



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM**

TITLE V/STATE OPERATING PERMIT

Issue Date: February 9, 2022

Effective Date: March 15, 2022

Expiration Date: March 14, 2027

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 46-00041

Federal Tax Id - Plant Code: 84-0772929-1

Owner Information

Name: GRAPHIC PKG INTL LLC
Mailing Address: 1035 LONGFORD RD
PHOENIXVILLE, PA 19460-1205

Plant Information

Plant: GRAPHIC PKG INTL LLC/VALLEY FORGE
Location: 46 Montgomery County 46957 Upper Providence Township
SIC Code: 2657 Manufacturing - Folding Paperboard Boxes

Responsible Official

Name: ZACHARY STEINLY
Title: PLANT MANAGER
Phone: (201) 466 - 5654 Email: zachary.steinly@graphicpkg.com

Permit Contact Person

Name: NATALIE REYNOLDS
Title: S&E MANAGER
Phone: (610) 935 - 4000 Email: natalie.l.reynolds@graphicpkg.com

[Signature] _____
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER



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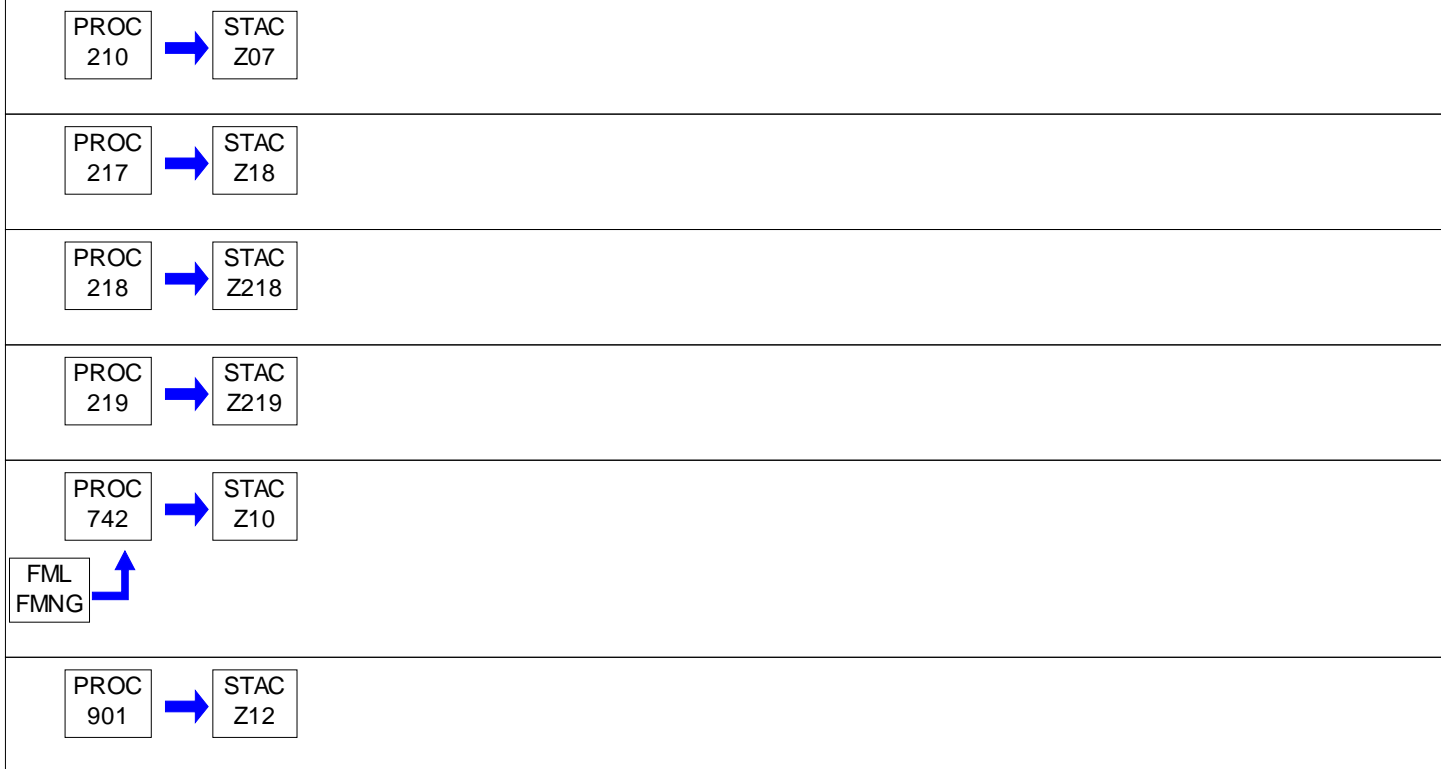
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
210	FINISHING DEPARTMENT		
217	FLEXOGRAPHIC PRINTING PRESS - BOBST NO. 2		
218	OFFSET LITHOGRAPHIC PRINTING PRESS NO. 2	N/A	VOCLBSINK/SOLVT
219	OFFSET LITHOGRAPHIC PRINTING PRESS NO. 3	N/A	VOCLBSINK/SOLVT
742	EGEN - NG GENERAC EMERGENCY ENGINE	430.000 CF/HR	Natural Gas
901	INK ROOM	N/A	VARIOUS
902	PARTS WASHER		
FMNG	NATURAL GAS PIPELINE		
Z07	FINISHING DEPARTMENT		
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PERMIT MAPS

**SECTION B. General Title V Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

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

#002 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the act.

#003 [25 Pa. Code § 127.512(c)(4)]**Property Rights**

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

#004 [25 Pa. Code § 127.446(a) and (c)]**Permit Expiration**

This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e), 127.503 & 127.704(b)]**Permit Renewal**

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.

(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]**Transfer of Ownership or Operational Control**

(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:

- (1) The Department determines that no other change in the permit is necessary;
- (2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by

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the Department.

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

#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]**Inspection and Entry**

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

- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

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

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]**Compliance Requirements**

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

#009 [25 Pa. Code § 127.512(c)(2)]**Need to Halt or Reduce Activity Not a Defense**

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

**SECTION B. General Title V Requirements****#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]****Duty to Provide Information**

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

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

#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]**Reopening and Revising the Title V Permit for Cause**

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

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

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#012 [25 Pa. Code § 127.543]**Reopening a Title V Permit for Cause by EPA**

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

#013 [25 Pa. Code § 127.522(a)]**Operating Permit Application Review by the EPA**

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

**SECTION B. General Title V Requirements****#014 [25 Pa. Code § 127.541]****Significant Operating Permit Modifications**

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#015 [25 Pa. Code §§ 121.1 & 127.462]**Minor Operating Permit Modifications**

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#016 [25 Pa. Code § 127.450]**Administrative Operating Permit Amendments**

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

#017 [25 Pa. Code § 127.512(b)]**Severability Clause**

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

#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]**Fee Payment**

(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). 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.

(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.

(c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.

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(d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

(e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.

(1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.

(2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.

(3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

#019 [25 Pa. Code §§ 127.14(b) & 127.449]**Authorization for De Minimis Emission Increases**

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

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

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

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

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

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

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

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(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

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

(d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#020 [25 Pa. Code §§ 127.11a & 127.215]**Reactivation of Sources**

(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#021 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the

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phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]**Submissions**

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

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

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

Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch
Air Section
1650 Arch Street, 3ED21
Philadelphia, PA 19103

The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

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

#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]**Sampling, Testing and Monitoring Procedures**

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#024 [25 Pa. Code §§ 127.511 & Chapter 135]**Recordkeeping Requirements**

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

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.

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(5) The results of the analyses.

(6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]**Reporting Requirements**

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#026 [25 Pa. Code § 127.513]**Compliance Certification**

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

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

**SECTION B. General Title V Requirements****#027 [25 Pa. Code § 127.3]****Operational Flexibility**

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

#028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]**Risk Management**

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:

- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
 - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

**SECTION B. General Title V Requirements**

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

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

(1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]**Approved Economic Incentives and Emission Trading Programs**

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]**Permit Shield**

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

#031 [25 Pa. Code §135.3]**Reporting**

(a) 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 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.

#032 [25 Pa. Code §135.4]**Report Format**

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 may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) 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.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations, as specified in 25 Pa. Code § 129.14;
- (7) - (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) The emissions are of minor significance with respect to causing air pollution; and
 - (ii) 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**

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

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

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

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

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

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

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

The opacity limitations of 25 Pa. Code § 123.41 shall not apply to a visible emission in any of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

**SECTION C. Site Level Requirements**

(c) When the emission results from sources specified in 25 Pa. Code § 123.1 (relating to prohibition of certain fugitive emissions), of this section.

006 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

The permittee shall limit facility-wide Volatile Organic Compound (VOC) emissions from all of the sources listed in Section A (Site Inventory) and Section H (Miscellaneous) to 150.3 tons per year, based on a 12-month rolling basis.

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

No person may permit the open burning of material in the Southeast air basin except where the open burning operations result from:

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

008 Elective Restriction

[Additional authority for this condition is also derived from 25 Pa. Code § 127.35, § 127.512, 40 CFR §§ 63.820(a)(2) and 63.820(a)(3).]

- (a) The Hazardous Air Pollutants (HAPs) emissions of this facility shall not exceed the following:
 - (1) 10 tons per year of each HAP on a 12-month rolling period at the facility, including materials used for source categories or purposes other than printing and publishing, and
 - (2) 25 tons per year of any combination of HAP on a rolling 12-month period at the facility, including materials used for source categories or purposes other than printing and publishing.
- (b) Exceedences of sub-condition (a) of this permit condition will result in the facility being subjected to 40 CFR § 63 Subpart KK: National Emission Standards for the Printing and Publishing Industry.

Throughput Restriction(s).**# 009 Elective Restriction**

[Additional authority for this condition is also derived from 25 Pa. Code § 127.35, § 127.512, 40 CFR §§ 63.820(a)(2) and 63.820(a)(3).]

- (a) The permittee shall use less than 10 tons per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- (b) The permittee shall use less than 25 tons per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

**SECTION C. Site Level Requirements****II. TESTING REQUIREMENTS.****# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

(a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139 and the most current version of the DEP Source Testing Manual, 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.**# 011 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

012 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

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

- (1) Odors which may be objectionable (as per 25 Pa. Code § 123.31).
- (2) Visible Emissions (as per 25 Pa. Code §§ 123.41 and 123.42).
- (3) Fugitive Particulate Matter (as per 25 Pa. Code §§ 123.1 and 123.2).

(b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:

- (1) Be investigated.
- (2) Be reported to the facility management, or individual(s) designated by the permittee.
- (3) Have appropriate corrective action taken (for emissions that originate on-site).
- (4) Be recorded in a permanent written log.

(c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly.

(d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to monthly.

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

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

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

(a) The permittee shall maintain records of the following to demonstrate compliance with the VOC emission limit:

**SECTION C. Site Level Requirements**

- (1) The total VOC emissions from the facility, calculated on a monthly basis.
- (2) The twelve month rolling summation of VOC emissions.
- (3) The calculation method used.

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

014 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

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

015 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain a standard training log in order to document the date and the attendance of the VOC solvent training.

016 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

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

017 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.829]**Subpart KK--National Emission Standards for the Printing and Publishing Industry
Recordkeeping requirements.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.35(b)]

The permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with the HAP limit for an area source (facility), including the mass of all HAP containing materials used at the facility and the mass fraction of HAP present in each HAP containing material used at the facility, on a monthly basis, pursuant to 40 CFR § 63.829(d).

V. REPORTING REQUIREMENTS.**# 018 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. 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. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner

**SECTION C. Site Level Requirements**

or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

(e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.

(f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.

(g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

019 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511(c)(1)–(2) and 127.513(5)(i)–(v).]

The permittee shall submit the following reports:

(a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V Permit as required under 25 Pa. Code § 127.513. The annual certificate of compliance shall be submitted to the Department in paper form, and EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov. The subject line shall read: "TVOP No. 46-00041, Graphic Packaging International LLC/Valley Forge".

(b) A semi-annual deviation report to the Department in paper form by October 1 of each year, for the period covering January 1–June 30, of the same year. [Note: The annual certificate of compliance in (a)(1), above, fulfills the obligation for the second deviation reporting period (i.e., July 1–December 31, of the previous year).]

020 [25 Pa. Code §135.21]**Emission statements**

The permittee shall submit by March 1, of each year, an annual emission statement for NO_x and VOC emissions for the preceding calendar year. Additionally, a description of the method used to calculate the emissions shall be included. The statement shall contain a certification by a company official or plant manager that the information contained in the statement is true and accurate.

VI. WORK PRACTICE REQUIREMENTS.**# 021 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in 25 Pa. Code § 123.1 (referring Prohibition of Certain Fugitive Emissions)

**SECTION C. Site Level Requirements**

shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

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

022 [25 Pa. Code §123.31]**Limitations**

The permittee shall take steps to eliminate impact of activities causing odors offsite. Permittee shall investigate any odor complaints received for validity, notify the manager and take appropriate actions to resolve any odor issues.

023 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

The permittee may not modify any air contaminant system identified in this permit prior to obtaining Department approval except those modifications authorized by Condition #019(g), Section B, of this permit.

024 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

The permittee shall ensure that the sources listed in Section A and Section H of this permit are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturers specifications.

025 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

The permittee shall provide a training program to employees that handle and/or have exposure to solvents in order to educate the employees on the proper handling of solvents and the effects of VOCs on the environment and human health. The training shall be provided at least every 18 months.

026 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

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

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.



SECTION C. Site Level Requirements

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

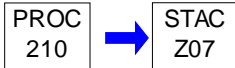
***** Permit Shield In Effect *****

**SECTION D. Source Level Requirements**

Source ID: 210

Source Name: FINISHING DEPARTMENT

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the VOC content of the glues used.

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

The permittee shall maintain records of the VOC content of the glues used to demonstrate compliance with the VOC content limit for this source.

V. REPORTING REQUIREMENTS.

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

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

The permittee shall limit the Volatile Organic Compound (VOC) content of the glue used as part of Finishing Operations to 1.38 pounds per gallon.

004 [25 Pa. Code §129.97]**Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.**

The permittee shall install, maintain, and operate this source in accordance with the manufacturer's specifications and with good operating practices according to 25 Pa. Code § 129.97(c)(2).

VII. ADDITIONAL REQUIREMENTS.**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) Source ID 210 Finishing Department consists of various sheeters, cutters, and gluers installed prior to 2012.

(b) Finishing Department equipment installed after 2012 is listed in Section H (Miscellaneous) of the permit.

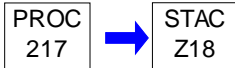
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 217

Source Name: FLEXOGRAPHIC PRINTING PRESS - BOBST NO. 2

Source Capacity/Throughput:

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

The permittee shall limit the volatile organic compound (VOC) emissions from this source, including inks and press-cleaning operations, to the maximum of 12.5 tons per year, based on a 12-month rolling sum calculated monthly.

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

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

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

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

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

(d) The permittee, as an alternative to the CPDS and SDS, may use the USEPA Test Method 24 to determine the VOC content of the inks.

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

The permittee shall monitor the following information for this source in order to demonstrate compliance with the conditions of this operating permit :

(a) The total VOC emissions from this press on a 12 consecutive month basis.

(b) The volatile fraction of the ink on a monthly basis, as follows:

- (1) Based on a monthly weighted average of all inks, the volatile fraction of the ink, as applied to the substrate.
- (2) The volatile fraction of any individual ink used, as applied to the substrate.

(c) The percent by weight of VOC in all cleaning solutions used on the press on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall record and maintain records of the following information:

(a) For each flexographic ink and solvent used on this press:

**SECTION D. Source Level Requirements**

- (1) The percent by weight or weight to volume ratio (lbs/gal) VOC content, as applied,
- (2) The monthly consumption in pounds or gallons,
- (3) Density,
- (4) An estimate of monthly VOC emissions, and
- (5) The percent by weight or weight to volume ratio (lbs/gal) HAP content.

(b) For each month of operation, the volume of all VOC containing solvents added to the ink and/or used for press clean up.

(c) For each month of operation, the 12-month rolling sum of VOC emissions.

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

The permittee shall record and maintain records of the volatile fraction of the ink as applied to the substrate, as follows:

- (a) Based on a monthly weighted average of all inks, the volatile fraction of the ink, as applied to the substrate.
- (b) The volatile fraction of any individual ink used, as applied to the substrate.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

In order to control emissions to the maximum extent consistent with the best available technology (BAT), as required in 25 Pa. Code §127.1 for the source, the permittee shall operate the Flexographic Press 2 under the following restrictions:

(a) The company shall use low VOC water-based inks and overprint material on this press:

(1) Based on a monthly weighted average of all inks, the volatile fraction of the ink, as applied to the substrate, shall contain an average of 17 percent or less by volume of VOC, and 83 percent or more by volume of water.

(2) The volatile fraction of any individual ink used, as applied to the substrate, shall contain 25 percent or less by volume of VOC and 75 percent or more by volume of water.

(b) All cleaning solutions used on the Press shall contain 3 percent or less by weight of VOC.

[Compliance with this condition streamlines compliance with the requirements of 25 Pa. Code § 129.67(b)(1) and (2).]

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

(a) The permittee shall maintain and operate this press according to manufacturer's specifications and good air pollution control practices.

(b) The permittee shall:

(1) Keep ink and varnish drums closed unless inks or varnishes are being transferred.

(2) Store used wet rags containing ink and solvent in closed containers and dispose of them according to the Department approved procedures.

(3) Clean up any spills of inks, solvents and varnishes as soon as possible.



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: 218

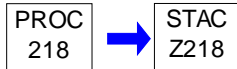
Source Name: OFFSET LITHOGRAPHIC PRINTING PRESS NO. 2

Source Capacity/Throughput:

N/A

VOCLBSINK/SOLVT

Conditions for this source occur in the following groups: 1

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit VOC emissions from this source, including inks, coatings, fountain solutions, and press-cleaning operations, to 24.5 tons per year, based on a 12-month rolling sum.

Throughput Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit material usage on this press as follows:

(a) non-heatset lithographic inks: 205,000 lb/yr, based on a 12-month rolling sum.

(b) non-heatset lithographic coatings: 970,000 lb/yr, based on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This lithographic press is a non-heatset sheetfed offset lithographic printing presses, as the term is defined in 25 Pa. Code § 121.1.

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

**SECTION D. Source Level Requirements**

Source ID: 219

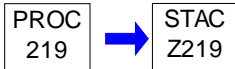
Source Name: OFFSET LITHOGRAPHIC PRINTING PRESS NO. 3

Source Capacity/Throughput:

N/A

VOCLBSINK/SOLVT

Conditions for this source occur in the following groups: 1

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit VOC emissions from this source, including inks, coatings, fountain solutions, and press-cleaning operations, to 21.0 tons per year, based on a 12-month rolling sum.

Throughput Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit material usage on this press as follows:

(a) non-heatset lithographic inks: 177,500 lb/yr, based on a 12-month rolling sum.

(b) non-heatset lithographic coatings: 835,500 lb/yr, based on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This lithographic press is a non-heatset sheetfed offset lithographic printing presses, as the term is defined in 25 Pa. Code § 121.1.

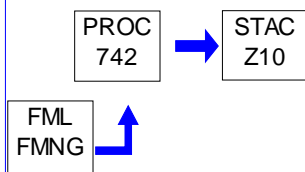
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 742

Source Name: EGEN - NG GENERAC EMERGENCY ENGINE

Source Capacity/Throughput: 430.000 CF/HR Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from this source in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

[Compliance with this emission limit is demonstrated through the use of proper fuel as allowed herein.]

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

The permittee shall limit the aggregate NO_x emissions from all exempt engines on site to less than 100 lbs/hr, 1000 lbs/day, 2.75 tons per ozone season and 6.6 tons per year on a 12-month rolling basis.

003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4233]**Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122.]

The permittee shall comply with the emission standards in Table 1 of 40 CFR Part 60 Subpart JJJJ for this emergency stationary SI ICE, according to 40 CFR § 60.4233(d), as follows:

NO_x = 10.0 g/HP-hr

CO = 387 g/HP-hr.

[Compliance with the emission standards of 40 CFR Part 60 Subpart JJJJ is demonstrated through manufacturer specification sheets with emission data and/or certification of conformity associated with each engine, as applicable.]

Fuel Restriction(s).**# 004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]****Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122.]

The permittee may operate this engine using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of 40 CFR Part 60 Subpart JJJJ.

**SECTION D. Source Level Requirements****Operation Hours Restriction(s).**

**# 005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122.]

(a) In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described as follows, is prohibited, according to 40 CFR § 60.4243(d)(1) through (3):

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) The permittee may operate the emergency stationary ICE for any combination of the purposes of maintenance checks and readiness testing for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (b) of this condition counts as part of the 100 hours per calendar year allowed by this paragraph (a). Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(b) If the permittee does not operate the engine according to the requirements of this condition, the engine will not be considered an emergency engine under 40 CFR Part 60 Subpart JJJJ and the engine must meet all requirements for nonemergency engines.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

**# 006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4237]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122.]

The permittee shall monitor the hours of operation of this emergency engine using a nonresettable hour meter, according to 40 CFR § 60.4237(c).

IV. RECORDKEEPING REQUIREMENTS.

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

The permittee shall keep records on site to demonstrate compliance that this engine is certified and in compliance with the emission standards as required by 40 CFR § Part 60 Subpart JJJJ (in this case, Engine Family and EPA Certificate Number KGNXB01.52NN (005)).

[This condition assures compliance with 40 CFR § 60.4243(b)(1): The permittee shall demonstrate compliance with the emission standards specified in 40 CFR § 60.4233(d) and (e) by purchasing an engine certified according to procedures specified in Subpart JJJJ, for the same model year and demonstrating compliance according to the methods specified in 40 CFR § 60.4243(a)(1).]

**SECTION D. Source Level Requirements****# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain monthly records of the aggregate NOx emissions from all exempt engines on site, including pounds per hour, pounds per day, ozone season (i.e., the period from May 1 through September 30 of each year) sums, and 12-month rolling sums, to demonstrate compliance with the NOx emission limit for this source.

009 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]**Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122.]

The permittee shall keep records of conducted maintenance to demonstrate compliance, according to 40 CFR § 60.4243(a)(1).

010 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4245]**Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122.]

The permittee shall keep records of the following information, according to 40 CFR § 60.4245(a):

- (a) All notifications submitted to comply with this subpart and all documentation supporting any notification.
- (b) Maintenance conducted on the engine.
- (c) Documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable.

011 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4245]**Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122.]

The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 012 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4234]****Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122.]

The permittee shall operate and maintain this stationary SI ICE that achieves the emission standards as required in 40 CFR Part 60 Subpart JJJJ over the entire life of the engine.

013 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]**Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?**

**SECTION D. Source Level Requirements**

Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122.]

The permittee shall comply with the emission standards of 40 CFR Part 60 Subpart JJJJ through engine certification to the emission standards, as applicable, for the same engine class and maximum engine power, according to 40 CFR § 60.4243(a).

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

The engine is subject to the requirements of Subpart JJJJ of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. In accordance with 40 CFR § 60.4, copies of all requests, reports, applications, submittals, and other communications are required to be submitted to both the USEPA and DEP. NSPS reports may be submitted electronically to EPA's Central Data Exchange: <https://cdx.epa.gov/>.

015 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

Generac EGEN rated at 30 kW (47.10 hp) Model No. RG025, natural gas engine, build date 09/09/2019

The engine powering the generator set is certified to comply with the USEPA emission regulations under the provisions of 40 CFR Part 60 Subpart JJJJ - Engine Family and EPA Certificate Number KGNXB01.52NN (005).

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

**SECTION D. Source Level Requirements**

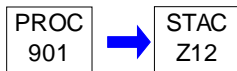
Source ID: 901

Source Name: INK ROOM

Source Capacity/Throughput:

N/A

VARIOUS

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

001 [25 Pa. Code §129.97]

Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.

The permittee shall limit the Volatile Organic Compounds (VOC) emissions for this source to 2.7 tons per year, based on a 12-month rolling period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §129.97]

Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.

The permittee shall maintain VOC emission calculations for this source in order to demonstrate compliance with the RACT VOC emission limit.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §129.97]

Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.

The permittee shall maintain and operate this source in accordance with the manufacturer's specifications and with good operating practices, according to 25 Pa. Code § 129.97(c)(2).

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: 902

Source Name: PARTS WASHER

Source Capacity/Throughput:

I. RESTRICTIONS.**Emission Restriction(s).****# 001 [25 Pa. Code §129.97]****Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.**

The permittee shall limit the Volatile Organic Compounds (VOC) emissions for this source to 2.7 tons per year, based on a 12-month rolling period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

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

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

The permittee shall maintain VOC emission calculations for this source in order to demonstrate compliance with the RACT VOC emission limit.

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

(a) The permittee shall maintain for at least 2 years and shall provide to the Department, on request, the following information for the immersion cold cleaning machine:

- (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 (68°F).

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

004 [25 Pa. Code §129.97]**Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.**

The permittee shall maintain VOC emission calculations for this source in order to demonstrate compliance with the RACT VOC emission limit.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 005 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall maintain and operate this immersion cold cleaning machines with a freeboard ratio of 0.50 or greater,

**SECTION D. Source Level Requirements**

according to 25 Pa. Code § 129.63(a)(1).

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

The permittee shall ensure the immersion cold cleaning machine has a permanent, conspicuous label summarizing operating requirements, including 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 cold cleaning machine.
- (b) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
- (c) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.

007 [25 Pa. Code §129.63]**Degreasing operations**

The permittee shall ensure the immersion cold cleaning machine is equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent, according to 25 Pa. Code § 129.63(a)(2)(ii).

008 [25 Pa. Code §129.63]**Degreasing operations**

The permittee shall operate the immersion cold cleaning machine 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 cold cleaning machine. 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 cold cleaning machine.
- (d) Air agitated solvent baths may not be used.
- (e) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

009 [25 Pa. Code §129.63]**Degreasing operations**

The permittee shall perform one of the following work practice standards for this parts washer:

- (a) A person may not use, sell or offer for sale for use in a cold cleaning machine 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, pursuant to 25 Pa. Code § 129.63(a)(4), OR
- (b) The cold cleaning machine shall have a freeboard ratio equal to or greater than 0.75, pursuant to 25 Pa. Code § 129.63(a)(7)(iii).

010 [25 Pa. Code §129.97]**Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.**

The permittee shall maintain and operate this source in accordance with the manufacturer's specifications and with good operating practices, according to 25 Pa. Code § 129.97(c)(2).



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION E. Source Group Restrictions.**

Group Name: 1

Group Description: Post-2012 Non-RACT Litho Presses

Sources included in this group

ID	Name
218	OFFSET LITHOGRAPHIC PRINTING PRESS NO. 2
219	OFFSET LITHOGRAPHIC PRINTING PRESS NO. 3

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.**# 001 [25 Pa. Code §129.67b]****Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

The permittee shall conduct sampling and testing as follows:

(a) 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.

(b) 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 USEPA.

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

The permittee shall monitor on a monthly basis the following, for each fountain solution, additive, ink, varnish, coating, and blanket and roller cleaning solution used on this press:

- (a) the VOC content in percent by weight as applied,
- (b) the monthly and 12-month rolling sum of consumption in pounds or gallons,
- (c) the fountain solution temperature, when applicable, and
- (d) the VOC composite partial vapor pressure of blanket and roller cleaning solutions, when applicable.

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

The permittee shall maintain records of VOC emissions for this source on a monthly basis, including 12-month rolling sums.

004 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall maintain records on a monthly basis of the following, for each fountain solution, additive, ink, coating, varnish, and blanket and roller cleaning solution used on this press:

- (1) the VOC content in percent by weight as applied,
- (2) the monthly and 12-month rolling sum of consumption in pounds or gallons,
- (3) the fountain solution temperature, when applicable, and
- (4) the VOC composite partial vapor pressure of blanket and roller cleaning solutions, when applicable.

(b) The permittee shall maintain records of the monthly weighted average % VOC by weight content of inks and coatings on a monthly basis.

005 [25 Pa. Code §129.67b]**Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

(a) The permittee shall maintain records sufficient to demonstrate compliance with 25 Pa. Code § 129.67b. Records maintained for compliance demonstrations may include purchase, use, production and other records.

**SECTION E. Source Group Restrictions.**

(b) The permittee shall maintain records of cleaning solutions and fountain solutions used at the facility, including:

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

- (i) The name and identification number for the blanket, roller or other cleaning solution.
- (ii) The VOC content (weight %) or VOC composite partial vapor pressure of each cleaning solution as applied.
- (iii) The volume used of each cleaning solution as applied on a 12-month rolling sum, if the owner or operator is using cleaning solutions which exceed the limits.
- (iv) Records of cleaning solution monitoring as required under 25 Pa. Code § 129.67b(e)(3).

(2) The following parameters for each press-ready (as applied) fountain solution:

- (i) The VOC content (weight %).
- (ii) Records of fountain solution monitoring as required under 25 Pa. Code § 129.67b(e)(2).

(c) 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.

(d) The permittee shall record all of the data required in the testing and monitoring conditions for this source in order to formulate monthly totals and 12-month rolling totals.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall use non-heatset lithographic inks and coatings with low VOC-content on this lithographic printing press as follows:

- (a) VOC content of inks: less than 24% VOC by weight, based on a monthly weighted average of inks,
- (b) VOC content of coatings: less than 2% VOC by weight, based on a monthly weighted average of coatings.

007 [25 Pa. Code §129.67b]**Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

The permittee shall demonstrate compliance with the fountain solution VOC limit by using one or more of the following methods:

(a) 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.

(b) Maintenance onsite of SDS, 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.

(c) 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 pressready fountain solution.

(1) 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.

(2) The VOC content shall be calculated one (2) 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.

**SECTION E. Source Group Restrictions.**

(3) 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.

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

(1) 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.

(2) 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.

(e) Another method to determine compliance with the VOC content limits for fountain solutions if the following requirements are met:

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

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

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

008 [25 Pa. Code §129.67b]**Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

The permittee shall demonstrate compliance with the VOC content limit or VOC composite partial vapor pressure limit for cleaning solutions by one or more of the following methods:

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

(b) Use of the equation in 25 Pa. Code § 129.67b(j) to calculate the composite partial vapor pressure of the press-ready (as applied) cleaning solution.

(c) Use of the methods in 25 Pa. Code § 129.67b(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.

(d) Maintenance onsite of SDS, 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.

(e) 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.

(1) 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.

(2) 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.

**SECTION E. Source Group Restrictions.**

(3) 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.

(f) Another method to determine compliance with the VOC content limits for cleaning solutions if the following requirements are met:

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

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

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

009 [25 Pa. Code §129.67b]**Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

The permittee shall comply with the following work practices for cleaning activities at the facility.

(a) Store all VOC-containing cleaning solutions, waste cleaning solutions and used shop towels in closed containers.

(b) 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 towels.

(c) Minimize spills of VOC-containing cleaning solutions and waste cleaning solutions and clean up spills immediately.

(d) Convey VOC-containing cleaning solutions, waste cleaning solutions and used shop towels from one location to another in closed containers or pipes.

(e) The requirements above in paragraphs (a), (b), (c) and (d) apply to the following activities:

(1) Cleaning of a press, including blanket washing, roller washing, plate cleaners, metering roller cleaners, impression cylinder cleaners and rubber rejuvenators.

(2) Cleaning of press parts, including press parts that have been removed from the press for cleaning.

(3) Cleaning of ink, coating or adhesive from areas around a press.

(f) The requirements above in paragraphs (a), (b), (c), and (d) do not apply to the following activities:

(1) Cleaning electronic components of a press.

(2) Cleaning in pre-press (for example, platemaking) operations.

(3) Cleaning in post-press (for example, binding) operations.

(4) Using janitorial supplies (for example, detergents or floor cleaners) for general cleaning around a press.

(5) 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 25 Pa. Code § 129.63 (relating to degreasing operations).

010 [25 Pa. Code §129.67b]**Control of VOC emissions from offset lithographic printing presses and letterpress printing presses.**

(a) The permittee shall not cause or permit the emission into the outdoor atmosphere of VOCs from cleaning solutions used in or on this offset lithographic printing press unless the following conditions are met:

**SECTION E. Source Group Restrictions.**

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

- (i) VOC composite partial vapor pressure less than 10 millimeters of mercury at 68°F (20°C).
- (ii) A VOC content less than 70% by weight.

(2) 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 (a)(1) of this condition is limited to 110 gallons per year, combined, of all cleaning solutions that exceed the limits in subparagraph (a)(1).

(b) The permittee shall not cause or permit the emission into the outdoor atmosphere of VOCs from a fountain solution used in this offset lithographic printing press unless the fountain solution meets the following VOC limit: The press-ready (as applied) fountain solution shall contain a VOC content of 5% or less by weight and no alcohol in the fountain solution.

VII. ADDITIONAL REQUIREMENTS.

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

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



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
217	FLEXOGRAPHIC PRINTING PRESS - BOBST NO. 2		
Emission Limit		Pollutant	
12.500 Tons/Yr	In any 12-month rolling summation		VOC
218	OFFSET LITHOGRAPHIC PRINTING PRESS NO. 2		
Emission Limit		Pollutant	
24.500 Tons/Yr	12-month rolling summation		VOC
219	OFFSET LITHOGRAPHIC PRINTING PRESS NO. 3		
Emission Limit		Pollutant	
21.000 Tons/Yr	12-month rolling summation		VOC
742	EGEN - NG GENERAC EMERGENCY ENGINE		
Emission Limit		Pollutant	
2.750 Tons/OZNESEAS	all exempt engines on site		NOX
6.600 Tons/Yr	all exempt engines on site		NOX
100.000 Lbs/Hr	all exempt engines on site		NOX
1,000.000 Lbs/Day	all exempt engines on site		NOX
901	INK ROOM		
Emission Limit		Pollutant	
2.700 Tons/Yr			VOC
902	PARTS WASHER		
Emission Limit		Pollutant	
2.700 Tons/Yr			VOC

Site Emission Restriction Summary

Emission Limit		Pollutant
150.300 Tons/Yr	12-month rolling summation	VOC
25.000 Tons/Yr	combination of HAPs	Hazardous Air Pollutants
10.000 Tons/Yr	individual HAPs	Hazardous Air Pollutants

**SECTION H. Miscellaneous.**-----
INITIAL NOVEMBER 2001

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

Permit No. OP-46-0041

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

- (1) Gloss calendaring machine with component boiler - removed ~2005
- (2) Guillotine cutters
- (3) Sheetters
- (4) Plate development equipment
- (5) Two (2) propane tanks: 1,000 gallon & 100 gallon
- (6) Hot melt systems
- (7) Chlorine pump and tank on water supply - removed ~2004
- (8) Sprinkler system for fire protection
- (9) 136 hp diesel engine for sprinkler system pump with fuel tank - removed ~2012
- (10) Air conditioning system
- (11) Aerator/joggers
- (12) Reverse osmosis water softening system - removed ~2009
- (13) Calcite fresh water treatment for corrosion control - removed January 2012
- (14) Maintenance department functions
- (15) Kewanee Heating Boiler (Source ID 033) - 3.4 MMBtu/hr natural gas or propane boiler *Removed 2021*
- (16) Columbia Heating Boiler (Source ID 034) - 1.3 MMBtu/hr natural gas boiler *Removed 2021*
- (17) Space Heaters (Source ID 116) - twenty (20) 0.08 MMBtu/hr direct radiant heaters, two (2) 1.375 MMBtu/hr space heaters, and two (2) 2.25 MMBtu/hr space heaters = 8.85 MMBtu/hr aggregate total, all fired by natural gas
- (18) Equipment added to the Finishing Department in 2018: (1) sheeter, (2) cutters, (1) gluer - reference RFD No. 6635.
- (19) Replacement of a cutter listed in Finishing Department (Source ID 210).
- (20) Bagger unit supported by 1.54 MMBtu/hr natural gas burner - reference RFD No. 8632.

MODIFICATION DECEMBER 2002

(a) This permit is a minor modification to the Title V permit previously issued November 15, 2001. The modification affects the fountain solution requirements at four (4) sheet fed lithographic printing presses. Work Practice Standards have been modified at Source IDs 204, 205, 206 and 208. Monitoring and Recordkeeping Requirements have been modified to reflect the changes to the Work Practice Standards.

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

(c) The emergency generator (750,000 Btu/hr capacity) shall be operated and maintained in accordance with manufacturer's specifications, according to presumptive RACT 25 Pa. Code § 129.93(c)(5). The generator consumes propane and operates less than 500 hours per year. This source now appears in Section A and Section D as Source ID 741 - 750,000 Btu/hr Propane Emergency Generator.

AMENDMENT JULY 2003

This permit is an Administrative Amendment to TVOP-46-00041 previously issued December 20, 2002. The amendment addresses objections raised during the appeal of the original Title V permit.

AMENDMENT MARCH 2004

**SECTION H. Miscellaneous.**

This permit is an Administrative Amendment to TVOP-46-00041 previously issued July 24, 2003. (New AUTH ID 537253, APS 346596). This amendment incorporates Plan Approval PA-46-0041A, new lithographic printing Press No. 1 (Source ID 216). This amendment also addresses the removal of Source ID 204 - #8 Harris Offset Press. Source 204 has been permanently removed from the facility and credible VOC emission reductions of 4.4 tpy of VOC have been used for internal netting to offset the VOC emission increase at the facility due to installation of Press No. 1. For New Source Review purposes, the emission increase from Press No. 1 shall be 20.1 tons of VOC per year.

 AMENDMENT MAY 2005

This permit has been amended (Administrative Amendment Application dated March 30, 2005) to address the change of ownership from the previous owner Jefferson Smurfit Corporation (US), previous tax ID 36-2659288, previous APS 346596 to the current owner Smurfit-Stone Container Enterprises, Inc., new tax ID 36-2041256, new APS 552075 (new AUTH ID 591155). The Responsible Official has also been updated.

 TRANSFER SEPTEMBER 2005

The Client ID has been corrected for this facility. Current Client ID 84906; new AUTH ID 606414; new APS 563618; Master AUTH ID 355402. Previous AUTH ID 591155 has been "removed/entered in error" in eFACTS.

 AMENDMENT DECEMBER 2005

This permit has been amended (Administrative Amendment Application dated September 22, 2005). New AUTH ID 607011, APS ID 563618. This amendment incorporates Plan Approval No. 46-0041C for the new flexographic printing Press No. 2 (Source ID 217). This amendment also addresses the shut down of offset lithographic printing press 4 (Source ID 206). Source 206 has been permanently shut down and it has generated the total of 9.1 tons per year of VOC reduction credits. These credible emissions have been used for internal netting to offset the VOC emission increase from press No. 2. As a result, the total net facility emission increase: 3.4 tons of VOC emissions per year.

 AMENDMENT NOVEMBER 2006

This permit has been amended (Administrative Amendment Application dated July 31, 2006) to address the change of ownership from the previous owner Smurfit-Stone Container Enterprises, Inc., previous Tax ID 36-2041256, previous APS 563618 to the current owner Bluegrass Folding Carton Company, LLC, new Tax ID 20-5002721, new APS 596477 (new AUTH ID 650313). The Responsible Official has also been updated.

 RENEWAL MARCH 2007

This permit is the Title V Renewal Permit (AUTH ID 654223; APS ID 599331). There are no new sources, no new state or federal regulations and the facility is not subjected to CAM.

 AMENDMENT DECEMBER 2008

This permit has been amended (Administrative Amendment Application dated November 24, 2008) to address the change of ownership from the previous owner Bluegrass Folding Carton Company, LLC, previous tax ID 20-5002721, previous APS 599331 to the current owner Graphic Packaging International, Inc., new tax ID 84-0772929, New AUTH 754770; New APS 664204; New Client 268942; New Site 237254; New PF 239549. All other information remains the same.

 RENEWAL FEBRUARY 2012

(a) This permit is the Title V Renewal Permit (AUTH ID 893424; APS 664204). The following has been addressed with this renewal permit:

**SECTION H. Miscellaneous.**

- (1) The responsible official has been updated from Robert Glaspey to John Best, General Manager.
- (2) The facility-wide VOC emission restriction, Section C, Condition #007 has been revised to more accurately indicate emissions from all sources operating at the plant, including sources operating in Section G (Miscellaneous).
- (3) The testing requirement for the printing presses (Source ID 205, 208, 216, 217) has been revised for accuracy.
- (4) Source ID 741 (Propane Emergency Generator) has been added to Section A and Section D in order to incorporate presumptive RACT conditions and 40 CFR Part 63 Subpart ZZZZ requirements at the source level; also noted in (e) above.
- (5) The following insignificant sources have been permanently shutdown and removed from the facility: (b)(1), (b)(7), (b)(12), (b)(13) above.
- (6) The following sources have been removed from Section A and Section D and now appear as insignificant sources of emissions in Section G above as (b)(15), (b)(16) and (b)(17): Source ID 033 Kewanee Heating Boiler, Source ID 034 Columbia Heating Boiler, Source ID 116 Space Heaters. The sources do not require additional monitoring or recordkeeping based on maximum capacity and type of fuel consumed for each source.
- (7) The facility's potential GHG emissions are below the applicability threshold at this time.
- (8) Source ID 902 has been created in the permit in order to address the requirements for degreasing operations, according to 25 Pa. Code § 129.63. The source includes one (1) immersion cold cleaning machine. Source ID 901 has been renamed to more accurately reflect the "Ink Room" as a source.

 RENEWAL FEBRUARY 2016

(a) This permit is the Title V Renewal Permit (AUTH ID 1141040; APS 664204). The following has been addressed with this renewal permit:

- (1) The responsible official has been updated from John Best to Jim Jackmore, Plant Manager.
- (2) The permit contact has been updated to Furqan Shaikh and the inspection contact has been updated to Jeff MacCain.
- (3) The requirements of 25 Pa. Code § 129.67b have been added to Lithographic Presses - Source ID 205, Source ID 208, and Source ID 216.
- (4) The RACT II requirements of 25 Pa. Code § 129.96-100 have been added to the permit as applicable.
- (5) Adhesives and glues used as part of Finishing Operations (Source ID 210) contain less than 20 grams VOC per liter adhesive; therefore the requirements of 25 Pa. Code § 129.77 do not apply in accordance with 25 Pa. Code § 129.77(k)(3).

 AMENDMENT MARCH 2018

This permit is an administrative amendment (AUTH ID 1219586; APS 664204) to address a change in responsible official from Jim Jackmore to Anthony Bates, Operations Manager.

 AMENDMENT FEBRUARY 2019

(a) This permit is an administrative amendment (AUTH ID 1257274; APS 664204) for the following:

- (1) Address a change in the company name from Graphic Packaging International, Inc. to Graphic Packaging International, LLC. There is no change in Tax ID.
- (2) To incorporate terms and conditions of Plan Approval No. 46-0041F which is for the installation of a new non-heatset, sheetfed, offset lithographic printing press (Source ID 218).

 AMENDMENT APRIL 2021

(a) This permit is an administrative amendment (AUTH ID 1346861; APS 664204) to incorporate terms and conditions of Plan Approval No. 46-0041H which is for the installation of a new non-heatset, sheetfed, offset lithographic printing press (Source ID 219). The following changes are also included with the amendment:

- (1) Section B and Section C have been updated to the most current template language used for Title V Operating Permits issued in the Southeast Region.
- (2) Due to a change to the AIMS permitting system, grouped permit conditions now appear in Section E, the Emission Restriction

**SECTION H. Miscellaneous.**

Summary now appears as Section G, and the Miscellaneous Section is now Section H of the permit.

(3) As part of the plan approval project, Source ID 208 was removed from the plant; Source ID 208 is removed from the permit. Source ID 216 was also removed from the plant (not a part of the plan approval project); Source ID 216 is removed from the permit.

RENEWAL MARCH 2022

(a) This permit is the Title V Renewal Permit (AUTH ID 1365164; APS 664204). The following has been addressed with this renewal permit:

(1) Responsible Official and Firm Plant Contact has been updated to Zachary Steinly, Plant Manager. Inspection contact and permit contact has been updated to Natalie Reynolds, Safety and Environmental Manager.

(2) Section B and Section C have been updated to the most current template language used for Title V Operating Permits issued in the Southeast Region.

(3) Source ID 205 (Lithographic Printing Press No. 7 Planeta) was removed from the facility and the permit.

(4) The Emergency Generator (Source ID 741) was replaced with a natural gas emergency generator (Source ID 742).



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