



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

**STATE ONLY SYNTHETIC MINOR OPERATING PERMIT**

Issue Date: August 18, 2022

Effective Date: August 18, 2022

Expiration Date: August 17, 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 unless otherwise designated.

**State Only Permit No: 09-00037**

Synthetic Minor

Federal Tax Id - Plant Code: 82-2801476

**Owner Information**

Name: BROOK &amp; WHITTLE LTD

Mailing Address: 3001 STATE RD  
CROYDON, PA 19021-6962

**Plant Information**

Plant: BW CROYDON / BRISTOL

Location: 09 Bucks County 09001 Bristol Township

SIC Code: 2754 Manufacturing - Commercial Printing, Gravure

**Responsible Official**

Name: FRANK BRADSHAW

Title: PLANT MGR

Phone: (215) 826 - 2412

Email: fbradshaw@bwhittle.com

**Permit Contact Person**

Name: FRANK BRADSHAW

Title: PLANT MGR

Phone: (215) 826 - 2412

Email: fbradshaw@bwhittle.com

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

JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER



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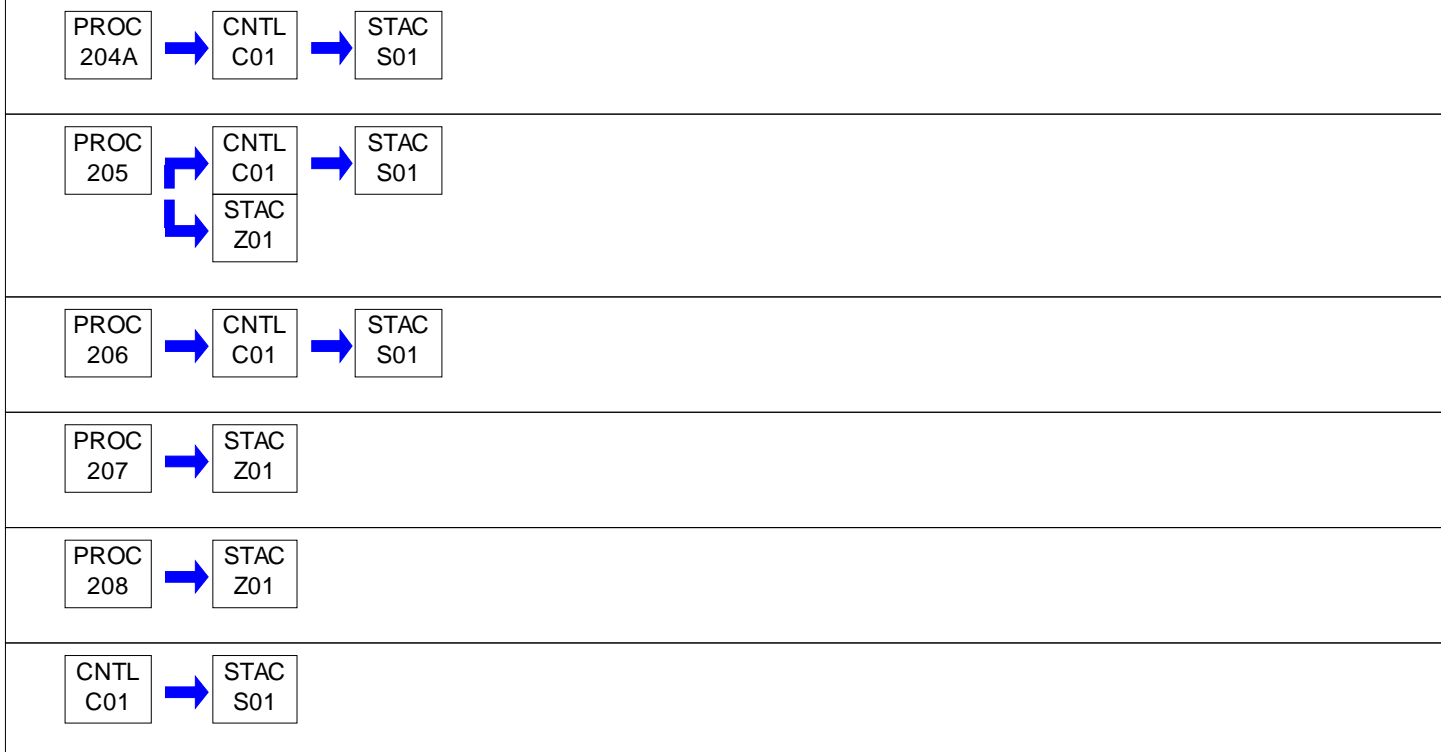
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
204A	ROTOMECH-10 ROTOGRAVURE PRESS		
205	SEAMING MACHINES	1.000 Gal/HR	BONDING AGENT
206	AUTOMATED PARTS WASHING SYSTEM	0.080 Gal/HR	N-PROPYL ACETATE
207	IMMERSION COLD CLEANING MACHINE		
208	REMOTE RESERVOIR COLD CLEANING MACHINE		
C01	REGENERATIVE THERMAL OXIDIZER (RTO)	10.000 MCF/HR	Natural Gas
S01	RTO STACK		
Z01	FUGITIVE EMISSIONS		

**PERMIT MAPS**

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

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

**#002 [25 Pa. Code § 127.446]****Operating Permit Duration.**

(a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.

(b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

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

(a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.

(b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

(c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.

(d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.

(e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).

(f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

**#004 [25 Pa. Code § 127.703]****Operating Permit Fees under Subchapter I.**

(a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.

(1) For a synthetic minor facility, a fee equal to:

(i) Four thousand dollars (\$4,000) for calendar years 2021—2025.

(ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.

(iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.

**SECTION B. General State Only Requirements**

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

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

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

**#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]****Transfer of Operating Permits.**

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

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

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

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

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

(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

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

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

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

**#007 [25 Pa. Code §§ 127.441 & 127.444]****Compliance Requirements.**

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

**SECTION B. General State Only Requirements**

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

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

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

**#008 [25 Pa. Code § 127.441]****Need to Halt or Reduce Activity Not a Defense.**

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

**#009 [25 Pa. Code §§ 127.442(a) & 127.461]****Duty to Provide Information.**

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

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

**#010 [25 Pa. Code § 127.461]****Revising an Operating Permit for Cause.**

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

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

**#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]****Operating Permit Modifications**

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

**SECTION B. General State Only Requirements**

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

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

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

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

**#012 [25 Pa. Code § 127.441]****Severability Clause.**

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

**#013 [25 Pa. Code § 127.449]****De Minimis Emission Increases.**

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

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

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

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

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

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

(2) One ton of NO<sub>x</sub> from a single source during the term of the permit and 5 tons of NO<sub>x</sub> at the facility during the term of the permit.

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

(4) Six-tenths of a ton of PM<sub>10</sub> from a single source during the term of the permit and 3.0 tons of PM<sub>10</sub> at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

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

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

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



**SECTION B. General State Only Requirements**

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
  - (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
  - (4) Space heaters which heat by direct heat transfer.
  - (5) Laboratory equipment used exclusively for chemical or physical analysis.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
  - (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
  - (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

**#014 [25 Pa. Code § 127.3]****Operational Flexibility.**

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

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)

**SECTION B. General State Only Requirements**

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

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

**#015 [25 Pa. Code § 127.11]****Reactivation**

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

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

**#016 [25 Pa. Code § 127.36]****Health Risk-based Emission Standards and Operating Practice Requirements.**

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

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

**#017 [25 Pa. Code § 121.9]****Circumvention.**

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

**#019 [25 Pa. Code §§ 127.441(c) & 135.5]****Sampling, Testing and Monitoring Procedures.**

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

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

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

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

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

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

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

**#021 [25 Pa. Code § 127.441(a)]****Property Rights.**

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

**#022 [25 Pa. Code § 127.447]****Alternative Operating Scenarios.**

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

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

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

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

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

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

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

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

**# 002 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

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

- (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.

**# 003 [25 Pa. Code §123.2]****Fugitive particulate matter**

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1 (a)(1)-(9), if such emissions are visible at the point the emissions pass outside the person's property.

**# 004 [25 Pa. Code §123.31]****Limitations**

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

**# 005 [25 Pa. Code §123.41]****Limitations**

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

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

**# 006 [25 Pa. Code §123.42]****Exceptions**

The opacity limitations 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.
- (c) When the emission results from sources specified in 25 Pa. Code § 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).

**SECTION C. Site Level Requirements****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit facility-wide VOC emissions to less than 25 tons per year, based on a 12-month rolling sum.

**# 008 [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) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (c) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (d) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.
- (f) A fire set solely for recreational or ceremonial purposes.
- (g) A fire set solely for cooking food.

**# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.820]****Subpart KK--National Emission Standards for the Printing and Publishing Industry****Applicability.**

The permittee shall limit facility-wide usage of Hazardous Air Pollutants (HAPs) to less than ten (10) tons per 12-month rolling sum individual HAP and less than twenty-five (25) tons per 12-month rolling sum any combination HAPs, including materials used for source categories or purposes other than printing and publishing, according to 40 CFR §§ 63.820(a)(2) and 63.820(a)(3).

**II. TESTING REQUIREMENTS.****# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source 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.

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

- (a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region  
RA-EPSEstacktesting@pa.gov

Central Office  
RA-EPstacktesting@pa.gov

- (b) The following pertinent information shall be listed on the title page.

(1) Test Date(s)

**SECTION C. Site Level Requirements**

- (i) For protocols, provide the proposed date on which testing will commence or "TBD"
- (ii) For reports, provide the first and last day of testing

(2) Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

(3) Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

(4) Testing Requirements (all that apply):

- (i) Operating permit number
- (ii) Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ, etc.)
- (iii) Special purpose(s) (i.e. Consent Order, RFD, RACT II, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

**III. MONITORING REQUIREMENTS.****# 012 [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.

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

(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); and
- (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.

**SECTION C. Site Level Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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 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.

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

The permittee shall maintain records of all training received by employees on the proper handling, use and storage of solvents, including training provided to employees on a regular basis and during orientation of new personnel.

**# 017 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The permittee shall maintain monthly records of facility-wide VOC emissions, including 12-month rolling sums.
- (b) The permittee shall maintain monthly records of facility-wide HAP emissions, including 12-month rolling sums.

**# 018 [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.**

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

**V. REPORTING REQUIREMENTS.****# 019 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

- (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 threshold quantity at a 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 40 CFR § 68.130; or,
    - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.



**SECTION C. Site Level Requirements**

(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 this 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 this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

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

**# 020 [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 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.

**SECTION C. Site Level 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.

**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 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, 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, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts;

(c) Paving and maintenance of roadways; and

(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 §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the source(s) and air pollution control device(s) are operated and maintained in a manner consistent with good operating and maintenance practices and in accordance with manufacturer's specifications.

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

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

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

The permittee shall immediately, upon discovery, implement measures which may include the application for the installation of an air 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.

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

(a) The permittee shall transfer inks, varnishes and solvents from closed container to closed container.

(b) Rags wet with inks, varnishes or solvents shall be stored in closed containers and disposed of according to Department approved procedures.

(c) The lids of drums and containers containing inks, varnishes and solvents shall be kept closed when not in use.

(d) Any spills of inks, varnishes and solvents shall be cleaned up as soon as possible.

**SECTION C. Site Level Requirements**

(e) The presses shall be maintained properly at all times.

[Compliance with the conditions above also demonstrate compliance with 25 Pa. Code § 129.52b(h) and 25 Pa. Code § 129.67a(g).]

(f) The permittee shall train employees on the proper handling, use and storage of solvents. Such training be provided to employees on a regular basis and during orientation of new personnel.

**VII. ADDITIONAL REQUIREMENTS.**

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

**VIII. COMPLIANCE CERTIFICATION.**

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

**IX. COMPLIANCE SCHEDULE.**

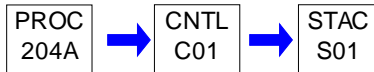
No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 204A

Source Name: ROTOMEC-10 ROTOGRAVURE PRESS

Source Capacity/Throughput:

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall limit VOC emissions from the Rotomec 10 Press to 216 pounds per hour (pre-control emissions), based on material usage data.

**Operation Hours Restriction(s).**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall limit the hours of operation for this press to 8,760 hours per year.

**Control Device Efficiency Restriction(s).**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall maintain 100% capture efficiency by operating the Rotomec-10 press in a permanent total enclosure and discharging all VOC emissions through the Regenerative Thermal Oxidizer (C01).

[This condition serves as Best Available Technology (BAT) and assures compliance with 25 Pa. Code § 129.67(b)(3) and (c)(2) and 25 Pa. Code § 129.67a(c)(3).]

**II. TESTING REQUIREMENTS.**

# 004 [25 Pa. Code §129.67a]

**Control of VOC emissions from flexible packaging printing presses.**

The permittee shall conduct sampling of an ink or coating and testing for the VOC content of the ink or coating in accordance with the procedures and test methods specified in Chapter 139, pursuant to 25 Pa. Code § 129.67a(f)(1)(i).

[Note: In accordance with 25 Pa. Code § 129.67a(f)(3), the following test methods have been approved by the Department:

(1) The permittee may use data from Certified Product Data Sheets (CPDS) and Safety Data Sheets (SDS) to determine the VOC and HAP content of as-applied inks or coatings or other components applied at this source and to calculate VOC and HAP emissions from this source.

(2) As an alternative to the CPDS and SDS, the permittee may use USEPA Test Method 24 to determine the VOC and HAP content of the inks or coatings or other components applied at this source.]

**III. MONITORING REQUIREMENTS.**

# 005 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall monitor the amount of inks, coatings, thinners, and clean-up solvents used on a daily basis.

# 006 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall monitor the hours of operation for this press on a daily basis.

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain the following daily records for this press, according to 25 Pa. Code § 129.52(d) and 25 Pa. Code § 129.95:

- (a) The following parameters for each coating, thinner, ink and other component (including clean-up solvents) as supplied:
  - (i) The coating, thinner, ink or component name and identification number.
  - (ii) The volume used.
  - (iii) The mix ratio.
  - (iv) The density or specific gravity.
  - (v) The weight percent of total volatiles, water, solids and exempt solvents.
- (b) The VOC content of each coating, thinner, ink and other component as supplied.
- (c) The VOC content of each as applied coating and ink.
- (d) The VOC content of each clean-up solvent.

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

- (a) The permittee shall maintain records of the CPDS and SDS or data from any alternate Department approved methods.
- (b) The permittee shall calculate and record on a monthly basis the average of VOC emissions from this press (pre-control) on a pounds per hour basis.
- (c) The permittee shall calculate and record the VOC emissions post-control on a monthly basis, including 12-month rolling sums.

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

The permittee shall maintain daily records of the hours of operation for this press.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall perform all clean up operations for this press within the total enclosure while vented to the RTO.

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

The permittee shall maintain the permanent total enclosure for this source in the same configuration as it is tested, unless otherwise approved by the Department.

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

The press shall be equipped with a natural gas, air circulating dryer.

**# 013 [25 Pa. Code §129.52]****Surface coating processes**

The permittee shall reduce the overall weight of VOCs emitted to the atmosphere through the use of the regenerative



**SECTION D. Source Level Requirements**

thermal oxidizer (C01) when this press performs surface coating operations (varnish), according to 25 Pa. Code § 129.52(c)(2).

**# 014 [25 Pa. Code §129.67]**  
**Graphic arts systems**  
[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.444]  
The permittee shall operate the thermal oxidizer in accordance with good engineering practice, according to 25 Pa. Code § 129.67(c).

**# 015 [25 Pa. Code §129.67a]**  
**Control of VOC emissions from flexible packaging printing presses.**  
[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67a(d)(3).]  
The RTO shall be in operation at all times that Source ID 204A (Rotomec-10) is operating.

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION D. Source Level Requirements**

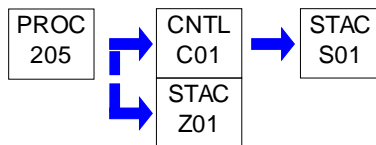
Source ID: 205

Source Name: SEAMING MACHINES

Source Capacity/Throughput:

1.000 Gal/HR

BONDING AGENT

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall limit the pre-control VOC emissions from this source to 5.5 tons per 12-month rolling sum, based on volume (gallons) of adhesive(s) applied and VOC content of the as-applied adhesive(s).

**Control Device Efficiency Restriction(s).**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall reduce the VOC emissions from Source ID 205 by an overall efficiency (destruction \* capture) of at least 88.2%, by weight.

[Compliance with this streamline permit condition assures compliance with 25 Pa. Code § 129.77(g)(1), which requires a minimum of 85%, by weight, overall reduction efficiency.]

**II. TESTING REQUIREMENTS.**

# 003 [25 Pa. Code §129.77.]

**Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

(a) The permittee shall use data from Certified Product Data Sheets (CPDS) and Safety Data Sheets (SDS) to determine the VOC and HAP content of as-applied adhesives and other components applied at this source and to calculate VOC and HAP emissions from this source.

(b) As an alternative to the CPDS and SDS, the permittee may use USEPA Test Method 24 to determine the VOC and HAP content of the adhesives/other components applied at this source.

[Compliance with this condition streamlines compliance with the VOC content testing requirements of 25 Pa. Code § 129.77.]

**III. MONITORING REQUIREMENTS.**

# 004 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall base pre-control VOC emission calculations on the volume (gallons) of adhesive used per month and the VOC content of each as-applied adhesive.

**IV. RECORDKEEPING REQUIREMENTS.**

# 005 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

(a) The permittee shall maintain records of the CPDS and SDS or data from any alternate Department approved methods.

(b) The permittee shall calculate and record the pre-control VOC emissions from this source on a monthly basis, including 12-month rolling sums.

**SECTION D. Source Level Requirements**

(c) The permittee shall calculate and record the post-control VOC emissions from this source on a monthly basis, including 12-month rolling sums.

**# 006 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall maintain the following records for materials used at this source, according to 25 Pa. Code § 129.77(o) and 25 Pa. Code § 129.77(g)(5):

- (a) A list of each adhesive product in use and in storage.
- (b) A data sheet or material list which provides the product name, manufacturer identification and use or material application type for each adhesive.
- (c) The VOC content of each adhesive, as supplied.
- (d) Catalysts, reducers or other components used and the mix ratio.
- (e) The VOC content or vapor pressure of each adhesive, if solvent or other VOC is added to the product before application.
- (f) The monthly volume purchased or produced of adhesive.
- (g) The monthly volume used or applied of each adhesive.

[Compliance with this streamlined condition demonstrates compliance with the RACT requirements of 25 Pa. Code § 129.95.]

**# 007 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall maintain daily records of the volume used each day of each noncomplying as applied adhesive and cleanup solvent, as applicable, according to 25 Pa. Code § 129.77(g)(6)(i).

[The VOC content limit applicable to operations at the facility is 4.3 pounds VOC per gallon, less water and exempt compounds, for plastic cement welding adhesives applied to flexible vinyl, as found in Table V of 25 Pa. Code § 127.77.]

**# 008 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

(a) The permittee shall maintain records to demonstrate compliance with 25 Pa. Code § 129.77 onsite for 5 years from the date the record is created, according to 25 Pa. Code § 129.77(q).

(b) The permittee shall make available to the Department the records used to demonstrate compliance with 25 Pa. Code § 129.77 upon receipt of a written request.

**V. REPORTING REQUIREMENTS.**

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

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

The permittee shall maintain and operate the seaming machines in accordance with manufacturer's specifications and good air pollution practices.



**SECTION D. Source Level Requirements****# 010 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall reduce VOC emissions from this source through the use of the Regenerative Thermal Oxidizer (C01), according to 25 Pa. Code § 129.77(g)(1).

**# 011 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall store or dispose of all absorbent materials, including cloth or paper, which are moistened with adhesives or cleanup solvents in nonabsorbent containers at the facility that are kept closed except when placing materials in or removing materials from the container, according to 25 Pa. Code § 129.77(h).

**# 012 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee may not add solvent to the adhesive in an amount in excess of the manufacturer's recommendation for application, if this addition causes the adhesive to exceed the applicable VOC content limit listed in this permit unless the emissions are controlled through the use of add-on air pollution control equipment, according to 25 Pa. Code § 129.77(j).

[Note: The VOC content limit applicable to operations at CMS is 4.3 pounds VOC per gallon, less water and exempt compounds, for plastic cement welding adhesives applied to flexible vinyl, as found in Table V of 25 Pa. Code § 127.77.]

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

If at any time, the permittee applies at this source a cleaning solvent or surface preparation solvent, as defined in 25 Pa. Code § 121.1, the permittee shall comply with the requirements of 25 Pa. Code § 129.77 associated with cleaning solvent and/or surface preparation solvent, as applicable.

**SECTION D. Source Level Requirements**

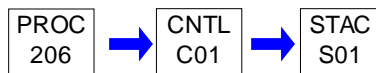
Source ID: 206

Source Name: AUTOMATED PARTS WASHING SYSTEM

Source Capacity/Throughput:

0.080 Gal/HR

N-PROPYL ACETATE

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

The permittee shall ensure that the emissions of volatile organic compounds (VOCs), expressed as n-propyl acetate from the Automated Parts Washer (Source ID: 206), shall not exceed 0.44 tons per year, as a twelve (12) month rolling sum.

[Compliance with this condition streamlines compliance with the VOC emission limit of 25 Pa. Code § 129.63(d)(2).]

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

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

(a) The permittee shall maintain monthly records of the hours of operation for this source, including 12-month rolling sums.

(b) The permittee shall calculate and record monthly and 12-month rolling sums of VOC emissions in order to determine compliance with the VOC emission limit for this source.

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

The permittee shall maintain records of the quantity of solvents added to or removed from this source as well as the dates of the additions and removals.

**V. REPORTING REQUIREMENTS.**

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

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

(a) The permittee shall ensure that emissions from the Automated Parts Washer (Source ID: 206) shall be ducted to the Regenerative Thermal Oxidizer (Source ID: C01)

(b) The permittee shall not operate the Automated Parts Washer (Source ID: 206) at any time that the Regenerative Thermal

**SECTION D. Source Level Requirements**

Oxidizer (Source ID: C01) is not operating.

(c) The permittee shall ensure that the Automated Parts Washer (Source ID: 206) is operated and maintained in accordance with manufacturer's specifications and good air pollution control practices.

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

The permittee shall operate the airtight cleaning machines in accordance with the following procedures, according to 25 Pa. Code § 129.63(d)(6):

- (a) Waste solvent, still bottoms and sump bottoms 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) Parts shall be oriented so that the solvent drains freely from the parts. Cleaned parts shall 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.
- (c) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the airtight cleaning machines.
- (d) Spills during solvent transfer and use of the airtight cleaning machines shall be cleaned up immediately.
- (e) Work area fans shall be located and positioned so that they do not blow across the airtight cleaning machine.
- (f) Spraying operations shall be done in the vapor zone or within a section of the machine that is not exposed to the ambient air.
- (g) When solvent is added to or drained from the airtight cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

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

The permittee shall equip the machine with a permanent, conspicuous label summarizing the operating requirements of 25 Pa. Code § 129.63(d)(6).

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

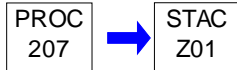
The automated parts washer is an air tight cleaning machine.

**SECTION D. Source Level Requirements**

Source ID: 207

Source Name: IMMERSION COLD CLEANING MACHINE

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

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

The permittee shall perform the following recordkeeping for the parts washers:

(a) The permittee shall maintain records and provide to the Department, on request, the information specified below, pursuant to 25 Pa. Code § 129.63(a)(6):

- (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.

**V. REPORTING REQUIREMENTS.**

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

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

The permittee should perform the following discretionary good operating practices for this parts washer, pursuant to 25 Pa. Code § 129.63(a)(2)(i)(A)-(C):

(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.

**SECTION D. Source Level Requirements**

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

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

(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 permittee shall maintain a freeboard ratio equal to or greater than 0.75 for this immersion parts washer, pursuant to 25 Pa. Code § 129.63(a)(7)(iii).

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

The permittee shall operate the cold cleaning machines in accordance with the following procedures, pursuant to 25 Pa. Code § 129.63(a)(3):

(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.

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

The permittee shall operate the immersion cold cleaning machine with a freeboard ratio of 0.50 or greater, according to 25 Pa. Code § 129.63(a)(1).

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

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

(a) The immersion cold cold cleaning machines shall have a permanent, conspicuous label summarizing the operating requirements contained in this permit for this source, pursuant to 25 Pa. Code § 129.63(a)(2)(i).

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

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

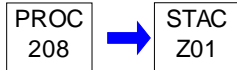
This immersion cold cleaning machine is located near the UV-cured ink Comco flexographic printing press.

**SECTION D. Source Level Requirements**

Source ID: 208

Source Name: REMOTE RESERVOIR COLD CLEANING MACHINE

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

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

The permittee shall perform the following recordkeeping for the parts washers:

(a) The permittee shall maintain records and provide to the Department, on request, the information specified below, pursuant to 25 Pa. Code § 129.63(a)(6):

- (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.

**V. REPORTING REQUIREMENTS.**

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

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

The permittee should perform the following discretionary good operating practices, pursuant to 25 Pa. Code § 129.63(a)(2)(i)(A)-(C):

(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.

**SECTION D. Source Level Requirements**

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

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

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).

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

The permittee shall operate the cold cleaning machines in accordance with the following procedures, pursuant to 25 Pa. Code § 129.63(a)(3):

- (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.

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

The permittee shall perform the following work practice standards for the parts washers:

- (a) The remote reservoir cold cleaning machines shall have a permanent, conspicuous label summarizing the operating requirements contained in this permit for this source, pursuant to 25 Pa. Code § 129.63(a)(2)(i).
- (b) The remote reservoir cold cleaning machines shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover, pursuant to 25 Pa. Code § 129.63(a)(2)(ii).

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

This remote reservoir cold cleaning machine is located in the maintenance area.

**SECTION D. Source Level Requirements**

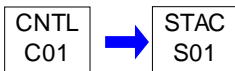
Source ID: C01

Source Name: REGENERATIVE THERMAL OXIDIZER (RTO)

Source Capacity/Throughput:

10.000 MCF/HR

Natural Gas

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

The permittee shall limit the total post-control VOC emissions from all sources routed to the RTO to 15 tons per year, based on a 12-month rolling sum.

**Control Device Efficiency Restriction(s).****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall maintain a minimum VOC mass destruction efficiency of 98% for the Regenerative Thermal Oxidizer (RTO) (Source ID: C01).

(b) The permittee shall maintain a control equipment capture efficiency as follows:

- (1) 100% for Source ID 204A and
- (2) 90% for Source ID 205 and Source ID 206.

[Compliance with this streamline permit condition assures compliance with 25 Pa. Code § 129.52(b)(2)  $O = (1 - E/V) * 100$ , where  $E = 4.84$  lb VOC/gal of coating solids (Table 1 Surface Coating Process Category 5: Paper Coating), and  $V =$  the highest VOC content of the as applied coating in lb VOC/gal coating solids.

Compliance with this streamline permit condition also assures compliance with 25 Pa. Code § 129.67(c) and 25 Pa. Code § 129.67a(c)(3).

Compliance with this streamline permit condition also assures compliance with 25 Pa. Code § 129.77(g)(1) which requires a minimum of 85% by weight overall reduction efficiency.]

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

(a) The permittee shall perform a stack test on the Regenerative Thermal Oxidizer (Source ID: C01) using Department-approved procedures once every five (5) calendar years, where five calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five years later. Performance tests shall be conducted while all sources ducted to the RTO are operating at maximum routine operating conditions or under other such conditions, within the capacity of the equipment, as may be requested by the Department. Refer to PADEP Source Testing Program website online for further information related to source testing including Source Testing FAQ and the PADEP Source Testing Manual.

(b) The source test shall, at a minimum, determine the RTO destruction efficiency of VOCs and HAPs. The test shall be conducted in accordance with the provisions of the appropriate EPA Test Method(s) or other Department approved methodology and in accordance with the procedures and test methods specified in Chapter 139 25 Pa. Code Chapter 139.

(c) The permittee shall monitor and record the average temperature demonstrated during the stack test in order to determine a baseline for compliance with 25 Pa. Code § 129.67a(d)(2).



**SECTION D. Source Level Requirements**

(d) The overall control efficiency of the add-on air pollution control device shall be determined by the following test methods and procedures subject to prior written approval by the Department.

(1) The interlock system on the overhead doors to the Rotomec-10 room assures permanent total enclosure (100% capture efficiency), in accordance with Method 204, for Source ID 204A.

(2) The control efficiency shall be determined using one or more of the following methods, as applicable. The method used to measure the inlet concentration of VOC may be the same method used to determine the outlet concentration of VOC unless use of the same method is determined to be technically infeasible.

(i) EPA Reference Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon, codified in 40 CFR Part 60, Appendix A, including updates and revisions. EPA Reference Method 25 may be used if the total gaseous nonmethane organic compound concentration is equal to or greater than 50 parts per million by volume, measured as carbon.

(ii) EPA Reference Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer, codified in 40 CFR Part 60, Appendix A, including updates and revisions. EPA Reference Method 25A may not be used if the total gaseous nonmethane organic compound concentration at the outlet of the add-on air pollution control device is equal to or greater than 50 parts per million by volume, measured as carbon.

(iii) EPA Reference Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography, codified in 40 CFR Part 60, Appendix A, including updates and revisions. EPA Reference Method 18 may be used if the total gaseous nonmethane organic compound concentration is equal to or greater than 50 parts per million by volume, measured as carbon. EPA Reference Method 18 may be used in conjunction with EPA Reference Method 25A to subtract emissions of exempt VOCs.

(e) Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with 25 Pa. Code § 129.67a may be used if prior approval is obtained in writing from the Department and the EPA.

(f) At least ninety (90) calendar days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of the sampling ports and other data necessary to ensure the collection of representative samples.

(g) At least thirty (30) calendar days prior to the test, the permittee shall notify the Regional Air Program Manager of the date and time of the test.

(h) Within sixty (60) calendar days after the source test, an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Program Manager for approval.

(i) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

**III. MONITORING REQUIREMENTS.**

**# 004 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall monitor the following operating parameters for the Regenerative Thermal Oxidizer (Source ID: C01) on a continuous basis:

- (a) Chamber exit gas temperature;
- (b) Air flow rate of the sources ducted to the Regenerative Thermal Oxidizer;
- (c) The time(s) and date(s) of operation.

[(a) above is in accordance with 25 Pa. Code § 129.67a(d)(1)(i) and streamlines compliance with 25 Pa. Code § 129.77(g)(2).]

**SECTION D. Source Level Requirements****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor VOC emissions from the RTO on a monthly basis, based on RTO destruction efficiency from the stack test results.

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

The permittee shall maintain records of all maintenance performed on the Regenerative Thermal Oxidizer and monitoring equipment, including the date and type of maintenance, according to 25 Pa. Code § 129.77(g)(6)(iii) and 25 Pa. Code § 129.67a(e)(1)(ii).

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

The permittee shall maintain monthly records of post-control VOC emissions, including 12-month rolling sums.

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

The permittee shall record the following operating parameters for the Regenerative Thermal Oxidizer (Source ID: C01) on a continuous basis:

- (a) Chamber exit gas temperature;
- (b) Air flow rate of the sources ducted to the Regenerative Thermal Oxidizer;
- (c) The time(s) and date(s) of operation.

[Compliance with (a) above streamlines compliance with 25 Pa. Code § 129.67a(d)(1) and (e)(1).]

[Condition (a) streamlines compliance with 25 Pa. Code § 129.77(g)(2). Condition (c) streamlines compliance with 25 Pa. Code § 129.77(g)(6)(ii)]

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

To determine compliance with the 3-hour block average temperature limit, the permittee shall average the temperature of the RTO during flexible package printing operations only and keep records of the 3-hour block averages. The temperature recorded during times when no flexible packaging printing is taking place shall not be included in the 3-hour block averages.

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

The permittee shall maintain onsite a copy of the latest stack test report and records of all data gathered during the latest stack test, including the average temperature of the RTO during testing.

**V. REPORTING REQUIREMENTS.**

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

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

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

- (a) The permittee shall operate the thermal oxidizer in accordance with good engineering practice and according to manufacturer's specifications at all times the add-on air pollution control device is in use, according to 25 Pa. Code §

**SECTION D. Source Level Requirements**

129.67(c) and 25 Pa. Code § 129.67a(d)(1).

(b) The add-on air pollution control device monitoring equipment shall be calibrated, operated, and maintained according to manufacturer's specifications at all times the add-on air pollution control device is in use, pursuant to 25 Pa. Code § 129.67a(d)(1).

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

The following requirements apply when any source ducted to the RTO is in operation:

(a) The permittee shall ensure that the burners for this Regenerative Thermal Oxidizer (Source ID: C01) shall maintain a minimum setpoint temperature of 1500°F.

(b) The permittee shall not, at any time, vent any solvent laden air to the RTO (Source ID: C01) until it has reached its minimum operating temperature of 1480°F.

(c) The permittee shall ensure that the temperature of the RTO (Source ID: C01) shall not drop below 1480°F at any time.

(d) When flexible packaging printing is taking place, the add-on air pollution control device shall be operated at a 3-hour average temperature not lower than 50°F below the average temperature demonstrated during the most recent compliant source test approved by the Department, according to 25 Pa. Code § 129.67a(d)(2).

(e) Compliance with (d) of this condition shall be determined based on 3-hour block averaging periods starting at midnight.

(f) When calculating the 3-hour block average temperature referred to in (d) and (e) of this condition, the permittee shall not include temperature recordings when no flexible packaging printing is taking place.

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

The permittee shall ensure that the Regenerative Thermal Oxidizer (Source ID: C01) shall be equipped with temperature monitoring instrumentation which continuously monitors the combustion chamber exit gas temperature, the time, and the date of operation.

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

The permittee shall ensure that the Regenerative Thermal Oxidizer (Source ID: C01) shall utilize a continuous emission air flow monitor to measure and record air flow of the sources ducted to the thermal oxidizer.

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

The permittee shall not operate any source if the air flow to the Regenerative Thermal Oxidizer (RTO) (Source ID:C01) exceeds 45,000 SCFM.

**VII. ADDITIONAL REQUIREMENTS.**

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



**SECTION E. Source Group Restrictions.**



**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
204A	ROTOMECH-10 ROTOGRAVURE PRESS		
<b>Emission Limit</b>			
216.000	Lbs/Hr	pre-control	VOC
205	SEAMING MACHINES		
<b>Emission Limit</b>			
5.500	Tons/Yr	pre-control, based on 12-month rolling sum	VOC
206	AUTOMATED PARTS WASHING SYSTEM		
<b>Emission Limit</b>			
0.440	Tons/Yr	12-month rolling sum (n-propyl acetate)	VOC
C01	REGENERATIVE THERMAL OXIDIZER (RTO)		
<b>Emission Limit</b>			
15.000	Tons/Yr	post-control, based on a 12-month rolling sum	VOC

**Site Emission Restriction Summary**

Emission Limit			Pollutant
24.900	Tons/Yr	based on a 12-month rolling sum	VOC
9.900	Tons/Yr	individual	Hazardous Air Pollutants
24.500	Tons/Yr	any combination	Hazardous Air Pollutants

**SECTION H. Miscellaneous.**

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January 2001

(a) This Title V Operating Permit (2012 RENEWAL UPDATE: SMOP) is the operative document and is a compilation of all the applicable requirements addressed in the following previously permitted documents:

- (1) Operating Permit OP-09-0036: VOC RACT for Bensalem Facility (TECMO-7 press, five (5) flexo/gravure presses)
- (2) Operating Permit OP-09-0037: VOC RACT for Bristol Facility - TECMO-8 press, fourteen (14) seaming machines and other sources
- (3) Operating Permit 09-320-003A: TECMO-8 Flexographic Press
- (4) Operating Permit 09-320-017: Regenerative Thermal Oxidizer
- (5) Plan Approval No. 09-0037B: five (5) presses (Source ID 203) and eighteen (18) seaming machines (Source ID 205)
- (6) Plan Approval No. 09-0037C: revised air handling capacity of RTO
- (7) Plan Approval No. 09-0037D: TECMO-7 (Source ID 204)
- (8) Plan Approval No. 09-0037E: automated parts washer (Source ID 206)
- (9) Plan Approval No. 09-0037F: Rotomec-10 (Source ID 204A)
- (10) Plan Approval No. 09-0037G: modify Plan Approval F
- (11) Plan Approval No. 09-0037H: duct work for seaming machines (205)

(b) The data listed in Section A, Site Inventory List, for the capacity and the fuel/material and the source descriptions and the permit maps in Section D are for descriptive purposes and are not considered as maximum source capacities or design limitations or enforceable conditions. Source limitations are indicated in the text of conditions listed in Section D of the permit.

(c) The following sources have been determined by the Department to be insignificant sources of air emissions, and therefore do not require additional limitations, monitoring, or recordkeeping. They are still subject to any applicable Federal, State, and Local Regulations that may apply, including the Site Level Requirements (Section C) of this permit.

- (1) Two (2) Fulton Therm natural gas-fired boilers, rated at 2.4 MMBtu/hr, each \*\* 2017 UPDATE \*\* One (1) Boiler has been removed.
- (2) Dayton emergency fire pump engine (7000 watts) located in the front of the building. The engine is not owned, operated, or leased by CMS; therefore CMS is not responsible for compliance with applicable regulations for the unit.
- (3) 22" web flexographic printing press using UV ink
- (4) Mark Andy 16" web flexographic printing press using UV ink
- (5) Two (2) shrink tunnels
- (6) 16" seven color Comco Flexographic Press using UV ink (previously listed as Source ID 203)

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July 2005

(d) This Title V Operating Permit (APS No.: 346529, Auth ID: 596053) has been administratively amended to correct the original expiration date on the permit (e.g., 1/31/06).

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June 2007

(e) This Title V Operating Permit (APS: 346529, Auth: 621031) is the RENEWAL permit. The following is a summary of changes with this renewal permit (further details can be found in the technical review memo associated with this AUTH ID):

(1) Plan Approval No. 09-0037B incorporated the Three (3) Narrow-web Printing Presses (originally five (5) (Source ID: 203) which includes the following: Seven (7) station Comco Flexographic Press, Eight (8) station Rotogravure Press, Four (4) station Rotogravure Press. [Note: Plan Approval No. 09-0037B incorporated the Fourteen (14) (originally eighteen (18) Seaming Machines (Source ID: 205).]

(2) Plan Approval No. 09-0037C (Five (5) Printing Presses), which revised the air handling capacity of the Regenerative Thermal Oxidizer (Source ID: C01) from 22,000 scfm to 45,000 scfm.

(3) Plan Approval No. 09-0037D incorporated the TECMO-7 Press (Source ID: 204).

(4) Plan Approval No. 09-0037E incorporated the Automated Parts Washing System (Source ID: 206). [Note: Plan Approval No.

**SECTION H. Miscellaneous.**

09-0037E was subsequently amended to increase the VOC emissions limit for the Automated Parts Washer System.]

(5) The names and titles of the Responsible Official (Kenneth Phillips, Chief Executive Officer) and the Permit Contact (Joel E. Spade, EHS Coordinator).

(6) Removed Section F (Emissions Trading Group) from Table of Contents and permit.

(7) Boiler #1 (Source ID: 031) was deactivated and removed from the facility in CY2003 and has subsequently been removed as an individual source in Sections A, D, and G (Emissions Restriction Summary).

(8) Boiler #2 (Source ID: 032) has been removed as an individual source in Sections A, D and G (now H). This combustion unit is now listed as an insignificant activity in Miscellaneous Section, and is exempted from Plan Approval limitations, monitoring and recordkeeping requirements per 25 Pa. Code § 127.14(a)(2).

(9) Flexo/Gravure Presses (Source ID: 203), the source name/designation has been changed to indicate the current number of combustion units in this source group (3).

(10) Tecmo-7 Press (Source ID: 204) has been deactivated and has been removed as an individual source in Sections A, D, and G (Emission Restriction Summary).

(11) Seaming Machines (Source ID: 205), the source name/designation has been changed to indicate the current number of sources in this source group (14).

(12) Automated Parts Washing System (Source ID: 206) that n-propyl acetate as a cleaning solvent, has been added as a new source and capacity/throughput and fuel/material data, permit maps and applicable conditions per Plan Approval No. 09-0037E in Section A, D, and F.

(13) See technical review memo associated with this AUTH ID for further details.

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June 2010

(f) AUTH ID 835056: Administrative Amendment to incorporate Plan Approval No. 09-0037G (Source ID 204A Rotomec-10 Rotogravure Press and Source ID C01 Regenerative Thermal Oxidizer). Plan Approval No. 09-0037G (modification of Source ID 204A Rotomec-10 Rotogravure Press) supersedes Plan Approval No. 09-0037F (installation of Source ID 204A Rotomec-10 Rotogravure Press). Source ID 202 Tecmo-8 Press and the Chestnut-8 of Source ID 203 have been permanently removed from the facility and no longer appear in this permit.

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June 2012

(g) APS 767043; AUTH ID 905710: This is the facility-wide operating permit renewal. With this renewal permit, CMS Gilbreth changes status from Title V to Synthetic Minor; the facility caps facility-wide VOC emissions to less than 25 tpy, facility wide any combination HAP emissions to less than 25 tpy, and facility wide any single HAP emissions to less than 10 tpy. All reference to Title V permitting requirements have been removed from this permit because they no longer apply to CMS Gilbreth. The following is a summary of revisions with this renewal:

(1) The responsible official has been updated from Kenneth Phillips (CEO) to Alan Wolk (VP, General Manager).

(2) Source ID 207 (Immersion Parts Washer) and Source ID 208 (Remote Reservoir Parts Washer) have been added to Section A (Site Inventory) and Section D (Source Level) in order to include applicable requirements from 25 Pa. Code § 129.63(a) into the permit.

(3) Synthetic Minor emission limit for VOC has been added to Section C (Site Level), including related recordkeeping.

(4) Risk Management Plan reporting requirement has been added to Section C (Site Level).

(5) Testing of inks, coatings, and other components has been revised for consistency at Source ID 203 and 205.

(6) The facility wide VOC emission limit streamlines compliance with the RACT VOC emission limit of 50 tpy for Source ID 205.

(7) Applicable degreasing requirements of 25 Pa. Code § 129.63(d) for air tight cleaning machines have been added to Source ID 206.

(8) The RTO Testing condition has been revised to require destruction efficiency determination annually, and capture efficiency determination once every five (5) years.



**SECTION H. Miscellaneous.**

(9) The applicable requirements of 25 Pa. Code § 129.77 have been added to Source ID 205.

(10) A compliance schedule has been added to Section C to address compliance with the requirements of 25 Pa. Code § 129.77.

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October 2016

(h) APS 767043; AUTH ID 1149549: This is a minor modification to address an increase in the hours of operation for Source ID 204A - Rotomec-10 Rotogravure Printing Press from 6,120 hours of operation per year to 8,760 hours of operation per year. A new and more accurate method of calculating emissions from the source approved by DEP results in a de minimis increase in VOC emissions of 0.11 tons per year. Refer to RFD No. 5833 submitted, reviewed and approved in July 2016.

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June 2017

(i) APS 767043; AUTH ID 1143929: This is the facility-wide operating permit renewal. The following items are addressed with the renewal:

(1) The responsible official has been updated from Alan Wolk (VP General Manager) to Brian Garnett (General Manager).

(2) Source ID 203 has been renamed 7-Station Comco Flexographic Press to show that the Chestnut Rotogravure Press has been removed from the facility.

(3) Reference to the 150-gallon solvent pump and/or distillation unit or solvent recovery unit with the name ROTO 140 has been removed from the permit because the recovery portion of the automated parts washer (Source ID 206) has been removed from the plant. Reference RFD No. 6209, reviewed and approved in March 2017.

(4) The frequency of stack testing the RTO is revised to once every five (5) years.

(5) The requirements of 25 Pa. Code § 129.67a (control of VOC emissions from flexible packaging printing presses) are incorporated into the permit and are applicable to Source ID 203 and Source ID 204A.

(6) The current frequency of perimeter monitoring for odors, visible and fugitive emissions is daily, as of May 25, 2017.

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March 2018

(j) APS 767043; AUTH ID 1216688: This administrative amendment addresses the following:

(1) Incorporate terms and conditions from plan approval No. 09-0037H which was for the installation of duct work from the existing seaming machines (Source ID 205) to the existing RTO (C01).

(2) June 2017 – Request for Determination (RFD) No. 6433: Installation of pressurized air locks at the Rotomec Room is exempt from plan approval requirements.

(3) October 2017 – Notification via letter pursuant to 25 Pa. Code § 127.14(c)(2). Installation of a UV flexographic press and replacement of two (2) seaming machines. Flexographic press results in VOC PTE increase less than 1.0 tpy; no change in emissions for seamer replacement.

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August 2020

(k) APS 1021001; AUTH 1322560: This administrative amendment addresses a change of ownership from West Rock Packaging, Inc. (Tax ID 36-4181015) to Brook and Whittle Limited (Tax ID 82-2801476). The permit contact has been changed to Brian Garnett.

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August 2022

(l) APS 1021001; AUTH ID 1384098: The following items are addressed in the renewal permit:

(1) The Permit Contact and the Responsible Official have been updated to Frank Bradshaw (Plant Manager).

(2) Section B (General Requirements) and Section C (Site Level Requirements) of the permit have been updated to the most current template language used for State Only Operating Permits issued in the Southeast Region. Information on the new fee schedule pursuant to 25 Pa. Code § 127.703 has been added to Section B (Condition #004) and the requirements of 25 Pa. Code



## SECTION H. Miscellaneous.

§ 135.3 now appears in Section B (Condition #023). Due to a change to the AIMS permitting system, grouped permit conditions now appear in Section E, the Emission Restriction Summary now appears as Section G, and the Miscellaneous Section is now Section H of the permit.

(3) Paper copies of test reports are no longer required for submittals to the Southeast Regional Office and the policy for reoccurring testing has been revised; the testing condition listed in Section D for the Regenerative Thermal Oxidizer (C01) has been revised to indicate these updates. A clarifying testing requirement has been added to Section C.

(4) In November 2017, a new 22" web flexographic printing press using press with UV ink was installed at the plant. The VOC content of the UV ink is 0.6% by weight; the potential VOC emissions are less than 1.0 tons per year. DEP responded via letter dated November 8, 2017 that installation of the press is exempt from plan approval requirements in accordance with 25 Pa. Code § 127.14(b). Fugitive VOC emissions from the press are not routed to the RTO. The new UV flexographic printing press has been added to this section of the permit under (c)(3).

(5) In June 2018, two (2) new flexographic printing presses using UV ink and two (2) shrink tunnels were installed at the plant: one (1) Comco 13" web (since removed), one (1) Mark Andy 16" web. The total potential VOC emissions from the installation are approximately 0.31 tons per year; DEP responded via letter dated June 11, 2018 that installation of the equipment is exempt from plan approval requirements in accordance with 25 Pa. Code § 127.14(b). Fugitive VOC emissions from the presses are not routed to the RTO. The new Mark Andy flexographic printing press and the shrink tunnels have been added to this section of the permit under (c)(4) and (5) as insignificant sources of emissions.

(6) RFD No. 6433 (June 2017): installation of an interlock system on the two (2) existing overhead doors for the Rotomec-10 room (Source ID 204A). The interlock system will prevent the "primary" overhead door from opening at the same time as the "secondary" connecting to the press room. The air locks will have HVAC units that are pressurize with conditioned air, so that no solvent laden air from the press room can escape into the air locks. In addition, one door is always closed when another is open; the combination resulting in no natural drafts openings. The interlock system has been added as a work practice standard in Section D of the permit under the RTO (Control Device ID C01) and the control device efficiency condition has been edited to include the interlock system on the room for Source ID 204A. Because the interlock system assures a permanent total enclosure (PTE), measurement of capture efficiency using Test Method 204 is no longer applicable. Section D, Condition #003(d)(1) has been revised to remove capture measurement and add verification of PTE through the use of the interlock system.

(7) Source ID 203: The 7-station Comco flexographic press has been converted to use UV-cured inks; the source is not required to vent to the RTO and has been removed from Section A and Section D of the permit and is now listed in the Miscellaneous Section of the permit in (c)(6) above. Refer to RFD No. 09-00037RFD AUTH ID 1404432.



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

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