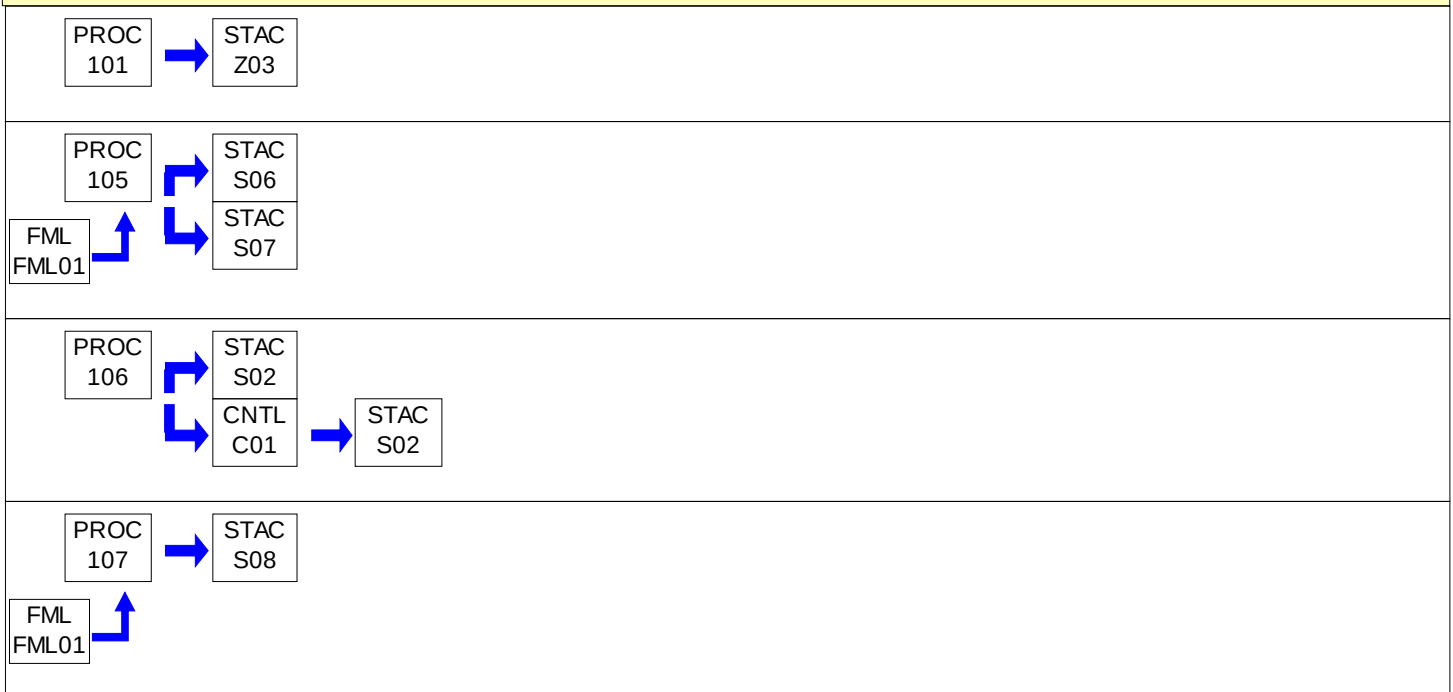
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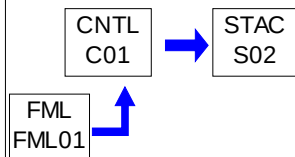
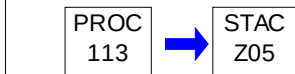
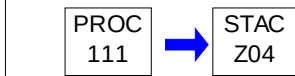
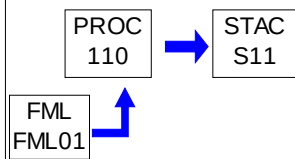
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	SIAT FLEXOGRAPHIC PRESS (#1)	1.000 Lbs/HR	SOLVENT
105	COATING LINE #2	2.500 MMBTU/HR	
		2.380 MCF/HR	Natural Gas
106	COATING LINE #3	23.000 Lbs/HR	SOLVENT
107	COATING LINE #4	6.400 MMBTU/HR	
		6.100 MCF/HR	Natural Gas
110	KIDDER FLEXOGRAPHIC PRESS (#2)	2.300 MMBTU/HR	
		1.900 Lbs/HR	SOLVENT
		2.190 MCF/HR	Natural Gas
111	COLD PARTS CLEANER	N/A	SOLVENT NAPHTHA
113	CLEANUP OPERATIONS	N/A	MEK, N-PROPANOL
C01	CATALYTIC OXIDIZER	950.000 CF/HR	Natural Gas
FML01	NATURAL GAS PIPELINE		
S02	COATING LINE #3 STACK		
S06	COATING LINE #2 STACK		
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PERMIT MAPS



**PERMIT MAPS**

SECTION B. General State Only Requirements

#001 [25 Pa. Code § 121.1]

Definitions.

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

- (a) 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.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating 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.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)&(c)]

Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.
- (d) 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.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,

SECTION B. General State Only Requirements

modification, revision, renewal, and re-issuance of each operating permit or part thereof.

(b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).

(1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.

(2) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.

(c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund".

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

Transfer of Operating Permits.

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and 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 a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]

Inspection and Entry.

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

(1) Enter at reasonable times upon the permittee's premises where a 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, at reasonable times, any records that are kept under the conditions of this permit;

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

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

(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 §§ 127.441 & 127.444]

Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes

SECTION B. General State Only Requirements

a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one 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 for the source is 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 State-Only 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 § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

#009 [25 Pa. Code §§ 127.442(a) & 127.461]

Duty to Provide Information.

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450 & 127.462]

Operating Permit Modifications

- (a) The permittee is authorized to make administrative amendments, minor operating permit modifications and

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significant operating permit modifications, under this permit, as outlined below:

(b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]

Severability Clause.

The provisions of this permit are severable, and if any provision of this permit is determined by a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. 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.

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

(c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder 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, the regulations thereunder or 25 Pa. Code Article III.

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

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:

SECTION B. General State Only Requirements

- (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 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.
- (e) 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 (c)(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 this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (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, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making 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.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (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)

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(6) Section 127.462 (relating to minor operating permit modifications)

(7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11]

Reactivation

(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).

(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).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].

(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]

Circumvention.

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 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#018 [25 Pa. Code §§ 127.402(d) & 127.442]

Reporting Requirements.

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

(c) 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 in the permit transmittal letter, or otherwise notified)

(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

(e) Any records, reports or information submitted to the Department shall be available to the public except for such

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records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#019 [25 Pa. Code §§ 127.441(c) & 135.5]

Sampling, Testing and Monitoring Procedures.

(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.

(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#020 [25 Pa. Code §§ 127.441(c) and 135.5]

Recordkeeping.

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

- (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 any 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.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privileges.

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.

SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

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

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving, and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Open burning operations, as specified in Condition # 008(a) - (e), Section C, of this permit.
- (g) Sources and classes of sources, other than those identified in (a) - (f), above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code § 123.1(b), that fugitive air contaminant emissions from the source, after appropriate controls, 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 quality standard.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

No person may permit fugitive particulate matter (PM) to be emitted into the outdoor atmosphere from a source specified in Condition # 002(a) - (g), Section C, of this permit, if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]

Limitations

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

005 [25 Pa. Code §123.41]

Limitations

No person may permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (a) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour.
- (b) Equal to or greater than 60% at any time.

006 [25 Pa. Code §123.42]

Exceptions

The emission limitations indicated in Condition # 005, Section C, of this permit, shall not apply to a visible air contaminant emission in either of the following instances:

SECTION C. Site Level Requirements

(a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.

(b) When the emission results from sources specified in Condition # 002, Section C, of this permit.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that emission into the outdoor atmosphere of volatile organic compounds (VOCs) from this facility occurs in such a manner that the rate of the emission does not exceed 24.9 tons/yr, calculated monthly as a twelve (12)-month rolling sum.

008 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material except the following:

(a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.

(b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(c) A fire set for the prevention and control of disease or pests, when approved by the Department.

(d) A fire set solely for recreational or ceremonial purposes.

(e) A fire set solely for cooking food.

II. TESTING REQUIREMENTS.

009 [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 Sections A or G, of this permit, may be in excess of the limitations specified in this permit or established pursuant to any applicable rule or regulation contained in 25 Pa. Code, Article III, the permittee shall be required to perform whatever test(s) is deemed necessary by the Department to determine the actual emission rate(s).

(b) Any test(s) required in (a), above, shall be performed in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.

010 [25 Pa. Code §123.43]

Measuring techniques

Visible air contaminant emissions may be measured using either of the following:

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

(b) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(1) Odors, which the Department may determine to be objectionable.

SECTION C. Site Level Requirements

(2) Visible air contaminant emissions.

(3) Fugitive air contaminant emissions.

(b) All detectable objectionable odors that originate on-site and cross the property line, as well as visible and/or fugitive air contaminant emissions that originate on-site, shall:

(1) Be investigated.

(2) Be reported to the facility management, or individual(s) designated by the permittee.

(3) Be recorded in a permanent written log.

(c) At the end of 6 months, upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next 6-month period.

(d) At the end of the second 6-month period, upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.

(e) The Department reserves the right to change the above monitoring requirements at any time, based on, but not limited to, the review of complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain records of all monitoring required in Condition # 011(a)(1) - (3), Section C, of this permit, including deviations from the conditions found in Section C, of this permit. The record of deviations shall contain, at a minimum, the following items for each incident:

(1) A description of the deviation.

(2) The source(s) and/or associated air pollution control device(s) and location(s).

(3) The starting and ending date(s) and times.

(4) The cause(s).

(5) The corrective action(s) taken, if necessary to abate the situation and prevent future occurrences.

(b) The monitoring shall be recorded and maintained in a Department-approved format and time frame.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All records, reports, and analysis results generated in compliance with the requirements of any section of this permit shall be maintained in accordance with Condition # 020(b), Section B, of this permit, and shall be made available to the Department upon written or verbal request within a reasonable time.

[Compliance with this streamlined permit condition assures compliance with 40 C.F.R. § 60.445(h).]

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all of the facility's emission increases, including the following types:

(a) De minimis emission increases without notification to the Department.

(b) De minimis emission increases with notification to the Department, via letter.

SECTION C. Site Level Requirements

(c) Emission increases resulting from a Request for Determination of Changes of Minor Significance and Exemption from Plan Approval/Operating Permit (RFD) to the Department.

(d) Emission increases resulting from the issuance of a plan approval and subsequent operating permit.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall maintain records of the following emissions from the facility on a monthly and 12-month rolling basis, calculated using Department-approved methods:

- (a) The total VOC emissions.
- (b) The total emissions of each individual hazardous air pollutant (HAP).
- (c) The total (aggregate) HAP emissions.

V. REPORTING REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Within sixty (60) days after permit issuance, the permittee shall submit to the Department, for approval, all newly-proposed recordkeeping formats required in this permit.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall, within two (2) hours of discovery of any occurrence, notify the Department, at (484) 250-5920, of any malfunction(s) of a source(s) and/or associated air pollution control device(s) listed in Sections A or G, of this permit, which results in, or may possibly result in, the emission of air contaminants in excess of the limitations specified in this permit or established pursuant to any applicable rule or regulation contained in 25 Pa. Code, Article III.

(b) Any malfunction(s) that occurs at this facility, and poses an imminent danger to public health, safety, welfare, and the environment, or would violate permit conditions if the source(s) and/or associated air pollution control device(s) were to continue to operate after the malfunction(s), shall immediately be reported to the Department by telephone at the above number.

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

- (1) A description of the malfunction(s).
- (2) The source(s) and/or associated air pollution control device(s) and location(s).
- (3) The starting and ending date(s) and time(s).
- (4) The cause(s).
- (5) The emission(s).
- (6) Any corrective action(s) taken.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release

SECTION C. Site Level Requirements

program consistent with requirements of the Clean Air Act, 40 C.F.R. 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 C.F.R. Part 68, and the Federal Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act when a regulated substance listed in 40 C.F.R. § 68.130 is present in a process in more than the threshold quantity at a facility. The permittee shall submit the RMP to the EPA 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 in 40 C.F.R. § 68.130.

(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 C.F.R. § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 C.F.R. 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 C.F.R. § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d) If this facility is subject to 40 C.F.R. Part 68, as part of the certification required under this permit, the permittee shall perform the following:

(1) Submit a compliance schedule for satisfying the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. § 68.10(a).

(2) Certify that this facility is in compliance with all requirements of 40 C.F.R. Part 68 including the registration and submission of the RMP.

(e) If this facility is subject to 40 C.F.R. Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for 5 years in accordance with 40 C.F.R. § 68.200.

(f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 C.F.R. Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 C.F.R. Part 68.

019 [25 Pa. Code §135.3]

Reporting

(a) The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from each previously-reported source(s), a new source(s) which was first operated during the preceding calendar year, and each source(s) modified during the same period that was not previously reported, including any source(s) listed in Section G, of this permit.

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

020 [25 Pa. Code §135.4]

Report format

SECTION C. Site Level Requirements

The permittee shall ensure that source reports are submitted in a format specified by the Department, and contain sufficient information to enable the Department to complete its emission inventory.

VI. WORK PRACTICE REQUIREMENTS.

021 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent PM from any source specified in Condition # 002(a) - (g), Section C, of this permit, from becoming airborne. These actions shall include, but not be limited to, the following:

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

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee may not modify any air contaminant system identified in Sections A or G, of this permit, prior to obtaining Department approval, except those modifications authorized by Condition # 013(g), Section B, of this permit.

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

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

024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall immediately, upon discovery, implement measures, which may include the application for the installation of an air pollution control device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of a source(s) listed in Sections A or G, of this permit, is causing the emission of air contaminants in excess of the limitations specified in this permit or established pursuant to any applicable rule or regulation contained in 25 Pa. Code, Article III.

025 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the following emissions from the facility on a monthly and 12-month rolling basis, using Department-approved methods:

- (a) The total VOC emissions.
- (b) The total emissions of each individual HAP.
- (c) The total (aggregate) HAP emissions.

VII. ADDITIONAL REQUIREMENTS.

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



SECTION C. Site Level Requirements

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Requirements**

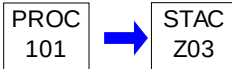
Source ID: 101

Source Name: SIAT FLEXOGRAPHIC PRESS (#1)

Source Capacity/Throughput:

1.000 Lbs/HR

SOLVENT

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that the emission of VOCs from this flexographic press occurs in such a manner that the rate of the emission does not exceed 4.4 tons/yr, calculated monthly as a 12-month rolling sum.

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.51(c).]

Sampling and testing shall be performed in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 (relating to sampling and testing).

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this flexographic press:

- (a) The hours of operation on a per-run and monthly basis.
- (b) The amount of each as supplied coating, ink, adhesive, wetting solution, diluent, etc. (coating material) used (gallons) on a per-run and monthly basis.
- (c) The amount of each as applied VOC containing material used (pounds and gallons) on a per-run, monthly, and 12-month rolling basis.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. §§ 60.445(a) and (d) and 60.446(a) and 25 Pa. Code §§ 127.443(b) and 129.52(c).]

The permittee shall maintain records of the following operating parameters for this flexographic press:

- (a) The hours of operation on a per-run and monthly basis.
- (b) The following for each as supplied VOC containing material used:
 - (1) The amount used (gallons) on a per-run and monthly basis.
 - (2) The VOC content (weight percent), obtained from one of the following:

SECTION D. Source Level Requirements

- (i) A certified product data sheet (CPDS).
- (ii) A material safety data sheet (MSDS). If the VOC content value is reported as a range, the upper bound of the range shall be considered the actual value.
- (iii) Testing in accordance with EPA Method 24/24A, as specified in 40 C.F.R. Part 60, Appendix A.
- (iv) An alternative method, as approved by the Department.
- (3) The HAP content (weight percent), calculated using a Department-approved method(s).
- (c) The following for each as applied VOC containing material used, calculated using Department-approved methods:
 - (1) The amount used (pounds and gallons) on a per-run, monthly, and 12-month rolling basis.
 - (2) The VOC content (weight percent and lbs/gal of coating solids).
 - (3) The HAP content (weight percent and lbs/gal of coating solids).
- (d) The VOC emissions (pounds or tons), on a monthly and 12-month rolling basis.
- (e) The HAP emissions (pounds or tons), on a monthly and 12-month rolling basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall operate and maintain this flexographic press in a manner consistent with good air pollution control practices. The practices shall include, but not be limited to, the following:

- (a) Good housekeeping procedures for the storage, use, and disposal of VOC containing materials.
- (b) Keeping VOC containing material containers closed when not in use.
- (c) Keeping all VOC containing material-laden shop towels in closed containers when not in use.

VII. ADDITIONAL REQUIREMENTS.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This flexographic press is subject to Subpart RR of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. In accordance with 40 C.F.R. § 60.4, copies of all requests, reports, applications, submittals, and other communications are required to be submitted to both the EPA and the Department. The EPA copies shall be forwarded to:

Director
Air Protection Division
U.S. EPA, Region III
1650 Arch Street

**SECTION D. Source Level Requirements**

Philadelphia, PA 19103-2029

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of a 300-mm web width, 2-color flexographic printing press (#1), Model No. L233/PPL, manufactured by Siat S.p.A. The flexographic press is rated at 500 ft/min line speed.

SECTION D. Source Level Requirements

Source ID: 105

Source Name: COATING LINE #2

Source Capacity/Throughput:

2.500 MMBTU/HR

2.380 MCF/HR

Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

The permittee shall ensure that emission into the outdoor atmosphere of PM from this coating line occurs in such a manner that the concentration of PM in the effluent gas does not exceed 0.04 gr/dscf.

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.51(c).]

Sampling and testing shall be performed in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 (relating to sampling and testing).

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this coating line:

- (a) The hours of operation, on a per-run and monthly basis.
- (b) The amount of natural gas consumed on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for this coating line:

- (a) The hours of operation, on a per-run and monthly basis.
- (b) The amount of natural gas consumed on a monthly basis.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.51(d)(3).]

The permittee shall maintain records sufficient to demonstrate that the as applied coatings used in this coating line do not contain any VOCs.

SECTION D. Source Level Requirements

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain this coating line in a manner consistent with good air pollution control practices. The practices shall include, but not be limited to, the following:

- (a) Good housekeeping procedures for the storage, use, and disposal of VOC containing materials.
- (b) Keeping VOC containing material containers closed when not in use.
- (c) Keeping all VOC containing material-laden shop towels in closed containers when not in use.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This coating line is subject to Subpart RR of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. In accordance with 40 C.F.R. § 60.4, copies of all requests, reports, applications, submittals, and other communications are required to be submitted to both the EPA and the Department. The EPA copies shall be forwarded to:

Director
Air Protection Division
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source is a coating line (#2) comprised of the following equipment:

- (a) An acrylic pigment application station.
- (b) An acrylic adhesive application station.
- (c) A natural gas-fired dryer rated at 2.5 mmBtu/hr heat input.

SECTION D. Source Level Requirements

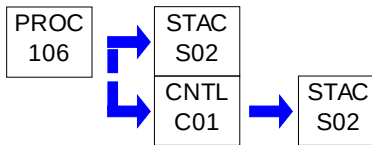
Source ID: 106

Source Name: COATING LINE #3

Source Capacity/Throughput:

23.000 Lbs/HR

SOLVENT



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

The permittee shall ensure that emission into the outdoor atmosphere of PM from this coating line occurs in such a manner that the concentration of PM in the effluent gas does not exceed 0.04 gr/dscf.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that emission into the outdoor atmosphere of VOCs from this coating line and the associated catalytic oxidizer (Source ID C01) occurs in such a manner that the rate of the emission does not exceed 4.0 tons/yr, calculated monthly as a 12-month rolling sum.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 60.442(a)(1).]

The permittee shall ensure that emission into the outdoor atmosphere of VOCs from this coating line occurs in such a manner that the rate of the emission does not exceed 0.20 lbs/lb of coating solids applied, calculated as specified in Condition # 012, Section D (under Source ID 106), of this permit.

II. TESTING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 60.446(a).]

The permittee shall certify the VOC content (lbs/gal of coating solids) of each as applied coating used in this coating line through either CPDS or testing using EPA Method 24/24A, as follows:

(a) When a CPDS is used to certify the VOC content, there is no need to perform testing if the supplier used EPA Method 24/24A as a basis for the CPDS.

(b) Except as specified in (a), above, each as applied coating used in this coating line in a given calendar year shall be tested, using EPA Method 24/24A, within that same calendar year. The coating sample shall be a 1-liter sample taken into a 1-liter container at a point where the sample is representative of the coating applied to the web substrate.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this coating line:

(a) The hours of operation, on a per-run and monthly basis.

(b) The amount of each as supplied coating material used on a per-run and monthly basis.

SECTION D. Source Level Requirements

- (c) The amount of each as applied coating used on a per-run, monthly, and 12-month rolling basis.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. §§ 60.445(a) and 60.446(a) and 25 Pa. Code § 129.52(c).]

(a) The permittee shall maintain records of the following operating parameters for this coating line:

(1) The hours of operation, on a per-run and monthly basis.

(2) The following for each as supplied coating material used:

(i) The coating material name and identification number.

(ii) The amount used (gallons) on a per-run and monthly basis.

(iii) The mix ratio.

(iv) The density (lbs/gal) or specific gravity.

(v) The weight percent of total volatiles, water, solids, and exempt solvents.

(vi) The volume percent of solids.

(vii) The VOC content (weight percent), obtained from one of the following:

(A) ACPDS.

(B) A MSDS. If the VOC content value is reported as a range, the upper bound of the range shall be considered the actual value.

(C) Testing in accordance with EPA Method 24/24A, as specified in 40 C.F.R. Part 60, Appendix A.

(D) An alternative method, as approved by the Department.

(viii) The HAP content (weight percent), calculated using a Department-approved method(s).

(3) The following for each as applied coating used, calculated using Department-approved methods:

(i) The amount used (pounds and gallons) on a per-run, monthly, and 12-month rolling basis.

(ii) The VOC content (weight percent and lbs/gal of coating solids).

(iii) The HAP content (weight percent and lbs/gal of coating solids).

(4) The VOC emissions (pounds or tons), on a monthly and 12-month rolling basis.

(5) The HAP emissions (pounds or tons), on a monthly and 12-month rolling basis.

(6) The weighted average VOC content (lbs/lb of coating solids) of all of the as applied coatings used, calculated as specified in Condition # 012, Section D (under Source ID 106), of this permit, on a monthly basis.

SECTION D. Source Level Requirements

(b) The records maintained in (a)(2)(i) - (vi) and (a)(3)(ii), above, shall be sufficient to demonstrate compliance with 25 Pa. Code § 129.52(c).

007 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain records of the following whenever the operation of this coating line occurs without the simultaneous operation of or control by the associated catalytic oxidizer (Source ID C01):

- (a) The starting and ending date(s) and time(s).
- (b) The cause(s).
- (c) The VOC emissions.
- (d) The HAP emissions.
- (e) Any corrective action(s) taken.

V. REPORTING REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 40 C.F.R. §§ 60.8(a) and 60.447.]

(a) The permittee shall submit a quarterly report to the EPA and the Department listing all occurrences of exceedances of the VOC emission restriction specified in Condition # 003, Section D (under Source ID 106), of this permit. If no exceedances occur during a particular quarter, the report shall state this and be submitted on a semi-annual basis.

(b) The reports shall be delivered or postmarked by the 30th day following the end of the reporting period, in accordance with (a), above.

VI. WORK PRACTICE REQUIREMENTS.**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall operate and maintain this coating line in a manner consistent with good air pollution control practices. The practices shall include, but not be limited to, the following:

- (a) Good housekeeping procedures for the storage, use, and disposal of VOC containing materials.
- (b) Keeping VOC containing material containers closed when not in use.
- (c) Keeping all VOC containing material-laden shop towels in closed containers when not in use.

010 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall ensure that this coating line is outfitted with an interlock system designed to automatically shut down the coating line in the occurrence of a malfunction of the associated catalytic oxidizer (Source ID C01).

011 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.52(b).]

Whenever the operation of this coating line occurs without the simultaneous operation of or control by the associated catalytic oxidizer (Source ID C01), the permittee shall maintain the VOC content of each as applied coating used in the coating line at or below 4.84 lbs/gal of coating solids.

SECTION D. Source Level Requirements

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 60.443(a) and (f).]

The permittee shall calculate the weighted average VOC content of all of the as applied coatings used, on a monthly basis, using the equation $VOC_{wavg} = \frac{\sum [W_i][M_i]}{\sum [W_{si}][M_i]}$, where:

VOC_{wavg} = The weighted average VOC content (lbs/lb of coating solids).

W_i = The weight percent of total volatiles of each as applied coating (i).

M_i = The amount (lbs) of each as applied coating (i).

W_{si} = The weight percent of solids of each as applied coating (i).

VII. ADDITIONAL REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This coating line is subject to Subpart RR of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. In accordance with 40 C.F.R. § 60.4, copies of all requests, reports, applications, submittals, and other communications are required to be submitted to both the EPA and the Department. The EPA copies shall be forwarded to:

Director
Air Protection Division
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) This source is a coating line (#3), model no. P-370, manufactured by G. Prandi & C., S.p.A, comprised of the following equipment:

- (1) A water-based primer application station.
- (2) A solvent-based release application station.
- (3) A dryer, which is indirectly heated by a hot water heater, as specified in (b)(6), Section G, of this permit.
- (4) A hot melt (adhesive) application station.
- (5) A flexographic print station.

(b) VOC emissions from (a)(2) & (a)(3), above, are routed, via a permanent total enclosure, to a catalytic oxidizer (Source ID C01) before exhausting into the outdoor atmosphere.

SECTION D. Source Level Requirements

Source ID: 107

Source Name: COATING LINE #4

Source Capacity/Throughput:

6.400 MMBTU/HR

6.100 MCF/HR

Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

The permittee shall ensure that emission into the outdoor atmosphere of PM from this coating line occurs in such a manner that the concentration of PM in the effluent gas does not exceed 0.04 gr/dscf.

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.51(c).]

Sampling and testing shall be performed in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 (relating to sampling and testing).

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this coating line:

- (a) The hours of operation, on a per-run and monthly basis.
- (b) The amount of natural gas consumed on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for this coating line:

- (a) The hours of operation, on a per-run and monthly basis.
- (b) The amount of natural gas consumed on a monthly basis.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.51(d)(3).]

The permittee shall maintain records sufficient to demonstrate that the as applied coatings used in this coating line do not contain any VOCs.

SECTION D. Source Level Requirements

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain this coating line in a manner consistent with good air pollution control practices. The practices shall include, but not be limited to, the following:

- (a) Good housekeeping procedures for the storage, use, and disposal of VOC containing materials.
- (b) Keeping VOC containing material containers closed when not in use.
- (c) Keeping all VOC containing material-laden shop towels in closed containers when not in use.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This coating line is subject to Subpart RR of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. In accordance with 40 C.F.R. § 60.4, copies of all requests, reports, applications, submittals, and other communications are required to be submitted to both the EPA and the Department. The EPA copies shall be forwarded to:

Director
Air Protection Division
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source is a coating line (#4), manufactured by Black Clawson Converting Machinery LLC, comprised of the following equipment:

- (a) An acrylic adhesive application station.
- (b) Four natural gas-fired dryers rated at 6.4 mmBtu/hr heat input (1.6 mmBtu/hr heat input each).

SECTION D. Source Level Requirements

Source ID: 110

Source Name: KIDDER FLEXOGRAPHIC PRESS (#2)

Source Capacity/Throughput:

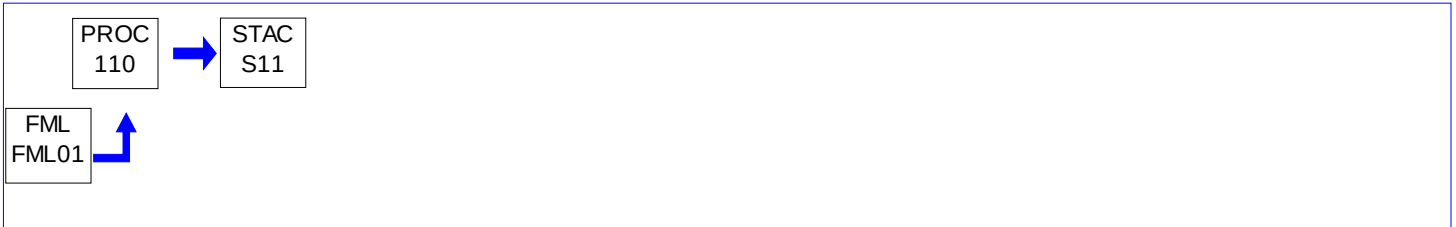
2.300 MMBTU/HR

1.900 Lbs/HR

SOLVENT

2.190 MCF/HR

Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

The permittee shall ensure that emission into the outdoor atmosphere of PM from this flexographic press occurs in such a manner that the concentration of PM in the effluent gas does not exceed 0.04 gr/dscf.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that emission into the outdoor atmosphere of VOCs from this flexographic press occurs in such a manner that the rate of the emission does not exceed 8.5 tons/yr, calculated monthly as a 12-month rolling sum.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.51(c).]

Sampling and testing shall be performed in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 (relating to sampling and testing).

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this flexographic press:

- The hours of operation on a per-run and monthly basis.
- The amount of each as supplied coating material used (gallons) on a per-run and monthly basis.
- The amount of each as applied coating used (pounds and gallons) on a per-run, monthly, and 12-month rolling basis.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. §§ 60.445(a) and (d) and 60.446(a) and 25 Pa. Code §§ 127.443(b) and 129.52(c).]

The permittee shall maintain records of the following operating parameters for this flexographic press:

SECTION D. Source Level Requirements

- (a) The hours of operation on a per-run and monthly basis.
- (b) The following for each as supplied coating material used:
 - (1) The amount used (gallons) on a per-run and monthly basis.
 - (2) The VOC content (weight percent), obtained from one of the following:
 - (i) ACPDS.
 - (ii) A MSDS. If the VOC content value is reported as a range, the upper bound of the range shall be considered the actual value.
 - (iii) Testing in accordance with EPA Method 24/24A, as specified in 40 C.F.R. Part 60, Appendix A.
 - (iv) An alternative method, as approved by the Department.
 - (3) The HAP content (weight percent), calculated using a Department-approved method(s).
- (c) The following for each as applied coating used, calculated using a Department-approved method(s):
 - (1) The amount used (pounds and gallons) on a per-run, monthly, and 12-month rolling basis.
 - (2) The VOC content (weight percent and lbs/gal of coating solids).
 - (3) The HAP content (weight percent and lbs/gal of coating solids).
 - (4) The VOC emissions (pounds or tons), on a monthly and 12-month rolling basis.
 - (5) The HAP emissions (pounds or tons), on a monthly and 12-month rolling basis.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall operate and maintain this flexographic press in a manner consistent with good air pollution control practices. The practices shall include, but not be limited to, the following:

- (a) Good housekeeping procedures for the storage, use, and disposal of VOC containing materials.
- (b) Keeping VOC containing material containers closed when not in use.
- (c) Keeping all VOC containing material-laden shop towels in closed containers when not in use.

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This flexographic press is subject to Subpart RR of the Standards of Performance for New Stationary Sources and shall

SECTION D. Source Level Requirements

comply with all applicable requirements of this Subpart. In accordance with 40 C.F.R. § 60.4, copies of all requests, reports, applications, submittals, and other communications are required to be submitted to both the EPA and the Department. The EPA copies shall be forwarded to:

Director
Air Protection Division
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of a 41-inch web width, 4-color flexographic printing press (#2) manufactured by Kidder. The flexographic printing press is rated at 650 ft/min line speed, and is equipped with two natural gas-fired belt dryers associated with the color stations, as follows:

Burner No.	Rated Heat Input	Color Station No(s).
1	1.5 mmBtu/hr	1, 2, 3
2	0.8 mmBtu/hr	4

	2.3 mmBtu/hr	

**SECTION D. Source Level Requirements**

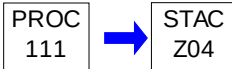
Source ID: 111

Source Name: COLD PARTS CLEANER

Source Capacity/Throughput:

N/A

SOLVENT NAPHTHA

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.**# 001 [25 Pa. Code §129.63]****Degreasing operations**

(a) For this cold parts cleaner, the permittee shall maintain records of the following information:

- (1) The name and address of the solvent supplier.
- (2) The type of solvent including the product or vendor identification number.
- (3) The vapor pressure of the solvent measured in mm Hg at 20 °C.

(b) An invoice, bill of sale, certificate that corresponds to the number of sales, CPDS, MSDS, or other appropriate documentation acceptable to the Department may be used to comply with (a), above.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 002 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall ensure that the freeboard ratio of this cold parts cleaner is maintained at a minimum of 0.50.

003 [25 Pa. Code §129.63]**Degreasing operations**

The permittee shall ensure that this cold parts cleaner is equipped with a cover that remains closed at all times except during cleaning of parts or the addition or removal of solvent.

004 [25 Pa. Code §129.63]**Degreasing operations**

The permittee shall ensure that this cold parts cleaner is operated in accordance with the following procedures:

SECTION D. Source Level Requirements

- (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 parts cleaner. 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 the parts cleaner.
- (d) Air-agitated solvent baths may not be used.
- (e) Spills during solvent transfer and use of the parts cleaner shall be cleaned up immediately.

005 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall ensure that this cold parts cleaner has a permanent, conspicuous label summarizing the operating requirements indicated in Condition # 004, Section D (under Source ID 111), of this permit. 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 draining. During the draining, tipping, or rotating, the parts should be positioned so that solvent drains directly back to the parts cleaner.
- (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 openings of the parts cleaner.

006 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall not use any solvent in this cold parts cleaner that has a vapor pressure equal to or greater than 1.0 mm Hg and a VOC content greater than 5%, by weight, measured at 20 °C (68 °F).

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of an immersion-type cold parts cleaner, Model No. 1634, manufactured by Heritage-Crystal Clean, LLC. The cold parts cleaner uses solvent naphtha as the solvent, and has a solvent capacity of 30 gal.

SECTION D. Source Level Requirements

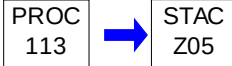
Source ID: 113

Source Name: CLEANUP OPERATIONS

Source Capacity/Throughput:

N/A

MEK, N-PROPANOL



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.51(c).]

Sampling and testing shall be performed in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 (relating to sampling and testing).

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of each solvent used (gallons) in these cleanup operations on a monthly and 12-month rolling basis.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for each solvent used in these cleanup operations:

- (a) The amount used (gallons) on a monthly and 12-month rolling basis.
- (b) The VOC content (weight percent), obtained from one of the following:
 - (1) ACPDS.
 - (2) A MSDS. If the VOC content value is reported as a range, the upper bound of the range shall be considered the actual value.
 - (3) Testing in accordance with EPA Method 24/24A, as specified in 40 C.F.R. Part 60, Appendix A.
 - (4) An alternative method, as approved by the Department.
- (c) The HAP content (weight percent).
- (d) The VOC emissions (pounds or tons), on a monthly and 12-month rolling basis, calculated using a Department-approved method(s).
- (e) The HAP emissions (pounds or tons), on a monthly and 12-month rolling basis, calculated using a Department-approved method(s).

SECTION D. Source Level Requirements**V. REPORTING REQUIREMENTS.**

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

VI. WORK PRACTICE REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall conduct these cleanup operations in a manner consistent with good air pollution control practices. The practices shall include, but not be limited to, the following:

- (a) Good housekeeping procedures for the storage, use, and disposal of solvents.
- (b) Keeping solvent containers closed when not in use.
- (c) Keeping all solvent-laden shop towels in closed containers when not in use.

005 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall calculate the VOC and HAP emissions from these cleanup operations, using a Department-approved method(s), on a monthly and 12-month rolling basis.

VII. ADDITIONAL REQUIREMENTS.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source grouping consists of the cleanup operations conducted throughout the facility. MEK and n-propanol are the solvents used in the cleanup operations.

SECTION D. Source Level Requirements

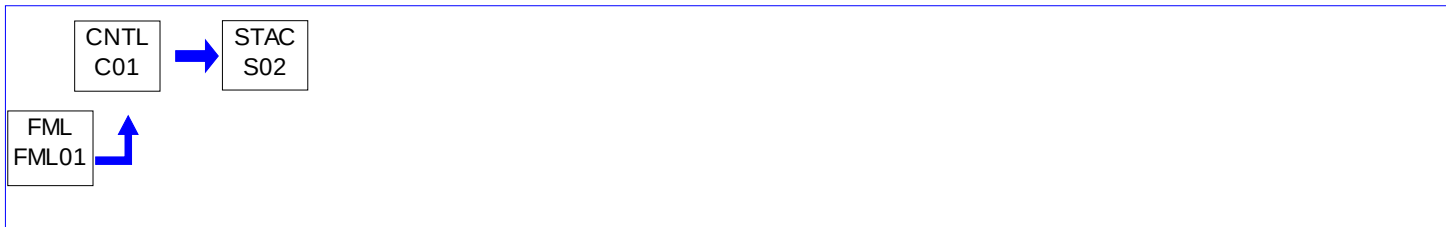
Source ID: C01

Source Name: CATALYTIC OXIDIZER

Source Capacity/Throughput:

950.000 CF/HR

Natural Gas



I. RESTRICTIONS.

Control Device Efficiencies Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that this catalytic oxidizer achieves 100% capture of the exhaust gas flow from the release application station of coating line #3 (Source ID 106), with a minimum VOC destruction efficiency of 98.6%.

[Compliance with this streamlined permit condition assures compliance with 40 C.F.R. § 60.445(g) and 25 Pa. Code § 129.52(b)(2).]

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.443(b).]

The permittee shall ensure that the total air flow to this catalytic oxidizer does not exceed 2,345 scfm at any time, unless an alternative air flow rate is approved by the Department.

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Between stack tests, the permittee shall perform testing on this catalytic oxidizer and/or sampling of the catalyst, using methods and in time frames approved by the Department, to assure that the catalyst has not been poisoned or become deteriorated.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) At least 12 months prior to the expiration date of this permit, or if the catalyst is replaced, the permittee shall perform a VOC emission stack test for this catalytic oxidizer, in accordance with the provisions of 40 C.F.R. §§ 60.444(c) and 60.446(b) and 25 Pa. Code Chapter 139. The test shall be conducted at the inlet and outlet of the catalytic oxidizer to demonstrate compliance with the VOC destruction efficiency restriction specified in Condition # 001, Section D (under Source ID C01), of this permit. During the test, the release application station of coating line #3 (Source ID 106) shall be operated at its rated capacity (to the extent possible), such that the test results are representative of normal operations.

(b) At least 60 days prior to the test, the company shall submit, to the Department for approval, the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples. A test protocol shall be approved by the Source Testing Section of the Department prior to the test.

(c) At least thirty (30) days prior to the test, the Regional Air Quality Manager shall be informed of the date(s) and time(s) of the test.

(d) Within 60 days after the source test, but no later than 6 months prior to this permit expiration, two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(e) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in

SECTION D. Source Level Requirements

writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following operating parameters for this catalytic oxidizer, when operating:

- (a) The inlet temperature, on a continuous basis.
- (b) The outlet temperature, on a continuous basis.
- (c) The exhaust gas flow from coating line #3 (Source ID 106), at least once per eight (8)-hour shift.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of natural gas consumed by this catalytic oxidizer on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following operating parameters for this catalytic oxidizer, when operating:

- (a) The inlet temperature, on a continuous basis.
- (b) The outlet temperature, on a continuous basis.
- (c) The exhaust gas flow from coating line #3 (Source ID 106), at least once per 8-hour shift.
- (d) Record of date of catalyst testing, results of catalyst testing and date of catalyst replacement.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the amount of natural gas consumed by this catalytic oxidizer on a monthly basis.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of all inspections, repairs, and maintenance performed on the monitoring equipment of this catalytic oxidizer.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that this catalytic oxidizer is operated at a minimum inlet temperature of 630 °F.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall not operate the release application station of coating line #3, as indicated in Condition # 011, Section D

SECTION D. Source Level Requirements

(under Source ID 106), of this permit, unless this catalytic oxidizer is operating in compliance with the capture efficiency restriction specified in Condition # 001, Section D (under Source ID C01), of this permit, and Conditions # 002 and 010, Section D (under Source ID C01), of this permit.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 C.F.R. § 60.445(f).]

(a) The permittee shall operate and maintain the following monitoring equipment for this catalytic oxidizer:

(1) A temperature monitoring device that continuously indicates and records the gas temperature prior to and following the catalyst bed.

(2) A differential pressure gauge to continuously indicate the velocity of the exhaust gas flow from coating line #3 (Source ID 106) to the catalytic oxidizer.

(b) Alternative equipment or method(s) may be used, if approved by the Department.

VII. ADDITIONAL REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This source consists of a low-temperature catalytic oxidizer, Model No. HTT2FM-HR-CAT, manufactured by HiTemp Technology Corp. The catalytic oxidizer is rated at 1.0 mmBtu/hr heat input and 2,345 scfm total air flow, and controls VOC emissions from the release application station of coating line #3 (Source ID 106), as indicated in Condition # 012(a)(2), Section D (under Source ID 106), of this permit.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This catalytic oxidizer is subject to Subpart RR of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. In accordance with 40 C.F.R. § 60.4, copies of all requests, reports, applications, submittals, and other communications are required to be submitted to both the EPA and the Department. The EPA copies shall be forwarded to:

Director
Air Protection Division
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029



SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

SECTION F. Emission Restriction Summary.

Source Id	Source Description		
101	SIAT FLEXOGRAPHIC PRESS (#1)		
Emission Limit		Pollutant	
4.400	Tons/Yr	12-Month Rolling Sum, Calculated Monthly	VOC
105	COATING LINE #2		
Emission Limit		Pollutant	
0.040	gr/DRY FT3		TSP
106	COATING LINE #3		
Emission Limit		Pollutant	
0.040	gr/DRY FT3		TSP
0.200	Lbs/Lbs		VOC
4.000	Tons/Yr	12-Month Rolling Sum, Calculated Monthly; Also Includes VOCs From the Associated Catalytic Oxidizer (Source ID C01)	VOC
107	COATING LINE #4		
Emission Limit		Pollutant	
0.040	gr/DRY FT3		TSP
110	KIDDER FLEXOGRAPHIC PRESS (#2)		
Emission Limit		Pollutant	
0.040	gr/DRY FT3		TSP
8.500	Tons/Yr	12-Month Rolling Sum, Calculated Monthly	VOC

Site Emission Restriction Summary

Emission Limit		Pollutant	
24.900	Tons/Yr	12-Month Rolling Sum, Calculated Monthly	VOC

SECTION G. Miscellaneous.

(a) The following previously-issued documents serve as the basis for certain terms and conditions set forth in this permit:

- (1) RFD No. 09-A01-494.
- (2) RFD No. 09-A01-503.
- (3) RFD No. 09-A01-536.
- (4) RFD No. 09-A01-554.
- (5) RFD No. 09-A01-555.
- (6) Plan Approval No. 09-0046A.
- (7) Operating Permit No. OP-09-0046.
- (8) Title V Operating Permit No. 09-00046.

(b) The following sources have been determined by the Department to be insignificant sources of air emissions and, therefore, do not require additional limitations, monitoring, or recordkeeping. They are still subject to any applicable federal, state, and local laws and regulations, including those indicated in Section C (Site Level Requirements), of this permit:

(1) Thirteen natural gas-fired space heaters (some of which formerly comprised Source ID 031), as follows:

Manufacturer	Model No.	Rated Heat Input	Quantity
Modine Mfg. Co. Reznor	PDP400AE0130	450 mBtu/hr	6
	XB-300	300 mBtu/hr	7
		----- 4.5 mmBtu/hr	----- 13

(2) Two 325-gal vertical mix tanks manufactured by G. Prandi & C., S.p.A (formerly Source IDs 102 and 103). The mix tanks are associated with coating line 3 (Source ID 106).

(3) A natural gas-fired hot melt boiler, Model No. DTV 600, manufactured by Therma (formerly Source ID 104). The boiler is rated at 2.4 mmBtu/hr heat input, and is used to heat the jackets of the acrylic (hot melt) adhesive storage tanks of (b)(9), below.

(4) A 2.5-inch diameter single screw extruder manufactured by Davis-Standard, LLC (formerly part of Source ID 108).

(5) Four resin storage silos associated with (b)(4), above (formerly part of Source ID 108).

(6) A natural gas-fired hot water heater, Model Type Mini-Therm, manufactured by Teledyne Laars (formerly Source ID 109). The hot water heater is rated at 1.0 mmBtu/hr heat input, and is used to provide indirect heat for the dryer of coating line #3 (Source ID 106).

(7) Eight slitters (#5 and #7 - #13).

(8) A cold parts cleaner associated with the Siat flexographic press (#1) (Source ID 101). The cold parts cleaner uses isopropyl alcohol as the solvent, and has a solvent capacity of <2 gal.

(9) Storage tanks for acrylic (hot melt) adhesives and non-volatile processing oils.

(10) A chemical test laboratory (for quality control/assurance and research and development activities).

(11) Repair or maintenance shop activities (i.e., lathes, bench grinders, drill presses, etc.).

(12) Air conditioning units.

(13) Office equipment (i.e., copiers, fax machines, computers, printers, etc.).

SECTION G. Miscellaneous.

(14) Janitorial and cleaning supplies.

(15) Different types of portable fire extinguishers.

(16) Plant maintenance and upkeep equipment (i.e., power floor scrubber, touch-up spray painting, etc.).

(c) This permit is a renewal of Title V Operating Permit No. 09-00046, originally issued on January 8, 2001 (APS ID 346457, Auth ID 355263), and previously modified on May 28, 2004 (APS ID 346457, Auth ID 520343), and amended on March 30, 2005 (APS ID 346457, Auth ID 582966). The following is a listing of the changes reflected in this permit (APS ID 346457, Auth ID 720238):

(1) The permit status has been changed from Title V to State Only (Synthetic Minor).

(2) The phrase "d/b/a TaraTape" has been added to the owner name.

(3) The following sources and emission points, along with corresponding source capacity and throughput listings, permit maps, conditions, and emission restrictions, have been removed from Sections A (Site Inventory List), D (Source Level Requirements), and F (Emission Restriction Summary), of this permit, where applicable (the sources have been added as (b)(1) - (6), above):

Source ID	Source Name
031	Space Heaters (7)
102	North Mix Tank
103	South Mix Tank
104	Hot Melt Boiler
108	Extruder
109	Hot Water Heater for Storage Cabinet
S03	North Mix Tank Stack
S04	South Mix Tank Stack
S05	Hot Melt Boiler Stack
S09	Extruder Stack
S10	Hot Water Heater for Stor(age Cabinet Stack)
Z01	Fugitive Emissions

(4) Manufacturer names have been added to the source names of Source IDs 101 and 110.

(5) The term "operation" has been removed from the source names of Source IDs 105 - 107 (for consistency with the definition in 40 C.F.R. § 60.441).

(6) Source capacity (i.e., rated heat input) listings for Source IDs 105 - 107 have been added to Sections A (Site Inventory List) and D, of this permit.

(7) Natural gas throughput listings for Source IDs 106 and C01 have been added to Sections A (Site Inventory List) and D, of this permit.

(8) The following source, source grouping, and emission points, along with corresponding source throughput listings, permit maps, and conditions, have been added to Sections A (Site Inventory List) and D, of this permit, where applicable:

Source ID	Source Name
111	Cold Parts Cleaner
113	Cleanup Operations
Z04	Cold Parts Cleaner Fugitive Emissions
Z05	Cleanup Operations Fugitive Emissions

(9) The VOC throughput listing for Source ID C01 has been removed (listing not intended to represent emissions).

(10) A fuel material location for natural gas has been added to this permit, as follows:

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(i) As Source ID FML01 in Section A (Site Inventory List), of this permit.

(ii) To the permit maps for Source IDs 105, 107, 110, and C01.

(11) The emission points associated with Source IDs 101 and 110 have been changed in Section A (Site Inventory List), of this permit, as follows:

Old Source ID	Old Source Name	New Source ID	New Source Name
S01	Flexographic Printing Press #1 Stack	Z03	Siat Flexographic Press (#1) Fugitive
Emissions			
Z10	Fugitive Emissions	S11	Kidder Flexographic Press (#2) Stack

(12) The term "coating line" has replaced the following:

(i) The term "hot melt coater" in the source name for Source ID S02.

(ii) The term "coater" in the source name for Source IDs S06 - S08.

(13) All occurrences of the term "Title V" in the previously-amended permit have either been removed or replaced with the term "State Only."

(14) The citation for Condition # 002, Section B, of the previously-amended permit (Condition # 021, Section B, of this permit), has been changed from 25 Pa. Code § 127.512(c)(4) to 25 Pa. Code § 127.441(a).

(15) The following for Condition # 003, Section B, of the previously-amended permit (Condition # 002, Section B, of this permit):

(i) The citation has been changed from 25 Pa. Code § 127.446(a) and (c) to 25 Pa. Code § 127.446.

(ii) The condition title has been changed from "Permit Expiration" to "Operating Permit Duration."

(16) The following for Condition # 004, Section B, of the previously-amended permit (Condition # 003, Section B, of this permit):

(i) The following citations have been changed:

(A) 25 Pa. Code § 127.446(e) to 25 Pa. Code § 127.446.

(B) 25 Pa. Code § 127.503 to 25 Pa. Code § 127.703(b) and (c).

(ii) A renewal application fee schedule has been added as Sub-condition (c)(1) - (2).

(iii) A requirement to submit to the Department supplemental compliance review forms has been added as Sub-condition (e).

(17) An application and annual administrative fee schedule has been added as Condition # 004, Section B, of this permit.

(18) The following for Condition # 005, Section B, of the previously-amended permit (same condition in this permit):

(i) The citation for 25 Pa. Code § 127.464(a) has been changed to 25 Pa. Code § 127.464.

(ii) The condition title has been changed from "Transfer of Ownership or Operational Control" to "Transfer of Operating Permits."

(iii) Sub-conditions (a) and (b) have been switched.

(iv) A statement that this permit is only valid for the sources and locations specified within has been added as Sub-condition (c).

(19) The following for Condition # 006, Section B, of the previously-amended permit (same condition in this permit):

(i) The citation for 25 Pa. Code § 127.513 has been changed to 25 Pa. Code § 127.441.

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- (ii) The citation for § 114 of the Clean Air Act (CAA) has been removed.
- (20) The following for Condition # 007, Section B, of the previously-amended permit (same condition in this permit):
 - (i) The citation for 25 Pa. Code § 127.25 has been removed.
 - (ii) The citation for 25 Pa. Code § 127.512(c)(1) has been changed to 25 Pa. Code § 127.441.
- (21) The citation for Condition # 008, Section B, of the previously-amended permit (same condition in this permit), has been changed from 25 Pa. Code § 127.512(c) to 25 Pa. Code § 127.441.
- (22) The following for Condition # 009, Section B, of the previously-amended permit (same condition in this permit):
 - (i) The citation for 25 Pa. Code § 127.411(d) has been removed.
 - (ii) The citation for 25 Pa. Code § 127.512(c)(5) has been changed to 25 Pa. Code § 127.461.
 - (iii) The citation for 25 Pa. Code § 127.442(a) has been added.
 - (iv) A requirement to submit to the Department reports relative to the operation and maintenance of the sources at the facility has been added as Sub-condition (a).
 - (v) Sub-condition (a) has been moved to Sub-condition (b).
 - (vi) Sub-condition (b) has been removed.
- (23) Conditions # 010, 011, 016, 023, 024, 027, and 028, Section B, of the previously-amended permit, have been removed.
- (24) A listing of reasons that this permit may be terminated, modified, suspended, or revoked has been added as Condition # 010, Section B, of this permit.
- (25) The following for Conditions # 012 - 014, Section B, of the previously-amended permit:
 - (i) They have been consolidated into Condition # 011, Section B, of this permit.
 - (ii) The citations for 25 Pa. Code §§ 121.1 and 127.541 have been removed.
- (26) The citation for Condition # 015, Section B, of the previously-amended permit (Condition # 012, Section B, of this permit), has been changed from 25 Pa. Code § 127.512(b) to 25 Pa. Code § 127.441.
- (27) A requirement to comply with any health risk-based emission standards or operating practice requirements imposed by the Department has been added as Condition # 016, Section B, of this permit.
- (28) The following for Condition # 017, Section B, of the previously-amended permit (Condition # 013, Section B, of this permit):
 - (i) The citation for 25 Pa. Code § 127.14(b) has been removed.
 - (ii) The reference to 25 Pa. Code § 127.14(b) has been removed from Sub-condition (a).
 - (iii) Sub-conditions (d)(4) and (e) have been removed.
- (29) The citation for and reference to 25 Pa. Code § 127.215 has been removed from Condition # 018, Section B, of the previously-amended permit (Condition # 015, Section B, of this permit).
- (30) The following for Condition # 019, Section B, of the previously-amended permit (Condition # 017, Section B, of this permit):
 - (i) The citation for 25 Pa. Code § 127.216 has been removed.
 - (ii) Sub-condition (a) has been removed.

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(31) The following for Condition # 020, Section B, of the previously-amended permit (Condition # 018, Section B, of this permit):

(i) The citation for 25 Pa. Code § 127.513(1) has been changed to 25 Pa. Code § 127.442.

(ii) The condition title has been changed from "Submissions" to "Reporting Requirements."

(iii) A requirement to comply with the applicable reporting requirements of the CAA, the Air Pollution Control Act, and 25 Pa. Code, Article III, has been added as Sub-condition (a).

(iv) Sub-condition (a) has been moved to Sub-condition (c).

(v) A requirement to submit to the Department reports relative to the operation and maintenance of the sources at the facility has been added as Sub-condition (b).

(vi) Sub-condition (b) has been removed.

(vii) The following for Sub-condition (c):

(A) It has been moved to Sub-condition (d).

(B) The term "compliance certification" has been removed.

(viii) A statement that any records submitted to the Department shall be made available to the public, except for those meeting certain confidentiality requirements, has been added as Sub-condition (e).

(32) The following for Condition # 021, Section B, of the previously-amended permit (Condition # 019, Section B, of this permit):

(i) The citations for 25 Pa. Code § 127.463(e) and Chapter 139 and §§ 114(a)(3) and 504(b) of the CAA have been removed.

(ii) A citation for 25 Pa. Code § 135.5 has been added.

(iii) The first sentence in Sub-condition (a) has been removed.

(33) The following for Condition # 022, Section B, of the previously-amended permit (Condition # 020, Section B, of this permit):

(i) The following citations have been changed:

(A) 25 Pa. Code § 127.511 to 25 Pa. Code § 127.441(c).

(B) 25 Pa. Code Chapter 135 to 25 Pa. Code § 135.5.

(ii) The condition title has been changed from "Recordkeeping Requirements" to "Recordkeeping."

(34) A statement that the permittee is authorized to make changes at the facility to implement any alternative operating scenarios identified in this permit has been added as Condition # 022, Section B, of this permit.

(35) Condition # 025(b), Section B, of the previously-amended permit, has been removed.

(36) The following for Condition # 026, Section B, of the previously-amended permit (Condition # 018, Section C, of this permit):

(i) The citation for 25 Pa. Code § 127.441(d) has been changed to 25 Pa. Code § 127.441.

(ii) The citations for 25 Pa. Code § 127.512(i) and 40 C.F.R. Part 68 have been removed.

(iii) The condition title has been changed from "Risk Management" to "Operating permit terms and conditions."

(iv) Sub-condition (f)(2) has been removed.

(37) Condition # 002(g), Section C, of the previously-amended permit, has been removed.

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(38) The term "air contaminant" has been added after the terms "fugitive" and "visible" in Conditions # 002(g), 006, 010, and 011(a) - (b), Section C, of this permit, where applicable.

(39) An additional authority citation to 25 Pa. Code § 127.443(b) has been added to each condition in this permit that is based on a condition found in (a)(6) - (7), above.

(40) Condition # 009, Section C, of the previously-amended permit, has been removed, except that the applicable requirements of 25 Pa. Code § 129.52 have been incorporated into or moved to Section D, of this permit, as follows:

- (i) Condition # 004, Section D (under Source ID 101), of this permit.
- (ii) Conditions # 006 and 010, Section D (under Source ID 106), of this permit.
- (iii) Condition # 005, Section D (under Source ID 110), of this permit.

(41) Condition # 010, Section C, of the previously-amended permit, has been removed, except that the applicability of 40 C.F.R. 60, Subpart RR, has been indicated in Section D, of this permit, as follows:

- (i) Condition # 007 (under Source ID 101), of this permit.
- (ii) Condition # 008 (under Source IDs 105, 107, and 110), of this permit.
- (iii) Condition # 014 (under Source ID 106), of this permit.
- (iv) Condition # 012 (under Source ID C01), of this permit.

(42) Condition # 011, Section C, of the previously-amended permit, has been removed, except that the requirement specified in Sub-condition (a)(1) for 40 C.F.R. § 60.442(a)(1) has been moved to Condition # 003, Section D (under Source ID 106), of this permit.

(43) Conditions # 012, 020, 022, and 029, Section C, of the previously-amended permit, have been removed.

(44) The following for Condition # 015, Section C, of the previously-amended permit (Condition # 011, Section C, of this permit):

- (i) The additional authority citation to 25 Pa. Code § 127.511 has been removed.
- (ii) The terms "particulate" and "particulate matter" have been removed from Sub-conditions (a) - (b).
- (iii) The language has been revised to specify that any fugitive air contaminant emissions that originate on-site are required to comply with Sub-condition (b)(1) - (3), not only those that originate on-site and cross the property line.
- (iv) The phrase "the compliance certification and the semi-annual report of monitoring and record keeping" has been removed from Sub-condition (e).

(45) Condition # 016, Section C, of the previously-amended permit, has been moved to Condition # 019(a), Section B, of this permit.

(46) Condition # 017, Section C, of the previously-amended permit, has been removed, except that the requirements specified in Sub-conditions (a) - (c) for 40 C.F.R. § 60.445(a), (d), and (f), respectively, have been incorporated into Section D, of this permit, where applicable, as follows:

- (i) Condition # 004, Section D (under Source ID 101), of this permit.
- (ii) Condition # 006, Section D (under Source ID 106), of this permit.
- (iii) Condition # 005, Section D (under Source ID 110), of this permit.
- (iv) Condition # 008, Section D (under Source ID C01), of this permit.

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(47) The following for Condition # 019, Section C, of the previously-amended permit (Condition # 012, Section C, of this permit):

(i) The citation has been changed from 25 Pa. Code § 127.511 to 25 Pa. Code § 127.441.

(ii) Requirements to maintain records of a description(s) and the location(s) of any deviation(s) have been added as/under Sub-conditions (a)(1) - (2), respectively.

(iii) A requirement that the monitoring of deviations be recorded and maintained in a Department-approved format and time frame has been added as Sub-condition (b).

(48) A requirement to maintain and make available, upon request by the Department, all records, reports, and analysis results used to comply with this permit has been added as Condition # 013, Section C, of this permit.

(49) A requirement to maintain records of the VOC and HAP emissions from the facility on a monthly and 12-month rolling basis has been added as Condition # 015, Section C, of this permit.

(50) A requirement to submit to the Department, for approval, all newly-proposed recordkeeping formats within 60 days after permit issuance has been added as Condition # 016, Section C, of this permit.

(51) Requirements to maintain records of the affected source(s) and/or associated air pollution control device(s) and their location(s), as well as the cause(s) of, any malfunction(s) at the facility, have been added as Condition # 017(c)(2) and (4), Section C, of this permit, respectively.

(52) The phrases "who has been previously advised by the Department to submit a source report" and "including any source(s) listed in Section G, of this permit" have been added to the beginning (after the term "the permittee") and end, respectively, of Condition # 023(a), of the previously-amended permit (Condition # 019(a), Section C, of this permit).

(53) Condition # 024, Section C, of the previously-amended permit, has been removed, except that the requirements specified in Sub-conditions (a) and (b) for 40 C.F.R. § 60.447(a) and (b), respectively, have been incorporated into Condition # 008(b) and (a), Section D (under Source ID 106), of this permit, respectively.

(54) A requirement that source reports be submitted in a format specified by the Department and contain sufficient information to enable the Department to complete its emission inventory has been added as Condition # 020, Section C, of this permit.

(55) A requirement to take all reasonable actions to prevent PM from any source specified in Condition # 002, Section C, of this permit, from becoming airborne has been added as Condition # 021, Section C, of this permit.

(56) A requirement to calculate the VOC and HAP emissions from the facility on a monthly and 12-month rolling basis has been added as Condition # 022, Section C, of this permit.

(57) The following for Condition # 025, Section C, of the previously-amended permit (Condition # 023, Section C, of this permit):

(i) The condition referenced in Sub-condition (a) has been changed from Condition # 017(b), Section B, to Condition # 013(b), Section B.

(ii) Sub-condition (b) has been removed.

(58) The second paragraph of Condition # 026, Section C, of the previously-amended permit, has been removed, except that the requirement to practice good housekeeping procedures for coating materials has been incorporated into Section D, of this permit, as follows:

(i) Condition # 005(a), Section D (under Source ID 101), of this permit.

(ii) Condition # 006(a), Section D (under Source IDs 105, 107, and 110), of this permit.

(iii) Condition # 012(a), Section D (under Source ID 106), of this permit.

(iv) Condition # 004(a), Section D (under Source ID 113), of this permit.

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(59) Condition # 028, Section C, of the previously-amended permit, has been removed, except that the third paragraph has been incorporated into Condition # 004(b), Section D (under Source ID 106), of this permit.

(60) Condition # 030(a) - (b), Section C, of the previously-amended permit, has been moved, to Section D, of this permit, as follows:

- (i) Condition # 005(b) - (c), Section D (under Source ID 101), of this permit.
- (ii) Condition # 006(b) - (c), Section D (under Source IDs 105, 107, and 110), of this permit.
- (iii) Condition # 012(b) - (c), Section D (under Source ID 106), of this permit.
- (iv) Condition # 004(b) - (c), Section D (under Source ID 113), of this permit.

(61) Condition # 031, Section C, of the previously-amended permit, has been removed, except that the requirements specified in Sub-condition (a)(2) for 40 C.F.R. § 60.443(a)(2) have been moved to Condition # 011, Section D (under Source ID 106), of this permit.

(62) Condition # 032, Section C, of the previously-amended permit, has been removed, except that the requirements specified in Sub-condition (a) for 40 C.F.R. § 60.446(a) have been incorporated into Section D, of this permit, as follows:

- (i) Condition # 004(b)(2)(i) - (iii) and (c)(2), Section D (under Source ID 101), of this permit.
- (ii) Conditions # 004(a) - (b) and 006(a)(2)(vii)(A) - (C), (a)(3)(ii) and (a)(4), Section D (under Source ID 106), of this permit.
- (iii) Condition # 005(b)(2)(i) - (iii) and (c)(2), Section D (under Source ID 110), of this permit.

(63) The starting date and frequency for when to submit compliance certifications has been removed from Sub-section VIII (Compliance Certification), Section C, of this permit.

(64) A compliance schedule with requirements to perform a stack test for the catalytic oxidizer (Source ID C01) and submit two copies of the complete test report for the stack test to the Regional Air Quality Manager for approval have been added as Conditions # 026 - 027, Section C, of this permit, respectively.

(65) Condition # 001, Section D (under Source ID 101), of the previously-amended permit, has been removed.

(66) Conditions # 003, 006, and 008, Section D (under Source IDs 101 and 110), of the previously-amended permit, have been removed.

(67) A requirement to perform sampling and testing in accordance with the procedures and test methods specified in 25 Pa. Code Chapter 139 has been added to Section D, of this permit, as follows:

- (i) Condition # 002, Section D (under Source IDs 101, 105, and 107), of this permit.
- (ii) Condition # 003, Section D (under Source ID 110), of this permit.
- (iii) Condition # 001, Section D (under Source ID 113), of this permit.

(68) Conditions # 004(2) and 007(2), Section D (under Source ID 101), of the previously-amended permit, have been incorporated into Conditions # 002 and 003(a), Section D (under Source ID 113), of this permit, respectively.

(69) Requirements to monitor and maintain records of the amount of as applied coating used have been added to Section D, of this permit, as follows:

- (i) Conditions # 003(c) and 004(c)(1), Section D (under Source ID 101), of this permit, respectively.
- (ii) Conditions # 005(c) and 006(a)(3)(i), Section D (under Source ID 106), of this permit, respectively.
- (iii) Conditions # 004(c) and 005(c)(1), Section D (under Source ID 110), of this permit, respectively.

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(70) A requirement to maintain records of the HAP emissions on a monthly and 12-month rolling basis has been added to Section D, of this permit, as follows:

- (i) Condition # 004(c)(5), Section D (under Source ID 101), of this permit.
- (ii) Condition # 005(c)(5), Section D (under Source ID 110), of this permit.

(71) Source descriptions have been added to Section D, of this permit, as follows:

- (i) Condition # 006 (under Source ID 101), of this permit.
- (ii) Condition # 007 (under Source IDs 105, 107, and 110), of this permit.
- (iii) Condition # 013 (under Source ID 106), of this permit.
- (iv) Condition # 011 (under Source ID C01), of this permit.

(72) Condition # 002, Section D (under Source IDs 105 - 107), of the previously-amended permit, has been removed.

(73) The following for Conditions # 003 and 004, Section D (under Source IDs 105 and 107), of the previously-amended permit (same conditions in this permit):

- (i) The frequency of monitoring and recordkeeping in Sub-condition (a) has been changed from daily to per run and monthly.
- (ii) The frequency of monitoring and recordkeeping in Sub-condition (b) has been changed from average daily to monthly.
- (iii) Sub-condition (c) has been removed.

(74) Condition # 005, Section D (under Source IDs 105 and 107), of the previously-amended permit, has been removed.

(75) The following for Condition # 003, Section D (under Source ID 106), of the previously-amended permit:

- (i) The VOC destruction efficiency restriction specified in Sub-condition (b) has been moved to Condition # 001, Section D (under Source ID C01), of this permit.
- (ii) Sub-condition (c) has been removed.

(76) A requirement to certify the VOC content of each as applied coating used in coating line #3 through either CPDS or testing using EPA Method 24/24A has been added as Condition # 004, Section D (under Source ID 106), of this permit.

(77) Requirements to monitor and maintain records of the hours of operation and amounts of each as supplied coating material and as applied coating used on a per-run, monthly, and 12-month rolling basis, where applicable, have been added as Conditions # 005 (a) - (c) and 006(a)(1), (a)(2)(ii), and (a)(3)(i), Section D (under Source ID 106), of this permit, respectively.

(78) The following for Condition # 004, Section D (under Source ID 106), of the previously-amended permit:

- (i) Sub-condition (a) has been moved to Condition # 006(a), Section D (under Source ID C01), of this permit.
- (ii) Sub-condition (b) has been moved to Condition # 006(e), Section D (under Source ID C01), of this permit.
- (iii) Sub-conditions (c), (e), and (f) have been removed.
- (iv) Sub-condition (d) has been moved to Condition # 007(a) - (b), Section D (under Source ID 106), of this permit.

(79) A requirement to maintain records of the records required under 25 Pa. Code § 129.52(c) has been added as Condition # 006(a)(2)(i) - (vi) and (a)(3)(ii), Section D (under Source ID 106), of this permit.

(80) Requirements to maintain records of the HAP content of each as supplied coating material and as applied coating used have been added as Condition # 006(a)(2)(vii) and (a)(3)(iii), Section D (under Source ID 106), of this permit, respectively.

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(81) Requirements to maintain records of the VOC and HAP emissions on a monthly and 12-month rolling basis have been added as Condition # 006(a)(3)(iv) and (v), Section D (under Source ID 106), of this permit, respectively.

(82) A requirement to maintain records of the weighted average VOC content of all of the as applied coatings used, on a monthly basis, has been added as Condition # 006(a)(4), Section D (under Source ID 106), of this permit.

(83) A statement that the records maintained in Condition # 006(a)(2)(i) - (vii) and (a)(3)(ii), Section D (under Source ID 106), of this permit, shall be sufficient to demonstrate compliance with 25 Pa. Code § 129.52(c) has been added as Condition # 006(b), Section D (under Source ID 106), of this permit.

(84) Requirements to maintain records of the emissions from and any corrective action(s) taken for coating line #3 whenever operation occurs without the simultaneous operation of or control by the associated catalytic oxidizer (Source ID C01) have been added as Condition # 007(c) and (d), Section D (under Source ID 106), of this permit, respectively.

(85) A requirement to submit a quarterly (or semi-annual) report to the EPA and the Department listing all occurrences of exceedances of the VOC emission restriction specified in Condition # 003, Section D (under Source ID 106), of this permit, has been added as Condition # 008(a), Section D (under Source ID 106), of this permit.

(86) A requirement that the reports required in (c)(85), above, be delivered or postmarked by the 30th day following the end of the reporting period, has been added as Condition # 008(b), Section D (under Source ID 106), of this permit.

(87) The following for Condition # 005, Section D (under Source ID 106), of the previously-amended permit:

(i) Sub-conditions (a) and (c) have been removed.

(ii) Sub-condition (b) has been moved to Condition # 002, Section D (under Source ID C01), of this permit.

(iii) The following for Sub-condition (d):

(A) It has been moved to Condition # 010, Section D (under Source ID C01), of this permit.

(B) The minimum inlet temperature has been changed from 550 °F to 630 °F.

(iv) Sub-condition (e) has been moved to Condition # 009, Section D (under Source ID 106), of this permit.

(88) A requirement to maintain the VOC content of each as applied coating used in coating line #3 at or below the value specified for paper coating in 25 Pa. Code § 129.52(b)(1), whenever operation occurs without the simultaneous operation of or control by the associated catalytic oxidizer (Source ID C01) has been added as Condition # 010, Section D (under Source ID 106), of this permit.

(89) A requirement for how to calculate the weighted average VOC content of all of the as applied coatings used, on a monthly basis, has been added as Condition # 011, Section D (under Source ID 106), of this permit.

(90) Condition # 006, Section D (under Source ID 106), of the previously-amended permit, has been moved to Condition # 013, Section D (under Source ID 106), of this permit.

(91) Condition # 001, Section D (under Source ID C01), of the previously-amended permit (Condition # 003, Section D (under Source ID C01), of this permit), has been modified to allow the permittee to use any Department-approved method to ensure that the catalyst has not been poisoned or become deteriorated.

(92) The following for Condition # 002, Section D (under Source ID C01), of the previously-amended permit (Condition # 004, Section D (under Source ID C01), of this permit):

(i) The following for Sub-condition (a):

(A) It has been modified such that VOCs are the only pollutant for which the permittee is required to perform a stack test.

(B) Requirements that the stack test be conducted at the inlet and outlet of the catalytic oxidizer and the release application station of coating line #3 (Source ID 106) be operated at its rated capacity (to the extent possible) have been added.

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(ii) A requirement that a test protocol be approved by the Source Testing Section of the Department prior to the test has been added to Sub-condition (b).

(iii) A requirement that the test be performed within 60 days of protocol approval has been added to Sub-condition (c).

(iv) The following for Sub-condition (d):

(A) The time within which the permittee is required to submit a complete test report to the Department has been changed from 30 days to 60 days.

(B) A requirement to submit the complete test report no later than 6 months prior to the expiration date of this permit has been added.

(93) The following for Condition # 003, Section D (under Source ID C01), of the previously-amended permit:

(i) Sub-condition (a) has been incorporated into Condition # 008(a)(1), Section D (under Source ID C01), of this permit.

(ii) The following for Sub-condition (b):

(A) It has been moved to Conditions # 005(c) and 008(a)(2), Section D (under Source ID C01), of this permit.

(B) The piece of equipment used to monitor the exhaust gas flow has been changed from a velocity pressure pitot tube to a differential pressure gauge.

(94) Requirements to monitor and maintain records of the inlet and outlet temperature for the catalytic oxidizer, on a continuous basis, have been added as Conditions # 005(a) and (b) and 007(a) and (b), Section D (under Source ID C01), of this permit, respectively.

(95) Requirements to monitor and maintain records of the amount of natural gas consumed by the catalytic oxidizer on a monthly basis has been added as Conditions # 006 and 008, Section D (under Source ID C01), of this permit, respectively.

(96) A requirement to maintain records of all inspections, repairs, and maintenance performed on the monitoring equipment of the catalytic oxidizer has been added as Condition # 009, Section D (under Source ID C01), of this permit.

(97) A requirement that the release application station of coating line #3 (Source ID 106) shall not be operated unless the catalytic oxidizer is operating in compliance with the capture efficiency restriction specified in Condition # 001, Section D (under Source ID C01), of this permit, and Conditions # 002 and 010, Section D (under Source ID C01), of this permit, has been added as Condition # 011, Section D (under Source ID C01), of this permit.

(98) A statement that alternative equipment or method(s) may be used for monitoring the catalytic oxidizer, if approved by the Department, has been added as Condition # 012(b), Section D (under Source ID C01), of this permit.

(99) The following have been removed from Section F (Emission Restriction Summary), of this permit:

(i) The PM emission concentration restriction for Source ID 101.

(ii) The SO_x emission concentration restrictions for Source IDs 105 - 107.

(100) APS No. 346457; AUTH NO. 941761: State Only Operating Permit Renewal.



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