



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: June 7, 2023

Effective Date: June 7, 2023

Expiration Date: June 6, 2028

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

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

TITLE V Permit No: 09-00009

Federal Tax Id - Plant Code: 39-1152983-1

Owner Information

Name: QUAD GRAPHICS MKT INC
Mailing Address: 4371 COUNTY LINE RD
CHALFONT, PA 18914-1825

Plant Information

Plant: QUAD GRAPHICS MARKETING LLC/CHALFONT
Location: 09 Bucks County 09932 New Britain Township
SIC Code: 2752 Manufacturing - Commercial Printing, Lithographic

Responsible Official

Name: JAMES GOFF
Title: PLANT DIR
Phone: (215) 997 - 5380 Email: JGOFF@quad.com

Permit Contact Person

Name: BECKY HOLT
Title: CORPORATE ENV LEADER
Phone: (414) 566 - 7670 Email: rholt@quad.com

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



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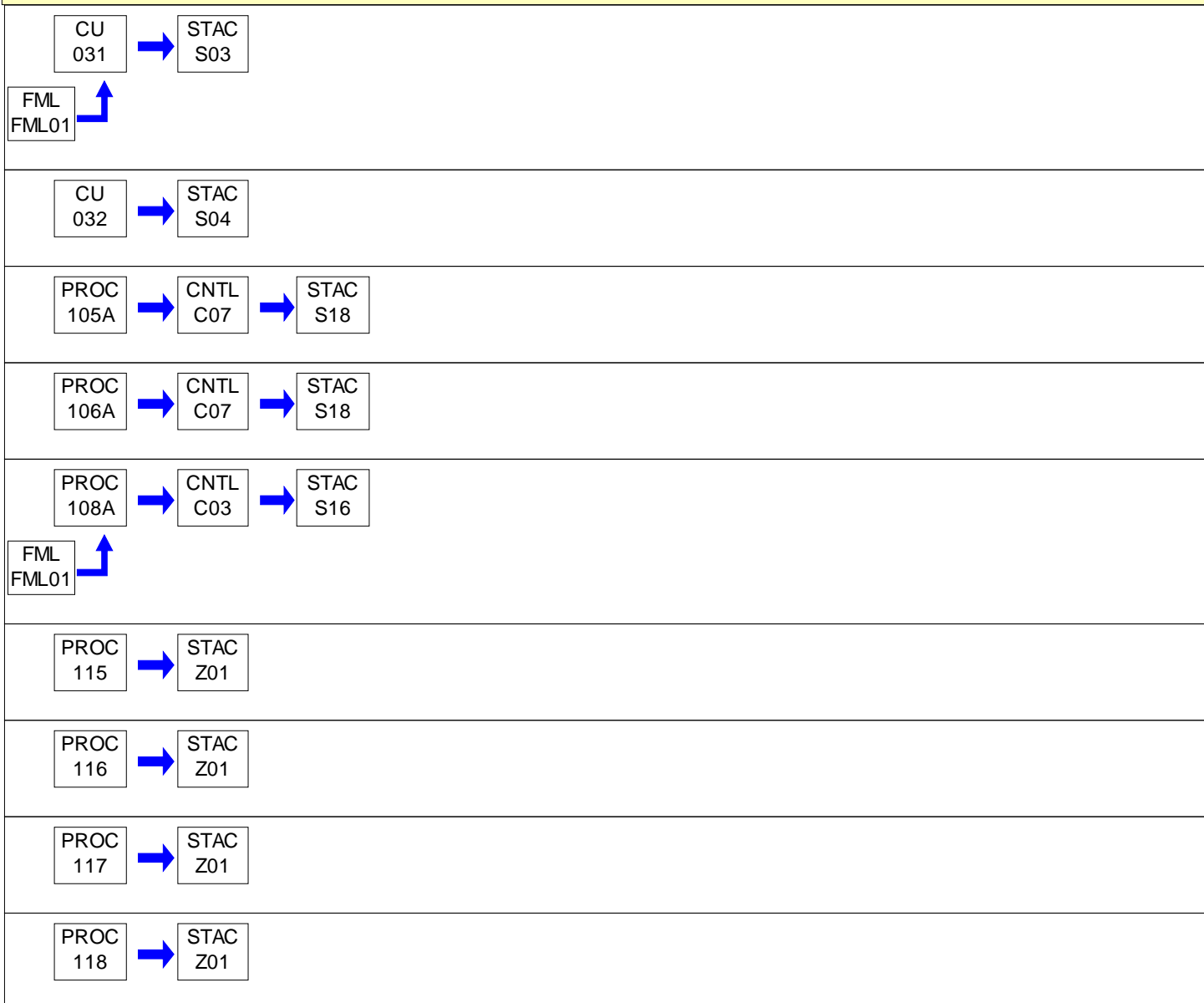
Section H. Miscellaneous

**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput		Fuel/Material
031	SUPERIOR BOILER	14.700	MMBTU/HR	
		14.700	MCF/HR	Natural Gas
032	JOHNSTON BOILER	11.200	MMBTU/HR	
		11.000	MCF/HR	Natural Gas
105A	PRESS 30 - HANTSCHO OFFSET	4.800	MMBTU/HR	
		200.000	Lbs/HR	HEATSET INKS
		4.710	MCF/HR	Natural Gas
106A	PRESS 44 - MITSUBISHI OFFSET	8.200	MMBTU/HR	
		200.000	Lbs/HR	HEATSET INKS
		8.040	MCF/HR	Natural Gas
108A	PRESS 18 - WORLD OFFSET	2.541	MMBTU/HR	
		200.000	Lbs/HR	HEATSET INKS
		2.490	MCF/HR	Natural Gas
115	CONVERTING LINE 9	50.000	Lbs/HR	FLEXO, INK JET & ADHES
116	CONVERTING LINE 29	50.000	Lbs/HR	FLEXO, INK JET & ADHES
117	CONVERTING LINE 45	50.000	Lbs/HR	FLEXO, INK JET INKS & AI
118	CONVERTING LINE 39	50.000	Lbs/HR	FLEXO, INK JET INKS & AI
119	CONVERTING LINE 22	50.000	Lbs/HR	FLEXO, INK JET INKS & AI
120	CONVERTING LINE 42	50.000	Lbs/HR	FLEXO, INK JET INKS & AI
121	CONVERTING LINE 38	50.000	Lbs/HR	FLEXO, INK JET INKS & AI
122	CONVERTING LINE 31	50.000	Lbs/HR	FLEXO, INK JET INKS & AI
123	CONVERTING LINE 35	50.000	Lbs/HR	FLEXO, INK JET INKS & AI
125A	PRESS 51 - HARRIS OFFSET	2.541	MMBTU/HR	
		200.000	Lbs/HR	HEATSET INKS
		2.490	MCF/HR	Natural Gas
126A	PRESS 52 - MITSUBISHI OFFSET	2.541	MMBTU/HR	
		200.000	Lbs/HR	HEATSET INKS
		2.490	MCF/HR	Natural Gas
127	PRESS 53	3.002	MMBTU/HR	
		200.000	Lbs/HR	HEATSET INKS
		2.940	MCF/HR	Natural Gas
128	PRESS 54 - HARRIS M1280	3.619	MMBTU/HR	
			N/A	HEATSET INKS
		3.550	MCF/HR	Natural Gas
734	BACK UP GENERATORS - 2	4.000	Gal/HR	#2 Oil
C03	QUANTUM OXIDIZER	2,592.000	CF/HR	Natural Gas
C06	QUANTUM 6000 CATALYTIC OXIDIZER	2,592.000	CF/HR	Natural Gas
C07	REGENERATIVE THERMAL OXIDIZER	3,619.000	CF/HR	Natural Gas
C098	40 OBP CYCLONE	1,440.000	Lbs/HR	PAPER TRIM
C099	60 OBP CYCLONE	3,100.000	Lbs/HR	PAPER TRIM
FML01	NATURAL GAS PIPELINE			

**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
S015	BACKUP GENERATOR STACK		
S03	SUPERIOR BOILER STACK		
S04	JOHNSTON BOILER STACK		
S06	QUANTUM 6000 OXIDIZER STACK		
S07	OBP 40 CYCLONE STACK		
S08	OBP 60 CYCLONE STACK		
S16	QUANTUM OXIDIZER STACK		
S18	RTO STACK		
Z01	FUGITIVE EMISSIONS		

PERMIT MAPS



PERMIT MAPS

PROC
119 → STAC
Z01

PROC
120 → STAC
Z01

PROC
121 → STAC
Z01

PROC
122 → STAC
Z01

PROC
123 → STAC
Z01

PROC
125A → CNTL
C06 → STAC
S06

PROC
126A → CNTL
C07 → STAC
S18

PROC
127 → CNTL
C07 → STAC
S18

PROC
128 → CNTL
C07 → STAC
S18

PROC
734 → STAC
S015

CNTL
C03 → STAC
S16

CNTL
C06 → STAC
S06

CNTL
C07 → STAC
S18

CNTL
C098 → STAC
S07

CNTL
C099 → STAC
S08

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

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

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

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

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

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

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

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

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

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

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.

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

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

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

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

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

**SECTION B. General Title V Requirements**

the Department.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

R3_Air_Apps_and_Notices@epa.gov

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

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

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

R3_Air_Apps_and_Notices@epa.gov

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

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

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

R3_Air_Apps_and_Notices@epa.gov

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

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

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

R3_Air_Apps_and_Notices@epa.gov

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

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

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

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

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

(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

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

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

**SECTION B. General Title V Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Title V Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Title V Requirements**

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

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

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

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

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

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

Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

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

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

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

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

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

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

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

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

**SECTION B. General Title V Requirements**

(5) The results of the analyses.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Title V Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving and maintenance of roads and streets.
- (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Open burning operations, as specified in 25 Pa. Code § 129.14.
- (g) N/A
- (h) N/A
- (i) Sources and classes of sources other than those identified in (a) -- (h) 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:
 - (1) The emissions are of minor significance with respect to causing air pollution; and
 - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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) (relating to prohibition of certain fugitive emissions) 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.

**SECTION C. Site Level Requirements****# 006 [25 Pa. Code §123.42]****Exceptions**

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

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from the sources specified in 25 Pa. Code § 123.1(a) (1) – (8) (relating to prohibition of certain fugitive emissions).

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

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

The permittee shall ensure that the emissions of hazardous air pollutants (HAP) from the facility shall emit less ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for all combined HAPs, as a 12-month rolling sum.

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

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

- (a) The permittee shall ensure that the volatile organic compounds (VOC) emissions from the facility shall not exceed 47.26 tons per year as a twelve (12) month rolling sum.
- (b) The permittee shall ensure that the calculation of the VOCs emissions will include all inks, coatings, fountain (wetting) solutions or cleanup operations (blanket wash), including de minimis sources, used at the facility.

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

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

The permittee shall ensure that the total nitrogen oxide (NOx) emissions from all sources at the facility shall not exceed 24.23 tons per year as a 12-month rolling sum.

010 [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.

**SECTION C. Site Level Requirements****II. TESTING 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 § 127.512.]

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

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139 and the most current version of the DEP Source Testing Manual, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.**# 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.**

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

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

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

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

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

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

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

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

The permittee shall calculate and maintain records of the total VOC, NO_x, and HAP emissions from the facility as a 12-

**SECTION C. Site Level Requirements**

month rolling sum.

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

The permittee shall maintain records of all of the facility's increases of emissions resulting 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; and
- (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.**

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

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

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

017 [25 Pa. Code §135.5]**Recordkeeping**

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with 135.21 (relating to reporting; and emission statements). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

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

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

The permittee shall submit the following:

- (a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under condition #26 of section B of this permit. The annual certificate of compliance shall be submitted to the DEP electronically, and to EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov. The subject line shall read: "TVOP No. 09-00009, QUAD GRAPHICS MARKETING LLC/CHALFONT."
- (b) A semi-annual deviation report to DEP, due by October 1 of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the obligation for the second deviation reporting period (July 1 through December 31 of the previous year).

**SECTION C. Site Level Requirements****# 019 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

- (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.
- (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.**# 020 [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.

**SECTION C. Site Level Requirements**

(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.

021 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall ensure that all VOC-containing materials shall be stored in covered containers when not being mixed or transferred to another container.

(b) The permittee shall ensure that all cleanup rags used with VOC-containing solvents shall be disposed of in covered containers.

022 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

(a) The permittee shall ensure that the source(s) and air pollution control device(s), listed in Section A and Section G, where applicable, of this permit, are operated and maintained in a manner consistent with good air pollution control practices, and in accordance with manufacturer's specifications.

(b) The permittee shall ensure that all stacks are accurately and adequately labeled.

023 [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.

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

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

The permittee may not modify any air contaminant system identified in this permit, prior to obtaining Department approval, except those modifications authorized by Condition #017(g), of Section B, of this permit.

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

The permittee can modify the mixture of pollutants under Section 112 of the Clean Air Act (42 U.S.C.A. § 7412) which are VOC or PM10 so long as the emissions limitations of this permit are not violated. The permittee shall keep a log which identifies the mixture of pollutants regulated under Section 112 with the next report required to be provided to the Department.

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

(a) A permit may contain terms and conditions the Department deems necessary to assure the proper operation of the source.

(b) At a minimum, each permit shall incorporate by reference the emission and performance standards and other requirements of the act, the Clean Air Act or the regulations thereunder.

(c) The operating permit shall incorporate the monitoring, recordkeeping and reporting requirements required by Chapter 139 (relating to sampling and testing) and other monitoring, recordkeeping or reporting requirements of this article and

**SECTION C. Site Level Requirements**

additional requirements related to monitoring, recordkeeping and reporting required by the Clean Air Act and the regulations thereunder including, if applicable, the enhanced monitoring requirements of 40 CFR Part 64 (relating to enhanced monitoring).

(d) The permit shall contain a requirement that the permittee develop an accidental release program consistent with the Clean Air Act and the regulations thereunder.

027 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

To calculate emissions at a press, the permittee may use the ink with the highest VOC and HAP content to represent all inks used by that press. The facility may also use this calculation method for cleaning solutions, inkjets and coatings.

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

#028 31-DEC-23

On or before the date above and each year thereafter, the permittee shall perform the annual preventive maintenance on all three oxidizers (C03 C06 and C07) to demonstrate compliance with:

Condition #012 for Source C03 in Section D

Condition #013 for Source C06 in Section D

Condition #023 for Source C07 in Section D

#029 13-MAY-24

On or before the date above and every two years thereafter, the permittee shall perform a Catalyst activity test on both Catalytic Oxidizers (C03 and C06) to demonstrate compliance with Condition #003 in Section D.

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

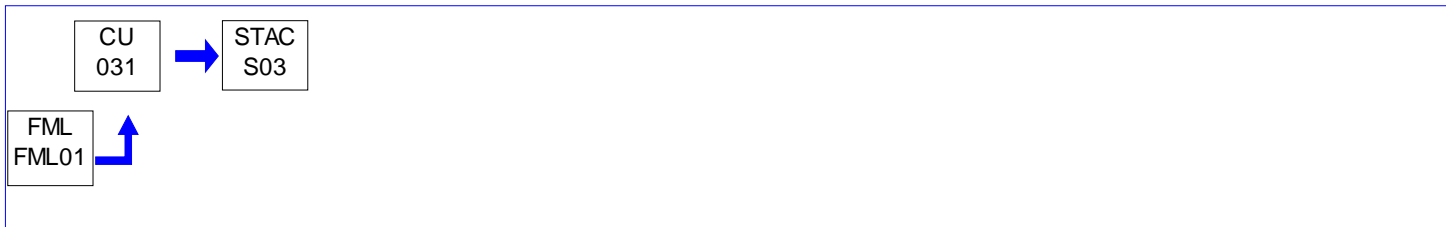
**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: SUPERIOR BOILER

Source Capacity/Throughput: 14.700 MMBTU/HR

14.700 MCF/HR Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.11]****Combustion units**

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pound per million Btu of heat input, pursuant to 25 Pa. Code § 123.11(a)(1).

002 [25 Pa. Code §123.22]**Combustion units**

No person may permit the emission into the outdoor atmosphere of sulfur oxides (SO_x), expressed as SO₂, from any combustion unit, in the Southeast Air Basin, in excess of 1.2 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

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

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

The permittee shall ensure that the emissions of air pollutants from the Superior Boiler (Source ID: 031) shall not exceed the following:

Pollutant	lbs/hr	tons/yr*
(1) Nitrogen Oxides (NO _x)	2.10	4.60
(2) Volatile Organic Compounds (VOC)	0.04	0.09
(3) Particulate Matter (PM)	0.11	0.23
(4) Sulfur Oxides (SO _x)	0.44	0.09
(5) Carbon Monoxide (CO)	0.53	1.15

[* as a 12-month rolling sum]

Operation Hours Restriction(s).**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

The permittee shall ensure that the operation of the Superior Boiler (Source ID: 031) shall not exceed 4,380 hours per year, as a 12-month rolling sum.

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

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

- (a) The permittee shall ensure that natural gas is used as fuel for the Superior Boiler (Source ID: 031).
- (b) The permittee shall ensure that natural gas usage for the Superior Boiler (Source ID: 031) shall not exceed 64.4 million standard cubic feet (mmscf) per year, as a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor the following for the Superior Boiler (Source ID: 031):

- (a) The number of hours the unit has operated, on a weekly basis.
- (b) The amount of fuel used, on a weekly basis.

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

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

- (a) To demonstrate compliance with the annual pollutant emission limit in Condition #003, the permittee shall calculate emissions from this combustion unit on a monthly basis and as 12-month rolling sum.
- (b) The permittee may calculate the total pollutant emissions from the facility's natural gas sources using the total annual fuel use and the appropriate specific pollutant emission factors.

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

The permittee shall maintain records of the following for the Superior Boiler (Source ID: 031):

- (a) The number of hours the unit has operated, on a weekly basis.
- (b) The amount of fuel used, on a weekly basis.
 - (i) The permittee may calculate the annual fuel consumption values using the firing rate of the unit, the hours of operation, and the heat content value for natural gas.

009 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.48c]**Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units Reporting and recordkeeping requirements.**

- (1) Except as provided under 40 CFR §60.48c (g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.
- (2) As an alternative to meeting the requirements of 40 CFR §60.48c (g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂

**SECTION D. Source Level Requirements**

standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain fuel meters on the Superior Boiler (Source ID: 031) to record the usage of natural gas.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.97.]

The permittee shall ensure that the Superior Boiler (Source ID: 031) shall be maintained and operated in accordance with manufacturer's specifications.

012 [25 Pa. Code §139.16]

Sulfur in fuel oil.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512 and § 129.100(g).]

Each adjustment conducted under the tune-up procedures for this source and shall contain the following:

- (a) the date of the tuning procedure;
- (b) the name of the service company and technician;
- (c) the final operating rate or load;
- (d) the final CO and NO_x emission rates; and
- (e) the final excess oxygen rate.

VII. ADDITIONAL REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The provisions of 40 CFR 63, Subpart JJJJJ are not applicable to this combustion unit because it is a gas-fired boiler as defined in §40 CFR 63.11237.

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

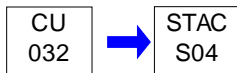
**SECTION D. Source Level Requirements**

Source ID: 032

Source Name: JOHNSTON BOILER

Source Capacity/Throughput: 11.200 MMBTU/HR

11.000 MCF/HR Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.11]****Combustion units**

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of 0.4 pound per million Btu of heat input, pursuant to 25 Pa. Code § 123.11(a)(1).

002 [25 Pa. Code §123.22]**Combustion units**

No person may permit the emission into the outdoor atmosphere of sulfur oxides (SO_x), expressed as SO₂, from any combustion unit, in the Southeast Air basin, in excess of 1.2 pounds per million Btu of heat input, pursuant to 25 Pa. Code § 123.22(e)(1).

Fuel Restriction(s).**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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

The permittee shall ensure that natural gas is used as fuel for the Johnston Boiler (Source ID: 032).

Operation Hours Restriction(s).**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the operation of the Johnston Boiler (Source ID: 032) shall not exceed 100 hours per year, as a 3-year average.

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor the following for the Johnston Boiler (Source ID: 032):

- (a) The amount of fuel combusted, on a monthly basis.
- (b) The 3-year average hours of operation, on an annual basis.

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

(a) The permittee shall maintain sufficient records for the Johnston Boiler (Source ID: 032) to demonstrate compliance with

**SECTION D. Source Level Requirements**

pollutant emission limits Conditions #001 and #002.

(b) The permittee may calculate the total pollutant emissions from the facility's natural gas sources using the total annual fuel use and the appropriate specific pollutant emission factor.

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

The permittee shall maintain records of the following for the Johnston Boiler (Source ID: 032) on a monthly basis:

(a) The amount of fuel combusted, on a monthly basis. The permittee may calculate the annual fuel consumption values using the firing rate of the unit, the hours of operation, and the heat content value for natural gas.

(b) The 3-year average hours of operation, on an annual basis.

V. REPORTING REQUIREMENTS.

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.97.]

The permittee shall ensure that the Johnston Boiler (Source ID: 032) shall be maintained and operated in accordance with manufacturer's specifications.

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

The provisions of 40 CFR 63, Subpart JJJJJJ are not applicable to this combustion unit because it is a gas-fired boiler as defined in §40 CFR 63.11237.

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

**SECTION D. Source Level Requirements**

Source ID: 105A

Source Name: PRESS 30 - HANTSCHO OFFSET

Source Capacity/Throughput:

4.800 MMBTU/HR

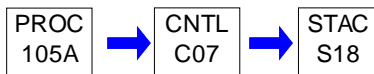
200.000 Lbs/HR

HEATSET INKS

4.710 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 2

**I. RESTRICTIONS.**

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511, 129.52 and 40 CFR Part 60, Appendix A.]

(a) The permittee shall test their inks, coatings and fountain solutions, as applied for the following, in accordance with Method 24, as specified in 40 CFR Part 60, Appendix A:

- (1) Volatile matter content.
- (2) Density.
- (3) Weight solids.

(b) The permittee shall test each ink, coating and fountain solution for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.

(c) The above testing requirements shall be waived if the permittee can demonstrate compliance with any of the following:

- (1) A statement from the supplier that EPA Method 24 was used,
- (2) A Certified Product Data Sheet (CPDS) is received from the supplier, or
- (3) A MSDS (the upper bound) is used in the calculations to demonstrate compliance with the VOC limitation for this source.

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

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

The permittee shall monitor the following operating parameters for the Offset Printing Press 30 (Source ID: 105A) on a monthly basis:

- (i) The ink quantity in pounds as applied.
- (ii) The ink composition:
 - (1) percent ink solvents by weight.
 - (2) ink density.

**SECTION D. Source Level Requirements**

- (iii) The quantity of blanket wash as applied.
- (iv) The composition of the blanket wash, in gallons and pounds.
 - (1) The VOC content of the blanket wash.
- (v) The quantity of fountain solution used.
- (vi) The percent of VOCs in the fountain solution used.

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

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

- (a) The permittee shall maintain records of the following operating parameters for the Offset Printing Press 30 (Source ID: 105A) on a monthly basis:
- (i) The ink quantity in pounds as applied.
 - (ii) The ink composition:
 - (1) percent ink solvents by weight.
 - (2) ink density.
 - (iii) The quantity of blanket wash as applied.
 - (iv) The composition of the blanket wash, in gallons and pounds.
 - (1) the VOC content of the blanket wash.
 - (v) The quantity of fountain solution used.
 - (vi) The percent of VOCs in the fountain solution used.
- (b) The permittee shall calculate and maintain records of the VOC and HAP emissions, on a monthly basis and as a 12-month rolling sum, using the destruction efficiency of the control device based on the most recent stack test and the following factors:
- (i) 20% of the ink VOC being retained in the paper.
 - (ii) 70% of the non-isopropyl alcohol fountain solution additive being carried over to the dryer.
 - (iii) 40% of the VOC in automatic blanket wash solutions being carried over to the dryer if the VOC composite vapor pressure is less than 10 mm Hg at 20°C (68°F).
 - (iv) 50% of the VOC in cleaning solutions used in conjunction with shop towels is retained in the towels if the VOC composite vapor pressure is less than 10 mmHg at 20°C (68°F).

V. REPORTING REQUIREMENTS.

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

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

The permittee shall use a fountain solution with 9.0% or less HAPs as applied on the heatset web offset presses.

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

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

The permittee shall use a fountain solution with 3.0% by wt. or less VOC as applied on the heatset web offset presses.

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

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

(a) The permittee shall ensure that the VOC emissions from the press dryer shall be exhausted to the Regenerative Thermal Oxidizer (Source ID: C07) anytime the Offset Printing Press 30 (Source ID: 105A) is applying ink.

(b) The permittee shall ensure that the Offset Printing Press 30 (Source ID: 105A) does not apply any ink before the thermal oxidizer combustion zone temperature reaches the minimum temperature requirement.

(c) The permittee shall ensure that all press operations have ceased prior to shutdown of the regenerative thermal oxidizer.

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

The 4.8 mcf/hr Noven dryer on Press 30 (Source ID: 105A) has been replaced by the natural gas-fired 2.451 mcf/hr Megtec dryer from Press 21.

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

**SECTION D. Source Level Requirements**

Source ID: 106A

Source Name: PRESS 44 - MITSUBISHI OFFSET

Source Capacity/Throughput:

8.200 MMBTU/HR

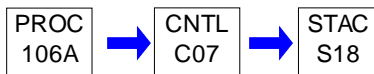
200.000 Lbs/HR

HEATSET INKS

8.040 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 2

**I. RESTRICTIONS.**

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511, 129.52 and 40 CFR Part 60, Appendix A.]

(a) The permittee shall test their inks, coatings and fountain solutions, as applied for the following, in accordance with Method 24, as specified in 40 CFR Part 60, Appendix A:

- (1) Volatile matter content.
- (2) Density.
- (3) Weight solids.

(b) The permittee shall test each ink, coating and fountain solution for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.

(c) The above testing requirements shall be waived if the permittee can demonstrate compliance with any of the following:

- (1) A statement from the supplier that EPA Method 24 was used,
- (2) A Certified Product Data Sheet (CPDS) is received from the supplier, or
- (3) A MSDS (the upper bound) is used in the calculations to demonstrate compliance with the VOC limitation for this source.

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

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

The permittee shall monitor the following operating parameters for the Offset Printing Press 44 (Source ID: 106A) on a monthly basis:

- (i) The ink quantity in pounds as applied.
- (ii) The ink composition:
 - (1) percent ink solvents by weight.
 - (2) ink density.

**SECTION D. Source Level Requirements**

- (iii) The quantity of blanket wash as applied.
- (iv) The composition of the blanket wash, in gallons and pounds.
 - (1) the VOC content of the blanket wash.
- (v) The quantity of fountain solution used.
- (vi) The percent of VOCs in the fountain solution used.

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

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

- (a) The permittee shall maintain records of the following operating parameters for the Offset Printing Press 44 (Source ID: 106A) on a monthly basis:
 - (i) The ink quantity in pounds as applied.
 - (ii) The ink composition:
 - (1) percent ink solvents by weight.
 - (2) ink density.
 - (iii) The quantity of blanket wash as applied.
 - (iv) The composition of the blanket wash, in gallons and pounds.
 - (1) the VOC content of the blanket wash.
 - (v) The quantity of fountain solution used.
 - (vi) The percent of VOCs in the fountain solution used.
- (b) The permittee shall calculate the VOC and HAP emissions, on a monthly basis and as a 12-month rolling sum, using the destruction efficiency of the control device based on the most recent stack test and the following factors:
 - (i) 20% of the ink VOC being retained in the paper.
 - (ii) 70% of the non-isopropyl alcohol fountain solution additive being carried over to the dryer.
 - (iii) 40% of the VOC in automatic blanket wash solutions being carried over to the dryer if the VOC composite vapor pressure is less than 10 mm Hg at 20°C (68°F).
 - (iv) 50% of the VOC in cleaning solutions used in conjunction with shop towels is retained in the towels if the VOC composite vapor pressure is less than 10 mmHg at 20°C (68°F).
- (c) Maintain records of the above data on a monthly basis to formulate monthly totals and twelve (12) month rolling totals.

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

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the fountain solution used on the heatset web offset presse shall have a 9.0 wt. % or less of HAPs, as applied.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall use a fountain solution with 3.0% by wt. or less VOC as applied on the heatset web offset presses.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The permittee shall ensure that the VOC emissions from the press dryer shall be exhausted to the Regenerative Thermal Oxidizer (Source ID: C07) anytime the Offset Printing Press 44 (Source ID: 106A) is applying ink.

(b) The permittee shall ensure that the Offset Printing Press 44 (Source ID: 106A) does not apply any ink before the thermal oxidizer combustion zone temperature reaches the minimum temperature requirement.

(c) The permittee shall ensure that all press operations have ceased prior to shutdown of the regenerative thermal oxidizer..

VII. ADDITIONAL REQUIREMENTS.

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

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

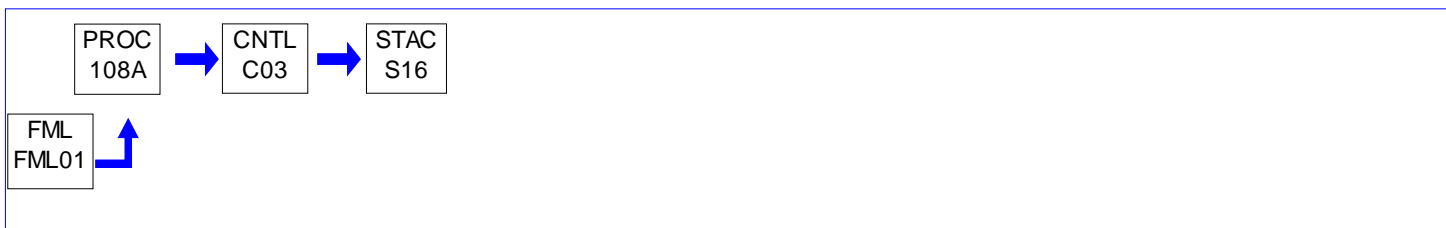
**SECTION D. Source Level Requirements**

Source ID: 108A

Source Name: PRESS 18 - WORLD OFFSET

Source Capacity/Throughput:	2.541 MMBTU/HR	
	200.000 Lbs/HR	HEATSET INKS
	2.490 MCF/HR	Natural Gas

Conditions for this source occur in the following groups: 2

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

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

The permittee shall ensure that the volatile organic compound (VOC) emissions from the World Offset Press 18 (Source ID: 108A) due to the usage of ink shall be limited to 1.18 pounds per hour and 5.15 tons per year, as a twelve (12) month rolling sum.

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

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

The permittee shall ensure that the combined emission of VOC from the use of inks, fountain/wetting solution and blanket wash/cleanup solvents for the World Offset Press No. 18 (Source ID: 108A) shall be limited to 7.40 tons per year, as a twelve (12) month rolling sum.

Fuel Restriction(s).**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that only natural gas shall be used as fuel for the World Offset Press No. 18 dryer (Source ID: 108A).

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511, 129.52 and 40 CFR Part 60, Appendix A.]

(a) The permittee shall test their inks, coatings and fountain solutions, as applied for the following, in accordance with Method 24, as specified in 40 CFR Part 60, Appendix A:

- (1) Volatile matter content.
- (2) Density.
- (3) Weight solids.

(b) The permittee shall test each ink, coating and fountain solution for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.

**SECTION D. Source Level Requirements**

(c) The above testing requirements shall be waived if the permittee can demonstrate compliance with any of the following:

- (1) A statement from the supplier that EPA Method 24 was used,
- (2) A Certified Product Data Sheet (CPDS) is received from the supplier, or
- (3) A MSDS (the upper bound) is used in the calculations to demonstrate compliance with the VOC limitation for this source.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The permittee shall monitor the following operating parameters for the World Offset Press No. 18 (Source ID: 108A) on a monthly basis:

- (i) The ink quantity in pounds, as applied.
- (ii) The ink composition:
 - (1) percent ink solvents, by weight.
 - (2) percent VOC content, by weight
 - (3) ink density.
- (iii) The quantity of blanket wash/cleanup solvents in gallons and pounds, as applied.
- (iv) The composition of the blanket wash/cleanup solvents.
 - (1) the percent VOC content of the blanket wash/cleanup solvents in gallons and pounds, as applied.
 - (2) blanket wash/cleaning solvents density.
 - (3) the blanket wash/cleaning solvents vapor pressure at 68°F
- (v) The quantity of fountain/wetting solution used, in gallons.
- (vi) The percent of VOC in the fountain/wetting solution used.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

(a) The permittee shall maintain records of the following operating parameters for the World Offset Press No. 18 (Source ID: 108A) on a monthly basis:

- (i) The ink quantity in pounds, as applied.
- (ii) The ink composition:
 - (1) percent ink solvents, by weight.

**SECTION D. Source Level Requirements**

- (2) percent VOC content, by weight
- (3) ink density.
- (iii) The quantity of blanket wash/cleanup solvents in gallons and pounds, as applied.
- (iv) The composition of the blanket wash/cleanup solvents.
 - (1) the percent VOC content of the blanket wash/cleanup solvents in gallons and pounds, as applied.
 - (2) blanket wash/cleaning solvents density.
 - (3) the blanket wash/cleaning solvents vapor pressure at 68°F
- (v) The quantity of fountain/wetting solution used, in gallons.
- (vi) The percent of VOC in the fountain/wetting solution used.
- (b) The permittee shall calculate the VOC and HAP emissions, on a monthly basis and as a 12-month rolling sum, using the destruction efficiency of the control device based on the most recent stack test and the following factors:
 - (i) 20% of the ink VOC being retained in the paper.
 - (ii) 70% of the non-isopropyl alcohol fountain solution additive being carried over to the dryer.
 - (iii) 40% of the VOC in automatic blanket wash solutions being carried over to the dryer if the VOC composite vapor pressure is less than 10 mm Hg at 20°C (68°F).
 - (iv) 50% of the VOC in cleaning solutions used in conjunction with shop towels is retained in the towels if the VOC composite vapor pressure is less than 10 mmHg at 20°C (68°F).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall ensure that the fountain solution used on the heatset web offset presses shall have a 9.0 wt. % or less of HAPs, as applied.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall use a fountain solution with 3.0% by wt. or less VOC as applied on the heatset web offset presses.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

The permittee shall ensure that the vapor pressure of the blanket wash/cleanup solvent shall not exceed 10mm of mercury (Hg) at 68°F.

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.**

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

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

**SECTION D. Source Level Requirements**

Source ID: 116

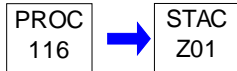
Source Name: CONVERTING LINE 29

Source Capacity/Throughput:

50.000 Lbs/HR

FLEXO, INK JET & ADHESIVES

Conditions for this source occur in the following groups: 1

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: 117

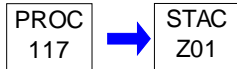
Source Name: CONVERTING LINE 45

Source Capacity/Throughput:

50.000 Lbs/HR

FLEXO, INK JET INKS & ADHESIV

Conditions for this source occur in the following groups: 1

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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



SECTION D. Source Level Requirements

Source ID: 118

Source Name: CONVERTING LINE 39

Source Capacity/Throughput:

50.000 Lbs/HR

FLEXO, INK JET INKS & ADHESIV

Conditions for this source occur in the following groups: 1



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: 119

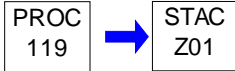
Source Name: CONVERTING LINE 22

Source Capacity/Throughput:

50.000 Lbs/HR

FLEXO, INK JET INKS & ADHESIV

Conditions for this source occur in the following groups: 1

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: 120

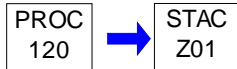
Source Name: CONVERTING LINE 42

Source Capacity/Throughput:

50.000 Lbs/HR

FLEXO, INK JET INKS & ADHESIV

Conditions for this source occur in the following groups: 1

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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



SECTION D. Source Level Requirements

Source ID: 121

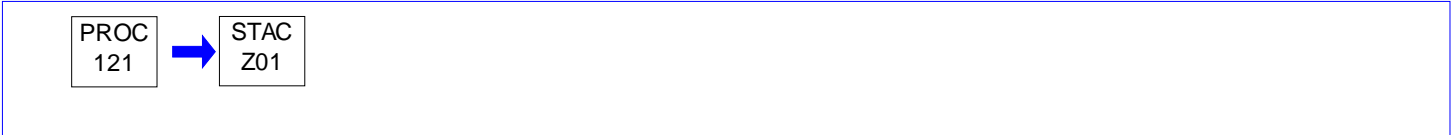
Source Name: CONVERTING LINE 38

Source Capacity/Throughput:

50.000 Lbs/HR

FLEXO, INK JET INKS & ADHESIV

Conditions for this source occur in the following groups: 1



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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



SECTION D. Source Level Requirements

Source ID: 122

Source Name: CONVERTING LINE 31

Source Capacity/Throughput:

50.000 Lbs/HR

FLEXO, INK JET INKS & ADHESIV

Conditions for this source occur in the following groups: 1



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: 123

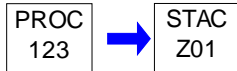
Source Name: CONVERTING LINE 35

Source Capacity/Throughput:

50.000 Lbs/HR

FLEXO, INK JET INKS & ADHESIV

Conditions for this source occur in the following groups: 1

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: 125A

Source Name: PRESS 51 - HARRIS OFFSET

Source Capacity/Throughput:

2.541 MMBTU/HR

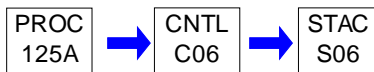
200.000 Lbs/HR

HEATSET INKS

2.490 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 2

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

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

(a) The permittee shall ensure that the post control volatile organic compounds (VOC) emissions from Press No. 51 (Source ID: 125A) shall not exceed 2.07 pounds per hour and 9.08 tons per year, as a twelve (12) month rolling sum.

(b) The permittee shall ensure that nitrogen oxides (NOx) emissions from the dryer of Press No. 51 (Source ID: 125A) shall not exceed 0.6 pounds per hour and 2.64 tons per year, as a twelve (12) month rolling sum.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511, 129.52 and 40 CFR Part 60, Appendix A.]

(a) The permittee shall test their inks, coatings and fountain solutions, as applied for the following, in accordance with Method 24, as specified in 40 CFR Part 60, Appendix A:

- (1) Volatile matter content.
- (2) Density.
- (3) Weight solids.

(b) The permittee shall test each ink, coating and fountain solution for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.

(c) The above testing requirements shall be waived if the permittee can demonstrate compliance with any of the following:

- (1) A statement from the supplier that EPA Method 24 was used,
- (2) A Certified Product Data Sheet (CPDS) is received from the supplier, or
- (3) A MSDS (the upper bound) is used in the calculations to demonstrate compliance with the VOC limitation for this source.

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

The permittee shall monitor the amount of fuel used by the dryers of Press No. 51 (Source ID: 125A) on a monthly basis.

**SECTION D. Source Level Requirements****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the following operating parameters for the Press No. 51 (Source ID: 125A) on a monthly basis:

- (i) The quantity of ink, in pounds, as applied.
- (ii) The ink composition:
 - (1) Percent of VOC content by weight.
 - (2) Ink density.
- (iii) The quantity of the fountain/wetting solution, in gallons as applied.
- (iv) The fountain/wetting solution composition:
 - (1) percent of VOCs by weight, in lbs/gal.
 - (2) fountain/wetting solution density.
 - (3) percent of HAP, in lbs/gal.
- (v) The quantity of the cleanup solvent, in gallons as applied.
- (vi) The cleanup solvent composition.
 - (1) Percent of VOC content by weight.
 - (2) Cleanup solvent density.

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

The permittee shall:

- a. maintain records of the amount of fuel used by the dryers of Press No. 51 (Source ID: 125A) on a monthly basis.
- b. calculate and maintain records of the post control NO_x and VOC emissions from Press 51 (Source ID: 125A) on a 12-month rolling basis.
- c. maintain a copy of the manufacturer's operation and maintenance procedures for Press No. 51 (Source ID: 125A) on site at all times.
- d. ensure that all maintenance performed on Press No. 51 (Source ID: 125A) shall be documented in a format approved by the Department and maintained on site.

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

(a) The permittee shall maintain records of the following operating parameters for the Press No. 51 (Source ID: 125A) on a monthly basis:

- (i) The quantity of ink, in pounds as applied;
- (ii) The ink composition:

**SECTION D. Source Level Requirements**

- (1) Percent of VOC content by weight.
- (2) Ink density.
- (iii) The quantity of the fountain/wetting solution, in gallons as applied.
- (iv) The fountain/wetting solution composition:
 - (1) percent of VOCs by weight, in lbs/gal.
 - (2) fountain/wetting solution density.
 - (3) percent of HAP, in lbs/gal.
- (v) The quantity of the cleanup solvent, in gallons as applied.
- (vi) The cleanup solvent composition.
 - (1) Percent of VOC content by weight.
 - (2) Cleanup solvent density.
- (b) The permittee shall calculate the VOC and HAP emissions, on a monthly basis and as a 12-month rolling sum, using the destruction efficiency of the control device based on the most recent stack test and the following factors:
 - (i) 20% of the ink VOC being retained in the paper.
 - (ii) 70% of the non-isopropyl alcohol fountain solution additive being carried over to the dryer.
 - (iii) 40% of the VOC in automatic blanket wash solutions being carried over to the dryer if the VOC composite vapor pressure is less than 10 mm Hg at 20°C (68°F).
 - (iv) 50% of the VOC in cleaning solutions used in conjunction with shop towels is retained in the towels if the VOC composite vapor pressure is less than 10 mm Hg at 20°C (68°F).

V. REPORTING REQUIREMENTS.

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

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

(a) The permittee shall ensure that Press No. 51 (Source ID: 125A) shall not be operated unless the Quantum 6000 Catalytic Oxidizer (Source ID: C06) has been preheated to 600°F and the exhaust air from the dryer is exhausted to the associated catalytic oxidizer.

(b) The permittee shall ensure that all press operations have ceased prior to shutdown of the oxidizer.

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

The permittee shall ensure that Press No. 51 (Source ID: 125A) shall be operated and maintained according to the manufacturer's specifications and good air pollution control practices.

**SECTION D. Source Level Requirements****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the fountain solution used on the heatset web offset presses shall have a 9.0 wt. % or less of HAPs, as applied.

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

The permittee shall ensure that Press 51 (Source ID: 125A) shall be equipped with a fuel meter to record the fuel usage.

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

**SECTION D. Source Level Requirements**

Source ID: 126A

Source Name: PRESS 52 - MITSUBISHI OFFSET

Source Capacity/Throughput:

2.541 MMBTU/HR

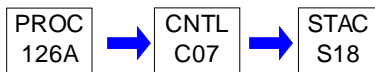
200.000 Lbs/HR

HEATSET INKS

2.490 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 2

**I. RESTRICTIONS.**

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511, 129.52 and 40 CFR Part 60, Appendix A.]

(a) The permittee shall test their inks, coatings and fountain solutions, as applied for the following, in accordance with Method 24, as specified in 40 CFR Part 60, Appendix A:

- (1) Volatile matter content.
- (2) Density.
- (3) Weight solids.

(b) The permittee shall test each ink, coating and fountain solution for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.

(c) The above testing requirements shall be waived if the permittee can demonstrate compliance with any of the following:

- (1) A statement from the supplier that EPA Method 24 was used,
- (2) A Certified Product Data Sheet (CPDS) is received from the supplier, or
- (3) A MSDS (the upper bound) is used in the calculations to demonstrate compliance with the VOC limitation for this source.

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

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

The permittee shall monitor, on a monthly basis, of the following for the inks, fountain/wetting solution, and blanket wash/cleanup solvents used on Press 52 (Source ID: 126A):

- (1) the amount used, in pounds or gallons.
- (2) The percent, by weight, VOC and HAP content, as applied.

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

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

(a) The permittee shall maintain records, on a monthly basis, of the following for the inks, fountain/wetting solution, and blanket wash/cleanup solvents used on Press 52 (Source ID: 126A):

- (1) the amount used, in pounds or gallons.
- (2) The percent, by weight, VOC and HAP content, as applied.

(b) Alternatively, the permittee may use the ink with the highest VOC and HAP content may be used to represent all inks used by this press.

(c) The permittee shall calculate and maintain records of the VOC and HAP emissions for Press 52 (Source ID: 126A) on a monthly basis and as a twelve (12) month rolling sum.

V. REPORTING REQUIREMENTS.

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

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

The permittee shall ensure that the fountain solution used on the heatset web offset presses shall have a 9.0 wt. % or less of HAPs, as applied.

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

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

The permittee shall use a fountain solution with 3% by wt. or less VOC as applied on the heatset web offset presses.

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

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

(a) The permittee shall ensure that the VOC emissions from the press dryer are exhausted to the Regenerative Thermal Oxidizer (Source ID: C07) anytime Press 52 (Source ID: 126A) is applying ink.

(b) The permittee shall ensure that all press operations have ceased prior to shutdown of the oxidizer.

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

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

The permittee shall not apply any ink to Press 52 (Source ID: 126A) before the thermal oxidizer combustion chamber temperature reaches the minimum temperature requirement.

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

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

The permittee shall ensure that all solvent containers shall be closed at all times unless filling, draining, or performing

**SECTION D. Source Level Requirements**

cleanup operations.

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

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

The permittee shall ensure that all solvent laden shop towels shall be kept in a closed container when not being used.

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

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

The permittee shall ensure that the blanket cleaning solution used on Press 52 (Source ID: 126A) shall meet at least one of the following parameters:

(a) VOC content, as applied, less than or equal to 30% by weight, or;

(b) VOC composite partial vapor pressure, as used, less than or equal to 10 mmHg at 68° F.

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: 127

Source Name: PRESS 53

Source Capacity/Throughput:

3.002 MMBTU/HR

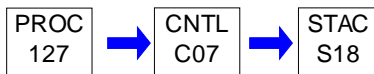
200.000 Lbs/HR

HEATSET INKS

2.940 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 2

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

The permittee shall ensure that volatile organic compounds (VOC) emissions from the use of heatset inks, fountain solutions and blanket washes on Press 53 (Source ID: 127) shall not exceed 1.7 pounds per hour and 7.6 tons per year, as a twelve (12) month rolling sum.

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

The permittee shall ensure that hazardous air pollutant (HAP) emissions from the use of heatset inks, fountain solutions and blanket washes on Press 53 (Source ID: 127) shall not exceed 0.82 tons per year, as a twelve (12) month rolling sum.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511, 129.52 and 40 CFR Part 60, Appendix A.]

(a) The permittee shall test their inks, coatings and fountain solutions, as applied for the following, in accordance with Method 24, as specified in 40 CFR Part 60, Appendix A:

- (1) Volatile matter content.
- (2) Density.
- (3) Weight solids.

(b) The permittee shall test each ink, coating and fountain solution for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.

(c) The above testing requirements shall be waived if the permittee can demonstrate compliance with any of the following:

- (1) A statement from the supplier that EPA Method 24 was used,
- (2) A Certified Product Data Sheet (CPDS) is received from the supplier, or
- (3) A MSDS (the upper bound) is used in the calculations to demonstrate compliance with the VOC limitation for this source.

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

The permittee shall monitor the following operating parameters for Press 53 (Source ID: 127) on a monthly basis:

**SECTION D. Source Level Requirements**

- (a) The ink quantity in pounds as applied.
- (b) The ink composition:
 - (i) Percent ink solvents by weight
 - (ii) Ink density
- (c) The quantity of fountain solution as applied.
 - (i) The percent of VOCs in the fountain solution, in lbs/gal.
 - (ii) The percent of HAPs in the fountain solution, in lbs/gal.
- (d) The quantity of blanket wash as applied.
 - (i) The composition of the blanket wash, in gallons and pounds.
 - (ii) The VOC content of the blanket wash.

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

- (a) The permittee shall maintain records of the following operating parameters for Press 53 (Source ID:127) on a monthly basis:
- (i) The ink quantity in pounds as applied.
 - (ii) The ink composition:
 - (1) Percent ink solvents by weight
 - (2) Ink density
 - (iii) The quantity of fountain solution as applied.
 - (1) The percent of VOCs in the fountain solution, in lbs/gal.
 - (2) The percent of HAPs in the fountain solution, in lbs/gal.
 - (iv) The quantity of blanket wash as applied.
 - (v) The composition of the blanket wash, in gallons and pounds.
 - (1) The VOC content of the blanket wash.
- (b) The permittee shall calculate the VOC and HAP emissions, on a monthly basis and as a 12-month rolling sum, using the destruction efficiency of the control device based on the most recent stack test and the following factors::
- (i) 20% of the ink VOC being retained in the paper.
 - (ii) 70% of the non-isopropyl alcohol fountain solution additive being carried over to the dryer.
 - (iii) 40% of the VOC in automatic blanket wash solutions being carried over to the dryer if the VOC composite vapor pressure is less than 10 mm Hg at 20°C (68°F).

**SECTION D. Source Level Requirements**

(iv) 50% of the VOC in the manual blanket wash solutions are evaporated into the pressroom as fugitive emissions.

(v) 50% of the VOC in cleaning solutions used in conjunction with shop towels is retained in the towels if the VOC composite vapor pressure is less than 10 mmHg at 20°C (68°F).

V. REPORTING REQUIREMENTS.

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

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

The permittee shall ensure that the heatset inks, fountain solutions, and blanket (cleanup) solvents used on Press 53 (Source ID: 127) shall not exceed the following parameters:

- (a) The heatset inks shall have an average 42% VOC content, by weight, as applied.
- (b) The fountain solution shall have a VOC content of 3.0% by weight, or less, as applied.
- (c) The fountain solution shall have a HAP content of 9.0 wt.% or less, as applied.
- (d) The VOC density of the blanket wash (cleanup) solvents shall not exceed 7.3 lb VOC per gal.
- (e) The vapor pressure of the blanket wash (cleanup) solvents shall not exceed 10 mm of mercury at 68° F.

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

(a) The permittee shall ensure that the VOC emissions from the press dryer are exhausted to the Regenerative Thermal Oxidizer (Source ID: C07) anytime Press 53 (Source ID: 127) is applying ink.

(b) The permittee shall ensure that all press operations have ceased prior to shutdown of the oxidizer.

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

The permittee shall not apply any ink to Press 53 (Source ID: 127) before the thermal oxidizer combustion chamber temperature reaches the minimum temperature requirement.

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: 128

Source Name: PRESS 54 - HARRIS M1280

Source Capacity/Throughput:

3.619 MMBTU/HR

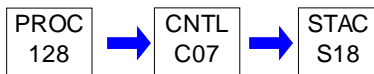
N/A

HEATSET INKS

3.550 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 2

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

The permittee shall ensure that the post-control volatile organic compounds (VOC) emissions from Press 54 (Source ID: 128) shall not exceed 1.76 pounds per hour and 7.8 tons per year, as a twelve (12) month rolling sum.

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

The permittee shall ensure that the hazardous air pollutant (HAP) emissions from Press 54 (Source ID: 128) shall not exceed 0.86 tons per year, as a twelve (12) month rolling sum.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511, 129.52 and 40 CFR Part 60, Appendix A.]

(a) The permittee shall test their inks, coatings and fountain solutions, as applied for the following, in accordance with Method 24, as specified in 40 CFR Part 60, Appendix A:

- (1) Volatile matter content.
- (2) Density.
- (3) Weight solids.

(b) The permittee shall test each ink, coating and fountain solution for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.

(c) The above testing requirements shall be waived if the permittee can demonstrate compliance with any of the following:

- (1) A statement from the supplier that EPA Method 24 was used,
- (2) A Certified Product Data Sheet (CPDS) is received from the supplier, or
- (3) A MSDS (the upper bound) is used in the calculations to demonstrate compliance with the VOC limitation for this source.

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

(a) The permittee shall monitor the following operating parameters for Press 54 (Source ID: 128) on a monthly basis:

**SECTION D. Source Level Requirements**

- (i) The ink quantity in pounds as applied.
- (ii) The ink composition:
 - (1) Percent ink solvents by weight
 - (2) Ink density
- (iii) The quantity of fountain solution as applied, pounds and/or gallons.
 - (1) The percent weight of VOCs in the fountain solution.
- (iv) The quantity of blanket wash as applied, pounds and/or gallons.
- (v) The composition (VOC content) of the blanket wash, in pounds per gallon ('lb/gal').

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

(a) The permittee shall maintain records of the following for Press 54 (Source ID: 128) on a monthly basis:

- (i) The ink quantity in pounds as applied.
- (ii) The ink composition:
 - (1) Percent ink solvents by weight
 - (2) Ink density
- (iii) The quantity of fountain solution as applied, pounds and/or gallons.
 - (1) The percent weight of VOCs in the fountain solution.
- (iv) The quantity of blanket wash as applied, pounds and/or gallons.
- (v) The composition (VOC content) of the blanket wash, in pounds per gallon ('lb/gal').

(b) The permittee shall calculate and maintain records of the VOC and HAP emissions, on a monthly basis and as a 12-month rolling sum, using the destruction efficiency of the control device based on the most recent stack test and the following retention factors:

- (i) 20% of the ink VOC being retained in the paper.
- (ii) 70% of the non-isopropyl alcohol fountain solution additive being carried over to the dryer.
- (iii) 40% of the VOC in the automatic blanket wash solutions being carried over to the dryer if the VOC composite vapor pressure is less than 10 mm Hg at 20°C (68°F).
- (iv) 50% of the VOC in the manual blanket wash solutions are evaporated into the pressroom as fugitive emissions.
- (v) 50% of the VOC in cleaning solutions used in conjunction with shop towels is retained in the towels if the VOC composite vapor pressure is less than 10 mmHg at 20°C (68°F).

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

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

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

The permittee shall ensure that the heatset inks, fountain solutions, and blanket (cleanup) solvents used on this lithographic press shall not exceed the following parameters:

- (a) The heatset inks shall have a maximum weighted-average VOC content of 42%.
- (b) The fountain solution shall have a VOC content of 3.0% wt. or less, as applied.
- (c) The fountain solution shall have a HAP content of 9.0% wt. or less, as applied.
- (d) The VOC density of the blanket wash (cleanup) solvents shall not exceed 7.3 lb VOC per gal.
- (e) The vapor pressure of the blanket wash (cleanup) solvents shall not exceed 10 mm of mercury at 68° F.

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

The permittee shall ensure that the VOC emissions from the press dryer is exhausted to the Regenerative Thermal Oxidizer (Source ID: C07) anytime the press is applying ink.

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

The permittee shall ensure that the thermal oxidizer combustion zone temperature is above the minimum temperature of 1500°F at all times that the press is applying ink.

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

The permittee shall ensure that all press operations have ceased prior to shutdown of the oxidizer.

VII. ADDITIONAL REQUIREMENTS.

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

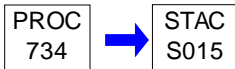
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 734

Source Name: BACK UP GENERATORS - 2

Source Capacity/Throughput: 4.000 Gal/HR #2 Oil

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

No person may permit the emission into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), from the Back Up Generator (Source ID: 734) at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.512(h) and 129.91-95.]

The permittee shall ensure that the hours of operation of each Back Up Generator (Source ID: 734) shall not exceed 500 hours per generator in a twelve (12) month rolling period.

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor the following operating parameters, on a monthly basis, for each Back Up Generator (Source ID: 734), when operating:

- (a) hours of operation.
- (b) amount and type of fuel used.

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

[Additional authority for this permit conditions is also derived from 25 Pa. Code § 127.512(h).]

The permittees shall maintain monthly records for the Back Up Generator (Source ID: 734) to demonstrate compliance with emission and operating hours restriction requirements in Conditions #001 and #002. At a minimum, these records shall contain the following information:

- (a) hours of operation.
- (b) amount and type of fuel used per month.

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

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.512(h) and 129.91-95.]

The permittee shall ensure that the operation and maintenance of the Back Up Generators (Source ID: 734) is in accordance with manufacturer's specifications.

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

The permittee shall ensure that the Back Up Generators (Source ID: 734) shall each be equipped with an hour meter to record the hours of operation.

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

Source ID: 734 consists of :

A. One 55 kW Onan emergency generator installed 1/01/1968, Model 55DFJ-4XR8/7580C.

B. One 250 kW Elliot Power Systems emergency generator installed 6/09/2002, Model 250RD.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart ZZZZ Table 2d]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions**

(a) Pursuant §§40 CFR 63.6600, 63.6602, and 63.6640, the permittee shall comply with the following requirements for existing emergency stationary CI RICE located at a area source of HAP emissions:

(1) Change oil and filter every 500 hours of operation or annually, whichever comes first. The permittee has the option to utilize an oil analysis program as described in §40 CFR 63.6625(i) in order to extend the oil change requirement;

(2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;

(3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. The permittee can petition the Department pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.

(b) During periods of startup the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?**

(a) The permittee shall operate the emergency stationary R.I.C.E. according to the requirements in the most recent version of 40 C.F.R. Section 63.6640(f).

**SECTION D. Source Level Requirements**

(b) If the permittee does not operate the engine according to the requirements of 40 C.F.R. Section 63.6640(f), the engine will not be considered an emergency engine under 40 C.F.R. Part 63 Subpart ZZZZ and must meet all requirements for non-emergency engines.

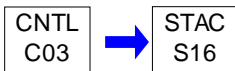
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: C03

Source Name: QUANTUM OXIDIZER

Source Capacity/Throughput: 2,592.000 CF/HR Natural Gas

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

The permittee shall ensure a minimum VOC destruction efficiency of 95% for the Quantum Oxidizer (Source ID: C03).

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

(a) The permittee shall perform a stack test using Department-approved procedures once every five (5) calendar years [where five (5) calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five (5) years later] on the Quantum Oxidizer (Source ID: C03), to demonstrate compliance with destruction and removal efficiency of VOCs. Such testing shall be conducted in accordance with 25 Pa. Code Chapter 139 and the Department's Source Testing Manual (274-0300-002).

(b) When determining VOC destruction efficiency of the Quantum Oxidizer, C03, the 3-hour average of the inlet temperature shall be no more than the minimum operating temperature of 600 °F plus 5% (630 °F). If the 3-hour average of the actual oxidizer combustion chamber temperature during testing exceeds 630 °F, the higher temperature will become the minimum operating temperature. In accordance with 25 Pa. Code § 139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.

(c) At least ninety (90) 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 sampling ports and other data to ensure the collection of representative samples.

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

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

(f) 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.

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

A catalyst activity test shall be performed a minimum of one time per rolling 2-year period.

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

[Additional authority for this permit condition is also derived from 40 CFR §§ 64.3 and 64.6]

(a) The permittee shall use the approved process parameter or indicator to obtain data and shall monitor the temperatures

**SECTION D. Source Level Requirements**

of the exhaust gases entering and exiting the catalyst bed, whenever the Quantum 6000 Catalytic Oxidizer (Source ID: C03) is in operation.

(b) In the event of a defective or malfunctioning monitoring device (e.g., thermocouple), the control device and associated presses will shut down automatically.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR §§ 64.3 and 64.6.]

(a) The permittee shall use the approved frequency below for monitoring of the applicable process parameters:

(i) The Catalytic Oxidizer combustion chamber operating temperature (inlet and outlet) shall be continuously monitored, over a one (1) hour averaging period.

(b) In the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall manually record the combustion chamber temperatures from the digital readout, on an hourly basis.

(c) In addition to the requirement in paragraph (b), on a daily basis, the permittee shall:

(i) Perform a visual inspection of the external structural integrity of the Catalytic Oxidizer, including the main fan and the ductwork for leakage.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain all necessary records to demonstrate compliance with minimum VOC destruction efficiency requirement for the Quantum Oxidizer (Source ID: C03).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the catalyst activity test results.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from §40 CFR 64.9]

(a) The permittee shall record the following using a DEP approved data collecting device.

(i) The temperatures of the exhaust gases entering and exiting the catalyst bed, whenever the Quantum 6000 Catalytic Oxidizer (Source ID: C03) is in operation.

(b) In the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall record the following approved indicator using the following approved data collecting device:

(i) The Catalytic Oxidizer exhaust gas temperature (inlet and outlet) shall be recorded hourly from the digital readout.

(c) In addition to paragraph (b)(i), in the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall record the following approved indicators:

(i) A visual inspection of the external structural integrity of the Catalytic Oxidizer, including the main fan and the ductwork for leakage.

**SECTION D. Source Level Requirements****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 64.9]

- (1) The permittee shall record all excursions and corrective actions taken in response to an excursion and the time elapsed until the corrective actions have been taken.
- (2) The permittee shall record all inspections, repair and maintenance performed on the monitoring equipment.
- (3) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, possible causes and corrective actions taken for the incidents.

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

[Additional authority for this permit condition is also derived from §§40 CFR 64.9 and 70.6(a)(3)(iii)(A)]

The permittee shall report all excursions and corrective actions taken, the dates, times, durations and possible causes, every six (6) months.

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

The permittee shall ensure a minimum inlet temperature of 600°F, over a one (1) hour averaging period, to the Quantum Oxidizer (Source ID: C03).

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

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

(a) The permittee shall ensure that the World Offset Press No. 18 Press (Source ID: 108A) shall be operated in the printing mode only when the Quantum Oxidizer (Source ID: C03) and the dryer are operational. The World Offset Press No. 18 Press (Source ID: 108A) shall not be operated when the Quantum Oxidizer (Source ID: C03) and the dryer are in the bypass mode.

(b) The permittee shall ensure that an interlock system shall be maintained to prevent operation of the World Offset Press No. 18 Press (Source ID: 108A) when the Quantum Oxidizer (Source ID: C03) is not operated.

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

(a). The permittee shall maintain and use temperature measuring and recording devices, such as circle and/or strip chart recorders, to indicate both the inlet and outlet temperatures of the gases exhausting to the control device.

(b). The permittee shall calibrate and check the accuracy of monitoring equipment taking into account the manufacturer's specifications at approved time intervals.

(i) The circular chart recorder or other approved device shall be calibrated and checked for accuracy on an annual basis.

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

[Additional authority for the following permit conditions are also derived from §40 CFR 64.3]

The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the devices.

**SECTION D. Source Level Requirements**

(a) The permittee shall, for an approved device, install detectors or sensors at a location approved by the Department for obtaining data that are representative of the monitored indicator.

(b) The permittee shall develop verification procedures to confirm the operational status of new or modified monitoring equipment prior to commencement of the monitoring process.

(c) The permittee shall calibrate and check the accuracy of monitoring equipment taking into account the manufacturer's specifications at approved time intervals.

(i) The circular chart recorder or other approved device shall be calibrated and checked for accuracy on an annual basis.

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

[Additional authority for this permit condition is also derived from §§40 CFR 64.6 and 64.3]

(a) The permittee shall use the approved means or devices to measure the applicable indicators.

(i) The Catalytic Oxidizer (Source ID:CO3) shall be equipped with a Department approved device for monitoring and recording the combustion chamber temperature.

(b) In the event of a defective or malfunctioning recordkeeping device (Department approved device), the permittee shall use the following approved means or devices to measure the applicable indicators.

(i) Manual recording of the combustion chamber temperature from the digital readout.

(c) In addition to paragraph (b)(i), in the event of a defective or malfunctioning recordkeeping device, the permittee shall use the following approved means or devices to measure the applicable indicators:

(i) A visual inspection of the external structural integrity of the Catalytic Oxidizer, including the main fan and the ductwork for leakage.

(ii) A Method 22 observation for fugitive emissions from the Catalytic Oxidizer stack (Source ID: S16).

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

Additional authority for this permit condition is also derived from 40 CFR §§ 64.3 and 64.6.]

The permittee shall adhere to the following approved ranges for the selected process parameters so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion.

(i) A combustion chamber operating temperature more than 30°F less than the specified operating temperature (e.g., 570°F), based on a one (1) hour averaging period.

(b) In the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall adhere to the approved range for the selected indicator, listed below, so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion.

(i) A manually recorded inlet temperature from the digital readout of less than 570°F.

(c) In addition to paragraph (b)(i), in the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), a departure from the following specified indicator range over a specified averaging period shall be defined as an excursion:

(i) Based on a daily visual inspection, any findings of defects or damage to the external structural integrity of the Catalytic Oxidizer, including the main fan or leakage from the ductwork; or,

**SECTION D. Source Level Requirements**

(ii) Based on a daily Method 22 observation, fugitive emissions from the Catalytic Oxidizer stack (Source ID: S16).

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

The permittee shall ensure that the Quantum Oxidizer (Source ID: C03) shall be operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with the manufacturer's specifications.

018 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall conduct regular preventative maintenance on the Quantum Catalytic Oxidizer in accordance with manufacturer's specifications. The maintenance program shall include, but not be limited to the following:

a. Weekly maintenance shall include:

1. Check air flow screens and ducting for debris.
2. Check for burned out indicator bulbs on control panel.
3. Check for gas leaks in the gas train and main gas line.

b. Monthly maintenance shall include:

1. Check dampers for correct operation and linkage for tightness.
2. Check the burner linkage rod for the positions marked at initial start-up.
3. Check exhaust fan drive belts for correct alignment and belt tension.
4. Check for fan noise.

c. Semiyearly Checks (3800 Hours) maintenance shall include:

1. Check the catalyst beds.
2. Check the flame rod and spark igniter.
3. Check the exterior of the oxidizer and the heat exchanger. Check for signs of hot spots or leakage (sapping).

d. Yearly Checks (7600 Hours) maintenance shall include:

1. Check fan and motor shafts for end play, not to exceed .005 inch.
2. Check all gaskets and seals. Replace if broken, brittle, or leaking.
3. Check for excessive temperature damage.

e. The permittee shall record any maintenance in a permanently bound logbook or other method approved by the Department. This log shall contain, at a minimum, the following information:

- (i) The date of the maintenance procedure.
- (ii) Type of maintenance performed.
- (iii) The name of the service company and technicians.

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

[Additional authority for the following permit conditions are also derived from §40 CFR 64.8]

The permittee shall develop and implement a quality improvement plan (QIP) as expeditiously as practicable if any of the following occurs:

(a) For properly and accurately collected data, accumulated excursions exceed five percent (5%) of the data for Catalytic Oxidizer combustion chamber temperatures.

**SECTION D. Source Level Requirements**

(b) Six excursions occur in a six-month reporting period.

(c) The Department determines after review of all reported information that the permittee has not responded acceptably to an excursion.

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

In general, the QIP plan should be developed within 60 days of any of the occurrences listed in Condition #020 and the permittee shall provide a copy of the QIP to the Department. Furthermore, the permittee shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from §40 CFR 64.9]

The permittee shall record actions taken to implement a QIP during a reporting period and all related actions including, but not limited to inspections, repairs and maintenance performed on the monitoring equipment.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Additional authority for this permit condition is also derived from §40 CFR 64.8]

In accordance with §40 CFR 64.8, the QIP shall include procedures for evaluating the control performance problems. Based on the results of the evaluation procedures, the permittee shall modify the QIP, and provide a copy to the Department, to include procedures for conducting more frequent or improved monitoring in conjunction with one or more of the following:

- (a) Improved preventive maintenance practices
- (b) Process operation changes
- (c) Appropriate improvements to control methods
- (d) Other steps appropriate to correct performance.

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

Following implementation of a QIP, the Department will require reasonable revisions to the QIP if the plan has failed to either:

- (a) Address the cause of the control device performance problem;
- (b) Provide adequate procedures for correcting control device performance problems in as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

Implementation of a QIP, shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under any federal, state, or local laws or any other applicable requirements under the Clean Air Act.

**SECTION D. Source Level Requirements****# 025 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The Quantum Oxidizer Catalytic Oxidizer (Source ID: C03) has a maximum design capacity of 6,000 standard cubic feet per minute (scfm).

The permittee has complied with BAT requirements pursuant to 25 Pa. Code Section 127.12 (a)(5) of this condition based on the results of a previous stack test conducted on November 17, 2011, in which the Catalytic Oxidizer demonstrated a destruction removal efficiency (DRE) of 97.3% by weight for total hydrocarbons (THC) while operating Press 18 under normal load conditions.

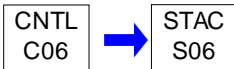
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: C06

Source Name: QUANTUM 6000 CATALYTIC OXIDIZER

Source Capacity/Throughput: 2,592.000 CF/HR Natural Gas

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

The permittee shall ensure a minimum VOC destruction efficiency of 95% for the Quantum 6000 Catalytic Oxidizer (Source ID: C06).

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

(a) The permittee shall perform a stack test using Department-approved procedures once every five (5) calendar years [where five (5) calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five (5) years later] on the Quantum 6000 Catalytic Oxidizer (Source ID: C06), to demonstrate compliance with destruction and removal efficiency of VOCs and HAPs. Such testing shall be conducted in accordance with 25 Pa. Code Chapter 139 and the Department's Source Testing Manual (274-0300-002).

(b) When determining VOC destruction efficiency of the Quantum Oxidizer, the 3-hour average of the inlet temperature shall be no more than the minimum operating temperature of 620 °F plus 5% (651 °F). If the 3-hour average of the actual oxidizer combustion chamber temperature during testing exceeds 651 °F, the higher temperature will become the minimum operating temperature. In accordance with 25 Pa. Code § 139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.

(c) At least ninety (90) 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 sampling ports and other data to ensure the collection of representative samples.

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

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

(f) 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.

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

A catalyst activity test shall be performed a minimum of one time per rolling 2-year period.

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

[Additional authority for this permit condition is also derived from 40 CFR §§ 64.3 and 64.6]

**SECTION D. Source Level Requirements**

(a) The permittee shall use the approved process parameter or indicator to obtain data and shall monitor the temperatures of the exhaust gases entering and exiting the catalyst bed, whenever the Quantum 6000 Catalytic Oxidizer (Source ID: C06) is in operation.

(b) In the event of a defective or malfunctioning monitoring device (e.g., thermocouple), the control device and associated presses will shut down automatically.

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

The permittee shall monitor the amount of fuel used by Press No. 51 (Source ID: 125A) and the Quantum 6000 Catalytic Oxidizer (Source ID: C06) on a monthly basis.

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

[Additional authority for this permit condition is also derived from 40 CFR §§ 64.3 and 64.6.]

(a) The permittee shall use the approved frequency below for monitoring of the applicable process parameters:

(i) The Catalytic Oxidizer combustion chamber operating temperature (inlet and outlet) shall be continuously monitored, over a one (1) hour averaging period.

(b) In the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall manually record the combustion chamber temperatures from the digital readout, on an hourly basis.

(c) In addition to the requirement in paragraph (b), on a daily basis, the permittee shall:

(i) Perform a visual inspection of the external structural integrity of the Catalytic Oxidizer, including the main fan and the ductwork for leakage.

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

The permittee shall maintain records of the amount of fuel used the Quantum 6000 Catalytic Oxidizer (Source ID: C06) on a monthly basis.

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

(a) The permittee shall maintain records, in a Department-approved format, of all maintenance performed on the Quantum 6000 Catalytic Oxidizer (Source ID: C06).

(b) The permittee shall maintain records of the catalyst activity test results.

(c) The permittee shall maintain these records onsite, and make them available upon request

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

[Additional authority for this permit condition is also derived from §40 CFR 64.9]

(a) The permittee shall record the following using a DEP approved data collecting device.

(i) The temperatures of the exhaust gases entering and exiting the catalyst bed, whenever the Quantum 6000 Catalytic Oxidizer (Source ID: C06) is in operation.

(b) In the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device),

**SECTION D. Source Level Requirements**

the permittee shall record the following approved indicator using the following approved data collecting device:

- (i) The Catalytic Oxidizer exhaust gas temperature (inlet and outlet) shall be recorded hourly from the digital readout.

(c) In addition to paragraph (b)(i), in the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall record the following approved indicators:

- (i) A visual inspection of the external structural integrity of the Catalytic Oxidizer, including the main fan and the ductwork for leakage.

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

[Additional authority for this permit condition is also derived from §40 CFR 64.9]

- (1) The permittee shall record all excursions and corrective actions taken in response to an excursion and the time elapsed until the corrective actions have been taken.
- (2) The permittee shall record all inspections, repair and maintenance performed on the monitoring equipment.
- (3) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, possible causes and corrective actions taken for the incidents.

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

[Additional authority for this permit condition is also derived from §§40 CFR 64.9 and 70.6(a)(3)(iii)(A)]

The permittee shall report all excursions and corrective actions taken, the dates, times, durations and possible causes, every six (6) months.

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

- (a) The permittee shall ensure that no VOC laden exhaust stream shall be introduced into the Quantum 600 Catalytic Oxidizer (Source ID: C06) until the inlet temperature of the catalyst bed is 620°F.
- (b) The permittee shall maintain and operate temperature measuring and recording devices, such as a circle and/or strip chart recorders, to indicate the temperatures of the exhaust gases entering and exiting the catalyst bed.
- (c) The permittee shall calibrate and check the accuracy of monitoring equipment taking into account the manufacturer's specifications at approved time intervals.
 - (i) The circular chart recorder or other approved device shall be calibrated and checked for accuracy on an annual basis.

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

- (a) The permittee shall ensure that the Quantum 6000 Catalytic Oxidizer (Source ID: C06) shall be operated and maintained according to the manufacturer's specifications and good air pollution control practices.
- (b) The permittee shall maintain a copy of the manufacturer's operation and maintenance procedures for the Quantum 6000 Catalytic Oxidizer (Source ID: C06) on site at all times.

**SECTION D. Source Level Requirements****# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for the following permit conditions are also derived from §40 CFR 64.3]

The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the devices.

(a) The permittee shall, for an approved device, install detectors or sensors at a location approved by the Department for obtaining data that are representative of the monitored indicator.

(b) The permittee shall develop verification procedures to confirm the operational status of new or modified monitoring equipment prior to commencement of the monitoring process.

(c) The permittee shall calibrate and check the accuracy of monitoring equipment taking into account the manufacturer's specifications at approved time intervals.

(i) The circular chart recorder or other approved device shall be calibrated and checked for accuracy on an annual basis.

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

Additional authority for this permit condition is also derived from 40 CFR §§ 64.3 and 64.6.]

The permittee shall adhere to the following approved ranges for the selected process parameters so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion.

(i) A combustion chamber operating temperature more than 30°F less than the specified operating temperature (e.g., 590°F), based on a one (1) hour averaging period.

(b) In the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall adhere to the approved range for the selected indicator, listed below, so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion.

(i) A manually recorded inlet temperature from the digital readout of less than 590°F.

(c) In addition to paragraph (b)(i), in the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), a departure from the following specified indicator range over a specified averaging period shall be defined as an excursion:

(i) Based on a daily visual inspection, any findings of defects or damage in the external structural integrity of the Catalytic Oxidizer, including the main fan or leakage from the ductwork.

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

[Additional authority for this permit condition is also derived from §§40 CFR 64.6 and 64.3]

(a) The permittee shall use the approved means or devices to measure the applicable indicators.

(i) The Catalytic Oxidizer (Source ID:CO6) shall be equipped with a Department approved device for monitoring and recording the combustion chamber temperature.

(b) In the event of a defective or malfunctioning recordkeeping device (Department approved device), the permittee shall use the following approved means or devices to measure the applicable indicators.

**SECTION D. Source Level Requirements**

(i) Manual recording of the combustion chamber temperature from the digital readout.

(c) In addition to paragraph (b)(i), in the event of a defective or malfunctioning recordkeeping device, the permittee shall use the following approved means or devices to measure the applicable indicators:

(i) A visual inspection of the external structural integrity of the Catalytic Oxidizer, including the main fan and the ductwork for leakage.

(ii) A Method 22 observation for fugitive emissions from the Catalytic Oxidizer stack (Source ID: S06).

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

The permittee shall ensure that the Quantum 6000 Catalytic Oxidizer (Source ID: C06), manufactured by MEGTEC, shall be used to control volatile organic compounds (VOC) emissions from Press 51 (Source ID: 125A).

018 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The Quantum Oxidizer Catalytic Oxidizer (Source ID: C06) has a maximum design capacity of 6,000 standard cubic feet per minute (scfm).

The permittee has complied with BAT requirements pursuant to 25 Pa. Code Section 127.12 (a)(5) of this condition based on the results of a previous stack test conducted on November 17 and 18, 2011, in which the Catalytic Oxidizer demonstrated a destruction removal efficiency (DRE) of 97.3% by weight for total hydrocarbons (THC) while operating Press 51 under normal load conditions.

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

The permittee shall conduct regular preventative maintenance on the Quantum Catalytic Oxidizer in accordance with manufacturer's specifications. The maintenance program shall include, but not be limited to the following:

a. Weekly maintenance shall include:

1. Check air flow screens and ducting for debris.
2. Check for burned out indicator bulbs on control panel.
3. Check for gas leaks in the gas train and main gas line.

b. Monthly maintenance shall include:

1. Check dampers for correct operation and linkage for tightness.
2. Check the burner linkage rod for the positions marked at initial start-up.
3. Check exhaust fan drive belts for correct alignment and belt tension.
4. Check for fan noise.

c. Semiyearly Checks (3800 Hours) maintenance shall include:

1. Check the catalyst beds.
2. Check the flame rod and spark igniter.
3. Check the exterior of the oxidizer and the heat exchanger. Check for signs of hot spots or leakage (sapping).

d. Yearly Checks (7600 Hours) maintenance shall include:

1. Check fan and motor shafts for end play, not to exceed .005 inch.
2. Check all gaskets and seals. Replace if broken, brittle, or leaking.
3. Check for excessive temperature damage.

e. The permittee shall record any maintenance in a permanently bound logbook or other method approved by the

**SECTION D. Source Level Requirements**

Department. This log shall contain, at a minimum, the following information:

- (i) The date of the maintenance procedure.
- (ii) Type of maintenance performed.
- (iii) The name of the service company and technicians.

020 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for the following permit conditions are also derived from §40 CFR 64.8]

The permittee shall develop and implement a quality improvement plan (QIP) as expeditiously as practicable if any of the following occurs:

- (a) For properly and accurately collected data, accumulated excursions exceed five percent (5%) of the data for Catalytic Oxidizer combustion chamber temperatures.
- (b) Six excursions occur in a six-month reporting period.
- (c) The Department determines after review of all reported information that the permittee has not responded acceptably to an excursion

021 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

In general, the QIP plan should be developed within 60 days of any of the occurrences listed in Condition #020 and the permittee shall provide a copy of the QIP to the Department. Furthermore, the permittee shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

022 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 64.9]

The permittee shall record actions taken to implement a QIP during a reporting period and all related actions including, but not limited to inspections, repairs and maintenance performed on the monitoring equipment.

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

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

In accordance with §40 CFR 64.8, the QIP shall include procedures for evaluating the control performance problems. Based on the results of the evaluation procedures, the permittee shall modify the QIP, and provide a copy to the Department, to include procedures for conducting more frequent or improved monitoring in conjunction with one or more of the following:

- (a) Improved preventive maintenance practices
- (b) Process operation changes
- (c) Appropriate improvements to control methods
- (d) Other steps appropriate to correct performance.

**SECTION D. Source Level Requirements****# 024 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

Following implementation of a QIP, the Department will require reasonable revisions to the QIP if the plan has failed to either:

- (a) Address the cause of the control device performance problem;
- (b) Provide adequate procedures for correcting control device performance problems in as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

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

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

Implementation of a QIP, shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under any federal, state, or local laws or any other applicable requirements under the Clean Air Act.

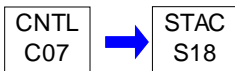
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: C07

Source Name: REGENERATIVE THERMAL OXIDIZER

Source Capacity/Throughput: 3,619.000 CF/HR Natural Gas

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

The permittee shall ensure that the Regenerative Thermal Oxidizer (Source ID: C07) shall operate with a minimum destruction efficiency of 95%.

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

(a) The permittee shall perform a stack test using Department-approved procedures once every five (5) calendar years [where five (5) calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five (5) years later] on the Regenerative Thermal Oxidizer (Source ID: C07), to demonstrate compliance with destruction and removal efficiency of VOCs and HAPs. Such testing shall be conducted in accordance with 25 Pa. Code Chapter 139 and the Department's Source Testing Manual (274-0300-002).

(b) When determining VOC destruction efficiency of the Regenerative Thermal Oxidizer, the 3-hour average of the combustion chamber temperature shall be no more than the minimum operating temperature of 1,500 °F plus 5% (1575 °F). If the 3-hour average of the actual oxidizer combustion chamber temperature during testing exceeds 1,575 °F, the higher temperature will become the minimum operating temperature. In accordance with 25 Pa. Code § 139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.

(c) At least ninety (90) 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 sampling ports and other data to ensure the collection of representative samples.

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

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

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

The permittee shall, on a monthly basis, monitor the amount of fuel used for the Regenerative Thermal Oxidizer (Source ID: C07).

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

[Additional authority for this permit condition is also derived from 40 CFR §§ 64.3 and 64.6]

**SECTION D. Source Level Requirements**

(a) The permittee shall use the approved process parameter or indicator to obtain data and monitor the emission control equipment performance:

(i) The Regenerative Thermal Oxidizer combustion chamber operating temperature.

(b) In the event of a defective or malfunctioning monitoring device (e.g., thermocouple), the control device and associated presses will shut down automatically.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR §§ 64.3 and 64.6.]

(a) The permittee shall use the approved frequency below for monitoring of the applicable process parameters:

(i) The Regenerative Thermal Oxidizer combustion chamber operating temperature shall be continuously monitored, over a one (1) hour averaging period.

(b) In the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall manually record the combustion chamber temperature from the digital readout, on an hourly basis.

(c) In addition to the requirement in paragraph (b), on a daily basis, the permittee shall:

(i) Perform a visual inspection of the external structural integrity of the RTO, including the valve timing system, the main fan and the ductwork for leakage.

(ii) Perform a Method 22 observation for fugitive emissions from the RTO stack (Source ID: S18).

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from §40 CFR 64.9]

(a) The permittee shall record the following approved indicator using the approved data collecting device.

(i) The Regenerative Thermal Oxidizer combustion chamber operating temperature shall be continuously recorded, using a circular chart recorder or a datalogger.

(b) In the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall record the following approved indicator using the following approved data collecting device:

(i) The Regenerative Thermal Oxidizer combustion chamber operating temperature shall be recorded hourly from the digital readout.

(c) In addition to paragraph (b)(i), in the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall record the following approved indicators:

(i) A visual inspection of the external structural integrity of the RTO, including the valve timing system, the main fan and the ductwork for leakage.

(ii) A Method 22 observation for fugitive emissions from the RTO stack (Source ID: S18).

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from §40 CFR 64.9]

**SECTION D. Source Level Requirements**

(1) The permittee shall record all excursions and corrective actions taken in response to an excursion and the time elapsed until the corrective actions have been taken.

(2) The permittee shall record all inspections, repair and maintenance performed on the monitoring equipment.

(3) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, possible causes and corrective actions taken for the incidents.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly and annual records of amount of fuel used, as measured at the meter connected to the Regenerative Thermal Oxidizer (Source ID: C07).

V. REPORTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from §§40 CFR 64.9 and 70.6(a)(3)(iii)(A)]

The permittee shall report all excursions and corrective actions taken, the dates, times, durations and possible causes, every six (6) months.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall report all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable), their dates, times and durations, possible causes and corrective actions taken, every six (6) months.

VI. WORK PRACTICE REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following permit conditions are also derived from §40 CFR 64.3]

The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the devices.

(a) The permittee shall, for an approved device, install detectors or sensors at a location approved by the Department for obtaining data that are representative of the monitored indicator.

(b) The permittee shall develop verification procedures to confirm the operational status of new or modified monitoring equipment prior to commencement of the monitoring process.

(c) The permittee shall calibrate and check the accuracy of monitoring equipment taking into account the manufacturer's specifications at approved time intervals.

(i) The circular chart recorder or other approved device shall be calibrated and checked for accuracy on an annual basis.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR §§ 64.3 and 64.6.]

The permittee shall adhere to the following approved ranges for the selected process parameters so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion.

**SECTION D. Source Level Requirements**

(i) A combustion chamber operating temperature more than 50°F less than the specified operating temperature (e.g., 1,500°F), based on an one (1) hour averaging period.

(b) In the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), the permittee shall adhere to the approved range for the selected indicator, listed below, so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion.

(i) A manually recorded combustion chamber temperature from the digital readout of less than 1,450°F.

(c) In addition to paragraph (b)(i), in the event of a defective or malfunctioning recordkeeping device (e.g., circular chart recorder or other approved device), a departure from the following specified indicator range over a specified averaging period shall be defined as an excursion:

(i) Based on a daily visual inspection, any findings of defects or damage in the external structural integrity of the RTO, including the valve timing system, the main fan or leakage from the ductwork; or,

(ii) Based on a daily Method 22 observation, fugitive emissions from the RTO stack (Source ID: S18).

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

[Additional authority for this permit condition is also derived from §§40 CFR 64.6 and 64.3]

(a) The permittee shall use the approved means or devices to measure the applicable indicators.

(i) The Regenerative Thermal Oxidizer (Source ID: C07) shall be equipped with a Chessel Model 392 temperature sensing and recording device or other Department approved device for monitoring and recording the combustion chamber temperature.

(b) In the event of a defective or malfunctioning recordkeeping device (e.g., Chessel Model 392 or other Department approved device), the permittee shall use the following approved means or devices to measure the applicable indicators.

(i) Manual recording of the combustion chamber temperature from the digital readout.

(c) In addition to paragraph (b)(i), in the event of a defective or malfunctioning recordkeeping device (e.g., Chessel Model 392 or other approved device), the permittee shall use the following approved means or devices to measure the applicable indicators:

(i) A visual inspection of the external structural integrity of the RTO, including the valve timing system, the main fan and the ductwork for leakage.

(ii) A Method 22 observation for fugitive emissions from the RTO stack (Source ID: S18).

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

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

The permittee shall ensure that the Regenerative Thermal Oxidizer (Source ID: C07) shall not be bypassed whenever the presses are applying inks.

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

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

The permittee shall ensure a minimum temperature of 1,500°F, based on an one (1) hour average, shall be maintained in the Regenerative Thermal Oxidizer combustion chamber to ensure a minimum 95% VOC destruction efficiency.

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 016 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for the following permit conditions are also derived from §40 CFR 64.8]

The permittee shall develop and implement a quality improvement plan (QIP) as expeditiously as practicable if any of the following occurs:

- (a) For properly and accurately collected data, accumulated excursions exceed five percent (5%) of the data for RTO combustion chamber temperatures.
- (b) Six excursions occur in a six-month reporting period.
- (c) The Department determines after review of all reported information that the permittee has not responded acceptably to an excursion.

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

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

In general, the QIP plan should be developed within 60 days of any of the occurrences listed in Condition #015 and the permittee shall provide a copy of the QIP to the Department. Furthermore, the permittee shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

018 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 64.9]

The permittee shall record actions taken to implement a QIP during a reporting period and all related actions including, but not limited to inspections, repairs and maintenance performed on the monitoring equipment.

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

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

In accordance with §40 CFR 64.8, the QIP shall include procedures for evaluating the control performance problems. Based on the results of the evaluation procedures, the permittee shall modify the QIP, and provide a copy to the Department, to include procedures for conducting more frequent or improved monitoring in conjunction with one or more of the following:

- (a) Improved preventive maintenance practices;
- (b) Process operation changes;
- (c) Appropriate improvements to control methods;
- (d) Other steps appropriate to correct performance.

020 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

Following implementation of a QIP, the Department will require reasonable revisions to the QIP if the plan has failed to either:

- (a) Address the cause of the control device performance problem;

**SECTION D. Source Level Requirements**

(b) Provide adequate procedures for correcting control device performance problems in as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

021 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 64.8]

Implementation of a QIP, shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under any federal, state, or local laws or any other applicable requirements under the Clean Air Act.

022 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The Regenerative Thermal Oxidizer (RTO) (Source ID: C07) is manufactured by Megtec, model CS-200-95, is equipped with a single natural gas-fired burner, manufactured by Maxon, model Kinemax, with a rated heat input capacity of 3.619 MMBtu/hr.

The permittee has complied with BAT requirements pursuant to 25 Pa. Code Section 127.12 (a)(5) of this condition based on the results of a previous stack test conducted on November 30, 2011, in which the RTO demonstrated a destruction removal efficiency (DRE) of 99% by weight for total hydrocarbons (THC) while operating Presses 21, 30, 44, 52, and 53 under normal load conditions.]

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

The permittee shall conduct regular preventative maintenance on the Megtec Oxidizer in accordance with manufacturer's specifications. The maintenance program shall include, but not be limited to the following:

a. Weekly maintenance shall include:

1. Check the air flow screens and ducting for debris.
2. Check that all guards and protection devices are installed.
3. Adjust the airline regulator to obtain a minimum working pressure of 80 psi (5.5 bars) at the gauge.
4. Check for leaks in the fuel train and supply line.
5. Observe the burner flame through the sight port for stability.

b. Monthly maintenance shall include:

1. Clean the optional airline filter.
2. Check all dampers and valves for correct settings and tightness.
3. Check all piping (pneumatic, fuel, etc.) for leaks. Repair leaks and record.

c. Quarterly maintenance shall include:

1. If applicable, check the exhaust fan coupling for correct alignment. Adjust as required. Repack the coupling if necessary.
2. If applicable, check the exhaust fan drive belts correct alignment and tension. Adjust as required.
3. Check the exhaust fan's wheel, inlet cone, and housing for wear and corrosion.
4. Check the exhaust fan's foundation bolts, bearings, wheel bolts, and set screws for the correct torque.
5. Lubricate the exhaust fan and combustion blower(s).
6. Check all safeties for correct operation. Refer to applicable standards literature for information on inspecting and maintaining burner.
7. Check all control cabinet doors for correct operation and sealing.
8. Check the control housing door for correct operation and sealing.
9. Check the AC heating unit for correct operation.

d. Semiannual maintenance shall include:

1. Check the spark ignitor.

**SECTION D. Source Level Requirements**

2. Check and clean the exterior of the oxidizer and its related equipment.
 3. With the electrical power OFF, tighten all AC voltage terminal connections on the motors, motor starters, and circuit breakers.
 4. Check the condition of the internal insulation. Check for signs of hot spots or leakage (sapping). Contact MEGTEC Systems if such a problem exists.
 5. Check that the high duct negative pressure switch operates correctly. Readjust or replace the switch as required.
 6. Check that the proof of flow pressure switch operates correctly. Readjust or replace the switch as necessary.
 7. Check that the proof of flow differential pressure transmitter is calibrated. Calibrate or replace the transmitter as necessary.
 8. Check that the compressed air pressure switch/alarm operates correctly. Readjust or replace the switch as necessary.
 9. Check that the duct negative and duct positive pressure transmitters are calibrated. Calibrate or replace the transmitters as necessary.
- e. Annual maintenance shall include:
1. Check the fan and motor shafts.
 2. Check all gaskets and seals. Replace any that are broken, brittle, or leaking.
 3. Shut down and lockout the main electrical power. Torque the bus bars in the motor control cabinet according to the manufacturer's recommendation.
 4. Check the ceramic heat exchange media for excessive breakage or plugging by inorganic material.
 5. Check all external surfaces of the oxidizer for rust or corrosion. Repair with primer and paint as necessary.
 6. Check the internal surfaces of the oxidizer, especially the cold face support, for corrosion.
- f. Two (2) year maintenance shall include:
1. Replace the main drive cylinders with new or rebuilt cylinders.
 2. Lubricate top spherical bearing with dry film moly spray.
 3. Lubricate rack and spur gear with dry film moly spray.
- g. Five (5) year maintenance shall include:
1. Check lift cylinder for seal or rod leaks, replace if necessary.
 2. Inspect and repack bottom taper roller bearing with grease.
 3. Inspect rack and spur gear for wear.
 4. Inspect valve seal rings and surrounding hardware for wear. Replace if necessary.
- h. The permittee shall record any maintenance in a permanently bound logbook or other method approved by the Department. This log shall contain, at a minimum, the following information:
1. The date of the maintenance procedure.
 2. Type of maintenance performed
 3. The name of the service company and technicians.

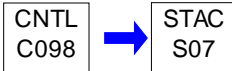
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: C098

Source Name: 40 OBP CYCLONE

Source Capacity/Throughput: 1,440.000 Lbs/HR PAPER TRIM

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emissions into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), from any process in a manner that the concentration of particulate matter in the effluent stream exceeds 0.04 grain per dry standard cubic foot, when the effluent stream volume is less than 150,000 dry standard cubic feet per minute.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

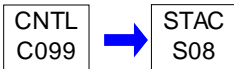
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: C099

Source Name: 60 OBP CYCLONE

Source Capacity/Throughput: 3,100.000 Lbs/HR PAPER TRIM

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emissions into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), from any process in a manner that the concentration of particulate matter in the effluent stream exceeds 0.04 grain per dry standard cubic foot, when the effluent stream volume is less than 150,000 dry standard cubic feet per minute.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION E. Source Group Restrictions.**

Group Name: 1

Group Description: Converting Lines

Sources included in this group

ID	Name
115	CONVERTING LINE 9
116	CONVERTING LINE 29
117	CONVERTING LINE 45
118	CONVERTING LINE 39
119	CONVERTING LINE 22
120	CONVERTING LINE 42
121	CONVERTING LINE 38
122	CONVERTING LINE 31
123	CONVERTING LINE 35

I. RESTRICTIONS.**Emission Restriction(s).****# 001 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall ensure that the VOC content of adhesives is limited to 1.0 lbs VOC per gallon of adhesive, less water and exempt compounds as applied.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511, 129.52 and 40 CFR part 60, Appendix A.]

(a) The permittee shall test their inks and adhesives, as applied for the following, in accordance with Method 24, as specified in 40 CFR Part 60, Appendix A:

- (1) Volatile matter content.
- (2) Water content.
- (3) Density.
- (4) Volume solids.
- (5) Weight solids.

(b) The permittee shall test each coating for each delivery, except those that are delivered having the same lot or batch number that have been previously tested.

(c) The above testing requirements shall be waived if the permittee can demonstrate compliance with any of the following:

- (1) A statement from the supplier that EPA Method 24 was used,
- (2) A Certified Product Data Sheet (CPDS) is received from the supplier, or
- (3) A MSDS (the upper bound) is used.

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

The permittee shall monitor the following information, for this source on a monthly basis:

- (1) Amount of inks and adhesives in gallons, as applied.
- (2) The ink/adhesive composition:

**SECTION E. Source Group Restrictions.**

- (a) Percent solids by volume and weight.
 - (b) Percent solvent by volume and weight.
 - (c) Percent water by volume and weight.
 - (d) Pounds of VOC per gallon minus water.
- (3) Daily cleanup solvents usage, and the VOC content and solvent density.

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

The permittee shall maintain records of the following operating information for this source on a monthly and annual basis:

- (1) Amount of inks and adhesives in pounds, as applied
- (2) The ink/adhesive composition:
 - (a) Percent of VOC per pound of ink/adhesive.
 - (b) Total VOC/HAP usage in pounds.
 - (c) Total VOC/HAP emissions in pounds.
- (3) Cleanup solvent usage, VOC percent, VOC/HAP usage in pounds and VOC/HAP emissions in pounds.

005 [25 Pa. Code §129.77.]**Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The permittee shall monitor and record:

- (1) A list of each adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent and cleanup solvent product in use and in storage.
- (2) A data sheet or material list which provides the product name, manufacturer identification and use or material application for each product included on the list required under paragraph (1).
- (3) The VOC content of each product on the list required under paragraph (1), as supplied.
- (4) Catalysts, reducers or other components used and the mix ratio.
- (5) The VOC content or vapor pressure of each product on the list required by paragraph (1), as applied, if solvent or other VOC is added to the product before application.
- (6) The volume purchased or produced of each product on the list required under paragraph (1).
- (7) The monthly volume used or applied as part of a manufacturing process at the facility of each product on the list required under paragraph (1).

V. REPORTING REQUIREMENTS.

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

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

The permittee shall ensure that the adhesive material will be stored in closed, nonabsorbent, non-leaking containers when not being mixed, transferred, or otherwise used.

**SECTION E. Source Group Restrictions.****VII. ADDITIONAL REQUIREMENTS.**

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

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

**SECTION E. Source Group Restrictions.**

Group Name: 2

Group Description: blanket wash

Sources included in this group

ID	Name
105A	PRESS 30 - HANTSCHO OFFSET
106A	PRESS 44 - MITSUBISHI OFFSET
108A	PRESS 18 - WORLD OFFSET
125A	PRESS 51 - HARRIS OFFSET
126A	PRESS 52 - MITSUBISHI OFFSET
127	PRESS 53
128	PRESS 54 - HARRIS M1280

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the blanket and roller cleaning solution(s) to one of the following requirements:

- a. VOC content, as applied, is less than or equal to 30 percent by weight, or;
- b. VOC composite partial vapor pressure, as used, is less than or equal to 10 mm Hg at 20°C (68°F).

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Descriptor		
031	SUPERIOR BOILER		
Emission Limit			Pollutant
0.530	Lbs/Hr		CO
1.150	Tons/Yr	12-month rolling sum	CO
2.100	Lbs/Hr		NOX
4.600	Tons/Yr	12-month rolling sum	NOX
0.090	Tons/Yr	12-month rolling sum	SOX
0.440	Lbs/Hr		SOX
1.200	Lbs/MMBTU		SOX
0.110	Lbs/Hr		TSP
0.230	Tons/Yr	12-month rolling sum	TSP
0.400	Lbs/MMBTU	particulate matter	TSP
0.040	Lbs/Hr		VOC
0.090	Tons/Yr	12-month rolling sum	VOC
032	JOHNSTON BOILER		
Emission Limit			Pollutant
1.200	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU	particulate matter	TSP
108A	PRESS 18 - WORLD OFFSET		
Emission Limit			Pollutant
1.180	Lbs/Hr	inks only	VOC
5.150	Tons/Yr	12-month rolling sum	VOC
7.400	Tons/Yr	total combined	VOC
125A	PRESS 51 - HARRIS OFFSET		
Emission Limit			Pollutant
0.600	Lbs/Hr		NOX
2.640	Tons/Yr	12-month rolling sum	NOX
2.070	Lbs/Hr		VOC
9.080	Tons/Yr	12-month rolling sum	VOC
127	PRESS 53		
Emission Limit			Pollutant
0.820	Tons/Yr	12-month rolling sum	Hazardous Air Pollutants
1.700	Lbs/Hr		VOC
7.600	Tons/Yr	12-month rolling sum	VOC
128	PRESS 54 - HARRIS M1280		
Emission Limit			Pollutant
0.860	Tons/Yr	12-month rolling sum	Hazardous Air Pollutants
1.760	Lbs/Hr		VOC
7.800	Tons/Yr	12-month rolling sum	VOC

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
734	BACK UP GENERATORS - 2		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	particulate matter	TSP
C098	40 OBP CYCLONE		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	particulate matter	TSP
C099	60 OBP CYCLONE		
Emission Limit		Pollutant	
0.040	gr/DRY FT3	particulate matter	TSP

Site Emission Restriction Summary

Emission Limit		Pollutant
24.230 Tons/Yr	12-month rolling sum	NOX
47.260 Tons/Yr	12-month rolling sum	VOC
10.000 Tons/Yr	for any single hap	Hazardous Air Pollutants
25.000 Tons/Yr	combined HAPs	Hazardous Air Pollutants

**SECTION H. Miscellaneous.**

(a) The following previously issued Operating Permits serve as a basis for certain terms and conditions in this Title V Operating Permit 09-00009:

- (i) Operating Permit: OP-09-0009 - Major VOC/Synthetic NOx RACT
- (ii) Operating Permit: OP-09-320-005A - Printing Presses
- (iii) Operating Permit: OP-09-320-008A - Printing Presses
- (iv) Operating Permit: OP-09-320-037 - Press 16

(b) The report required in Section C, VIII. Compliance Certification shall be for the period from January 1st through December 31st for the previous year.

(c) The data listed in Sections A, Site Inventory List, for capacity and fuel/material and the source capacity 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 limits are indicated in the text conditions of Sections D and E and are listed in Section G of this Title V Operating Permit.

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

- (1) Shrink Wrap Machine
- (2) Parts Cleaners
- (3) Oil Dispensing Units
- (4) Spray Booths (2)
- (5) Forklifts
- (6) Propane Storage Tank
- (7) Space Heating Tank
- (8) Image Dryer
- (9) Storage Tanks
 - (i) 300 Gallon AST (Above-ground Storage Tank), Tank ID # 09-45476 004A: Stores diesel fuel used by the backup generator.
 - (ii) 30,000 Gallon AST, Tank ID # 09-45476 003A: Stores the recovered ink oil from the printing process.
 - (iii) 2,000 Gallon AST, Tank ID # 09-45476 05A: Stores the back up #2 fuel oil for the Johnston boiler.
 - (iv) 5,200 Gallon AST, Tank ID # 09-45476 001A: Stores non-hazardous waste from printing process. This tank was exempted pursuant RFD #3046.
- (10) Torit Dust Collector
- (11) Space Heaters (3)
- (12) Brian Water Tube Boiler (Source 033)
- (13) Trendsetter 800 II Quantum
- (14) Trendsetter Spectrum
- (15) Platemaking Line consisting of the following:
 - (i) Quartz 850 Processor
 - (ii) Quartz 850 RG Processor
 - (iii) Wisconsin Prebake Oven
 - (iv) Wisconsin Postbake Oven
- (16) two (2) T490-HP Printing Presses - RFD 7943

(e) The Title V Operating Permit 09-00009 (APS No. 346623, Auth ID: 503451) has been administratively amended to incorporate conditions from Plan Approval PA-09-0009B for the installation of Web Offset Press No. 51 (Source ID: 125) and associated control device, Quantum 6000 Catalytic Oxidizer (Source ID: C06).

(f) The Title V Operating Permit 09-00009 (APS No. 346623, Auth ID: 594464) has been administratively amended to incorporate conditions from Plan Approval PA-09-0009D for the installation of a heatset web offset lithographic Press No. 52 and associated MEGTEC Regenerative Thermal Oxidizer (RTO) control device.

(g) The Title V Operating Permit 09-00009 (APS No. 346623, Auth ID: 615914) has been administratively amended to incorporate conditions from Plan Approval PA-09-0009E for the modification of the operation of the World Offset Press No. 18 (Source ID: 108).

(h) The Title V Operating Permit 09-00009 (APS No. 346623, Auth ID: 617785) has been renewed.

(i) The Title V Operating Permit 09-00009 (APS No. 346623, Auth ID: 709968) has been administratively amended to address

**SECTION H. Miscellaneous.**

issues contained in the Amended Notice Of Appeal (EHB Docket No. 2007-200-R).

- (j) The Title V Operating Permit 09-00009 (APS No. 346623, Auth ID: 911623) has been renewed and administratively amend to incorporate the conditions of Plan Approval 09-0009F.
- (k) The Title V Operating Permit 09-00009 (APS No. 806022, AUTH ID: 966779) has been administratively amended to incorporate a Change of Ownership (COO).
- (l) The Title V Operating Permit 09-00009 (APS No. 806022, AUTH ID: 1036047) has been modified to permit the reactivation of the Johnston Boiler (Source ID: 032).
- (j) The Title V Operating Permit 09-00009 (APS No. 806022, AUTH ID: 1151667) has been administratively amended to incorporate conditions from Plan Approval 09-0009G for the installtion of the new heatset lithographic Harris M1000 BE printing press (Source ID: 128) and moving the existing Megtec dryer from the existing Press 21 (Source ID: 104) to the existing Press 30 (Source ID: 105A).
- (k) Title V permit renewal, AUTH 1170941.
- (l) Title V permit renewal, AUTH 1389394



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