



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

**TITLE V/STATE OPERATING PERMIT**

Issue Date:	June 10, 2021	Effective Date:	October 31, 2022
Revision Date:	October 31, 2022	Expiration Date:	June 30, 2026
Revision Type:	Amendment		

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: 67-05030**

Federal Tax Id - Plant Code: 23-1544725-1

**Owner Information**

Name: CP CONVERTERS INC  
Mailing Address: 15 GRUMBACHER RD  
YORK, PA 17406-8417

**Plant Information**

Plant: CP CONVERTERS INC/MANCHESTER  
Location: 67 York County 67939 Manchester Township  
SIC Code: 2673 Manufacturing - Bags - Plastics, Laminated And Coated

**Responsible Official**

Name: RYAN SMITH  
Title: SAFETY DIRECTOR  
Phone: (717) 900 - 4631 Email: rsmith@cpflexpack.com

**Permit Contact Person**

Name: RYAN SMITH  
Title: SAFETY DIRECTOR  
Phone: (717) 900 - 4631 Email: rsmith@cpflexpack.com

[Signature] \_\_\_\_\_  
WILLIAM R. WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER



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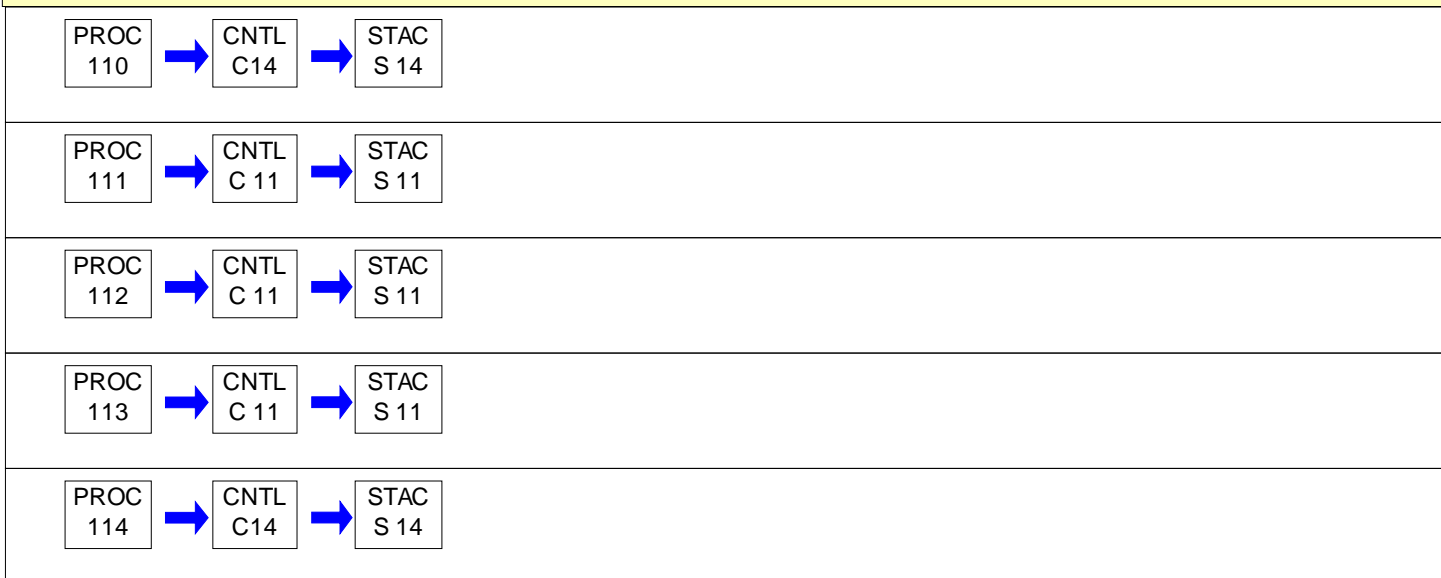
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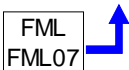
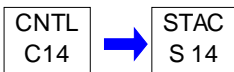
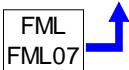
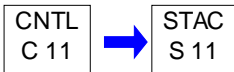
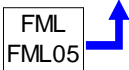
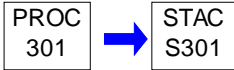
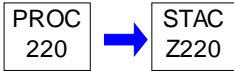
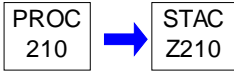
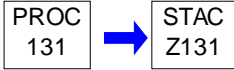
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
110	NO. 10 FLEXOGRAPHIC PRESS	70.000 Lbs/HR	INK SOLVENT
		120.000 Lbs/HR	THIN SOLVENT
111	NO. 11 FLEXOGRAPHIC PRESS	70.000 Lbs/HR	INK SOLVENT
		120.000 Lbs/HR	THIN. SOLVENT
112	NO. 12 FLEXOGRAPHIC PRESS	70.000 Lbs/HR	INK SOLVENT
		120.000 Lbs/HR	THIN. SOLVENT
113	NO. 13 FLEXOGRAPHIC PRESS	380.000 Lbs/HR	MAX SOLVENT LOAD
114	NO. 14 FLEXOGRAPHIC PRESS	380.000 Lbs/HR	MAX SOLVENT LOAD
115	NO. 15 FLEXOGRAPHIC PRESS	520.000 Lbs/HR	INK SOLVENT
		87.000 Lbs/HR	THIN. SOLVENT
131	FOUR LAMINATORS		
210	EXTRUDER 1		
220	EXTRUDER 2		
301	EMERGENCY GENERATOR (13 HP)		
C 11	PRESS 11, 12, & 13 CATALYTIC OXIDIZER, MEGTEC	3.000 MCF/HR	Natural Gas
C14	CONTROL, PRESS 10, 14 AND 15 RTO, MEGTEC	5.000 MCF/HR	Natural Gas
FML05	PROPANE		
FML07	NATURAL GAS LINE		
S 11	STACK, MEGTEC CATALYTIC OXIDIZER, PTE ROOM 1 SOURCES		
S 14	STACK, MEGTEC RTO, PTE ROOM 2 SOURCES		
S301	EMERGENCY GENERATOR STACK		
Z131	FUGITIVE, LAMINATORS		
Z210	FUGITIVE EMISSIONS, EXTRUDER 1		
Z220	FUGITIVE EMISSIONS, EXTRUDER 2		

**PERMIT MAPS**



**PERMIT MAPS**



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**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 § 127.513]****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

**SECTION B. General Title V Requirements**

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.

**#025 [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.
- (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.

**#026 [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.

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Title V Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The permittee shall not allow the emission into the outdoor atmosphere of any fugitive air contaminant from a source other than the following:

- (a) Construction or demolition of building or structure.
- (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 material.
- (f) Sources and classes of sources other than those identified above, for which the operator has obtained a determination from the Department, in accordance with 25 Pa. Code §123.1(b), 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.
  - (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air standard.

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

The person shall not allow the emission of fugitive particulate matter into the outdoor atmosphere from a source specified in Condition #001 if the emissions are visible at the point the emissions pass outside the permittee's property.

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

The permittee shall not allow 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 permittee's property.

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

The permittee shall not allow 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 percent for a period or periods aggregating more than three minutes in any one (1) hour.
- (b) Equal to or greater than 60 percent at any time.

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

The emission limitation of 25 Pa. Code §123.41 shall not apply when:

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



**SECTION C. Site Level Requirements**

(c) The emission results from sources specified in Section C, Condition #001.

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

Annual VOC emissions from the facility shall not exceed the following limit, based on 12-month rolling total:

(a) VOC: 129 tons

The permittee shall limit the facility's total actual HAP emissions below the following levels, based on 12-month rolling totals:

- (b) Any single HAP: 10 tons
- (c) Combined HAPs: 25 tons

**Notes:**

- 1: Additional authority for this permit condition part (a) is derived from operating permit No. 67-2030A.
- 2: Compliance verification requires the VOC and HAPs emissions (in mass unit) to be calculated on a monthly and 12-month rolling total basis.

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

a.) The permittee shall comply with a VOC emission cap of 39 tons during any consecutive 12-month period for the five presses (Source IDs 110, 111, 112, 113 and 114). The VOC emission cap for the five presses is a compliance cap, imposed for NSR applicability purposes. This VOC emission cap shall not provide any relief from NSR applicability determinations for any future physical change or change in the method of operation of the five presses at the facility. The five presses (Source IDs 110, 111, 112, 113 and 114) covered under the VOC emission cap shall be considered as one emissions unit, as defined in 25 Pa. Code Section 121.1 (relating to definitions), for NSR applicability purposes. Any future NSR applicability determinations must consider the baseline actual VOC emissions of the five presses as one emissions unit and not the VOC emission cap. In the event that major NSR is triggered for any of the five presses covered by the VOC emission cap, LAER shall apply to the five presses. If the company finds it necessary to relax the VOC emission cap at some future date, the requirements of 25 Pa. Code Section 127.203(e)(2) shall apply.

b.) The provisions of part (a), above, do not preclude the permittee from seeking and procuring a Plantwide Applicability Limit (PAL) pursuant to 25 Pa. Code, Section 127.218.

Compliance verification requires emissions to be calculated and recorded for each month and each consecutive 12-month period. All records shall be maintained for the most recent five-year period and made available to Department representatives upon request.

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

The Department reserves the right to order stack testing of the Sources in permanent total enclosure room 1 and permanent total enclosure room 2 to verify the emissions standards.

**# 009 [25 Pa. Code §127.512]****Operating permit terms and conditions.**

(a) The permittee shall carry out a performance testing of the sources, controls and permanent total enclosures (2 PTEs) once during the term of the permit.

(b) Unless otherwise approved by the Department in writing, the performance test shall be conducted while the unit is

**SECTION C. Site Level Requirements**

operating at normal operating press load conditions. The testing shall include the following:

- (1) Visible Emissions
- (2) Destruction efficiency of VOC for each incinerator /RTO /PTE as applicable
- (3) Outlet concentration of VOC in parts per million (ppm)

(c) Unless otherwise approved in writing by DEP, the permittee shall do the following:

(1) Conduct performance testing in accordance with the provisions of 25 Pa Code Section 139 and the Department's Source Testing Manual and any applicable federal regulations.

(2) Submit to DEP a test protocol for review and approval no later than 365 days before the expiration of this permit, and not conduct the test that is the subject of the protocol until the protocol has been approved by DEP.

(3) If DEP finds deficiencies in the protocol, the permittee shall provide a response to DEP addressing the deficiencies within 30 days of being notified of the deficiencies.

(4) Complete the performance test within 90 days of DEP's approval of the test protocol.

(d) Pursuant to 25 Pa. Code § 139.3 at least 15 calendar days prior to commencing an emission testing program, notification as to the date and time of testing shall be given to the appropriate Regional Office. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.

(e) Pursuant to 25 Pa. Code Section 139.53(a)(3) within 15 calendar days after completion of the on-site testing portion of an emission test program, if a complete test report has not yet been submitted, an electronic mail notification shall be sent to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office indicating the completion date of the on-site testing.

(f) A complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program.

(g) Pursuant to 25 Pa. Code Section 139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:

1. A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
2. Permit number(s) and condition(s) which are the basis for the evaluation.
3. Summary of results with respect to each applicable permit condition.
4. Statement of compliance or non-compliance with each applicable permit condition.

(h) Pursuant to 25 Pa. Code § 139.3 to all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

(i) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.

(j) Pursuant to 25 Pa. Code Section 139.53(a)(1) and 139.53(a)(3) all submittals, besides notifications, shall be accomplished through PSIMS\*Online available through <https://www.depgreenport.state.pa.us/ecomm/Login.jsp> when it becomes available. If internet submittal cannot be accomplished, submittal shall be made as follows:

Regional Office:  
Digital copy (only): RA-epscstacktesting@pa.gov

**SECTION C. Site Level Requirements**

Bureau of Air Quality:

Paper copy: PA DEP, Bureau of Air Quality, Division of Source Testing and Monitoring, 400 Market Street, 12th Floor Rachael Carson State Office Building, Harrisburg, PA 17105-8468

Digital copy: RA-epstacktesting@pa.gov

(k) The permittee shall ensure all federal reporting requirements contained in the applicable subpart of 40 CFR are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between state and the federal, the most stringent provision, term, condition, method or rule shall be used by default.

(l) The test report shall include the following information from the recorded parameters:

- (1) The combined total VOC emissions in pounds per hour (lb/hr) from the flexographic presses /PTE.
- (2) HAP and HAPs contents in the VOC emissions, in above part (1), estimated from the VOC.

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

Visible air contaminants may be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurement.
- (b) Observers, trained and certified in EPA Method 9 to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

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

(a) Monthly emissions: The referenced monthly emissions, in above Condition #006 (a), (b) and (c), shall be monitored and determined from the coatings, cleanups, and solvents usage for each source referenced in Section A of this permit, from the certified product data sheet (CPDS) or the material safety data sheet (MSDS), or the vendor specification, and the monthly operating hours for each press.

(b) Annual facility emissions: On a monthly basis, the annual emissions shall be monitored, calculated, and recorded, from the above part (a) determinations, on a 12-month rolling total basis.

**# 012 [25 Pa. Code §127.511]****Monitoring and related recordkeeping and reporting requirements.**

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

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

**# 013 [25 Pa. Code §127.512]****Operating permit terms and conditions.**

In the event that the facility wishes to obtain credit waste ink/solvent disposal for VOC and HAP(s) emissions reporting, the

**SECTION C. Site Level Requirements**

permittee shall provide the following information for waste inks and solvents, or mixtures sent off-site for recycling or disposal:

- (a) Pounds or gallons per month of waste inks and solvents, or mixtures shipped from the facility
- (b) Waste profile or sampling data for each shipment
- (c) Identification of the waste disposal company for each shipment

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

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

- (a) The permittee shall monitor and record number of hours of operations of each source listed in Section A, both on a monthly and yearly basis.
- (b) For the monthly periphery inspection the permittee shall maintain a logbook for recording the status of malodorous air contaminants, visible emissions and fugitive visible emission exceedences. The logbook shall also include the name of the facility representative, and the date and time the monitoring was conducted and wind direction.

**# 015 [25 Pa. Code §127.512]****Operating permit terms and conditions.**

- (a) The permittee shall maintain records including purchase orders and /or invoices of solutions containing VOCs used in the facility and documentations of the VOCs contents in the solutions obtained through EPA approved test methods or procedures. The records shall be kept for the items listed in the reporting requirements in Section C, Condition #017.
- (b) The permittee shall maintain records of waste solvent shipped off site for obtaining credit, to meet the reporting requirements in Section C, Condition #017.
- (c) The records referenced at paragraph (a) and (b) shall be retained at site for five years and made available to the Department's representative upon request.

**V. REPORTING REQUIREMENTS.****# 016 [25 Pa. Code §127.512]****Operating permit terms and conditions.**

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

- (a) When the malfunction poses an imminent and substantial danger to the public health and safety or harm to the environment, the notification shall be reported immediately to the Department by telephone. The telephone report of such malfunctions shall occur no later than two hours after the incident.
  - (1) The notice shall describe the:
    - (i) name and location of the facility;
    - (ii) nature and cause of the malfunction or breakdown;
    - (iii) time when the malfunction or breakdown was first observed;
    - (iv) expected duration of excess emissions; and
    - (v) estimated rate of emissions.
  - (2) The owner or operator shall notify the Department immediately when corrective measures have been accomplished.

**SECTION C. Site Level Requirements**

(3) The permittee shall submit a written report of instances of such malfunctions to the department, in writing, within three (3) days of the of the telephone report.

(4) The owner or operator shall submit reports on the operation and maintenance of the source to the Regional Air Program Manager at such intervals and in such form and detail as may be required by the Department. Information required in the reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and maintenance schedules.

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

(c) Malfunctions shall be reported to the Department at the following address:

PADEP  
Air Quality District Supervisor  
909 Elmerton Avenue  
Harrisburg, PA 17110

Telephone reports can be made to the Air Quality Program at (717) 705-4702 during normal business hours or to the Department's Emergency Hotline at any time. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at <https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx>.

**# 017 [25 Pa. Code §135.3]****Reporting**

(a) An annual emissions report containing information for all sources listed in this operating permit, new sources which were first operated during preceding year and sources modified during the same period shall be submitted to the Department's Air Quality District Supervisor. The report for January 1 through December 31 is due no later than March 1 of the following year. Also, reference Conditions B031 and B032.

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

**VI. WORK PRACTICE REQUIREMENTS.****# 018 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee shall take all reasonable actions to prevent particulate matter from a source identified in condition #001 from becoming airborne, as per §123.1(c). These actions shall include, but are not limited to, the following:

(a) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(b) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(c) Paving and maintenance of roadways.

(d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

**# 019 [25 Pa. Code §127.512]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from RACT operating permit No. 67-2030]

(a) Any natural draft opening (NDO) of the permanent total enclosure (PTE), defined as any opening in the enclosure that

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remains open during operation of the facility and is not connected to a duct in which a fan is installed, shall be subject to the following:

- (1) The NDO shall be at least four equivalent opening diameters from each VOC emitting point.
  - (2) The total area of all NDOs shall not exceed five percent of the interior surface of the enclosure. If flexible curtains are used at the openings the open area must be determined when air is flowing through the curtains and as the curtains are deflected.
  - (3) The average facial velocity of the air through all NDOs shall be at least 200 feet per minute (fpm).
  - (4) The direction of air flow through all NDOs shall be into the enclosure.
  - (5) All VOC emissions generated in the PTE must be captured and contained for discharge through the control device.
- (b) All access doors, vents, air intakes, and other openings which have not been evaluated to meet the requirements of (a) above, shall be kept closed during routine operation of the plant.
- (c) After all sources within the PTE have stopped generating emissions, the PTE shall continue to be exhausted through the control devices for a period of time to ensure remaining fugitive emissions are captured and destroyed. The permittee shall exhaust the equivalent of at least four room air changes through the control device prior to bypassing or shutting down the incinerator.
- (d) The permittee shall maintain, on site, a hand held anemometer accurate to within plus minus five percent of full scale. The permittee shall use this instrument to measure the air velocities through the NDOs at least once per day when emissions are being generated within the enclosure. The permittee shall document the velocities and directions of air flow through the NDOs and make these records available to the Department when requested.
- (e) The permittee shall keep all containers containing VOCs tightly closed when not in use, including those containers containing cleaning solvents and used liquids containing VOCs. The solvent laden wipes shall be kept in closed containers when not in use.

**VII. ADDITIONAL REQUIREMENTS.****# 020 [25 Pa. Code §127.444]****Compliance requirements.**

A person may not cause or permit the operation of a source subject to this article unless the source 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 application and 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 this chapter in a manner inconsistent with good operating practices.

**# 021 [25 Pa. Code §127.512]****Operating permit terms and conditions.**

Annual Compliance Certification, referenced in below Section C (VIII), may be submitted in electronic form to EPA Region 3 at the following e-mail address: R3\_APD\_Permits@epa.gov. A copy of the report shall be submitted to the PA DEP's Air Quality District Supervisor at 909 Elmerton Avenue, Harrisburg, PA 17110.

**# 022 [25 Pa. Code §129.14]****Open burning operations**

No person shall conduct open burning of material at the facility, as per §129.14(a), 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

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public official.

- (b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (c) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (d) A fire set solely for recreational or ceremonial purposes.
- (e) A fire set solely for cooking food.

**VIII. COMPLIANCE CERTIFICATION.**

The permittee shall submit within thirty days of 01/01/2022 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #026 of section B of this permit, and annually thereafter.

**IX. COMPLIANCE SCHEDULE.**

No compliance milestones exist.

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

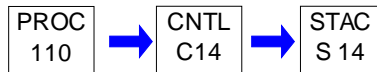
**SECTION D. Source Level Requirements**

Source ID: 110

Source Name: NO. 10 FLEXOGRAPHIC PRESS

Source Capacity/Throughput:	70.000 Lbs/HR	INK SOLVENT
	120.000 Lbs/HR	THIN SOLVENT

Conditions for this source occur in the following groups: 2  
3  
5

**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. \*\*\***



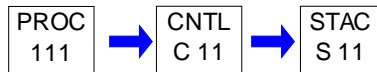
**SECTION D. Source Level Requirements**

Source ID: 111

Source Name: NO. 11 FLEXOGRAPHIC PRESS

Source Capacity/Throughput:	70.000 Lbs/HR	INK SOLVENT
	120.000 Lbs/HR	THIN. SOLVENT

Conditions for this source occur in the following groups: 1  
3  
6

**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. \*\*\***

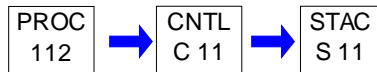
**SECTION D. Source Level Requirements**

Source ID: 112

Source Name: NO. 12 FLEXOGRAPHIC PRESS

Source Capacity/Throughput:	70.000 Lbs/HR	INK SOLVENT
	120.000 Lbs/HR	THIN. SOLVENT

Conditions for this source occur in the following groups: 1  
3  
6

**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. \*\*\***

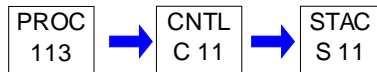
**SECTION D. Source Level Requirements**

Source ID: 113

Source Name: NO. 13 FLEXOGRAPHIC PRESS

Source Capacity/Throughput: 380.000 Lbs/HR MAX SOLVENT LOAD

Conditions for this source occur in the following groups: 1  
3  
6

**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. \*\*\***

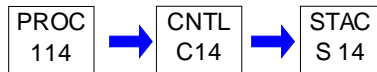
**SECTION D. Source Level Requirements**

Source ID: 114

Source Name: NO. 14 FLEXOGRAPHIC PRESS

Source Capacity/Throughput: 380.000 Lbs/HR MAX SOLVENT LOAD

Conditions for this source occur in the following groups: 2  
3  
5

**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. \*\*\***

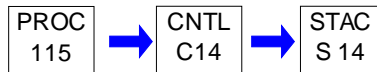
**SECTION D. Source Level Requirements**

Source ID: 115

Source Name: NO. 15 FLEXOGRAPHIC PRESS

Source Capacity/Throughput:	520.000 Lbs/HR	INK SOLVENT
	87.000 Lbs/HR	THIN. SOLVENT

Conditions for this source occur in the following groups: 2  
3  
5

**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. \*\*\***

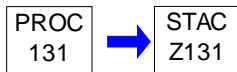
**SECTION D. Source Level Requirements**

Source ID: 131

Source Name: FOUR LAMINATORS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 8

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

The permittee shall limit total actual VOC emissions from coatings, prior to controls, below 25 tons based on a 12-month rolling total for each laminator line.

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

Manufacturer's supplied VOC data sheets and the certified product data sheets (CPDS) for all coatings and cleaning solvents used at this facility within the most recent five years shall be maintained, and made available to the Department's representative upon request.

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

The annual VOC emissions from coatings, thinners and clean up solvents for each laminator line shall be reported to the Department in conjunction with Section C, Condition #017(a).

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

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

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

The permittee shall provide the following information to obtain credit for waste solvents sent off-site for recycling, incineration or destruction at a legally permitted facility:

- (a) Gallons per quarter of waste solvents shipped from the facility.
- (b) Waste profile or sampling data for each shipment.
- (c) Identification of waste disposal company for each shipment.

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

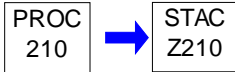
**SECTION D. Source Level Requirements**

Source ID: 210

Source Name: EXTRUDER 1

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 8

**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. \*\*\***



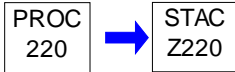
**SECTION D. Source Level Requirements**

Source ID: 220

Source Name: EXTRUDER 2

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 8

**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. \*\*\***

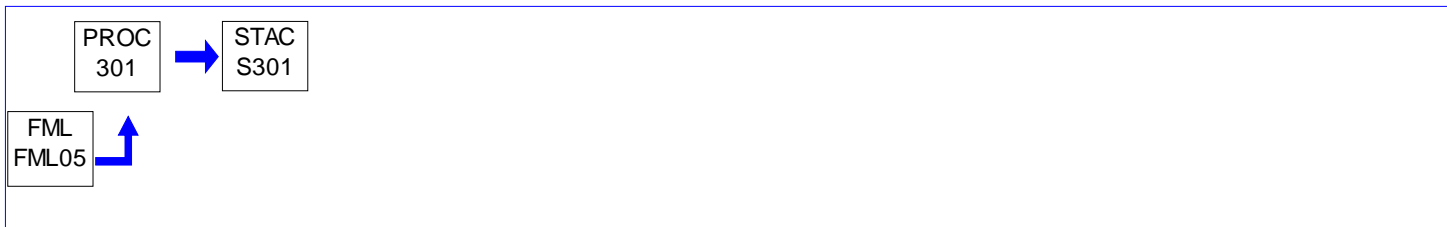
**SECTION D. Source Level Requirements**

Source ID: 301

Source Name: EMERGENCY GENERATOR (13 HP)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 7

**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: C 11

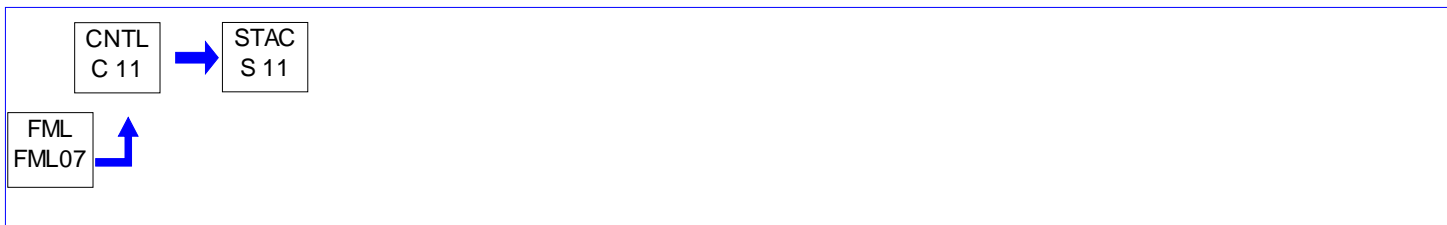
Source Name: PRESS 11, 12, &amp; 13 CATALYTIC OXIDIZER, MEGTEC

Source Capacity/Throughput:

3.000 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 6

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

The permittee shall not allow the emission into the outdoor atmosphere of particulate matter from Control ID C 11 (PTE 1) in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot, as per §123.13(c)(1)(i).

**# 002 [25 Pa. Code §123.21]****General**

The permittee shall not allow the emissions into the outdoor atmosphere of sulfur oxides from Control ID C 11 (PTE 1) in a manner that the concentration of sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

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

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: C14

Source Name: CONTROL, PRESS 10, 14 AND 15 RTO, MEGTEC

Source Capacity/Throughput:

5.000 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: 5

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

The permittee shall not allow the emission into the outdoor atmosphere of particulate matter from the regenerative thermal oxidizer (RTO), Control ID C 14 (PTE 2), in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot, as per Section 123.13(c)(1)(i).

**# 002 [25 Pa. Code §123.21]****General**

The permittee shall not allow the emissions into the outdoor atmosphere of sulfur oxides from Control ID C 14 (PTE 2) in a manner that the concentration of sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume dry basis, as per Section 123.21(b).

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

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

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 E. Source Group Restrictions.**

Group Name: 1

Group Description: Flexographic Presses in PTE 1 Controlled by Catalytic Oxidizer (C 11)

Sources included in this group

ID	Name
111	NO. 11 FLEXOGRAPHIC PRESS
112	NO. 12 FLEXOGRAPHIC PRESS
113	NO. 13 FLEXOGRAPHIC PRESS

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

The overall VOC control efficiency for the presses shall be 95 percent or greater with the permanent total enclosure (PTE) having 100 percent capture efficiency and the catalytic oxidizer having 95 percent or greater destruction efficiency.

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

The VOC emissions from Source IDs 111, 112 and 113 shall not exceed 39 tons each, or combined, based on a 12-month rolling total.

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

(a) The catalytic oxidizer controlling emissions from Source IDs 111, 112 and 113 flexographic presses shall have a catalyst preheat temperature of 550 degree F or greater.

(b) The permittee shall cease the operation of flexographic presses when the catalytic oxidizer is not in operation.

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

The permittee shall maintain a record of VOC emissions from Source IDs 111, 112 and 113, and respective coatings usage and operating hours on a monthly basis. The records shall be retained at site for five years and made available to the Department's representative upon request.

**V. REPORTING REQUIREMENTS.**

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



**SECTION E. Source Group Restrictions.**

**VI. WORK PRACTICE REQUIREMENTS.**

**# 005 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall operate and maintain Source IDs 111, 112 and 113 in accordance with the manufacturers specifications.

**# 006 [25 Pa. Code §127.512]**

**Operating permit terms and conditions.**

The natural draft opening(s) to permanent total enclosure (PTE) Room 1 shall be maintained at a minimum of 200 fpm facial velocity (equivalent to negative pressure of 0.007 inch Wg).

**# 007 [25 Pa. Code §127.512]**

**Operating permit terms and conditions.**

Source IDs 111, 112 and 113 and Control ID C11 shall be operated and maintained in accordance with the manufacturers' specifications, or as per the operational handbook.

**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: Flexographic Presses in Permanent Total Enclosure (PTE 2) Controlled by RTO (C 14)

Sources included in this group

ID	Name
110	NO. 10 FLEXOGRAPHIC PRESS
114	NO. 14 FLEXOGRAPHIC PRESS
115	NO. 15 FLEXOGRAPHIC PRESS

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

The permittee shall not allow the emission into the outdoor atmosphere of particulate matter from the presses in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot, as per Section 123.13(c)(1)(i).

**# 002 [25 Pa. Code §123.21]****General**

The permittee shall not allow the emissions into the outdoor atmosphere of sulfur oxides from the presses in a manner that the concentration of sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume dry basis, as per Section 123.21(b).

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

(a) The RTO controlling emissions from the sources, and the permanent total enclosure (PTE) shall have a preheat temperature of 1,400 degree F or greater.

(b) The permittee shall cease the operation of flexographic presses in the PTE when the RTO (C14) is not in operation.

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

The overall VOC control efficiency for the presses shall be 97 percent or greater with the permanent total enclosure (PTE) having 100 percent capture efficiency and the regenerative thermal oxidizer (RTO) having 97 percent or greater destruction efficiency.

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

The VOC emissions from Source IDs 110, 114 and 115 shall not exceed 39 tons each based on a 12-month rolling total.

**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).

**SECTION E. Source Group Restrictions.****IV. RECORDKEEPING REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep a record of material usage, including coatings and clean-up solvents, for the sources to demonstrate the emissions of HAPs.

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

Source IDs 110, 114 and 115 and Control ID C14 shall be operated and maintained in accordance with the manufacturers' specifications.

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

The natural draft opening(s) to permanent total enclosure Room 2 (NDOs) shall be maintained at a minimum of 200 fpm facial velocity (equivalent to negative pressure of 0.007 inch Wg).

**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: 3

Group Description: 25 Pa. Code, Section 129.67a - Control of VOC emissions from flexible packaging printing

**Sources included in this group**

ID	Name
110	NO. 10 FLEXOGRAPHIC PRESS
111	NO. 11 FLEXOGRAPHIC PRESS
112	NO. 12 FLEXOGRAPHIC PRESS
113	NO. 13 FLEXOGRAPHIC PRESS
114	NO. 14 FLEXOGRAPHIC PRESS
115	NO. 15 FLEXOGRAPHIC PRESS

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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.****# 001 [25 Pa. Code §129.67a]****Control of VOC emissions from flexible packaging printing presses.**

(a) Applicability.

(1) Except as specified in paragraph (3) or (4), this section applies to the owner and operator of a flexible packaging printing press if one or more of the following apply:

(i) Potential VOC emissions. An individual flexible packaging printing press has potential emissions from the dryer, before consideration of add-on controls, of at least 25 tpy of VOCs from inks, coatings and adhesives combined. This section supersedes § 129.67 (relating to graphic arts systems).

(ii) Actual VOC emissions at or above threshold. The total actual VOC emissions from all inks, coatings and adhesives combined from all flexible packaging printing presses and all VOC emissions from related cleaning activities at the facility are equal to or greater than 450 pounds (204.1 kilograms) per month or 2.7 tons (2,455 kilograms) per 12-month rolling period, before consideration of add-on controls.

**SECTION E. Source Group Restrictions.**

(iii) [N/A - ACTUAL VOC EMISSIONS ABOVE THRESHOLD]

(2) The owner or operator of a flexographic or rotogravure printing press subject to paragraph (1)(ii) and § 129.67, who was required to install a control device under § 129.67 prior to June 28, 2014, shall continue the operation of that control device and also meet the requirements of this section.

(3) VOCs from adhesives used at a facility that are not used or applied on or with a flexible packaging printing press are not subject to this section and may be regulated under § 129.52b, § 129.77 or Chapter 130, Subchapter D (relating to control of VOC emissions from paper, film and foil surface coating processes; control of emissions from the use or application of adhesives, sealants, primers and solvents; and adhesives, sealants, primers and solvents).

(4) Surface coating of flexible packaging substrates that is not done with a flexible packaging printing press is regulated under § 129.52b.

(b) Existing RACT permit. This section supersedes the requirements of a RACT permit issued to the owner or operator of a source subject to this section prior to January 1, 2015, under §§ 129.91—129.95 (relating to stationary sources of NOx and VOCs) to control, reduce or minimize VOCs from a flexible packaging printing press, except to the extent the RACT permit contains more stringent requirements.

(c) Emission limits. Beginning January 1, 2015, a person subject to subsection (a)(1)(i) may not cause or permit the emission into the outdoor atmosphere of VOCs from a flexible packaging printing press unless one or more of the following limitations is met:

(1) Individual ink, coating or adhesive. The VOC content of each as applied ink, coating or adhesive used on a single flexible packaging printing press meets the following requirements:

(i) The VOC content is equal to or less than one or both of the following limits:

(A) 0.16 lb VOC per lb material as applied.

(B) 0.8 lb VOC per lb material solids as applied.

(ii) The VOC content is calculated as follows for VOC content expressed in units of weight of VOC per weight of material solids:

$$\text{VOCB} = (\text{Wo})/(\text{Wn})$$

Where:

VOCB = VOC content in lb VOC/lb of solids as applied or kg VOC/kg of solids as applied

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

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

Ww = Weight percent of water

Wex = Weight percent of exempt solvents

Wn = Weight percent of solids of the as applied ink, coating or adhesive

(iii) Sampling of the ink, coating or adhesive and testing for the VOC content of the ink, coating or adhesive is performed in accordance with subsection (f).

(2) Weighted average. The daily weighted-average VOC content of all inks, coatings and adhesives combined used on a single flexible packaging printing press meets one or both of the VOC content limits in paragraph (1)(i). The use of averaging to meet the VOC content limits may not be used across multiple printing presses. Averaging is available on a

**SECTION E. Source Group Restrictions.**

single flexible packaging printing press if the following requirements are met:

(i) The daily weighted average is calculated using the following equation:

(The equation formula does not copy. Please see original text for exact formula)

Where:

VOC<sub>w</sub>=The daily weighted average VOC content, as applied, of all inks, coatings and adhesives combined used on a single flexible packaging printing press, in lb VOC/gal of coating solids

n=The number of different inks, coatings and adhesives used each day on the single flexible packaging printing press

V<sub>i</sub>=The volume of solids for each ink, coating and adhesive, as applied, used each day on the single flexible packaging printing press, in gallons

C<sub>i</sub>=The VOC content of each ink, coating and adhesive, as applied, used each day on the single flexible packaging printing press, in lb VOC/gal coating solids

V<sub>t</sub>=The total volume of solids for all inks, coatings and adhesives combined, as applied, used each day on the single flexible packaging printing press, in gallons

(ii) Sampling of the inks, coatings and adhesives and testing for the VOC content of the inks, coatings and adhesives is performed in accordance with subsection (f).

(3) Add-on air pollution control device. The overall weight of VOCs emitted to the atmosphere from all inks, coatings and adhesives combined used on a single flexible packaging printing press is reduced through the use of vapor recovery or oxidation or another method that is acceptable under § 129.51(a) (relating to general). The overall control efficiency of a control system, as determined by the test methods and procedures specified in subsection (f), may not be less than that listed in Table 1.

Table 1

Overall Control Efficiency Requirement of a Control System on a  
Single Flexible Packaging Printing Press  
with Potential Emissions  $\geq 25$  tpy of VOC Before Control

Control System Overall Control Efficiency Requirement	Printing Press First Installation Date(1)		Air Pollution Control Device First Installation Date(1)	
	Prior to March 14, 1995*	On or after March 14, 1995*	Prior to January 1, 2015**	On or after January 1, 2015**
	$\geq 65\%$	X		X
$\geq 70\%$	X			X
$\geq 75\%$		X	X	
$\geq 80\%$		X		X

(1) First installation date is the first date of operation for a source or a control device. This date does not change if the source or control device is moved to a new location or if the control device is later used to control a new source.

\* March 14, 1995, is the date of the proposed 1996 NESHAP for the printing and publishing industry.

\*\* January 1, 2015, is the compliance date of the flexible packaging printing press regulation.

(4) Restriction on potential VOC emissions. The Department has issued a plan approval, operating permit or Title V

**SECTION E. Source Group Restrictions.**

permit to the owner or operator prior to January 1, 2015, establishing a Federally-enforceable limitation to limit the potential emissions of VOC from the flexible packaging printing press below 25 tpy before consideration of add-on controls.

(d) Compliance and monitoring requirements for an add-on air pollution control device. The owner or operator of a flexible packaging printing press subject to subsection (a)(1)(i) using an add-on air pollution control device in accordance with subsection (c)(3) shall comply with the following requirements:

(1) The add-on air pollution control device shall be equipped with the applicable monitoring equipment and the monitoring equipment shall be installed, calibrated, operated and maintained according to manufacturer's specifications at all times the add-on air pollution control device is in use. If the add-on air pollution control device is a:

(i) Noncatalytic thermal oxidizer, the minimum combustion or operating temperature must be continuously monitored. The temperature reading shall be recorded in accordance with subsection (e)(1) at least once every 15 minutes while the noncatalytic thermal oxidizer is operating.

(ii) Catalytic thermal oxidizer:

(A) The inlet gas temperature must be continuously monitored. The temperature reading shall be recorded in accordance with subsection (e)(1) at least once every 15 minutes while the catalytic thermal oxidizer is operating.

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

(iii) Control device other than that specified in subparagraph (i) or (ii), parameters specific to the control device must be continuously monitored. The parameters shall be recorded in accordance with subsection (e)(1) at least once every 15 minutes while the control device is operating.

(2) The add-on air pollution control device specified in paragraph (1) shall be operated at a 3-hour average temperature not lower than 50°F below the average temperature demonstrated during the most recent compliant source test approved by the Department.

(3) The add-on air pollution control device specified in paragraph (1) shall be in operation at all times that the source is operating.

(4) The add-on air pollution control device shall be approved, in writing, by the Department in a plan approval, operating permit or Title V permit prior to use.

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

(1) An owner or operator subject to subsection (a)(1)(i) using an add-on air pollution control device shall maintain records sufficient to demonstrate compliance with subsection (d), including records of the following information:

(i) Temperature reading of the add-on air pollution control device.

(ii) Maintenance performed on the add-on air pollution control device and monitoring equipment, including the date and type of maintenance.

(iii) Catalyst activity test performed, if applicable.

(2) An owner or operator subject to subsection (a)(1)(i) not using an add-on air pollution control device shall maintain records of the as applied VOC content of inks, coatings and adhesives sufficient to demonstrate compliance with the limitations under subsection (c)(1) or (2).

(3) An owner or operator claiming exemption from a VOC control provision of this section based on potential or actual VOC emissions, as applicable, shall maintain records that demonstrate to the Department that the press or facility is exempt.

**SECTION E. Source Group Restrictions.**

(4) The owner or operator may group materials into classes using the highest VOC content in any material in a class to represent that class of material.

(5) The records required under paragraphs (1)—(4) shall be maintained for 2 years, unless a longer period is required by a plan approval or operating permit issued under Chapter 127 (relating to construction, modification, reactivation and operation of sources). The records shall be submitted to the Department in an acceptable format upon receipt of a written request.

(6) The owner or operator of a flexible packaging printing press subject to subsection (a)(1)(i) that is required to demonstrate overall control efficiency in accordance with subsections (c)(3) and (d) shall submit reports to the Department in accordance with Chapter 139 (relating to sampling and testing).

(f) Sampling and testing.

(1) Sampling and testing shall be performed as follows:

(i) Sampling of an ink or coating and testing for the VOC content of the ink or coating shall be performed in accordance with the procedures and test methods specified in Chapter 139.

(ii) Sampling and testing of an add-on air pollution control device shall be performed in accordance with the procedures and test methods specified in Chapter 139 and meet one of the following:

(A) Sampling and testing shall be performed no later than 180 days after the compliance date of the press.

(B) Sampling and testing shall have been performed within 5 years prior to January 1, 2015, and previously approved by the Department. Capture efficiency retesting may be waived for capture systems that are not permanent total enclosures if the operating parameters indicate that a fundamental change has not taken place in the operation or design of the equipment, unless retesting is required under Subpart C, Article III (relating to air resources) or a plan approval, operating permit or an order issued by the Department. For purposes of this clause, fundamental changes include adding printing stations to a press, increasing or decreasing the volumetric flow rate from the dryer or changing the static duct pressure.

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

(i) The capture efficiency shall be determined in accordance with either of the following methods:

(A) 40 CFR Part 51, Appendix M, Methods 204—204F, including updates and revisions.

(B) 40 CFR Part 63, Subpart KK, Appendix A (relating to data quality objective and lower confidence limit approaches for alternative capture efficiency protocols and test methods).

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

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

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

(C) EPA Reference Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography, codified in 40 CFR Part 60, Appendix A, including updates and revisions. EPA Reference Method 18 may be used if the total

**SECTION E. Source Group Restrictions.**

gaseous nonmethane organic compound concentration is equal to or greater than 50 parts per million by volume, measured as carbon. EPA Reference Method 18 may be used in conjunction with EPA Reference Method 25A to subtract emissions of exempt VOCs.

(3) Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with this section may be used if prior approval is obtained in writing from the Department and the EPA.

(g) Work practice requirements for cleaning activities.

(1) Except as specified in paragraph (3), beginning January 1, 2015, the owner or operator of a flexible packaging printing press subject to subsection (a)(1)(i), (1)(ii) or (2) shall comply with the following work practices for cleaning activities at the facility:

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

(ii) Ensure that mixing vessels and storage containers used for VOC-containing cleaning solutions, waste cleaning solutions and used shop towels are kept closed at all times, except when depositing or removing these solutions or shop towels.

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

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

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

(i) Cleaning of ink, coating or adhesive from a press.

(ii) Cleaning of ink, coating or adhesive from press parts, including press parts that have been removed from the press for cleaning.

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

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

(i) Cleaning electronic components of a press.

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

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

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

(v) The use of parts washers or cold cleaners at a flexible packaging printing facility. The use of parts washers and cold cleaners is regulated under § 129.63 (relating to degreasing operations).

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



**SECTION E. Source Group Restrictions.**

Group Name: 5

Group Description: 40 CFR Part 64 – Compliance Assurance Monitoring Requirements (RTO)

**Sources included in this group**

ID	Name
110	NO. 10 FLEXOGRAPHIC PRESS
114	NO. 14 FLEXOGRAPHIC PRESS
115	NO. 15 FLEXOGRAPHIC PRESS
C14	CONTROL, PRESS 10, 14 AND 15 RTO, MEGTEC

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

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

This is a CAM related requirement:

(a) The permittee shall use the approved process parameter(s) or indicator(s) to obtain data and monitor the emission control equipment performance:

1. Oxidizer's operating temperature(s),
2. Visual inspection of equipment, and

(b) The permittee shall use the approved means or devices to measure the applicable indicator(s):

1. Record of the operating temperature(s) of the oxidizers' combustion chambers. Oxidizer temperature thermocouples accurate to within 2.0 % of temperature measured, or 20 degrees Fahrenheit, whichever is greater.
2. Inspections of the oxidizer systems including valve(s) in accordance with a Preventative Maintenance Program for Regenerative Thermal Oxidizers. (PM-RTO)

(c) The permittee shall use the approved frequency for condition monitoring of indicator(s):

1. Oxidizers' operating temperatures - continuously.
2. Visible inspection - weekly, monthly, semi-annually, annually and biennially, in accordance PM-RTO, referenced in above paragraph (b)(2).

(d) The permittee shall use the approved period over which discrete data points for approved indicator(s) will be collected and averaged for the purpose of determining an excursion:

1. Oxidizers' operating temperatures - three hours.

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

This is a CAM related requirement:

(a) The permittee shall record all instances of malfunctions and/or excursions in a log book, or in the weekly inspection log. The records shall include a reason for the malfunction, actions taken to correct the situation, and all emissions during such time.

**SECTION E. Source Group Restrictions.**

1. An excursion shall be defined as any three-hour period when the average temperature is 50 degrees Fahrenheit less than the set-point temperature demonstrated during the most recent compliance demonstration, or 1,400 degrees F, whichever is more restrictive.
2. An excursion shall be defined as any finding that the structural integrity of the oxidizer has been significantly jeopardized and it no longer operates as designed.
3. An excursion shall be defined as calculations that demonstrate that the oxidizer does not meet the permitted destruction efficiency.

(b) Each excursion shall trigger an assessment of the problem, corrective action, and may trigger a reporting requirement.

These records shall be maintained on site for the most recent five year period, and made available to the Department upon request.

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

This is a CAM related requirement:

(a) The permittee shall maintain a continuous record of the combustion chamber zone temperature(s) for the oxidizer, recorded at least every 15-minute, using a strip chart, electronic media or equivalent to ensure that it meets the minimum temperature as required in Condition #003, Group 2, Section E.

(b) The permittee shall maintain records of the quarterly visual inspection results relating to ensuring oxidizer's performance: structural integrity of the oxidizer, and proper operation of the valve(s).

The records shall be kept on site for the most recent five years, and be made available to the Department upon request.

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

This is a CAM related requirement:

(a) The permittee shall report all excursions, corrective actions taken, dates, times, durations, and possible causes of the events to the Department, in accordance with the annual and semi-annual Compliance Certification reports required in Section B, Conditions #024 and #026.

(b) 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, durations, possible causes, and corrective actions taken, to the Department, in accordance with the semi-annual Compliance Certification report.

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

This is a CAM related requirement:

The permittee shall annually calibrate or replace any instrument used to measure, display, or record temperatures of the thermal oxidizer using an acceptance criteria of 20 degrees Fahrenheit, or within 2 percent of the temperature measured, whichever is greater.

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

This is a CAM related requirement:

**SECTION E. Source Group Restrictions.**

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

1. Six excursions of any given parameter occur in a six-month period, or
2. The Department determines after review of all reported information that the permittee has not responded acceptably to an excursion.

b) 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.

c) 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 QIP shall be modified to include procedures for conducting more frequent or improved monitoring in conjunction with one or more of the following:

1. Improved preventive maintenance practices,
2. Process operation changes,
3. Appropriate improvements to control methods,
4. Other steps appropriate to correct performance.

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

1. Address the cause of the control device performance problem, or
2. 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.

e) Implementation of a QIP, shall not excuse the permittee 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.

**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: 6

Group Description: 40 CFR Part 64 – Compliance Assurance Monitoring Requirements (Catalytic Oxidizer)

Sources included in this group

ID	Name
111	NO. 11 FLEXOGRAPHIC PRESS
112	NO. 12 FLEXOGRAPHIC PRESS
113	NO. 13 FLEXOGRAPHIC PRESS
C 11	PRESS 11, 12, & 13 CATALYTIC OXIDIZER, MEGTEC

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

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

(a) The permittee shall use the approved process parameter(s) or indicator(s) to obtain data and monitor the emission control equipment performance:

1. Catalytic oxidizer's operating temperature(s),
2. Visual inspection of equipment, and

(b) The permittee shall use the approved means or devices to measure the applicable indicator(s):

1. Record of the operating temperature(s) of the catalytic oxidizer chamber(s), with the thermocouple(s) accurate to within 2.0 % of temperature measured, or 20 degrees Fahrenheit, whichever is greater.
2. Inspections of the oxidizer systems including valve(s) in accordance with a Preventative Maintenance Program (PMPCat-ox)

(c) The permittee shall use the approved frequency for condition monitoring of indicator(s):

1. Oxidizer's operating temperatures - continuously.
2. Visible inspection - weekly, monthly, semi-annually, annually and biennially, in accordance PM-Cat-ox, referenced in above paragraph (b)(2).

(d) The permittee shall use the approved period over which discrete data points for approved indicator(s) will be collected and averaged for the purpose of determining an excursion:

1. Oxidizer's operating temperatures - three hours.

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

This is a CAM related requirement:

(a) The permittee shall maintain a continuous record of the combustion chamber zone temperature(s) for the catalytic oxidizer, recorded at least every 15 minutes, using a strip chart, electronic media or equivalent to ensure that it meets the minimum temperature as required in Condition #005, Group 1, Section E.

(b) The permittee shall maintain records of the quarterly visual inspection results relating to ensuring the oxidizer's performance: structural integrity of the incinerator, and proper operation of the valve(s).

**SECTION E. Source Group Restrictions.**

The records shall be kept on site for the most recent five years, and be made available to the Department upon request.

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

This is a CAM related requirement:

(a) The permittee shall record all instances of malfunctions and/or excursions in a log book, or in the weekly inspection log. The records shall include a reason for the malfunction, actions taken to correct the situation, and all emissions during such time.

1. An excursion shall be defined as any three-hour period when the average temperature is 50 degrees Fahrenheit less than the average temperature demonstrated during the most recent compliance demonstration, or 550 degree F, whichever is more restrictive.

2. An excursion shall be defined as any finding that the structural integrity of the oxidizer has been significantly jeopardized and it no longer operates as designed.

3. An excursion shall be defined as any stack test that demonstrate that the oxidizer does not meet the permitted destruction efficiency.

(b) Each excursion shall trigger an assessment of the problem, corrective action, and may trigger a reporting requirement.

These records shall be maintained on site for the most recent five year period, and made available to the Department upon request.

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

This is a CAM related requirement:

(a) The permittee shall report all excursions, corrective actions taken, dates, times, durations, and possible causes of the events to the Department, in accordance with the annual and semi-annual Compliance Certification reports required in Section B, Conditions #024 and #026.

(b) 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, durations, possible causes, and corrective actions taken, to the Department, in accordance with the semi-annual Compliance Certification report.

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

This is a CAM related requirement:

The permittee shall annually calibrate or replace any instrument used to measure, display, or record temperature(s) of the catalytic oxidizer using an acceptance criteria of 20 degrees Fahrenheit, or within 2 percent of the temperature measured, whichever is greater.

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

This is a CAM related requirement:

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

**SECTION E. Source Group Restrictions.**

1. Six excursions of any given parameter occur in a six-month period, or
  2. The Department determines after review of all reported information that the permittee has not responded acceptably to an excursion.
- b) 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.
- c) 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 QIP shall be modified to include procedures for conducting more frequent or improved monitoring in conjunction with one or more of the following:
1. Improved preventive maintenance practices,
  2. Process operation changes,
  3. Appropriate improvements to control methods,
  4. Other steps appropriate to correct performance.
- d) Following implementation of a QIP, the Department will require reasonable revisions to the QIP if the plan has failed to either:
1. Address the cause of the control device performance problem, or
  2. 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.
- e) Implementation of a QIP, shall not excuse the permittee 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.

**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: 7

Group Description: 40 CFR Part 63, Subpart ZZZZ Requirements

Sources included in this group

ID	Name
301	EMERGENCY GENERATOR (13 HP)

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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.****# 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6585]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****Am I subject to this subpart?**

§ 63.6585 Am I subject to this subpart?

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

(c) An area source of HAP emissions is a source that is not a major source.

(d) If you are an owner or operator of an area source subject to this subpart, your status as an entity subject to a standard or

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other requirements under this subpart does not subject you to the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart as applicable.

(e) [NA – NOT USED FOR NATIONAL SECURITY PURPOSES]

(f) [NA – RICE NOT RESIDENTIAL, COMMERCIAL OR INSTITUTIONAL]

[69 FR 33506, June 15, 2004, as amended at 73 FR 3603, Jan. 18, 2008; 78 FR 6700, Jan. 30, 2013; 87 FR 48607, Aug. 10, 2022]

§ 63.6590 What parts of my plant does this subpart cover?

This subpart applies to each affected source.

(a) Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

(1) Existing stationary RICE.

(i) [NA – NOT A MAJOR HAP SOURCE]

(ii) [NA – NOT A MAJOR HAP SOURCE]

(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

(iv) A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

(2) New stationary RICE.

(i) [NA – NOT A MAJOR HAP SOURCE]

(ii) [NA – NOT A MAJOR HAP SOURCE]

(iii) [NA – NOT A NEW SOURCE]

(3) [NA – NOT A RECONSTRUCTED SOURCE]

(b) Stationary RICE subject to limited requirements. (1) An affected source which meets either of the criteria in paragraphs (b)(1)(i) through (ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of § 63.6645(f).

(i) [NA – NOT A MAJOR HAP SOURCE]

(ii) [NA – NOT A MAJOR HAP SOURCE]

(2) [NA – NOT A MAJOR HAP SOURCE AND DOES NOT COMBUST LFG]

(3) The following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements:

(i) [NA – NOT A MAJOR HAP SOURCE]

(ii) [NA – NOT A MAJOR HAP SOURCE]



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(iii) [NA – NOT A MAJOR HAP SOURCE]

(iv) [NA – NOT A MAJOR HAP SOURCE]

(v) [NA – NOT A MAJOR HAP SOURCE AND DOES NOT COMBUST LFG]

(c) [NA – NOT SUBJECT TO SUBPARTS IIII OR JJJJ]

[69 FR 33506, June 15, 2004, as amended at 73 FR 3604, Jan. 18, 2008; 75 FR 9674, Mar. 3, 2010; 75 FR 37733, June 30, 2010; 75 FR 51588, Aug. 20, 2010; 78 FR 6700, Jan. 30, 2013; 87 FR 48607, Aug. 10, 2022]

§ 63.6595 When do I have to comply with this subpart?

(a) Affected sources. (1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations, operating limitations and other requirements no later than June 15, 2007. IF YOU HAVE an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or AN EXISTING STATIONARY CI RICE LOCATED AT AN AREA SOURCE OF HAP EMISSIONS, YOU MUST COMPLY WITH THE APPLICABLE EMISSION LIMITATIONS, OPERATING LIMITATIONS, AND OTHER REQUIREMENTS NO LATER THAN MAY 3, 2013.

IF YOU HAVE an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of hap emissions, or AN EXISTING STATIONARY SI RICE LOCATED AT AN AREA SOURCE OF HAP EMISSIONS, YOU MUST COMPLY WITH THE APPLICABLE EMISSION LIMITATIONS, OPERATING LIMITATIONS, AND OTHER REQUIREMENTS NO LATER THAN OCTOBER 19, 2013.

(2) [NA – NOT A MAJOR HAP SOURCE]

(3) [NA – NOT A MAJOR HAP SOURCE]

(4) [NA – NOT A MAJOR HAP SOURCE]

(5) [NA – NOT A MAJOR HAP SOURCE]

(6) [NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

(7) [NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

(b) Area sources that become major sources. If you have an area source that increases its emissions or its potential to emit such that it becomes a major source of HAP, the compliance dates in paragraphs (b)(1) and (2) of this section apply to you.

(1) Any stationary RICE for which construction or reconstruction is commenced after the date when your area source becomes a major source of HAP must be in compliance with this subpart upon startup of your affected source.

(2) Any stationary RICE for which construction or reconstruction is commenced before your area source becomes a major source of HAP must be in compliance with the provisions of this subpart that are applicable to RICE located at major sources within 3 years after your area source becomes a major source of HAP.

(c) If you own or operate an affected source, you must meet the applicable notification requirements in § 63.6645 and in 40 CFR part 63, subpart A.

[69 FR 33506, June 15, 2004, as amended at 73 FR 3604, Jan. 18, 2008; 75 FR 9675, Mar. 3, 2010; 75 FR 51589, Aug. 20, 2010; 78 FR 6701, Jan. 30, 2013]

Emission and Operating Limitations

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§ 63.6600 What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?

[NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

§ 63.6601 What emission limitations must I meet if I own or operate a new or reconstructed 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than or equal to 500 brake HP located at a major source of HAP emissions?

[NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

§ 63.6602 What emission limitations and other requirements must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?

[NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

§ 63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in § 63.6620 and Table 4 to this subpart.

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, YOU MUST COMPLY WITH THE REQUIREMENTS IN TABLE 2d to this subpart and the operating limitations in Table 2b to this subpart that apply to you.

**TABLE 2d REQUIREMENTS:**

4. For each EMERGENCY STATIONARY CI RICE and black start stationary CI RICE\*\*, you must meet the following requirement, except during periods of startup:

- a. Change oil and filter every 500 hours of operation or annually, whichever comes first\*;
- b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

5. For each EMERGENCY STATIONARY SI RICE; black start stationary SI RICE; non-emergency, non-black start 4SLB stationary RICE >500 HP that operate 24 hours or less per calendar year; non-emergency, non-black start 4SRB stationary RICE >500 HP that operate 24 hours or less per calendar year\*\*, you must meet the following requirement, except during periods of startup:

- a. Change oil and filter every 500 hours of operation or annually, whichever comes first\*;
- b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

\*Sources have the option to utilize an oil analysis program as described in § 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

\*\*If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has

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ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

[END OF TABLE 2d REQUIREMENTS]

(b) [NA – EMERGENCY ENGINE(S)]

(c) [NA – EMERGENCY ENGINE(S)]

(d) [NA – EMERGENCY ENGINE(S)]

(e) [NA – EMERGENCY ENGINE(S)]

(f) [NA – EMERGENCY ENGINE(S)]

[75 FR 9675, Mar. 3, 2010, as amended at 75 FR 51589, Aug. 20, 2010; 76 FR 12866, Mar. 9, 2011; 78 FR 6701, Jan. 30, 2013]

§ 63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?

(a) [NA – EMERGENCY ENGINE(S)]

(b) Beginning January 1, 2015, if you own or operate an existing emergency CI stationary RICE with a site rating of more than 100 brake HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates for the purpose specified in § 63.6640(f)(4)(ii), you must use diesel fuel that meets the requirements in 40 CFR 1090.305 for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted.

(c) (Reserved)

(d) [NA – NOT IN SPECIFIED GEOGRAPHIC LOCATIONS]

[78 FR 6702, Jan. 30, 2013, as amended at 85 FR 78463, Dec. 4, 2020; 87 FR 48607, Aug. 10, 2022]

General Compliance Requirements

§ 63.6605 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to you at all times.

(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[75 FR 9675, Mar. 3, 2010, as amended at 78 FR 6702, Jan. 30, 2013]

Testing and Initial Compliance Requirements

§ 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?

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[NA – NOT A MAJOR HAP SOURCE]

§ 63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?

[NA – NOT A MAJOR HAP SOURCE]

§ 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?

[NA – NO PERFORMANCE TESTING REQUIRED]

§ 63.6615 When must I conduct subsequent performance tests?

[NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

§ 63.6620 What performance tests and other procedures must I use?

[NA – NO PERFORMANCE TESTING REQUIRED]

§ 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

(a) [NA – CEMS NOT REQUIRED]

(b) [NA – CPMS NOT REQUIRED]

(c) [NA – LFG NOT USED]

(d) [NA – NOT A MAJOR HAP SOURCE]

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

(1) [NA – NOT A MAJOR HAP SOURCE]

(2) [NA – NOT A MAJOR HAP SOURCE]

(3) An existing emergency or black start stationary RICE located at an area source of HAP emissions;

(4) [NA – EMERGENCY ENGINE(S)]

(5) [NA – EMERGENCY ENGINE(S)]

(6) [NA – EMERGENCY ENGINE(S)]

(7) [NA – EMERGENCY ENGINE(S)]

(8) [NA – EMERGENCY ENGINE(S)]

(9) [NA – EMERGENCY ENGINE(S)]

(10) [NA – EMERGENCY ENGINE(S)]

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(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

(g) [NA – EMERGENCY ENGINE(S)]

(h) If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

(i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

(j) If you own or operate a stationary SI engine that is subject to the work, operation or management practices in items 6, 7, or 8 of Table 2c to this subpart or in items 5, 6, 7, 9, or 11 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[69 FR 33506, June 15, 2004, as amended at 73 FR 3606, Jan. 18, 2008; 75 FR 9676, Mar. 3, 2010; 75 FR 51589, Aug. 20, 2010; 76 FR 12866, Mar. 9, 2011; 78 FR 6703, Jan. 30, 2013]

§ 63.6630 How do I demonstrate initial compliance with the emission limitations, operating limitations, and other requirements?

(a) You must demonstrate initial compliance with each emission limitation, operating limitation, and other requirement that applies to you according to Table 5 of this subpart. [NA – NONE OF THE CATEGORIES IN TABLE 5 APPLY TO EMERGENCY ENGINES]

(b) [NA – PERFORMANCE TESTING NOT REQUIRED]

(c) [NA – NOCS NOT REQUIRED FOR EXISTING EMERGENCY RICE]

(d) [NA – EMERGENCY ENGINE(S)]

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(e) [NA – EMERGENCY ENGINE(S)]

[69 FR 33506, June 15, 2004, as amended at 78 FR 6704, Jan. 30, 2013]

Continuous Compliance Requirements

§ 63.6635 How do I monitor and collect data to demonstrate continuous compliance?

[NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

§ 63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?

(a) You must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.

TABLE 6 REQUIREMENTS

9. FOR EACH existing emergency and black start stationary RICE  $\leq 500$  HP located at a major source of HAP, existing non-emergency stationary RICE  $< 100$  HP located at a major source of HAP, EXISTING EMERGENCY and black start STATIONARY RICE LOCATED AT AN AREA SOURCE OF HAP, existing non-emergency stationary CI RICE  $\approx 300$  HP located at an area source of HAP, existing non-emergency 2SLB stationary RICE located at an area source of HAP, existing non-emergency stationary SI RICE located at an area source of HAP which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, existing non-emergency 4SLB and 4SRB stationary RICE  $\leq 500$  HP located at an area source of HAP, existing non-emergency 4SLB and 4SRB stationary RICE  $> 500$  HP located at an area source of HAP that operate 24 hours or less per calendar year, and existing non-emergency 4SLB and 4SRB stationary RICE  $> 500$  HP located at an area source of HAP that are remote stationary RICE, complying with the requirement to "Work or Management practices", you must demonstrate continuous compliance by:

i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or

ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[END OF TABLE 6 REQUIREMENTS]

(b) [NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

(c) [NA – ANNUAL COMPLIANCE DEMONSTRATION NOT REQUIRED]

(d) [NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

(e) You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or

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reconstructed limited use stationary RICE. [EXISTING EMERGENCY RICE AT AREA HAP SOURCES ARE NOT AMONG THOSE EXEMPTED FROM THIS SECTION]

(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4), is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

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

(2) You may operate your emergency stationary RICE for the purpose specified in paragraph (f)(2)(i) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii)-(iii) [Reserved]

(3) [NA – NOT A MAJOR HAP SOURCE]

(4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.

(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

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[69 FR 33506, June 15, 2004, as amended at 71 FR 20467, Apr. 20, 2006; 73 FR 3606, Jan. 18, 2008; 75 FR 9676, Mar. 3, 2010; 75 FR 51591, Aug. 20, 2010; 78 FR 6704, Jan. 30, 2013; 87 FR 48607, Aug. 10, 2022]

Notifications, Reports, and Records

§ 63.6645 What notifications must I submit and when?

(a) You must submit all of the notifications in §§ 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following;

(1) [NA – NOT A MAJOR HAP SOURCE]

(2) [NA PER (5) BELOW]

(3) [NA – NOT A MAJOR HAP SOURCE]

(4) [NA – NOT A MAJOR HAP SOURCE]

(5) THIS REQUIREMENT DOES NOT APPLY IF YOU OWN OR OPERATE an existing stationary RICE less than 100 HP, AN EXISTING STATIONARY EMERGENCY RICE, OR AN EXISTING STATIONARY RICE THAT IS NOT SUBJECT TO ANY NUMERICAL EMISSION STANDARDS.

(b) [NA – NOT A MAJOR HAP SOURCE]

(c) [NA – NOT A MAJOR HAP SOURCE]

(d) [NA – NOT A MAJOR HAP SOURCE]

(e) [NA – NOT A MAJOR HAP SOURCE]

(f) [NA – 63.6590(b) DOES NOT APPLY]

(g) [NA – PERFORMANCE TEST NOT REQUIRED]

(h) [NA – PERFORMANCE TEST NOT REQUIRED]

(i) [NA – EMERGENCY ENGINE(S)]

[73 FR 3606, Jan. 18, 2008, as amended at 75 FR 9677, Mar. 3, 2010; 75 FR 51591, Aug. 20, 2010; 78 FR 6705, Jan. 30, 2013; 85 FR 73912, Nov. 19, 2020]

§ 63.6650 What reports must I submit and when?

(a) You must submit each report in Table 7 of this subpart that applies to you.

TABLE 7 REQUIREMENTS

4. For each emergency stationary RICE that operate for the purposes specified in § 63.6640(f)(4)(ii), you must submit a Report. The report must contain the information in § 63.6650(h)(1). You must submit the report annually according to the requirements in § 63.6650(h)(2)-(3).

END OF TABLE 7 REQUIREMENTS

(b) Unless the Administrator has approved a different schedule for submission of reports under § 63.10(a), you must submit each report by the date in Table 7 of this subpart and according to the requirements in paragraphs (b)(1) through (b)(9) of this section.



**SECTION E. Source Group Restrictions.**

- (1) [NA – ANNUAL REPORT REQUIRED, ONLY UNDER CERTAIN CONDITIONS]
- (2) [NA – ANNUAL REPORT REQUIRED, ONLY UNDER CERTAIN CONDITIONS]
- (3) [NA – ANNUAL REPORT REQUIRED, ONLY UNDER CERTAIN CONDITIONS]
- (4) [NA – ANNUAL REPORT REQUIRED, ONLY UNDER CERTAIN CONDITIONS]
- (5) [NA – ANNUAL REPORT REQUIRED, ONLY UNDER CERTAIN CONDITIONS]
- (6) For annual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in § 63.6595 and ending on December 31.
- (7) For annual Compliance reports, the first Compliance report must be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date that is specified for your affected source in § 63.6595.
- (8) For annual Compliance reports, each subsequent Compliance report must cover the annual reporting period from January 1 through December 31.
- (9) For annual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than January 31.
- (c) [NA – “COMPLIANCE REPORT” NOT REQUIRED]
- (d) [NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]
- (e) [NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]
- (f) [NA – NOT SUBJECT TO TITLE V PERMITTING]
- (g) [NA – LFG NOT USED]
- (h) If you own or operate an emergency stationary RICE with a site rating of more than 100 brake HP that operates for the purpose specified in § 63.6640(f)(4)(ii), you must submit an annual report according to the requirements in paragraphs (h)(1) through (3) of this section.
  - (1) The report must contain the following information:
    - (i) Company name and address where the engine is located.
    - (ii) Date of the report and beginning and ending dates of the reporting period.
    - (iii) Engine site rating and model year.
    - (iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
    - (v)-(vi) {Reserved}
    - (vii) Hours spent for operation for the purpose specified in § 63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in § 63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.
    - (viii) If there were no deviations from the fuel requirements in § 63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.
    - (ix) If there were deviations from the fuel requirements in § 63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.

**SECTION E. Source Group Restrictions.**

(2) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

(3) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in § 63.13.

[69 FR 33506, June 15, 2004, as amended at 75 FR 9677, Mar. 3, 2010; 78 FR 6705, Jan. 30, 2013; 87 FR 48607, Aug. 10, 2022]

§ 63.6655 What records must I keep?

(a) [NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

(b) [NA – NO CEMS OR CPMS]

(c) [NA – LFG NOT USED]

(d) [NA – NOT SUBJECT TO EMISSION OR OPERATING LIMITATIONS]

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

(1) [NA – NOT A MAJOR HAP SOURCE]

(2) An existing stationary emergency RICE.

(3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) through (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purpose specified in § 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

(1) [NA – NOT A MAJOR HAP SOURCE]

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

[69 FR 33506, June 15, 2004, as amended at 75 FR 9678, Mar. 3, 2010; 75 FR 51592, Aug. 20, 2010; 78 FR 6706, Jan. 30, 2013; 87 FR 48607, Aug. 10, 2022]

§ 63.6660 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review according to § 63.10(b)(1).

(b) As specified in § 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1).

**SECTION E. Source Group Restrictions.**

[69 FR 33506, June 15, 2004, as amended at 75 FR 9678, Mar. 3, 2010]

**Other Requirements and Information**

§ 63.6665 What parts of the General Provisions apply to me?

Table 8 to this subpart shows which parts of the General Provisions in §§ 63.1 through 63.15 apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with any of the requirements of the General Provisions specified in Table 8: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing stationary RICE that combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, an existing emergency stationary RICE, or an existing limited use stationary RICE. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in the General Provisions specified in Table 8 except for the initial notification requirements: A new stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new emergency stationary RICE, or a new limited use stationary RICE. [EXISTING EMERGENCY RICE AT AREA HAP SOURCES ARE NOT AMONG THOSE EXEMPTED FROM THIS SECTION]

[75 FR 9678, Mar. 3, 2010]

§ 63.6675 What definitions apply to this subpart? [INCORPORATED BY REFERENCE]

**Regulatory Changes:**

Individual sources within this source group that are subject to 40 CFR Part 63 Subpart ZZZZ -National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines shall comply with all applicable requirements of the Subpart. 40 CFR 63.13(a) requires submission of copies of all requests, reports and other communications to both the Department and the EPA. The EPA copies shall be forwarded to:

US EPA  
Region III, Air and Radiation Division  
Permits Branch (3AD10)  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2852

The Department copies shall be forwarded to [wiveaver@pa.gov](mailto:wiveaver@pa.gov), unless otherwise specified in writing by DEP.

In the event that the Federal Subpart that is the subject of this Source Group is revised, the permittee shall comply with the revised version of the subpart, and shall not be required to comply with any provisions in this permit designated as having the subpart as their authority, to the extent that such permit provisions would be inconsistent with the applicable provisions of the revised subpart.

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

**SECTION E. Source Group Restrictions.**

Group Name: 8

Group Description: 25 Pa. Code, Section 129.52b Requirements

**Sources included in this group**

ID	Name
131	FOUR LAMINATORS
210	EXTRUDER 1
220	EXTRUDER 2

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

The VOC emissions from the use of IPA in Extruders #1 and #2 combined is limited to no greater than 6.75 tons per calendar year.

**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.****# 002 [25 Pa. Code §129.52b]****Control of VOC emissions from paper, film and foil surface coating processes.**

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

(1) [N/A – THE EMISSION LIMITS IN TABLE I AND OTHER REQUIREMENTS OF THIS SECTION DO NOT APPLY SINCE THE POTENTIAL TO EMIT VOCs FROM COATINGS IS LESS THAN 25 TONS FOR EACH LAMINATOR LINE, EXTRUDER 1 AND EXTRUDER 2]

(2) [N/A – THE EMISSION LIMIT IN TABLE II AND OTHER REQUIREMENTS OF THIS SECTION DO NOT APPLY SINCE THE LAMINATOR LINES, EXTRUDER 1 AND EXTRUDER 2 ARE NOT A PAPER SURFACE COATING PROCESS]

(3) The work practice requirements for cleaning materials found in subsection (h), and the related compliance monitoring and recordkeeping and reporting requirements of subsections (d) and (e), apply to the owner and operator of a paper, film or foil surface coating process if the total actual VOC emissions from all paper, film or foil surface coating operations,

**SECTION E. Source Group Restrictions.**

including related cleaning activities, at the facility are equal to or greater than 15 pounds (6.8 kilograms) per day or 2.7 tons (2,455 kilograms) per 12-month rolling period, before consideration of controls.

(b) Existing RACT permit. The requirements of this section supersede the requirements of a RACT permit issued to the owner or operator of a source subject to subsection (a) prior to January 1, 2012, under § § 129.91 - 129.95 (relating to stationary sources of NO<sub>x</sub> and VOCs) to control, reduce or minimize VOCs from a paper, film or foil surface coating process, except to the extent the RACT permit contains more stringent requirements.

(c) [N/A – THE FACILITY IS NOT SUBJECT TO SUBSECTION (a)(1) OR (2)]

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

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

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

(ii) Volume used.

(iii) Mix ratio.

(iv) Density or specific gravity.

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

(vi) VOC content.

(2) [N/A – FACILITY IS NOT SUBJECT TO SUBSECTION (a)(2)]

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

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

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

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

(f) [N/A – FACILITY IS NOT SUBJECT TO SUBSECTION (a)(1)]

(g) [N/A – FACILITY IS NOT SUBJECT TO VOC COATING LIMITS IN TABLES I AND II]

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

(1) Store all VOC-containing cleaning materials and used shop towels in closed containers.

(2) Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times, except when depositing or removing these materials.

(3) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.

(4) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.

(5) Minimize VOC emissions from cleaning of storage, mixing and conveying equipment.



**SECTION E. Source Group Restrictions.**

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



**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Title V facility.



**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.



**SECTION H. Miscellaneous.**

This administrative amendment includes sources and applicable conditions covered in the previous 67-05030 operating permit issued June 10, 2021 and supersedes that permit.

#001 The following sources do not require any restrictions, work practice standards or testing, monitoring, recordkeeping and reporting requirements:

- (a) Distillation Unit, with closed loop distillation system.
- (b) Two Storage Tanks (for 90:10 blend of Alcohols having vapor pressure 40 mm Hg or 0.773 psia, and N-Propyl Acetate having vapor pressure 25 mm Hg or 0.483 psia), capacity 8,000 gal and 4,000 gal each.
- (c) CP Blend Storage, capacity 4,000 gal, for distilled cleaning solvent, having vapor pressure less than 1.5 psia (10.5 kilopascals).
- (d) Space heaters, natural gas fired, combined capacity about 5 mmbtu/hr. The space heaters are used when the plant is shut down. With the plant operating, heat from the process is sufficient to maintain the required temperature.
- (e) Ink Mixing Room

#002 Fugitive emissions from the flexographic presses are captured in the permanent total enclosures for destruction in the respective RTO/oxidizer/incinerator listed and mapped in Section A.

#003 This operating permit includes the conditions in the following plan approvals and operating permit:

- (a) 67-05030A. Source ID 111, No. 11 Flexographic Press.
- (b) 67-05030B. Source ID 112, No. 12 Flexographic Press to replace the No. 2 Flexographic Press and the Control ID C11 to replace Control ID C05, and to control three presses in the permanent total enclosure: Source IDs 105, 111 and 112.
- (c) 67-05030C. Source ID 113, No. 13 Flexographic Press to replace the No. 5 Flexographic Press. The Control ID C11 controls three presses in the permanent total enclosure, these are: Source IDs 111, 112 and 113.
- (d) 67-05030D. Source ID 114, No. 14 Flexographic Press to replace No. 7 Press and new RTO Megtec (C14) to replace the three bio-oxidizers (C07, C08W and C10).
- (e) 67-05030E. Source ID 115, No. 15 Flexographic Press to replace No. 8 and 9 Presses. The Control ID C14 controls three presses in the permanent total enclosure, these are: Source IDs 110, 114 and 115.
- (f) 67-05030F. Modifies the CAM plan in issued plan approval 67-05030E and previous Title-V operating permit 67-05030 for Source IDs 110, 114 and 115, controlled by the MEGTEC Systems RTO, Source ID C14.
- (g) Operating permit No. 67-2030 (RACT).
- (h) 67-05030G - allows the use of isopropyl alcohol in the adhesive coating for Source ID 210 - Extruder 1 and Source ID 220 - Extruder 2..

#004 The facility is not subject to 40 CFR Part 63 Subpart KK since it is an area source of HAPs.

#005 Source IDs 210 & 220 - The adhesive coating is made up of one (1) part IPA, six (6) parts MICAH-760-A and thirty (30) parts water.



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

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