



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: February 10, 2021

Effective Date: March 1, 2021

Expiration Date: February 28, 2026

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: 67-05137

Synthetic Minor

Federal Tax Id - Plant Code: 23-1707232-1

Owner Information

Name: MENASHA PACKAGING CO LLC

Mailing Address: 30 GRUMBACHER RD  
YORK, PA 17406-8420

Plant Information

Plant: MENASHA PKG LLC/YORK

Location: 67 York County 67939 Manchester Township

SIC Code: 2752 Manufacturing - Commercial Printing, Lithographic

Responsible Official

Name: TIM CASTOR

Title: REGIONAL OPERATIONS MGR

Phone: (717) 767 - 6602

Permit Contact Person

Name: CHUCK WELLS

Title: EHS MGR

Phone: (717) 505 - 9351

[Signature] \_\_\_\_\_

WILLIAM R. WEAVER, SOUTH CENTRAL REGION AIR PROGRAM MANAGER



## SECTION A. Table of Contents

### Section A. Facility/Source Identification

Table of Contents  
Site Inventory List

### Section B. General State Only Requirements

- #001 Definitions.
- #002 Operating Permit Duration.
- #003 Permit Renewal.
- #004 Operating Permit Fees under Subchapter I.
- #005 Transfer of Operating Permits.
- #006 Inspection and Entry.
- #007 Compliance Requirements.
- #008 Need to Halt or Reduce Activity Not a Defense.
- #009 Duty to Provide Information.
- #010 Revising an Operating Permit for Cause.
- #011 Operating Permit Modifications
- #012 Severability Clause.
- #013 De Minimis Emission Increases.
- #014 Operational Flexibility.
- #015 Reactivation
- #016 Health Risk-based Emission Standards and Operating Practice Requirements.
- #017 Circumvention.
- #018 Reporting Requirements.
- #019 Sampling, Testing and Monitoring Procedures.
- #020 Recordkeeping.
- #021 Property Rights.
- #022 Alternative Operating Scenarios.
- #023 Reporting
- #024 Report Format

### Section C. Site Level State Only Requirements

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

### Section D. Source Level State Only Requirements

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

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

### Section E. Source Group Restrictions

- E-I: Restrictions



## **SECTION A. Table of Contents**

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

### **Section F. Alternative Operating Scenario(s)**

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

### **Section G. Emission Restriction Summary**

### **Section H. Miscellaneous**

**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	PRINTING OPERATIONS	134,000.000 Lbs/HR	PAPER SHEETS
102	PARTS WASHING		
S101	PRINTING EMISSIONS		
Z102	PARTS CLEANING EMISSIONS		

**PERMIT MAPS**

PROC  
101 → STAC  
S101

PROC  
102 → STAC  
Z102

**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)]****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 as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (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 the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
- (1) For a synthetic minor facility, a fee equal to:
- (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
  - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
  - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.

**SECTION B. General State Only Requirements**

(2) For a facility that is not a synthetic minor, a fee equal to:

- (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
- (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
- (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.

(b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

**#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 a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:

**SECTION B. General State Only Requirements**

- (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, 127.465 & 127.703]****Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:

**SECTION B. General State Only Requirements**

(b) Administrative Amendments. The permittee shall submit the application for 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 submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.

(e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

**#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<sub>x</sub> from a single source during the term of the permit and 5 tons of NO<sub>x</sub> 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 PM<sub>10</sub> from a single source during the term of the permit and 3.0 tons of PM<sub>10</sub> 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)

**SECTION B. General State Only Requirements**

(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

**SECTION B. General State Only Requirements**

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 B. General State Only Requirements****#023 [25 Pa. Code §135.3]****Reporting**

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

**#024 [25 Pa. Code §135.4]****Report Format**

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

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

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

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

**# 002 [25 Pa. Code §123.2]****Fugitive particulate matter**

No person shall permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Condition #001 above, if such emissions are visible at the point the emissions pass outside the permittee's property.

**# 003 [25 Pa. Code §123.31]****Limitations**

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

**# 004 [25 Pa. Code §123.41]****Limitations**

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

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

**# 005 [25 Pa. Code §123.42]****Exceptions**

The emission limitations of site condition # 004 shall not apply when:

- (a) The presence of uncombined water is the only reason for failure of the emission to meet the limitation.
- (b) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) The emission results from sources specified in Site Level Condition #001, above.

**SECTION C. Site Level Requirements****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the facility's total actual emissions below the following levels to maintain the facility's Title V synthetic minor status:

- (a) 100 tons/year of sulfur oxides
- (b) 100 tons/year of nitrogen oxides
- (c) 100 tons/year of carbon monoxide
- (d) 100 tons/year of PM-10 (particulate matter with an effective aerodynamic diameter of less than or equal to a nominal 10 micrometer body as measured by the applicable reference method or an equal method)
- (e) 50 tons/year of volatile organic compounds
- (f) 10 tons/year of any individual hazardous air pollutant
- (g) 25 tons/year of total combined hazardous air pollutants

The above emission limits are based upon a 12-month rolling average and apply to each consecutive 12-month period. Compliance verification requires emissions to be calculated for each month and each consecutive 12-month period. Calculation records shall be maintained on-site for the most recent five-year period and made available to Department representatives upon request.

**# 007 [25 Pa. Code §129.14]****Open burning operations**

No person shall conduct the open burning of materials in an air basin except for the following:

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

This permit does not constitute authorization to burn solid waste pursuant to Section 610 (3) of the Solid Waste Management Act, 35 P.S. Section 6018.610 (3), or any other provision of the Solid Waste Management Act.

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

The Department reserves the right to require exhaust stack testing of the sources and control devices referenced in this permit to measure emissions for purposes including verification of permit condition compliance and estimation of annual air emissions.

**# 009 [25 Pa. Code §139.1]****Sampling facilities.**

Upon the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such sources. In the request, the Department will set

**SECTION C. Site Level Requirements**

forth the time period in which the facilities shall be provided, as well as the specifications for the facilities.

**III. MONITORING REQUIREMENTS.****# 010 [25 Pa. Code §123.43]****Measuring techniques**

Visible air contaminants 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 certified in EPA Method 9, to measure plume opacity with the naked eye or with the aid of devices approved by the Department.

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

The permittee shall conduct a monthly inspection around the plant periphery during daylight hours when the plant is in production to detect visible emissions, fugitive visible emissions, and malodorous emissions as follows:

- (a) Visible emissions in excess of the limits stated in Section C, Condition #004. Visible emissions may be measured according to the methods specified in Section C, Condition #010, or alternatively, plant personnel who observe such emissions may report the incident of visible emissions to the Department within four hours of each incident and make arrangements for a certified observer to verify the visible emissions.
- (b) The presence of fugitive emissions visible beyond the plant boundaries as stated in Section C, Condition # 002.
- (c) The presence of malodorous air emissions beyond the plant boundaries as stated in Section C, Condition #003.

**IV. RECORDKEEPING REQUIREMENTS.****# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain monthly emission records which contain, but are not limited to, the following information for each ink, diluent solvent and cleanup solvent used in conjunction with the printing operations:

- (a) materials containing VOCs and HAPs
  - (1) manufacturer
  - (2) product number and type
  - (3) usage (by weight or volume)
  - (4) density (s.g. or lb/gal)
  - (5) VOC content (percent by weight) as applied
  - (6) HAP content (type and percent by weight)
- (c) VOC and HAP emissions (by month and tons/year)
- (d) for VOC emission calculation purposes, the total quantities of each pollutant shall be determined from the actual VOCs in each material and the quantities of each of those materials used rather than using overall averages
- (e) supporting documentation including supporting calculations, emission factors and assumptions with supporting documentation, and any other information required for determining compliance, when requested by the Department

**SECTION C. Site Level Requirements**

(f) a listing of each HAP found in each of the as-applied inks, diluent and cleanup solvents

(g) a cumulative content listing of each HAP in units of pounds-HAP

The aforementioned data shall be recorded at least on a monthly basis and submitted to the Air Quality District Supervisor no later than March 1 of the following year for each operating period starting January 1 and ending on December 31.

**# 013 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain a record of each monthly inspection conducted in accordance with Section C, Condition 011. At a minimum, these records shall include the following information:

- (1) The name of the company representative conducting each inspection.
- (2) The date and time of each inspection.
- (3) The wind direction during each inspection.
- (4) A description of the emissions and/or malodors observed and the actions taken to mitigate them.

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

**V. REPORTING REQUIREMENTS.****# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall report the following information to secure credit for ink/coating/printing wastes sent off-site for recycling or incineration at a legally-permitted facility:

- (a) Amount per month of ink/coating/printing wastes shipped from the facility
- (b) Waste profile for each shipment
- (c) Identification of the waste disposal company for each shipment

**# 015 [25 Pa. Code §127.442]****Reporting requirements.**

The permittee shall report malfunctions to the Department. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

(a) Malfunction which poses an imminent danger to the public health, safety, welfare, and environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two (2) hours after the incident. Telephone reports can be made to the Air Quality Program at (717)-705-4886 during normal business hours or to the Department's Emergency Hotline at any time. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at <https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx>. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.

(b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirement of subsection (a) above, shall be reported to the Department, in writing, within five (5) days of malfunction discovery.



## SECTION C. Site Level Requirements

### VI. WORK PRACTICE REQUIREMENTS.

#### # 016 [25 Pa. Code §123.1]

##### Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from the sources identified in Section C, Condition #001 (a) through (e) from becoming airborne. These actions shall include, but are not limited to, the following:

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

#### # 017 [25 Pa. Code §127.441]

##### Operating permit terms and conditions.

- (a) The permittee shall keep all containers which contain VOC/HAP materials tightly closed when not in use.
- (b) Spills of materials containing VOC/HAP shall be cleaned up immediately with cleaning cloths or other methods that will minimize the evaporation of VOC/HAP into the atmosphere.
- (c) Solvent laden cloths shall be kept in closed containers when not in use.

### VII. ADDITIONAL REQUIREMENTS.

#### # 018 [25 Pa. Code §127.444]

##### Compliance requirements.

The permittee shall operate and maintain the emission sources and air cleaning devices referenced in this permit in accordance with the manufacturer's general recommendations and good air pollution control practices.

### 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.

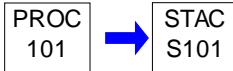
No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: PRINTING OPERATIONS

Source Capacity/Throughput: 134,000.000 Lbs/HR PAPER SHEETS

**I. RESTRICTIONS.****Throughput Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Any blanket and roller cleaning solution used on the Source ID 101 printing presses shall meet one of the following requirements:

- a. VOC content, as-applied, less than or equal to 30% by weight, or
- b. VOC composite vapor pressure, as used, less than or equal to 10 mm Hg as 20 degrees C. (68 degrees F.)

The use of up to 55 gallons of cleaning solutions not meeting the requirements of a. or b. above is permitted over any consecutive 12-month period.

**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.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain records of material usage, including inks, coatings and clean-up solvents for the Source ID 101 printing operations to demonstrate the emissions of VOC and HAP.

**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall collect and record the following information:

- a. For each sheet-fed offset lithographic ink or conventional varnish used: the monthly consumption in pounds or gallons; the percent by weight VOC and HAP content, as applied; and, an estimate of VOC and HAP emissions. Alternately, the ink with the highest VOC and HAP content may be used to represent all inks used by all sheet-fed offset lithographic printing presses.
- b. For each fountain solution and additive: the monthly consumption in pounds or gallons; the percent by weight or weight to volume ratio (lbs/gal) VOC and HAP content, and, an estimate of VOC and HAP emissions.
- c. For each blanket and roller cleaning solution used: the monthly consumption in pounds or gallons; the percent by weight or weight to volume ratio (lbs/gal) VOC and HAP content, and, an estimate of VOC and HAP emissions.

**SECTION D. Source Level Requirements**

- d. For each month of operation, the volume of all cleaning solution used which does not meet Condition 001(a) or (b).
- e. For each month of operation, an estimate of VOC and HAP emissions during the latest 12 months.

The information shall be maintained at the facility for a minimum of 5 years and shall be made available to an authorized Department representative at any time during normal working hours.

**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.**

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

**VII. ADDITIONAL REQUIREMENTS.**

**# 004 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall comply with the following requirements from 25 Pa. Code Section 129.67b:

Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.

(a) Applicability.

(1) Except as specified in paragraph (3), this section applies to the owner and operator of an offset lithographic printing press or a letterpress printing press, or both, if the press meets one or a combination of the following:

(i) [NA - NO ADD-ON CONTROLS]

(ii) [NA - NOT LETTERPRESS]

(iii) Offset lithographic printing. One or more offset lithographic printing presses if the total actual VOC emissions from all inks (including varnishes), coatings, adhesives and fountain solutions combined from all offset lithographic printing presses and all VOC emissions from related cleaning activities at the facility are equal to or greater than 450 pounds (204.1 kilograms) per month or 2.7 tons (2,455 kilograms) per 12-month rolling period, before consideration of add-on controls.

(iv) Offset lithographic printing and letterpress printing. One or more offset lithographic printing presses and one or more letterpress printing presses if the total actual VOC emissions from all inks (including varnishes), coatings, adhesives and fountain solutions combined and all VOC emissions from related cleaning activities at the facility are equal to or greater than 450 pounds (204.1 kilograms) per month or 2.7 tons (2,455 kilograms) per 12-month rolling period, before consideration of add-on controls.

(v) [NA - EMISSIONS > 450 LBS/MONTH]

(2) The owner or operator of an offset lithographic printing press subject to paragraph (1) may use the VOC emission retention factors and capture efficiency factors specified in subsection (l) to determine the amount of potential or actual VOC emissions that is available for capture and control from the inks (including varnishes), fountain solutions and cleaning solutions used on the offset lithographic printing press.

(3) VOCs from adhesives used at a facility that are not used or applied on or with an offset lithographic printing press or a letterpress printing press are not subject to this section and may be regulated under § 129.77 or Chapter 130, Subchapter

**SECTION D. Source Level Requirements**

D (relating to control of emissions from the use or application of adhesives, sealants, primers and solvents; and adhesives, sealants, primers and solvents).

(b) [NA - NO EXISTING RACT PERMIT]

(c) Emission limits for cleaning solutions and fountain solutions used in or on printing presses subject to this section.

(1) Cleaning solutions. Beginning January 1, 2015, a person subject to subsection (a)(1)(i), (ii), (iii) or (iv) may not cause or permit the emission into the outdoor atmosphere of VOCs from cleaning solutions used in or on an offset lithographic printing press or a letterpress printing press unless the following conditions are met:

(i) The cleaning solutions used must meet one or both of the following VOC limits:

(A) A VOC composite partial vapor pressure less than 10 millimeters of mercury at 68°F (20°C).

(B) A VOC content less than 70% by weight.

(ii) The use of one or more cleaning solutions with a higher VOC composite partial vapor pressure or higher VOC content, or both, than is listed in subparagraph (i) is limited to 110 gallons per year, combined, of all cleaning solutions that exceed the limits in subparagraph (i).

(2) Fountain solutions. Except as specified in paragraph (3), beginning January 1, 2015, a person subject to subsection (a)(1)(i), (iii) or (iv) may not cause or permit the emission into the outdoor atmosphere of VOCs from a fountain solution used in an offset lithographic printing press unless the fountain solution meets one or more of the following VOC limits.

(i) [NA - NOT WEB PRESSES]

(ii) For each sheet-fed offset lithographic printing press, the press-ready (as applied) fountain solution must meet one of the following limits:

(A) A VOC content of 5% or less by weight.

(B) A VOC content of 8.5% or less by weight if the fountain solution is refrigerated below 60°F (15.5°C).

(C) A VOC content of 5% or less by weight and no alcohol in the fountain solution.

(D) Another method that achieves a level of control of VOC emissions from the press-ready (as applied) fountain solution equal to or better than the methods listed in clauses (A)—(C).

(iii) [NA - NOT WEB PRESSES]

(3) Fountain solution exceptions. The control requirements under paragraph (2) for a fountain solution do not apply to the owner or operator of either of the following:

(i) A sheet-fed offset lithographic printing press with maximum sheet size 11 x 17 inches or smaller.

(ii) An offset lithographic printing press with total fountain solution reservoir of less than 1 gallon.

(d) [NA - NOT WEB PRESSES]

(e) Compliance and monitoring requirements.

(1) [NA - NO ADD-ON CONTROLS]

(2) Fountain solution. The owner or operator of an offset lithographic printing press subject to this section that is required to meet one of the fountain solution VOC limits of subsection (c)(2) shall demonstrate compliance by using one or more of

**SECTION D. Source Level Requirements**

the following methods:

(i) Analysis of a sample of the press-ready (as applied) fountain solution for VOC content using EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, codified in 40 CFR Part 60, Appendix A, including updates and revisions.

(ii) Maintenance onsite of MSDS, CPDS or other data provided by the manufacturer of the fountain solution that indicates the VOC content of the press-ready (as applied) fountain solution.

(iii) Calculation of the VOC content of the press-ready (as applied) fountain solution that combines the EPA Reference Method 24 analytical VOC content data for each of the concentrated components or additives used to prepare the press-ready fountain solution.

(A) The VOC content data for each of the concentrated components or additives shall be combined in the proportions in which the concentrated components or additives are mixed to make the batch of press-ready (as applied) fountain solution.

(B) The VOC content shall be calculated one time for each recipe of press-ready (as applied) fountain solution. The recipe name, VOC content for each concentrated component or additive and fountain solution mix ratio shall be recorded in a logbook.

(C) The EPA Reference Method 24 analysis of the concentrated components or additives used to prepare the press-ready (as applied) fountain solution may be performed by the supplier of the components or additives and these results provided to the owner or operator of the affected press.

(iv) Measurement of the recirculating reservoir temperature of a refrigerated press-ready (as applied) fountain solution specified in subsection (c)(2)(i)(B) or (ii)(B) with a thermometer or other temperature detection device capable of reading to 0.5°F (0.28°C) to ensure that the temperature of the refrigerated fountain solution containing alcohol is maintained below 60°F (15.5°C) at all times. The temperature on the thermometer or other temperature detection device shall be continuously monitored. The temperature reading shall be recorded at least once per operating day to verify that the refrigeration system is operating properly.

(v) Monitoring of the press-ready (as applied) fountain solution for alcohol concentration or VOC content with one or more of the following instruments:

(A) A refractometer or a hydrometer to monitor the fountain solution alcohol concentration. The instrument must:

(I) Be corrected for temperature one time per 8-hour shift.

(II) Have a visual, analog or digital readout with an accuracy of 0.5%.

(III) Be calibrated with a standard solution for the type of alcohol used in the fountain solution.

(B) A conductivity meter to determine the fountain solution VOC content. Reading for the fountain solution must be referenced to the conductivity of the incoming water.

(vi) Another method to determine compliance with the VOC content limits for fountain solutions in subsection (c)(2) if the following requirements are met:

(A) The facility owner or operator submits a request, in writing, to the appropriate regional office of the Department for approval of the alternative method.

(B) The request demonstrates that the alternative method provides results that accurately determine the fountain solution VOC content.

(C) The Department provides prior written approval of the alternative method.

**SECTION D. Source Level Requirements**

(3) Cleaning solution. The owner or operator of an offset lithographic printing press or a letterpress printing press subject to this section shall demonstrate compliance with the VOC content limit or VOC composite partial vapor pressure limit for cleaning solutions in subsection (c)(1) by one or more of the following methods:

(i) Analysis of a sample of press-ready (as applied) cleaning solution for VOC content using EPA Reference Method 24.

(ii) Use of the equation in subsection (j) to calculate the composite partial vapor pressure of the press-ready (as applied) cleaning solution.

(iii) Use of the methods in subsection (k) to determine the VOC composite partial vapor pressure of a single concentrated component or additive used to prepare the press-ready (as applied) cleaning solution.

(iv) Maintenance onsite of MSDS, CPDS or other data provided by the manufacturer of the press-ready (as applied) cleaning solution that indicates the VOC content or the VOC composite partial vapor pressure, or both, of the press-ready (as applied) cleaning solution.

(v) Calculation of the VOC content or the VOC composite partial vapor pressure, or both, of the press-ready (as applied) cleaning solution that combines the EPA Reference Method 24 analytical VOC content data or analytical VOC composite partial vapor pressure data for each of the concentrated components or additives used to prepare the press-ready (as applied) cleaning solution.

(A) The VOC content data or VOC composite partial vapor pressure data for each of the concentrated components or additives shall be combined in the proportions in which the concentrated components or additives are mixed to make the batch of press-ready (as applied) cleaning solution.

(B) The VOC content or VOC composite partial vapor pressure shall be calculated one time for each recipe of press-ready (as applied) cleaning solution. The recipe name, VOC content or VOC composite partial vapor pressure for each concentrated component or additive and cleaning solution mix ratio shall be recorded in a log book.

(C) The EPA Reference Method 24 analysis of the concentrated components or additives used to prepare the press-ready (as applied) cleaning solution may be performed or the VOC composite partial vapor pressure data may be determined by the supplier of the components or additives and these results provided to the owner or operator of the affected press.

(vi) Another method to determine compliance with the VOC content limits for cleaning solutions in subsection (c)(1) if the following requirements are met:

(A) The facility owner or operator submits a request, in writing, to the appropriate regional office of the Department for approval of the alternative method.

(B) The request demonstrates that the alternative method provides results that accurately determine the cleaning solution VOC content or VOC composite partial vapor pressure.

(C) The Department provides prior written approval of the alternative method.

(f) Recordkeeping requirements. Beginning January 1, 2015, the owner or operator of a printing press subject to this section shall maintain records sufficient to demonstrate compliance with this section. Records maintained for compliance demonstrations may include purchase, use, production and other records.

(1) [NA - NO ADD-ON CONTROLS]

(2) An owner or operator subject to subsection (a)(1)(i), (ii), (iii) or (iv) shall maintain records of cleaning solutions and fountain solutions used at the facility, including:

(i) The following parameters for each press ready blanket, roller or other cleaning solution:

**SECTION D. Source Level Requirements**

- (A) The name and identification number for the blanket, roller or other cleaning solution.
- (B) The VOC content (weight %) or VOC composite partial vapor pressure of each cleaning solution as applied.
- (C) The volume used of each cleaning solution as applied, if the owner or operator is using cleaning solutions which exceed the limits in subsection (c)(1)(i).
- (D) Records of cleaning solution monitoring as required under subsection (e)(3).
- (ii) The following parameters for each press-ready (as applied) fountain solution:
  - (A) The VOC content (weight %).
  - (B) Records of fountain solution monitoring as required under subsection (e)(2).
- (3) An owner or operator claiming exemption from a VOC control provision of this section based on potential or actual VOC emissions, as applicable, shall maintain records that demonstrate to the Department that the press or facility is exempt.
- (4) The owner or operator may group materials into classes using the highest VOC content in any material in a class to represent that class of material.
- (g) Reporting requirements. Beginning January 1, 2015, the owner or operator of an offset lithographic printing press or a letterpress printing press subject to this section shall meet the following reporting requirements:
  - (1) The records required under subsection (f) shall be maintained onsite for 2 years unless a longer period is required by a plan approval or operating permit issued under Chapter 127 (relating to construction, modification, reactivation and operation of sources). The records shall be submitted to the Department in an acceptable format upon receipt of a written request.
  - (2) [NA - NO ADD-ON CONTROLS]
- (h) Sampling and testing.
  - (1) Sampling and testing shall be performed as follows:
    - (i) Sampling of an ink, varnish, coating, fountain solution or cleaning solution and testing for the VOC content of the ink, varnish, coating, fountain solution or cleaning solution shall be performed in accordance with the procedures and test methods specified in Chapter 139.
    - (ii) [NA - NO ADD-ON CONTROLS]
    - (2) [NA - NO ADD-ON CONTROLS]
    - (3) Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with this section may be used if prior approval is obtained in writing from the Department and the EPA.
      - (i) Work practice requirements for cleaning activities.
        - (1) Except as specified in paragraph (3), beginning January 1, 2015, the owner or operator of an offset lithographic printing press or a letterpress printing press subject to subsection (a)(1)(i), (ii), (iii) or (iv) shall comply with the following work practices for cleaning activities at the facility:
          - (i) Store all VOC-containing cleaning solutions, waste cleaning solutions and used shop towels in closed containers.
          - (ii) Ensure that mixing vessels and storage containers used for VOC-containing cleaning solutions, waste cleaning solutions and used shop towels are kept closed at all times, except when depositing or removing these solutions or shop

**SECTION D. Source Level Requirements**

towels.

- (iii) Minimize spills of VOC-containing cleaning solutions and waste cleaning solutions and clean up spills immediately.
- (iv) Convey VOC-containing cleaning solutions, waste cleaning solutions and used shop towels from one location to another in closed containers or pipes.

(2) The requirements in paragraph (1) apply to the following activities:

- (i) Cleaning of a press, including blanket washing, roller washing, plate cleaners, metering roller cleaners, impression cylinder cleaners and rubber rejuvenators.
- (ii) Cleaning of press parts, including press parts that have been removed from the press for cleaning.
- (iii) Cleaning of ink, coating or adhesive from areas around a press.

(3) The requirements in paragraph (1) do not apply to the following activities:

- (i) Cleaning electronic components of a press.
  - (ii) Cleaning in pre-press (for example, platemaking) operations.
  - (iii) Cleaning in post-press (for example, binding) operations.
  - (iv) Using janitorial supplies (for example, detergents or floor cleaners) for general cleaning around a press.
  - (v) The use of parts washers or cold cleaners at an offset lithographic printing or a letterpress printing facility. The use of parts washers and cold cleaners is regulated under § 129.63 (relating to degreasing operations).
- (j) Composite partial vapor pressure. The composite partial vapor pressure of organic compounds in cleaning solutions shall be determined by one of the following procedures:
- (1) Quantifying the amount of each compound in the blend using gas chromatographic analysis, using an appropriate and current ASTM test method with prior written approval by the Department.
  - (2) Calculating the composite partial vapor pressure using the following equation:

[EQUATION LISTED IN TITLE 25 SECTION 129.67b]

Where:

PPc = VOC composite partial vapor pressure at 20°C, in mm mercury

Wi = Weight of the "i"th VOC compound, in grams

Ww = Weight of water, in grams

We = Weight of the "e"th exempt compound, in grams

MWi = Molecular weight of the "i"th VOC compound, in grams per g-mole, as given in chemical reference literature

MWw = Molecular weight of water, in grams per g-mole (18 grams per g-mole)

MWe = Molecular weight of the "e"th exempt compound, in grams per g-mole, as given in chemical reference literature

VPI = Vapor pressure of the "i"th VOC compound at 20°C, in mm mercury, as determined by subsection (k)



**SECTION D. Source Level Requirements**

(k) Determination of vapor pressure of single organic compounds in cleaning solutions. The vapor pressure of each single component compound shall be determined from one or more of the following:

- (1) An appropriate and current ASTM test method with prior written approval by the Department.
- (2) The most recent edition of one or more of the following sources:
  - (i) Vapour Pressures of Pure Substances, Boublik, Elsevier Scientific Publishing Company, New York.
  - (ii) Perry's Chemical Engineers' Handbook, Green and Perry, McGraw-Hill Book Company.
  - (iii) CRC Handbook of Chemistry and Physics, CRC Press.
  - (iv) Lange's Handbook of Chemistry, McGraw-Hill Book Company.
  - (v) Additional sources approved by the Department.

(l) [NA - NO ADD-ON CONTROLS]

**# 005 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

Should paper coating emissions exceed 3 pounds/hour, 15 pounds/day or 2.7 tons/year, the permittee shall comply with the following requirements from 25 Pa. Code Section 129.52b. In order to show continuing exemption from these requirements, the permittee shall keep a 12-month rolling total of VOC emissions from paper coating operations and shall make such records available to DEP upon request:

Control of VOC emissions from paper, film and foil surface coating processes.

(a) Applicability. This section applies to the owner and operator of a paper, film or foil surface coating process, as follows, if the surface coating process meets one or a combination of the following:

(1) [NA - THE PERMITTEE SHALL LIMIT THE VOC POTENTIAL-TO-EMIT FROM AFFECTED OPERATIONS TO LESS THAN 25 TONS PER YEAR]

(2) The emission limit in Table II and other requirements of this section apply to the owner and operator of a paper surface coating process which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year since January 1, 1987. For these processes, the emission limit and other requirements of this section supersede the emission limit and other requirements of § 129.52.

(3) The work practice requirements for cleaning materials found in subsection (h), and the related compliance monitoring and recordkeeping and reporting requirements of subsections (d) and (e), apply to the owner and operator of a paper, film or foil surface coating process if the total actual VOC emissions from all paper, film or foil surface coating operations, including related cleaning activities, at the facility are equal to or greater than 15 pounds (6.8 kilograms) per day or 2.7 tons (2,455 kilograms) per 12-month rolling period, before consideration of controls.

(b) [NA - NO EXISTING RACT PERMIT]

(c) Emission limits. Beginning January 1, 2012, a person subject to subsection (a)(1) or (2) may not cause or permit the emission into the outdoor atmosphere of VOCs from a paper, film or foil surface coating process, unless one of the following limitations is met:

(1) The VOC content of each as applied coating is equal to or less than the limit specified in Table I or Table II, as applicable.

(i) [NA - BECAUSE (ii) APPLIES]

**SECTION D. Source Level Requirements**

(ii) The VOC content of the as applied coating, expressed in units of weight of voc per volume of coating solids, shall be calculated as follows:

$$\text{VOC} = (\text{Wo})(\text{Dc})/\text{Vn}$$

Where:

VOC = VOC Content in lb voc/gal of coating solids

Wo = Weight percent of VOC (Wv-Ww-Wex)

Wv = Weight percent of total volatiles (100%-weight percent solids)

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

Dc = Density of coating, lb/gal, at 25° C

Vn = Volume percent of solids of the as applied coating

(iii) [NA - NO DIP COATING]

(iv) Sampling and testing shall be done in accordance with the procedures and test methods specified in Chapter 139 (relating to sampling and testing).

(2) [NA - NO ADD-ON CONTROLS]

(d) Compliance monitoring procedures. The owner or operator of a facility subject to this section shall maintain records sufficient to demonstrate compliance as follows:

(1) The owner or operator of a facility subject to subsection (a) shall maintain daily records of the following parameters for each coating, thinner, component or cleaning solvent, as supplied:

(i) Name and identification number of the coating, thinner, component or cleaning solvent.

(ii) Volume used.

(iii) Mix ratio.

(iv) Density or specific gravity.

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

(vi) VOC content.

(2) In addition to the records required under paragraph (1), the owner or operator of a facility subject to subsection (a)(2) shall maintain daily records of the volume percent solids for each coating, thinner or component, as supplied.

(3) The owner or operator of a facility subject to subsection (a) shall maintain daily records of the VOC content of each as applied coating or cleaning solvent.

(e) Recordkeeping and reporting requirements. The records required under subsection (d) shall be:

(1) Maintained for 2 years, unless a longer period is required under § 127.511(b)(2) (relating to monitoring and related recordkeeping and reporting requirements).

(2) Submitted to the Department upon receipt of a written request.

(f) Coating application methods. A person subject to subsection (a)(1) may not cause or permit the emission into the outdoor atmosphere of VOCs from the application of paper, film or foil surface coatings, unless the coatings are applied using one or more of the following coating application methods:

**SECTION D. Source Level Requirements**

- (1) Rotogravure coating.
- (2) Reverse roll coating.
- (3) Knife coating.
- (4) Dip coating.
- (5) Slot die coating.
- (6) Flexographic coating.
- (7) Extrusion coating.
- (8) Calendaring.
- (9) Other coating application method, if approved in writing by the Department prior to the use of the application method.

(i) The coating application method must be capable of achieving a transfer efficiency equivalent to or better than that achieved by a method listed in paragraphs (1)—(8).

(ii) The request for approval must be submitted in writing by the owner or operator of the paper, film or foil surface coating facility.

(g) Exempt coatings. The VOC coating content limits in Tables I and II do not apply to a coating used exclusively for determining product quality and commercial acceptance and other small quantity coatings, if the coating meets the following criteria:

(1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.

(2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

(h) Work practice requirements for cleaning materials. The owner or operator of a paper, film or foil surface coating process subject to subsection (a) shall comply with the following work practices for cleaning materials:

- (1) Store all VOC-containing cleaning materials and used shop towels in closed containers.
- (2) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times, except when depositing or removing these materials.
- (3) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.
- (4) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- (5) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.

Table I [NA - INDIVIDUAL LINE PTE < 25 TPY OF VOC]

Table II - Emission Limit of VOCs for Paper Coating if Actual VOC Emissions have Exceeded 3 Pounds per Hour, 15 Pounds per Day or 2.7 Tons per Year in Any Year Since January 1, 1987

Weight of VOC per Volume of

**SECTION D. Source Level Requirements**

## Coating Solids, as Applied

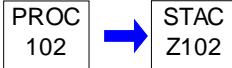
Units	RACT Limit Paper Coating
lb voc/gal coating solids	4.84
kg voc/l coating solids	0.58

**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: PARTS WASHING

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §129.63]****Degreasing operations**

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

(a) After December 22, 2002, Source ID 102 parts washing units shall not employ any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.

(b) This permit condition does not apply when:

(1) Source ID 102 parts washing units are used in extreme cleaning service. Extreme cleaning service is defined as the use of a cold cleaning machine to clean parts used in the manufacture of the following gases or to clean parts exposed to these gases in manufacturing, production, research and development, analytical work, or other similar operations:

- (A) Oxygen in concentrations greater than 23%
- (B) Ozone
- (C) Nitrous oxide
- (D) Fluorine
- (E) Chlorine
- (F) Bromine
- (G) Halogenated compounds

(2) The permittee demonstrates, and the Department approves in writing, that compliance with this permit condition will result in unsafe operating conditions.

**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.****# 002 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall maintain the following records for the Source ID 102 parts washing units:

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

**SECTION D. Source Level Requirements**

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

The permittee shall retain these records for a minimum of two (2) years as per Section 129.63(a)(6) and shall make them available to the Department upon its request.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 003 [25 Pa. Code §129.63]****Degreasing operations**

Source ID 102 immersion parts washing units shall have a freeboard ratio of 0.50 or greater.

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

Each Source ID 102 parts washing unit shall be equipped with one of the following:

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

**# 005 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall operate each Source ID 102 parts washing unit in accordance with the following procedures:

- (a) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (b) Flushing of parts using a flexible hose or other flushing device shall be performed only within the unit. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (c) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in Source ID 102 parts washing units.
- (d) Air-agitated solvent baths may not be used.
- (e) Spills during solvent transfer and use of each Source ID 102 parts washing unit shall be cleaned up immediately.

**# 006 [25 Pa. Code §129.63]****Degreasing operations**

Each Source ID 102 parts washing unit shall have a permanent, conspicuous label summarizing the operating requirements in Condition #005. In addition, the label shall include the following discretionary good operating practices:

- (a) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the unit.
- (b) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.

**SECTION D. Source Level Requirements**

(c) Work area fans should be located and positioned so that they do not blow across the opening of the parts washing unit.

**VII. ADDITIONAL REQUIREMENTS.**

**# 007 [25 Pa. Code §129.63]**

**Degreasing operations**

All of the aforementioned permit conditions apply to each Source ID 102 parts washing unit so long as the unit uses 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.



**SECTION E. Source Group Restrictions.**





**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.



**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.



## SECTION H. Miscellaneous.

The Source ID 101 sheet-fed lithographic printing operations include the following:

1. 73XXL - Man Roland Model 908 XXL lithographic press (installed 2004)
2. 64 UV - Man Roland Model 907B lithographic press (installed 2007)
3. 64 Conventional - Man Roland Model 907B lithographic press (installed 2010)
4. 6-Color 55" - Man Roland Model 906B lithographic press (installed 2000)
5. 6-Color 55" - Man Roland Model 906B lithographic press (installed 1999)
6. 1040PC Perfector - Heidelberg Speedmaster Model lithographic press (installed 1998)
7. 8-Color Perfector - Heidelberg Speedmaster Model lithographic press (installed 2000)
8. 640 CH - Heidelberg Speedmaster CH Model lithographic press (installed 1998)
9. 640 CD - Heidelberg Speedmaster CD Model lithographic press (installed 1998)
10. KBA Rapida Model 145-8+L lithographic press (installed 2015)

The following sources and activities are not subject to any specific work practice standards, testing, monitoring, recordkeeping or reporting requirements:

1. Air conditioning and ventilation systems (includes space heaters and air make-up units)
2. Office equipment (copiers, printers, fax machines, etc.)
3. Janitorial equipment and activities
4. Plant maintenance (painting, welding, woodworking, cleaning, etc.)
5. Mobile sources (trucks, forklifts, snowblowers, etc.)
6. Fuel oil, gasoline, propane and other storage tanks
7. Materials handling and storage
8. Laboratory/R & D sources and activities
9. Ink mixing and storage
10. Typesetting, image setting and platemaking
11. Cyclone/trim collection system



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

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