



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

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date:	May 19, 2022	Effective Date:	March 13, 2023
Revision Date:	March 13, 2023	Expiration Date:	May 18, 2027
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 unless otherwise designated.

State Only Permit No: 46-00012

Synthetic Minor

Federal Tax Id - Plant Code: 88-1616492-1

Owner Information

Name: 800 RIVER OWNER
Mailing Address: 2 PARK AVE FL 14
NEW YORK, NY 10016-5702

Plant Information

Plant: 800 RIVER OWNER LLC/ CONSHOHOCKEN
Location: 46 Montgomery County 46955 Upper Merion Township
SIC Code: 6500 Real Estate

Responsible Official

Name: MICHAEL K BENNETT
Title: VP- HEAD OF DEVELOPMENT
Phone: (732) 331 - 8284 Email: mb@dhphllc.com

Permit Contact Person

Name: MICHAEL K BENNETT
Title: VP- HEAD OF DEVELOPMENT
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[Signature] _____
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER



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Source ID	Source Name	Capacity/Throughput	Fuel/Material
033	HW BOILER 1 (MB)	12.500 MMBTU/HR	
		13,125.000 CF/HR	Natural Gas
034	HW BOILER 2 (MB)	12.500 MMBTU/HR	
		13,125.000 CF/HR	Natural Gas
035	HW BOILER 3 (MB)	12.500 MMBTU/HR	
		13,125.000 CF/HR	Natural Gas
036	STEAM BOILER 1 (MB)	16.700 MMBTU/HR	
		17,587.500 CF/HR	Natural Gas
731A	BACKUP GENERATOR & PH FIRE PUMP	N/A	#2 Oil
FML1	NATURAL GAS PIPELINE		
FML2	DIESEL FUEL		
S033	HW BLR 1 STACK (MB)		
S034	HW BLR 2 STACK (MB)		
S035	HW BLR 3 STACK (MB)		
S036	STEAM BLR 1 STACK		
S731A	BACKUP GENERATOR & PH FIRE PUMP STACK		

PERMIT MAPS

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

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

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

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

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

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

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

- (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
- (1) For a synthetic minor facility, a fee equal to:
- (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
 - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
 - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

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

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

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

(1) Section 127.14 (relating to exemptions)

(2) Section 127.447 (relating to alternative operating scenarios)

(3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)

(4) Section 127.449 (relating to de minimis emission increases)

(5) Section 127.450 (relating to administrative operating permit amendments)

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations.

(7) N/A

(8) N/A

(9) Sources and classes of sources other than those identified in paragraphs (1)—(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(i) The emissions are of minor significance with respect to causing air pollution.

(ii) The emissions are not preventing or interfering with the attainment or maintenance of an ambient air quality standard.

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

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

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

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

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

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

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

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

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

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

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

The permittee shall ensure that the total NOx emissions does not exceed 24.9 tons per year based on a twelve (12) month rolling sum.

Throughput Restriction(s).**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Natural gas use at the facility shall not exceed 355 million standard cubic feet in any 12-consecutive month period.

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

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

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

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

Visible emissions may be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurements; or
- (b) Observers trained and qualified 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) The permittee shall monitor the facility, once per operating day, for the following:

- (1) odors which may be objectionable (as per 25 Pa. Code §123.31);
- (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
- (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).

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

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

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

(d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the

**SECTION C. Site Level Requirements**

feasibility of decreasing the frequency of monitoring to monthly.

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

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

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

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

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

The permittee shall maintain natural gas usage records for the facility on a monthly basis and on a 12 consecutive month basis.

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

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

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

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

The permittee shall calculate the following actual emissions from the facility on a monthly, and a 12-consecutive month, basis:

- (a) NO_x;
- (b) VOC; and
- (c) HAP (total and individual).

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

The permittee shall maintain all records and test reports generated under this operating permit for a period of five (5) years, in a format approved by the Department, and shall make them available upon request.

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

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

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health,

**SECTION C. Site Level Requirements**

safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

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

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

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

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

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

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

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

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

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

- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
 - (i) Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or,
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(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

**SECTION C. Site Level Requirements**

such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

- (d) If this facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
 - (2) Certify that this facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If this facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

VI. WORK PRACTICE REQUIREMENTS.**# 019 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following

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

020 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

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

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

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

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

023 [25 Pa. Code §129.14]**Open burning operations**

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

- (a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a



SECTION C. Site Level Requirements

public officer.

(b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(c) A fire set for the prevention and control of disease or pests, when approved by the Department.

(d) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

(e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.

(f) A fire set solely for recreational or ceremonial purposes.

(g) A fire set solely for cooking food.

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 033

Source Name: HW BOILER 1 (MB)

Source Capacity/Throughput: 12.500 MMBTU/HR

13,125.000 CF/HR

Natural Gas

Conditions for this source occur in the following groups: 001

**I. RESTRICTIONS.**

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

**SECTION D. Source Level Requirements**

Source ID: 034

Source Name: HW BOILER 2 (MB)

Source Capacity/Throughput: 12.500 MMBTU/HR

13,125.000 CF/HR

Natural Gas

Conditions for this source occur in the following groups: 001

**I. RESTRICTIONS.**

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

**SECTION D. Source Level Requirements**

Source ID: 035

Source Name: HW BOILER 3 (MB)

Source Capacity/Throughput: 12.500 MMBTU/HR

13,125.000 CF/HR

Natural Gas

Conditions for this source occur in the following groups: 001

**I. RESTRICTIONS.**

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

**SECTION D. Source Level Requirements**

Source ID: 036

Source Name: STEAM BOILER 1 (MB)

Source Capacity/Throughput: 16.700 MMBTU/HR

17,587.500 CF/HR

Natural Gas

Conditions for this source occur in the following groups: 001

**I. RESTRICTIONS.**

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

**SECTION D. Source Level Requirements**

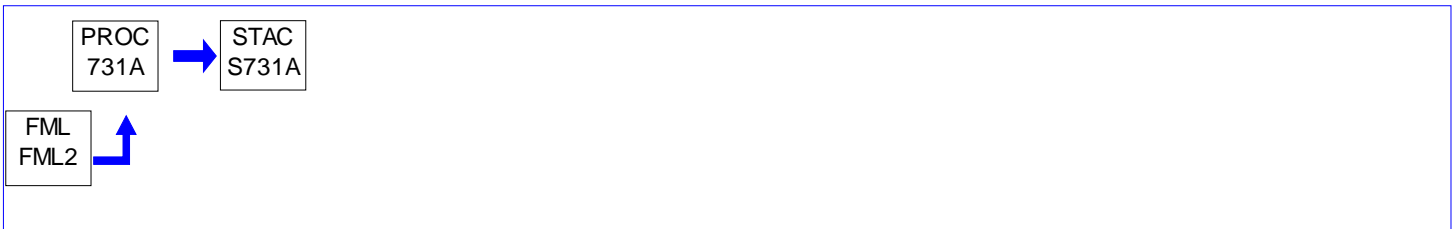
Source ID: 731A

Source Name: BACKUP GENERATOR & PH FIRE PUMP

Source Capacity/Throughput:

N/A

#2 Oil

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

No person may permit the emission into the outdoor atmosphere of particulate matter from this source in excess of 0.04gr/dscf, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

PADEP has approved of the following method to calculate the filterable particulate matter emissions for these sources: The exhaust rate specified by the manufacturer(s), the current AP-42 emission factors, and heat input rate(s) may be used to calculate filterable particulate matter emissions.

002 [25 Pa. Code §123.21]**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides (SOx), expressed as SO₂, in the effluent gas exceeds 500 ppmvd.

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

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

Operation Hours Restriction(s).**# 004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?**

a) The permittee shall limit the operation of this source for maintenance checks and readiness testing to 100 hours per year on a 12-month rolling basis.

(b) The permittee may operate the emergency generator for up to 50 hours per per calendar year for non-emergency situations as outlined in 40 C.F.R. § 63.6640(f). This 50 hours must be counted as part of the 100 hours for maintenance and readiness testing in paragraph (a). The generator may not be operated for peak shaving, non-emergency demand response or to generate income for for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(c) If the permittee does not limit operation as stated in paragraphs (a) and (b), the emergency engine(s) will be subject to the full requirements of 40 C.F.R. Part 63 Subpart ZZZZ - "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines".

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

[Additional authority for this condition is also derived from 25 Pa. Code §§ 127.512, 129.93(c)(5).]

The permittee shall not operate the emergency generator more than 500 hours in any 12 consecutive month period.

**SECTION D. Source Level Requirements****II. TESTING REQUIREMENTS.****# 006 [25 Pa. Code §139.16]****Sulfur in fuel oil.**

(a) The following are applicable to tests for the analysis of commercial fuel oil:

(1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) Test methods and procedures for the determination of viscosity shall be that specified in 25 Pa. Code § 139.4(11) (relating to references). The viscosity shall be determined at 100°F.

(3) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)-(15) and (20).

(4) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

(b) The testing requirements in subpart (a) above shall be waived in the event that a delivery receipt from the supplier, showing the percentage sulfur in the fuel, is obtained each time a fuel oil delivery is made.

III. MONITORING REQUIREMENTS.

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

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

The permittee shall maintain monthly records, including 12-month rolling sums of the hours of operation for the Backup Generator & PH Fire Pump.

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

The permittee shall maintain records of tune-ups, repairs, parts replacement, and other maintenance performed in accordance with manufacturer's specifications.

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

(a) The permittee shall keep records of the following:

- (1) hours of operation of each engine, through a non-resettable hour meter;
- (2) hours spent for emergency operation and what classified the operation as an emergency; and
- (3) hours spent for non-emergency operation.

(b) If the backup generator is used for demand response operation, the permittee shall keep records of the notification of the emergency situation, and the time the engine was operated as part of the demand response.

[Compliance with the requirements of the paragraph above also demonstrates compliance with the applicable requirements of 40 CFR § 63.6655]

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

The permittee shall maintain monthly records of the aggregate NOx emissions from this source including pounds per hour, pounds per day, ozone season (i.e., the period from May 1 through September 30 of each year) sums, and 12-month rolling

**SECTION D. Source Level Requirements**

sums to demonstrate compliance with the NOx emission limits applicable to this source.

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What records must I keep?**

(a) The permittee shall 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.

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6660]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****In what form and how long must I keep my records?**

(a) Records must be in a form suitable and readily available for expeditious review according to 40 CFR § 63.10(b)(1).

(b) Each record shall be readily accessible in hard copy or electronic form on-site for at least two (2) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR § 63.10(b)(1). The records may be kept off-site for the remaining three (3) years.

V. REPORTING REQUIREMENTS.

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

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

[Additional authority for this permit condition is also derived from 40 CFR § 63.6640.]

The permittee shall ensure that the Backup Generator & PH Fire Pump are operated and maintained in accordance with the manufacturers' specifications.

014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63 Subpart ZZZZ Table 6]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****Table 6 to Subpart ZZZZ of Part 63.-- Continuous Compliance With Emission Limitations and Operating Limitations**

(a) The permittee must continuously comply with the emissions and operating limitations and work or management practices as required.

(b) For each existing emergency RICE located at an area source, complying with work or management practices, the permittee shall:

(1) operate and maintain the stationary RICE according to the manufacturer's maintenance instructions; or

(2) develop and follow a 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.

015 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other**

**SECTION D. Source Level Requirements****requirements?**

(a) The permittee shall operate the emergency stationary RICE according to the requirements in the most recent version of 40 CFR Section 63.6640(f).

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

016 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6640]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?**

(a) The permittee shall:

- (1) change oil and filter every 500 hours of operation or annually, whichever comes first;
- (2) inspect spark plugs every 1,000 hours of operation or annually, which comes first, and;
- (3) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

(b) The permittee must report each instance in which you did not meet any of the above. These instances are deviations from the operating limitations and must be reported according to the requirements in 40 CFR § 63.6650.

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

This source group (Source 731A) is comprised of the following equipment:

(a) Backup Generator

Engine Manufacturer: Caterpillar
 Model: 3412
 Rated Capacity: 4.88 MMBtu/hr (749 Hp)
 Installation Date: 10/1/1990

(b) PH Fire Pump

Engine Manufacturer: Fire Trol, Inc. (Cummins Engine)
 Model: FTA 1100 6BTA-5.9L
 Rated Capacity: 1.78 MMBtu/hr (698.9 Hp)
 Installation Date: 10/1/1990

018 [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?**

[Additional authority for this permit condition is also derived from 40 CFR §§ 63.6640 and 63.6675.]

(a) An Owner/operator meeting the definition for institutional establishment pursuant to 40 CFR §63.6675, operating an emergency stationary RICE located at an area source of HAP emissions that do not operate or are not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) and that do not operate for the purpose specified in §63.6640(f)(4)(ii) shall not be subject to Subpart ZZZZ.

(b) If the owner/operator of this fails to satisfy the definition of an Institutional Establishment, Source Id No. 731A shall be subject to all applicable requirements of Subpart ZZZZ.

**SECTION E. Source Group Restrictions.**

Group Name: 001

Group Description: Combustion Units

Sources included in this group

ID	Name
033	HW BOILER 1 (MB)
034	HW BOILER 2 (MB)
035	HW BOILER 3 (MB)
036	STEAM BOILER 1 (MB)

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

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

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

A person may not permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from a combustion unit in excess of 1.0 pounds per million Btu of heat input, in accordance with 25 Pa. Code § 123.22(e)(1).

[Compliance with this condition assures compliance with the sulfur dioxide standards of 40 CFR 60 Subpart Dc.]

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

[Additional authority for this condition is also derived from 25 Pa. Code § 127.444.]

The permittee shall use only natural gas as fuel for the sources of this group.

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor on a monthly basis the fuel use from the meter installed on the main gas line and the meters installed on each combustion unit in this source group (Group 001). The frequency of monitoring, as required in this condition, is consistent with the "Alternative Monitoring Frequency of Fuel Usage" approval granted to the permittee by letter, dated March 29, 2001, from US EPA Region III.

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

[Additional authority for this permit condition is also derived from 40 CFR § 60.48c.]

The permittee shall record on a monthly basis the fuel use from the meter installed on the main gas line and the meters installed on each combustion unit in this source group (Group 001). The frequency of recordkeeping is consistent with Subpart Dc and the "Alternative Monitoring Frequency of Fuel Usage" approval granted to the permittee by letter from US EPA Region III.

**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 (State Only General Requirements).

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

[Additional authority for this condition is also derived from 25 Pa. Code § 129.93.]

This source shall be operated and maintained in accordance with manufacturer's specifications.

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

The permittee may use the current EPA AP-42 emission factors and fuel (natural gas) consumption estimates as an alternate method to calculate NO_x and filterable particulate matter emissions from the combustion units in this group.

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
033	HW BOILER 1 (MB)		
Emission Limit			
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU		TSP
034	HW BOILER 2 (MB)		
Emission Limit			
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU		TSP
035	HW BOILER 3 (MB)		
Emission Limit			
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU	particulate matter	TSP
036	STEAM BOILER 1 (MB)		
Emission Limit			
1.000	Lbs/MMBTU		SOX
0.400	Lbs/MMBTU	particulate matter	TSP
731A	BACKUP GENERATOR & PH FIRE PUMP		
Emission Limit			
500.000	PPMV	dry basis	SOX
0.040	gr/DRY FT3	particulate matter	TSP

Site Emission Restriction Summary

Emission Limit		Pollutant
24.900 Tons/Yr	12-month rolling sum.	NOX

**SECTION H. Miscellaneous.**

(a) The Department has determined that the emissions from the following activities, excluding those indicated as site level requirements, in Section C of this permit, are exempted from monitoring, recordkeeping or reporting requirements.

- (i) Miscellaneous fugitive emissions from maintenance and utility area
- (ii) Miscellaneous fugitive emissions from janitorial sources
- (iii) Miscellaneous fugitive emissions from Mail room
- (iv) Miscellaneous fugitive emissions from Four plate making film processor
- (v) Miscellaneous fugitive emissions from Newsroom HVAC unit
- (vi) Miscellaneous fugitive emissions from Newsroom film processor
- (vii) Miscellaneous fugitive emissions from Vehicle Maintenance Facility
- (viii) Miscellaneous fugitive emissions from Gasoline Storage Tank
- (ix) Miscellaneous fugitive emissions from Source 101(Developing Process)
- (x) Forklifts and clamp trucks
- (xi) Two (2) electric space heaters
- (xii) Cooking ovens for food
- (xiii) Natural gas stoves/ovens
- (xiv) Office equipment
- (xv) Electric machines including machine shop tools, lathes
- (xvi) Propane powered floor maintenance equipment

The above sources are considered de minimis and each shall be operated with VOC emission rates of no greater than 3.0 pounds per hour, 15.0 pounds per day and 2.7 tons per year, as a 12-month rolling sum, whichever is more stringent.

(b) The following sources have been exempted from Plan Approval requirements for monitoring, recordkeeping and reporting through Request For Determinations (RFD):

- (i) RFD No. 46-A01-1826 (Diesel Powered Generator - exempted 4/3/2001)
- (ii) RFD No. 46-A01-1626 (Film Processor - exempted 10/18/1999)
- (iii) RFD No. 46-A01-1610 (Page Negative Processing Area - exempted 9/17/1999)
- (iv) RFD No. 46-A01-1507 (Photoprocessor and 2-Natural Gas Fired HVAC Units - exempted 5/8/1999)
- (v) RFD No. 46-A01-1399 (Detergent-based Parts Washer -exempted 6/27/1997)
- (vi) RFD No. 46-A01-2469 (4-Computer-to-Plate (CTP) imagers, 3-plate benders)
- (vii) RFD No. 46-A01-2538 (1-Computer-to-Plate (CTP) imager, processor and bender and modification to Press 1- exempted 10/16/1997)

(c) The following previously issued Operating Permits serve as a basis for certain terms and conditions in this Title V Operating Permit 46-00012:

**SECTION H. Miscellaneous.**

- (i) Operating Permit: OP-46-0012 - Facility VOC/NOx RACT (Reasonably Available Control Technology);
- (ii) Operating Permit: 46-320-11 through 46-320-18 for Nine (9) Printing Presses (A through I);
- (iii) Operating Permit: 46-302-182 - Four (4) natural gas-fired boilers.
- (d) The following permit conditions have been amended in response to a Notice of Appeal (EHB Docket No. 2001-282-K):
 - (i) Section D, Conditions #003 and #004 (Source ID: 001, 002, 003 and 004) - the frequency of the required monitoring and recordkeeping for these sources have been revised to monthly.
 - (ii) Section D, Conditions #002 and #003 (Source ID: 031 and 032) - the monitoring and recordkeeping requirements for these sources have been revised to hours of operation on a monthly basis.
 - (iii) Section C, Condition #006 - moved the 24.9 tpy NOx emission limit to Section C.
 - (iv) Section C, Condition #008 - included a 355 million scf/year natural gas throughput limit for all combustion units (except for the Back-up Generator (Source ID: 031) and the Fire Pump (Source ID: 032)).
 - (v) Section D - included 25 Pa. Code Section 123.22 as an applicable requirement to Source ID(s): #005, 006, 007, 010, 011, 012, 013, 014 and 015.
 - (vi) Source ID: 126, Section D, Condition #006 - revised the condition to require operation and maintenance of a functional Stage II Refueling Control Program.
 - (vii) Source ID: 125, Section D, Conditions #003 and #004 - revised the conditions to require the monitoring and recordkeeping of the estimated amount of platemaking developer used daily, based on the number of plates processed and the previously established (worst case) average plate coverage rate.
 - (viii) Source ID: 127, Section D, Condition #003 - revised the condition to include the term "in connection with each press."
 - (ix) Source ID: 127, Section D, Condition #004 - revised the condition to permit the company's supplier to conduct annual EPA Method 24 (40 CFR 60, Appendix A) testing of the inks used at the press.
 - (x) Source ID: 127, Section D, Condition #007 - revised the condition to include paragraphs (d) and (e) to verify compliance of the VOC emissions from the use of fountain solution and blanket wash for the press.
 - (xi) Source ID: 127, Section D, Conditions #005 and 007 - revised these conditions to omit the requirement to monitor and record the amount of paper printed on each press.
 - (xii) Source ID: 127, Section D, Condition #011 - revised the condition to include the term "...or other Department approved methods."
 - (xiii) Section G (Miscellaneous) - moved Source ID: 101 (Developing Process) to this section as a de minimis source category.
 - (xiv) Source ID: CO1, Section D, Condition #002 and #003 - revised the frequency of the required monitoring and recordkeeping to weekly.
 - (xv) Source ID: CO1, Section D, Condition #005 - included condition to document the maximum capacity of this source as 8,400 cfm (air flow).
 - (xvi) Source ID: 126, Section D - omitted the regulatory condition 25 PA Code Section 129.62 as applicable for this source.
 - (xvii) Section C, Section VIII (Compliance Certification) - the initial date of the submission of the annual compliance certification and semiannual monitoring/deviation has been included (10/30/2002).
- (e) This Title V Operating Permit 46-00012 (APS No.: 346554; Auth ID: 494860) was amended in March 2003.
- (f) This Title V Operating Permit 46-00012 (APS No: 346554, Auth ID: 573432) was amended to incorporate the conditions from

**SECTION H. Miscellaneous.**

Plan Approval No. PA-46-0012 (Five Platemaking Processors).

(g) The data listed in Section A, Site Inventory List, for capacity and fuel/material and the source capacity descriptions and permit maps in Section D are for descriptive purposes and are not considered as maximum source capacities or design limitations or enforceable conditions. Source limits are indicated in the text conditions in Sections D and E and are listed in Section G of this Title V Operating Permit.

(h) The report required in Section C, VIII. Compliance Certification shall be for the period from January 1st through December 31st of the previous year.

(i) This Title V Operating Permit 46-00012 (APS ID: 345475, Auth ID: 635589) has been amended to reflect a change of ownership and has been renewed.

(j) The following existing combustion sources have been exempted from monitoring, recordkeeping and reporting requirements per 25 Pa. Code §§ 127.14(a)(2) and 127.14(a)(8)(39) and have been removed from Sections A, D and F of this Title V Operating Permit (renewal):

- (i) HW Heater 1 (MB) (Source ID: 005 - 0.8 MMBTU/hr rated capacity)
- (ii) HW Heater 2 (MB) (Source ID: 006 - 0.8 MMBTU/hr rated capacity)
- (iii) HW Heater 3 (MB) (Source ID: 007 - 1.2 MMBTU/hr rated capacity)
- (iv) VMF HW Boiler 4 (Source ID: 010 - 0.2 MMBTU/hr rated capacity)
- (v) VMF HW Boiler 5 (Source ID: 011 - 0.2 MMBTU/hr rated capacity)
- (vi) VMF HW Heater 4 (Source ID: 012 - 0.3 MMBTU/hr rated capacity)
- (vii) VMF Garage Space Heaters (8) (Source ID: 013 - 0.8 MMBTU/hr rated capacity each)
- (viii) Pump House HW Boiler 6 (Source ID: 014 - 0.2 MMBTU/hr rated capacity)
- (ix) Pump House Space Heater 3 (Source ID: 015 - 0.1 MMBTU/hr rated capacity)

(k) The following existing combustion units have had their Source ID number changed in this Title V Operating Permit (renewal):

- (i) HW Boiler 1 (MB) - Source ID: 033
- (ii) HW Boiler 2 (MB) - Source ID: 034
- (iii) HW Boiler 3 (MB) - Source ID: 035
- (iv) Steam Boiler 1 (MB) - Source ID: 036

(l) The following processes have had their Source ID number and source classification changed in this Title V Operating Permit (renewal):

- (i) Back-Up Generator - Source ID: 731
- (ii) PH Fire Pump - Source ID: 732

(m) The following emission points have had their Source ID number changed in this Title V Operating Permit (renewal):

- (i) HW BLR 1 Stack (MB) - Source ID: S033
- (ii) HW BLR 2 Stack (MB) - Source ID: S034
- (iii) HW BLR 3 Stack (MB) - Source ID: S035
- (iv) Steam BLR 1 Stack - Source ID: S036
- (v) Generator Exhaust - Source ID: S731

**SECTION H. Miscellaneous.**

- (vi) PH Fire Pump Exhaust - Source ID: S732
- (n) The following changes have been made to the renewed TVOP-46-00012
- (i) Title Page - Change facility and plant name.
- (ii) Title Page - Change of name and title for the Responsible Official and the Permit Contact Person.
- (iii) Section A, Site Inventory List - The data for Capacity/Throughput, Fuel/Material, source capacity as well as the Permit Maps for Sources 005, 006, 007, 010, 011, 012, 013, 014 and 015 have been removed.
- (iv) Section B, Condition #003 - Change of the location of permit expiration date from Page 2 to Page 1.
- (v) Section B, Condition #020(b) - Change to the EPA agency division and mailstop address as follows:
- Air Enforcement Branch (3AP12)
United State Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029
- (vi) Section B, Condition #021 - Inclusion of new regulatory citation (25 Pa. Code § 127.463(e)).
- (vii) Section B, Condition #023 - Inclusion of new regulatory citation (25 Pa. Code § 127.463(e)).
- (viii) Section B, Condition #024(a) - Change to the provision for the submission deadline for the compliance certification as follows:
- "One year (1) after the date of issuance of the Title V permit, and each year thereafter...".
- (ix) Section B, Condition #024(b) - Change to the provision for the submission deadline for the compliance certification to the Department and the EPA as follows:
- "The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance or, of the submittal date specified elsewhere in the permit,..."
- {Note: The above revisions in Section B are the differences in this section in the original TVOP issued 11/7/2001 and the renewed TVOP.}
- (x) Section C, Site Level Requirements, Condition #011 - The condition was deleted (duplicate of Condition #010, incorrect regulatory citation).
- (xi) Section C, Site Level Requirements, Condition #014 - The condition was added to require the permittee to monitor the fuel use from the meter installed on the main gas line, on a monthly basis for miscellaneous combustion units/sources at the facility.
- (xii) Section C, Site Level Requirements, Condition #017 - The condition was added to require the permittee to maintain records of the fuel use from the meter installed on the main gas line, on a monthly basis for miscellaneous combustion units/sources at the facility.
- (xiii) Section C, Site Level Requirements, Condition #020 - Revised the condition to include the current telephone number of the DEP (SERO) Air Quality Program.
- (xiv) Section C, Site Level Requirements, Condition #028 - Revised the number of the condition cited in Section B (General Title V Requirements) to Condition #017(g).
- (xv) Sections A and D, Source ID: 033 (HW Boiler 1 (MB)) - The Source ID for this source was changed from 001 to 033.
- (xvi) Section D, Source ID: 033 (HW Boiler 1 (MB)), Condition #001 - The condition was revised to include a citation to 25 Pa. Code § 123.11(a)(1).

**SECTION H. Miscellaneous.**

- (xvii) Section D, Source ID: 033 (HW Boiler 1 (MB)), Condition #002 - The condition was revised to include a citation to 25 Pa. Code § 123.22(e)(1).
- (xviii) Sections A and D, Source ID: 034 (HW Boiler 2 (MB)) - The Source ID for this source was changed from 002 to 034.
- (xix) Section D, Source ID: 034 (HW Boiler 2 (MB)), Condition #001 - The condition was revised to include a citation to 25 Pa. Code § 123.11(a)(1).
- (xx) Section D, Source ID: 034 (HW Boiler 2 (MB)), Condition #002 - The condition was revised to include a citation to 25 Pa. Code § 123.22(e)(1).
- (xxi) Sections A and D, Source ID: 035 (HW Boiler 3 (MB)) - The Source ID for this source was changed from 003 to 035.
- (xxii) Section D, Source ID: 035 (HW Boiler 3 (MB)), Condition #001 - The condition was revised to include a citation to 25 Pa. Code § 123.11(a)(1).
- (xxiii) Section D, Source ID: 035 (HW Boiler 3 (MB)), Condition #002 - The condition was revised to include a citation to 25 Pa. Code § 123.22(e)(1).
- (xxiv) Section D, Source ID: 036 (Steam Boiler 1 (MB)) - The Source ID for this source was changed from 004 to 036.
- (xxv) Section D, Source ID: 036 (Steam Boiler 1 (MB)), Condition #001 - The condition was revised to include a citation to 25 Pa. Code § 123.11(a)(1).
- (xxvi) Section D, Source ID: 036 (Steam Boiler 1 (MB)), Condition #002 - The condition was revised to include a citation to 25 Pa. Code § 123.22(e)(1).
- (xxvii) Sections A, D, and F, Source ID(s): 005, 006, 007, 010, 011, 012, 013, 014 and 015 - The Capacity/Throughput data, Fuel/Material data, Permit Maps and regulatory conditions for these sources have been removed.
- (xxviii) Section D, Source ID: 127 (Printing Presses)(9), Condition #001 - The condition was revised to include a citation to 25 Pa. Code § 123.13(c)(1)(i).
- (xxix) Sections A and D, Source ID: 731 (Back-Up Generator) - The Source ID for this source was changed from 031 to 731.
- (xxx) Section D, Source ID: 731 (Back-Up Generator), Condition #001 - The regulatory provisions of 25 Pa. Code § 123.13 (Particulate matter emission limit of 0.04 grams per dry standard cubic foot) were added.
- (xxxi) Section D, Source ID: 731 (Back-Up Generator), Condition #002 - The regulatory provisions of 25 Pa. Code § 123.21 (sulfur oxide emission limit of 500 ppm_{dv}) were added.
- (xxxii) Section D, Source ID: 731 (Back-Up Generator), Condition #003 - A testing requirement condition was added.
- (xxxiii) Section D, Source ID: 731 (Back-Up Generator), Condition #008 - The Additional Requirement condition describing the source designation and classification change was deleted and moved to Section G (Miscellaneous).
- (xxxiv) Sections A and D, Source ID: 731 (PH Fire Pump) - The Source ID for this source was changed from 032 to 732.
- (xxxv) Section D, Source ID: 732 (PH Fire Pump), Condition #001 - The regulatory provisions of 25 Pa. Code § 123.13 (Particulate matter emission limit of 0.04 grams per dry standard cubic foot) was added.
- (xxxvi) Section D, Source ID: 732 (PH Fire Pump), Condition #002 - The regulatory provisions of 25 Pa. Code § 123.21 (sulfur oxide emission limit of 500 ppm_{dv}) was added.
- (xxxvii) Section D, Source ID: 732 (PH Fire Pump), Condition #008 - The Additional Requirement condition describing the source designation and classification change was deleted and moved to Section G (Miscellaneous).
- (xxxviii) Sections A and D, Source ID: CO1 (Printing Press Dust Collectors (9)) - The Source Name for this source has been changed to "Printing Press Dust Collectors (9)".

**SECTION H. Miscellaneous.**

(xxxix) Section D, Source ID: CO1 (Printing Press Dust Collectors (9)), Condition #001 - The condition containing the regulatory provisions of 25 Pa. Code § 123.13 (Particulate matter emission limit of 0.04 grams per dry standard cubic foot) was deleted.

(xl) Section D, Source ID: CO1 (Printing Press Dust Collectors (9)), Condition #013 - This Work Practice Standard condition that requires that the VOC emissions from the Printing Presses (9) (Source ID: 127) be exhausted to Printing Press Dust Collectors (9) (Source ID: CO1) and the associated stacks have been added.

(xli) Section D, Source ID: CO1 (Printing Press Dust Collectors (9)) Conditions #001 - #025. Additional monitoring, recordkeeping, reporting, work practice standard, and additional requirement conditions have been added to assure compliance with the federal CAM requirements of 40 CFR Part 64.

(o) This facility is subject to the compliance assurance monitoring (CAM) provisions of 40 CFR Part 64.

(p) This Title V Operating Permit 46-00012 (APS No.: 346554, Auth ID: 710876) has been modified to incorporate the following changes:

(i) Removing Five (5) Platemaking Processors (Source 125) from Sections A, D, and F;

(ii) Revised condition language for Sources 127, 731, 732, and CO1;

(iii) Add a fifth CTP processor as an insignificant source in Section G (Miscellaneous).

(q) The previously-issued TVOP 46-00012 permit has been reissued and renewed as State Only Operating Permit (Synthetic Minor) 46-00012 (APS No.: 737800, Auth ID: 860994).

(r) This State Only Operating Permit 46-00012 (APS No.: 737800, Auth ID: 979920) has been administratively amended to identify a change in the names and titles of the Responsible Official, as defined in 25 PA Code § 121.1, and the Permit Contact Person.

(s) May 2016, APS: 737800, AUTH: 1100318. Permit renewal. No new sources and no new regulations.

The following two (2) eRFDs were approved by the Department as not needing a plan approval:

- eRFD number 1049, September 2009. This RFD was to modify press G (Part of Source 127) in which one 4 x 4 color tower replaced one 2 x 2 color tower and one 4 x 4 color tower replace one black and white tower.

- eRFD number 1510, June 2010. This RFD was to modify press G (Part of source 127) through the installation of color printing ink towers. The existing printing ink towers will be removed from Press G. The modification will not result in an increase in the potential VOC emissions from the source.

- Two (2) 0.8 MMBtu/hr natural gas-fired hot water heaters have been installed as replacements for two of the previously listed hot water heaters (HW heater 1 and HW heater 2).

- Effective April 28, 2011, CAM no longer applies [see (m)(xi), and (o), above] as the facility was no longer considered a major facility required to have a Title V permit.

- Effective 2-19-2003, the Department approved the facility to change the frequency of monitoring for visible emission, odors, and fugitive particulate matter from weekly to monthly.

February 2017. Delegation of Responsible Official allowing Daniel H. Shepardson, Dir. of Safety & Risk, to review and sign Air Emission Reports on behalf of Fred Lehman.

05/2022

This permit is the SMOP renewal permit (AUTH ID1356710 APS ID 1040148). The following items have been addressed with the issuance of the renewal permit:

Amendment to address a change of ownership from Phila Media Network Conshohocken LLC (Tax ID 27-2924715-1) to 800 Schuylkill River Road Associates, LLC (Tax ID 85-3419219)

The Responsible Office has been updated to replace Fred Lehman with Robert Heany, Vice President. The Permit Contact has been updated to replace Daniel H Shepardson with Kevin Kyle.

**SECTION H. Miscellaneous.**

Removal of Source ID Nos 126, 127 and the associated control devices C010 and C01, which are no longer located at the facility.

Removal of sources associated with RFD No. 46-A01-1626, RFD No. 46-A01-1610, RFD No. 46-A01-1507, RFD No. 46-A01-1399, RFD No. 46-A01-2469, and RFD No. 46-A01-2538, which are no longer at the facility.

The following list constitutes the remaining miscellaneous sources. These sources are exempt from monitoring, recordkeeping and reporting requirements under 25 Pa. Code §§ 127.14(a)(2) and 127.14(a)(8)(39).

Source ID Nos 005 and 006 HW Heater 1 and 2 (0.8 MMBTU/hr. (each))

Source ID 007 HW Heater 3 (1.2MMBTU/hr.)

Source ID Nos. 010 and 011 VMF Boiler 4 and 5 (0.2 MMBTU/hr. (each))

Source ID 012 VMF Heater 4 (0.3 MMBTU/hr.)

Source ID 013 VMF Garage Space Heater (8) 90.8 MMBTU/hr. (each))

Source ID 015 Pump House Space Heater 3 (0.1 MMBTU/hr.)

Source ID 014 Pump House Boiler 6 (0.2 MMBTU/hr.)

March 2023

AUTH ID 1425858; APS 1080283: This is an Administrative Amendment to address the following actions:

A Change of Ownership from Schuylkill River Road Associates, LLC (Tax ID 85-3419219) to 800 River Owner LLC (Tax ID 88-1616492).

The Responsible Official has been updated from Robert Heany, Vice President to Michael K Bennett, Vice President – Head of Development.

The Permit Contact has been updated from Kevin Kyle, Manager to Michael K Bennett, Vice President – Head of Development.



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